

Application for Leave to Apply for Judicial Review (0.53, r.3)

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO: ⁰⁵²⁴ OF 2009

BETWEEN:

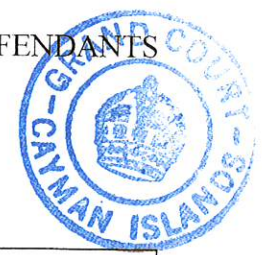
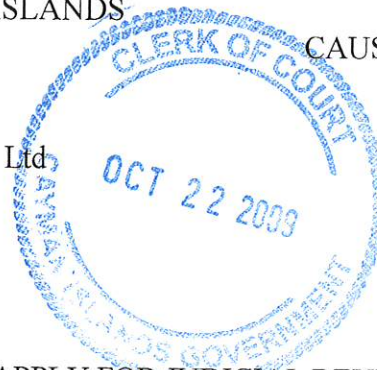
Citi Hedge Fund Services (Cayman) Ltd
Karen Mae Wade

PLAINTIFFS

AND:

Work Permit Board
Chief Immigration Officer

DEFENDANTS



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(s)	Citi Hedge Fund Services Karen Mae Wade, c/o Citi Hedge Fund Services (Cayman) Ltd Cayman Corporate Centre (Cayman) Ltd. 27 Hospital Road -5 th Floor PO Box 10293 Grand Cayman KY1-1003. Senior Vice President, Legal Counsel Business in Financial Industry
Judgment, order, decision or other proceeding in respect of which relief is sought	Decision of Work Permit Board dated 17 September 2009 or 9 October 2009
Relief Sought: Leave, and writ of Certiorari.	And injunction requiring CIO to not remove Karen Mae Wade or restrict employment
Name and address of applicant's attorneys, or, if no attorneys acting, the address for service of the applicant	Conyers Dill and Pearman Cricket Square, Hutchins Drive, Po Box 2681 Grand Cayman KY1-1111
Signed <i>Conyers Dill & Pearman per [Signature]</i>	Dated 22 October 2009

(Citi Hedge Fund Services (Cayman) Ltd continued)

GROUND ON WHICH RELIEF IS SOUGHT

1. The Work Permit Board failed to consider the application at all before stating a decision, and failed to comply with the rules of natural justice.

In the Alternative

2. The Work Permit Board failed to apply the section 49 and then section 44 of the Immigration Law (2009 R) to the facts stated in the application, and acted without or in excess of its jurisdiction and/or there is an error of law on the face of the record.

In the Alternative

3. The decision fails to meet the *Wednesbury Principle* in that no board, properly directing itself on the relevant law and acting reasonably could have reached that decision.

Note - Grounds must be supported by an affidavit which verifies the facts relied on.

This application was filed by Conyers Dill & Pearman, Attorneys-at-Law for and on behalf of the Petitioner herein whose address is that of its Attorneys, Cricket Square, Hutchins Drive, P.O. Box 2681, Grand Cayman KY1-1111, Cayman Islands.
22 October 2009

