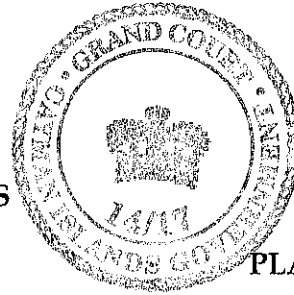


IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO: 65 OF 2018

BETWEEN

PHILLIP BRADLEY HINDS

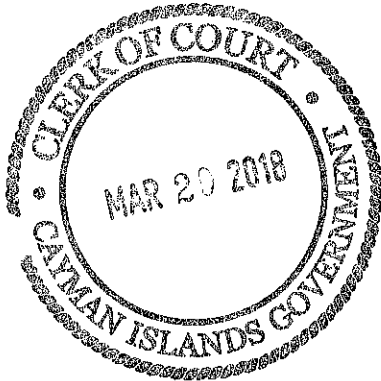


PLAINTIFF

AND

CONYERS, DILL & PEARMAN (A FIRM)

DEFENDANT



WRIT OF SUMMONS

TO: Conyers, Dill & Pearman, Cricket Square, PO Box 2681, Grand Cayman, KY1-1111, Cayman Islands

THIS WRIT OF SUMMONS has been issued against you by the above-named Plaintiff in respect of the claim set out on the next page.

Within 14 days after the service of this Writ on you, counting the day of service, you must either satisfy the claim or return to the Court office, PO Box 495G, George Town, Grand Cayman the accompanying Acknowledgement of Service stating therein whether you intend to contest these proceedings.

If you fail to satisfy the claim or to return the Acknowledgment within the time stated, or if you return the Acknowledgment without stating therein an intention to contest the proceedings, the Plaintiff may proceed with the action and judgment may be entered against you forthwith without further notice.

Issued this 29 day of March 2018

NOTE - This Writ may not be served later than four calendar months (or, if leave is required to effect service out of the jurisdiction, six months) beginning with the date of issue unless renewed by order of the Court.

IMPORTANT

Directions for Acknowledgement of Service are given with the accompanying form.

GENERAL ENDORSEMENT

The Plaintiff claims:

1. Damages for negligence in contract and tort for the failure of the Defendant firm as attorneys for the Plaintiff (pursuant to an engagement on or about 4 August 2010 to act for him in connection with the estates of his parents, John Samuel Hinds and Esther Rosalind Hinds) to advise the Plaintiff that his claim in respect of the parcel of land registered in the Cayman Islands Land Registry as Block 15C Parcel 63 might become barred by limitation if he did not bring proceedings by 26 February 2011 or alternatively by 17 March 2011 and to advise the Plaintiff that he ought therefore to bring such proceedings by then.
2. Damages for breach of contract and damages for negligence for the failure of the Defendant firm to provide the Plaintiff with correct legal advice in relation to limitation issues generally in connection with the estates of his parents, John Samuel Hinds and Esther Rosalind Hinds, including reimbursement of legal fees paid by the Plaintiff to the Defendant where consideration has failed.
3. Interest;
4. Costs.



SINCLAIRS

THIS WRIT was issued by Sinclairs of Third Floor Genesis Building, Genesis Close, George Town, Grand Cayman, PO Box 498, Grand Cayman KY1-1106, Cayman Islands (Ref. SD/TR), Attorneys-at-Law for the Plaintiff.

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. OF 2018

BETWEEN:

PHILLIP BRADLEY HINDS

PLAINTIFF

AND:

CONYERS, DILL & PEARMAN (A FIRM)

DEFENDANT

RESPONSE PACK FOR THE
DEFENDANT

**DIRECTIONS FOR ACKNOWLEDGEMENT OF SERVICE
OF WRIT OF SUMMONS**

1. The accompanying form of Acknowledgement of Service should be completed by an Attorney acting on behalf of the Defendant or by the Defendant if acting in person.

After completion it must be delivered or sent by post to the Law Courts, PO BOX 495, GRAND CAYMAN KY1-1106.

2. A Defendant who states in his Acknowledgement of Service that he intends to contest the proceedings must also serve a Defence on the Attorney for the Plaintiffs (or on the Plaintiffs if acting in person).

If a Statement of Claim is indorsed on the Writ (i.e. the words of "Statement of Claim" appear on the top of page 3), the Defence must be served within 14 days after the time for acknowledging service of the Writ, unless in the meantime a summons for judgment is served on the Defendant.

