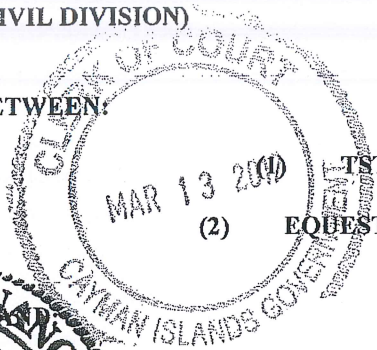


IN THE GRAND COURT OF THE CAYMAN ISLANDS
(CIVIL DIVISION)

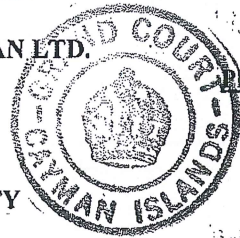
CAUSE NO. 18 of 2017

BETWEEN:



TSTOLEN TYME HOLDING LTD.

(2) EQUESTRIAN CENTRE OF CAYMAN LTD.



Plaintiffs

THE NATIONAL ROADS AUTHORITY

Defendant



APPLICATION FOR LEAVE TO APPLY FOR JUDICIAL REVIEW

To the Clerk of the Court, Law Courts, George Town, Grand Cayman	
Name, address and description of Applicant	<p>Tstolen Tyme Holdings Ltd. : A Company incorporated under the Companies Law of the Cayman Islands and which is the registered owner of George Town South Block 14D parcels 239 and 240 and which has an address of P.O. Box 472, Grand Cayman KY1-1106</p> <p>Equestrian Centre of Cayman Ltd. : A Company incorporated under the Companies Law of the Cayman Islands and which carries on the business of a horseback riding school and boarding stables on George Town South Block 14D parcels 74, 239 and 240 and which has an address of P.O. Box 818, Grand Cayman KY1-1103.</p>
Judgment, order, decision or other proceeding in respect of which relief is sought	Anticipated decision of the National Roads Authority to proceed with an expansion of the Linford Pearson Highway in such a way as to require the taking of portions of George Town South Block 14D parcels 74, 239 and 240.

Relief Sought

The current proceedings are required to meet the procedural maneuverings of the National Roads Authority (the Government) in this matter. These proceedings will be/are directly connected to proceedings in this Court from 2001 known as Grand Court Cause No. 732 of 2001. In summary, and to the best of the knowledge and belief of the Plaintiffs in the face of deliberate obstruction by the NRA, the NRA intends to proceed to build a road across the Plaintiff's land on the untrue basis that such road layout is in accordance with its duties to the Public. In fact, the intended road layout is the product of illegal agreement(s) by representatives and/or agents of the Government/NRA/Crown to favour the private interests of certain landowners [Bobby Thompson and family] to align the road so as not to cross their land and to force it across the land of those not within the unlawfully favoured class of the Government's partners in this illegal scheme.

In light of the foregoing, judicial review is sought seeking any and all appropriate orders to prevent the aforesaid illegal activities and breaches of duty(ies) including but not limited to:

1. An Order of Prohibition prohibiting the National Roads Authority, its agents or servants or howsoever otherwise from proceeding with any decision(s) already made or to be (obstensibly/formally) made/published that is/are poisoned by the illegalities above.
2. An Order of Mandamus directed to the National Roads Authority to forthwith disclose by discovery, affidavit, deposition or otherwise the full details of the scheme set out above.
3. An injunction restraining the National Roads Authority from taking any further steps to action the above scheme including removing the extant injunction protecting the Plaintiffs in Grand Court Cause No. 732 of 2001 and/or a new and/or further injunction in these proceedings to similarly protect the Defendants from the above scheme.
4. The Applicant hereby requests a hearing of this application before a Judge pursuant to Rule 3(3) of Order 53 of the Grand Court Rules (1995 Revision)(as amended);
5. If leave to apply is granted, a direction that the hearing of the application for judicial review be expedited;
6. An order for costs.

Name and address of applicant's attorneys, or if no attorneys acting, the address for service of the applicant

Chapmans
81 West Church Street
PO Box 742
Grand Cayman
Cayman Islands KY1-1301

Signed *Chapmans*

Dated 13 March 2017

GROUNDS ON WHICH RELIEF IS SOUGHT

(If there has been any delay, include reasons here)

See above, which are the best particulars currently available until discovery herein.

Dated this 13th day of March 2017
Filed this day of March 2017

Chapmans
Chapmans
Attorneys for the Plaintiffs

TO: The Clerk of the Grand Court

Estimated time for the hearing: 30 minutes

THIS APPLICATION is filed by Chapmans, Attorneys for the Plaintiffs, whose address for service is that of their said attorneys, namely: 81 West Church Street P.O. Box 742, Grand Cayman, Cayman Islands KY1-1303