



First Affidavit of Jamie Michael McGee  
Application for Limited Admission  
Sworn 20<sup>th</sup> September 2022  
Exhibit "JMM1"

**IN THE GRAND COURT OF THE CAYMAN ISLANDS  
CIVIL DIVISION**

**CAUSE NO. ATT OF 2022**

**IN THE MATTER OF SECTION 4(1) OF THE LEGAL PRACTITIONERS ACT (2022 REVISION)**

**AND**

**IN THE MATTER OF AN APPLICATION FOR LIMITED ADMISSION OF DAVID CHIVERS KC**

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**FIRST AFFIDAVIT OF JAMIE MICHAEL MCGEE**

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I, **JAMIE MICHAEL MCGEE**, of Bedell Cristin, Attorneys-at-Law, 18 Forum Lane, Suite 5305, Camana Bay, P.O. Box 1990, Grand Cayman, KY1-1104, Cayman Islands **MAKE OATH AND SAY** as follows:

1. I am a Senior Associate with the firm of Bedell Cristin, attorneys-at-law. I swear this affidavit pursuant to Section 4(1) of the Legal Practitioners Act (2022 Revision) and paragraph 6 of Grand Court Practice Direction 4 of 2012, in support of the application for the limited admission of David Chivers KC ("**Counsel**").
2. Limited admission is sought for Counsel for the purposes of appearing on behalf of, acting for and advising Blue Ocean Structure Investment Company Limited (the "**Petitioner**") in connection with the proceedings before the Grand Court of the Cayman Islands between Global Cord Blood Corporation (the "**Company**") and the Petitioner with FSD Cause No. 108 of 2022 (IKJ) and advising the Petitioner in respect of the proceedings commenced against, *inter alia*, the Company in FSD Cause No. 129 of 2022 (IKJ) (collectively the "**Proceedings**").

00921450.1

**THIS AFFIDAVIT** was **FILED** by **BEDELL CRISTIN** of 18 Forum Lane, Suite 5305, Camana Bay, P.O. Box 1990, Grand Cayman, KY1-1104, Cayman Islands, Attorneys-at-law for and on behalf of an Application for Limited Admission. 139297.0001/2964818-1

3. I confirm that it is the wish of the Petitioner who is the client of Bedell Cristin, that Counsel should be instructed on the Petitioner's behalf to come to the Islands for the purpose of appearing in the Proceedings and for providing advice related thereto.
4. I confirm that I have instructed Counsel, at the request of the Petitioner, to come to the Islands for the purpose of appearing, acting or advising in relation to the Proceedings.
5. Counsel has sought the amendment of a Temporary Work Permit ("TWP") originally obtained by Ogier to allow him to also be employed by Bedell Cristin as well as to permit him to appear in the Proceedings. A copy of Counsel's current TWP and the supporting amendments issued by WORC are exhibited at pages 1 to 6 of "JMM1".

SWORN by JAMIE MICHAEL MCGEE )  
 At Grand Cayman, Cayman Islands )  
 On this the 20<sup>th</sup> day of September 2022 )  
 Before me: )  
 )  
 )  
 )  
 )

NOTARY PUBLIC

  
 \_\_\_\_\_  
 JAMIE MICHAEL MCGEE

Sheryl Davis  
 Notary Public in and for the Cayman Islands  
 My commission expires: 31 January 2022



IN THE GRAND COURT OF THE CAYMAN ISLANDS  
CIVIL DIVISION

CAUSE NO. ATT OF 2022

IN THE MATTER OF SECTION 4(1) OF THE LEGAL PRACTITIONERS ACT (2022 REVISION)

AND

IN THE MATTER OF AN APPLICATION FOR LIMITED ADMISSION OF DAVID TOM CHIVERS KC

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EXHIBIT "JMM1" TO THE FIRST AFFIDAVIT OF  
JAMIE MICHAEL MCGEE

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This is the paginated Exhibit "JMM1" mentioned and referred to in the First Affidavit of Jamie Michael McGee sworn on the twentieth day of September 2022 before me:-