If the Statement of Claim is not indorsed on the Writ, the Defence need not be served until 14 days after a Statement of Claim has been served on the Defendant.

If the Defendant fails to serve his Defence within the appropriate time, the Plaintiff may enter judgment against him without further notice.

3. A Stay of Execution against the Defendant's goods may be applied for where the Defendant is unable to pay the money for which any judgment is entered. If a Defendant to an action for a debt or liquidated demand (i.e. a fixed sum) who does not intend to contest the proceedings states, in answer to Question 3 in the Acknowledgement of Service, that he intends to apply for a stay, execution will be stayed for 14 days after his Acknowledgement, but he must, within that time, issue a Summons for a Stay of Execution, supported by an affidavit of his means. The affidavit should state any offer which the Defendant desires to make for payment of the money by instalments or otherwise.

See over for notes for guidance

Please complete overleaf

Notes for Guidance

1. Each Defendant (if there are more than one) is required to complete an Acknowledgement of Service and return it to the Courts Office.
2. For the purpose of calculating the period of 14 days for acknowledging service, a writ served on the Defendant personally is treated as having been served on the day it was delivered to him.
3. Where the Defendant is sued in a name different from his own, the form must be completed by him with the addition in paragraph 1 of the words "sued as (*the name stated on the Writ of Summons*)".
4. Where the Defendant is a FIRM and an attorney is not instructed, the form must be completed by a PARTNER by name, with the addition in paragraph 1 of the description "Partner in the firm of (.....)" after his name.
5. Where the Defendant is sued as an individual TRADING IN A NAME OTHER THAN HIS OWN, the form must be completed by him with the addition in paragraph 1 of the description "trading as (.....)" after his name.
6. Where the Defendant is a Limited Company the form must be completed by an Attorney or by someone authorised to act on behalf of the Company, but the Company can take no further step in the proceedings without an Attorney acting on its behalf.
7. Where the Defendant is a MINOR or a MENTAL PATIENT, the form must be completed by an Attorney acting for a guardian *ad litem*.
8. A Defendant acting in person may obtain help in completing the form at the Courts Office.

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. OF 2018

BETWEEN:

PHILLIP BRADLEY HINDS

PLAINTIFF

AND:

CONYERS, DILL & PEARMAN (A FIRM)

DEFENDANT

ACKNOWLEDGMENT OF SERVICE OF
WRIT OF SUMMONS

If you intend to instruct an Attorney to act for you, give him this form IMMEDIATELY.

Important. Read the accompanying directions and notes for guidance carefully before completing this form. If any information required is omitted or given wrongly, THIS FORM MAY HAVE TO BE RETURNED.

Delay may result in judgment being entered against a Defendant whereby he may have to pay the costs of applying to set it aside.

1. State the full name of the Defendant by whom or on whose behalf the service of the Writ is being acknowledged:

2. State whether the Defendant intends to contest the proceedings (tick appropriate box)

YES

NO

3. If the claim against the Defendant is for a debt or liquidated demand, AND he does not intend to contest the proceedings, state if the Defendant intends to apply for a stay of execution against any judgment entered by the Plaintiff (tick box)

YES

NO

Service of the Writ is acknowledged accordingly

Partner in the firm of Conyers Dill and Pearman

Address for service:

<p>Conyers Dill and Pearman Boundary Hall, 2nd Floor, Cricket Square, PO Box 2681, Grand Cayman KY1-1111 Cayman Islands</p>
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Notes on address for service

Attorney: where the Defendant is represented by an attorney, state the attorney's place of business in the Cayman Islands. A Defendant may not act by a foreign attorney.

Defendant in person: where the Defendant is acting in person, he must give his post office box number and the physical address of his residence or, if he does not reside in the Cayman Islands, he must give an address in Grand Cayman where communications for him should be sent. In the case of a limited company, "residence" means its registered or principal office.

Endorsement by Plaintiff's Attorney in the box below.

Sinclairs
3rd Floor Genesis Building
Genesis Close
PO Box 498
George Town
Grand Cayman KY1-1106
Ref: SD/TR

Endorsement by Defendant's Attorney (or by Defendant if suing in person) of his name, address and reference, if any, in the box below.

Conyers Dill and Pearman
Boundary Hall, 2nd Floor
Cricket Square
PO Box 2681
Grand Cayman
KY1-1111
Cayman Islands