NOTARY PUBLIC

Sheryl Davis  
Notary Public in and for the Cayman Islands  
My commission expires: 8 January 2022



## Immigration (Transition) TWP & BVP, Regulations 2019 Temporary Work Permit

**Permit Number:** 149403  
**Date of Issue:** 29-Jul-2022  
**Period Covered:** 29-Jul-2022 to 27-Oct-2022

### PARTICULARS OF PERMIT HOLDER

**Surname:** CHIVERS  
**Other Names:** TOM DAVID  
**Date of Birth:** 17-Nov-1960  
**Citizen of:** UNITED KINGDOM  
**Passport Number:** 546409840  
**Sex:** Male  
**Worker Reference:** 0121693  
**Term Limit:**



### PARTICULARS OF EMPLOYMENT

**Employers Name:** OGIER  
**Employers Address:** 89 Nexus Way, Camana Bay  
Grand Cayman KY1-9007 CAYMAN ISLANDS  
**Primary Occupation:** QUEEN COUNSELS  
**Location:** GRAND CAYMAN



**Signed:** 

**Dated:** 29th July 2022

On behalf of  
Director Of W.O.R.C.

**This Permit is subject to SPECIFIC CONDITIONS outlined below and STANDARD CONDITIONS shown on the attached Appendix.**

**Specific Conditions:**

- (1) This Temporary Work Permit has been granted in accordance with Regulation 4 (1) and (2) of THE IMMIGRATION (TRANSITION) (TEMPORARY WORK PERMITS AND BUSINESS VISITORS PERMITS) REGULATIONS (2022 Revision). A Temporary Work Permit is granted for a continuous period of up to six months and this period may neither be extended nor renewed. If granted for a period of less than six months it may be renewed for a period not exceeding six months.
- (2) Please note, all references to the Immigration Law (2015 Revision), Immigration (Transition) Law 2018, and/or Immigration (Transition)(Temporary Work Permits and Business Visitors' Permits) Regulations, 2019, and the varying sections are now replaced by the Immigration (Transition)(Temporary Work Permits and Business Visitors' Permits) Regulations (2022 Revision) and the varying sections. All references to Chief Immigration Officer are now replaced by the Director of WORC.
- (3) Cause Number FSD 227 of 2017.

**End of Specific Conditions**

THE PERMIT HOLDER SHALL NOT BE EMPLOYED OTHER THAN BY THE EMPLOYER NAMED ON THIS DOCUMENT WITHOUT PRIOR APPROVAL.

THIS PERMIT WILL BE AUTOMATICALLY TERMINATED IF EMPLOYMENT IS NOT TAKEN UP WITHIN 30 (THIRTY) DAYS OF THE DATE HEREOF.

FAILURE TO COMPLY WITH ANY OF THE TERMS AND CONDITIONS SHOWN ON THIS DOCUMENT OR THE APPENDIX HERETO AUTOMATICALLY RENDERS THIS PERMIT SUBJECT TO REVOCATION.

A COPY OF THIS PERMIT IS GIVEN TO BOTH THE EMPLOYER AND THE EMPLOYEE.



**WORC**

WORKFORCE OPPORTUNITIES & RESIDENCY CAYMAN  
CAYMAN ISLANDS GOVERNMENT

Director Of W.O.R.C.  
Workforce Opportunities & Residency Cayman  
87 Mary Street  
George Town, Grand Cayman  
Cayman Islands

Phone: (345) 945-9672  
Web : www.worc.ky

Our Ref: 0121693/4

15th September, 2022

OGIER  
89 Nexus Way, Camana Bay  
Grand Cayman KY1-9007  
Cayman Islands

Dear Sir/Madam,

**CHIVERS, TOM DAVID**  
**Work Permit Amendment**  
**Section 63(7) of the Immigration (Transition) Act (2022 Revision)**

I refer to your application in respect of the above named person and write to advise that the application has been approved by the Director Of W.O.R.C..

- This work permit has been amended to allow the worker to work part time with BEDELL CRISTIN as a COUNSEL for 20 hours per week. This approval is subject to OGIER, remaining the primary employer.
- Please note, all references to the Immigration Law (2015 Revision), Immigration (Transition) Law 2018 and/or Immigration (Transition) Act (2021 Revision), and the varying sections are now replaced by the Immigration (Transition) Act (2022 Revision), and the varying sections.

The fee required for this Work Permit amendment is CI\$0.00, together with a non refundable cash deposit of CI\$0.00 which is required to cover the cost of repatriation. It should be noted that an additional annual fee of CI\$0.00 is required in order for your dependant(s) to be allowed to accompany you. This fee, if applicable, has been included in the work permit amendment fee prescribed above. The permit holder and any members of the permit holder's household named in the permit must have their passports endorsed by the Department of Immigration. All cheques should be made payable to the *Cayman Islands Government*.

It is a condition of this approval that no employment should be undertaken unless these fees are paid. It is a further condition of this approval that unless the necessary fees are paid within THIRTY (30) days of the date of this notification, the permit shall not be deemed to have taken effect, and therefore, rendered invalid. A new application and the administrative fees would have to be re-submitted for consideration.

Yours faithfully,

On behalf of  
**Director Of W.O.R.C.**



**WORC**

WORKFORCE OPPORTUNITIES & RESIDENCY CAYMAN  
CAYMAN ISLANDS GOVERNMENT

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Our Ref: 0121693/4

15th September, 2022

OGIER

89 Nexus Way, Camana Bay  
Grand Cayman KY1-9007  
Cayman Islands

**Further Conditions:**

- This work permit has been amended to allow the worker to work part time with BEDELL CRISTIN as a COUNSEL for 20 hours per week. This approval is subject to OGIER, remaining the primary employer.
- Please note, all references to the Immigration Law (2015 Revision), Immigration (Transition) Law 2018 and/or Immigration (Transition) Act (2021 Revision), and the varying sections are now replaced by the Immigration (Transition) Act (2022 Revision), and the varying sections.



**WORC**

WORKFORCE OPPORTUNITIES & RESIDENCY CAYMAN  
CAYMAN ISLANDS GOVERNMENT

Director Of W.O.R.C.  
Workforce Opportunities & Residency Cayman  
87 Mary Street  
George Town, Grand Cayman  
Cayman Islands

Phone: (345) 945-9672  
Web : www.worc.ky

Our Ref: 0121693/3

15th September, 2022

OGIER  
89 Nexus Way, Camana Bay  
Grand Cayman KY1-9007  
Cayman Islands

Dear Sir/Madam,

**CHIVERS, TOM DAVID**  
**Work Permit Amendment**  
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I refer to your application in respect of the above named person and write to advise that the application has been approved by the Director Of W.O.R.C..

- This work permit has been amended to add the following Cause Numbers, as requested:
  - FSD 108 of 2022 (IKJ)
  - FSD 129 of 2022 (IKJ)
- Please note, all references to the Immigration Law (2015 Revision), Immigration (Transition) Law 2018 and/or Immigration (Transition) Act (2021 Revision), and the varying sections are now replaced by the Immigration (Transition) Act (2022 Revision), and the varying sections.

The fee required for this Work Permit amendment is CI\$0.00, together with a non refundable cash deposit of CI\$0.00 which is required to cover the cost of repatriation. It should be noted that an additional annual fee of CI\$0.00 is required in order for your dependant(s) to be allowed to accompany you. This fee, if applicable, has been included in the work permit amendment fee prescribed above. The permit holder and any members of the permit holder's household named in the permit must have their passports endorsed by the Department of Immigration. All cheques should be made payable to the *Cayman Islands Government*.

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Yours faithfully,

On behalf of  
**Director Of W.O.R.C.**



**WORC**

WORKFORCE OPPORTUNITIES & RESIDENCY CAYMAN  
CAYMAN ISLANDS GOVERNMENT

Page: 2

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