

IN THE GRAND COURT OF THE CAYMAN ISLANDS

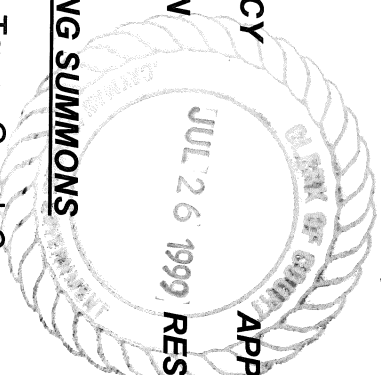
CAUSE NO. 1450 OF 1999

**IN THE MATTER OF
The Guardianship and Custody of Children Law (1996 Revision)**

**AND IN THE MATTER OF
The Minor, AHMAREE SHAMONTI PIERCY,
(D.O.B. 25th June 1998)**

**BETWEEN JONATHAN PIERCY APPLICANT
AND OMERIA GORDON RESPONDENT**

ORIGINATING SUMMONS



LET THE RESPONDENT of George Town, Grand Cayman attend before a Judge in Chambers, at the Law Courts, George Town, Grand Cayman on the 19 day of AUGUST 1999 at 9:30 o'clock in the noon on the hearing of an application by the Applicant, of George Town, Grand Cayman that:

1. The Applicant be granted joint-custody of the child Ahmaree Shamonti Piercy, along with the Respondent.
2. The Applicant be granted liberal and unsupervised access to the said child.
3. There be such further Orders, as the Court deems just and equitable in the circumstances.
4. The Respondent do bear the costs of this application.

LET THE DEFENDANT within 14 days after service of this Summons on her counting the day of service return the accompanying Acknowledgment of Service to the Courts Office.

Dated this 14th day of July 1999



SAMSON MURRAY JACKSON
Attorneys-at-Law for the Applicant



NOTES:

1. This Summons may not be served later than 4 calendar months (or if leave is required to effect service out of the jurisdiction, 6 months) beginning with that date unless renewed by Order of the Court.
2. If a Respondent does not attend personally or by his Attorney at the time and place above-mentioned such order will be made, as the Court may think just and expedient.

IMPORTANT

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

THIS ORIGINATING SUMMONS was filed by Samson Murray Jackson, Attorneys-at-Law for the Applicant herein whose address for service is that of his said Attorneys-at-Law, The Ground Floor (West Wing) Sigma Building, Smith/Hospital Roads, George Town, Grand Cayman.

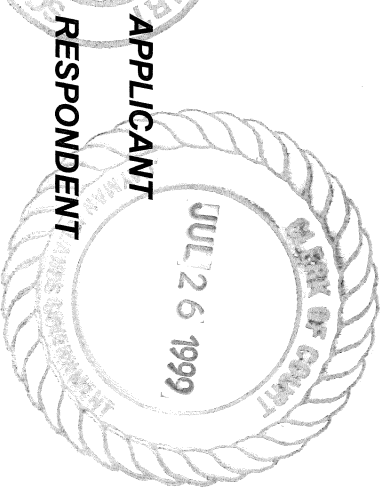
IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. 450 OF 1999

**IN THE MATTER OF
The Guardianship and Custody of Children Law (1996 Revision)**

**AND IN THE MATTER OF
The Minor, AHIMAREE SHAMONTI PIERCY,
(D.O.B 25th June 1998)**

**BETWEEN JONATHAN PIERCY
AND OMERIA GORDON**



**APPLICANT
RESPONDENT**

AFFIDAVIT IN SUPPORT

I, **JONATHAN PIERCY**, of George Town, Grand Cayman, being duly sworn, make oath and say as follows:


1. That I am the Applicant herein and I make this Affidavit in support of my application to be granted liberal access to the minor child,
2. That to the best of my knowledge and belief I am the father of the said child. Now produced and shown to me marked "JP1" is a copy of the birth certificate in relation to the said child. It will be noted that I am there listed as the father of the said child and I hereby confirm and acknowledge that I indeed the father of the child.
3. That the said child was born out of a relationship that I had with the Respondent.
4. That I have supported and maintained the said child since its birth.
5. That the relationship between the Respondent and myself has now ended and I am currently involved in another relationship with another woman, Ms. Maria Arch.
6. That the Respondent has been refusing me access to the said child ever since I commenced the relationship with Ms. Arch.

7. The Respondent further refuses to speak to me about anything relative to the said child.
8. That I desire to play a supportive and meaningful relationship with the said child and to live up to my responsibilities as the father of the said child.
9. That I am of the opinion that it is the best interest and welfare of the said child that he develops a meaningful relationship with me as his father from the very early and formative years of the child's life.
10. That the Respondent is denying me this opportunity by refusing me access to the said child.
11. That I verily believe that the Respondent is denying me the said access because of her resentment of the break-up between us and her jealousy in respect of the new relationship that I have formed with Ms. Arch. I further believe that such an attitude is grossly unreasonable.
12. That the action of the Respondent is causing the child to miss out from bonding with his/her father and his/her paternal relatives and accordingly in all the circumstances I crave an Order in terms of the Summons hereto.

Sworn to at George Town, Grand Cayman
this 14th day of July 1999
before me:



Jonathan Piency



Clerk of the Courts

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. OF 1999

IN THE MATTER OF
The Guardianship and Custody of Children Law (1996 Revision)


AND IN THE MATTER OF
The Minor AHMAREE SHAMONTI PIERCY,
(D.O.B 25th June 1998)


BETWEEN JONATHAN PIERCY APPLICANT
AND OMERIA GORDON RESPONDENT

EXHIBIT "JP1"

This is the birth certificate referred to as Exhibit "JP1" at paragraph 2 hereof.

Sworn to at George Town, Grand Cayman
this 14 day of July 1999
before me:


Jonathan Piercy


Clerk of the Courts

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. 450 OF 1999

**IN THE MATTER OF
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**AND IN THE MATTER OF
The Minor, AHMAREE SHAMONTI PIERCY,
(D.O.B 25th June 1998)**

BETWEEN JONATHAN PIERCY APPLICANT
AND OMERIA GORDON RESPONDENT

**DIRECTIONS FOR ACKNOWLEDGMENT OF SERVICE
OF ORIGINATING SUMMONS**

The accompanying form of **Acknowledgment of Service** should be completed by an Attorney acting on behalf of the Respondent or by the Respondent if acting in person. After completion it must be delivered or sent by post to the Law Courts, P.O. Box 495G, George Town, Grand Cayman.

Notes for Guidance

1. Each Respondent (if there are more than one) is required to complete an Acknowledgment 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 Respondent personally is treated as having been served on the day it was delivered to him.
3. Where the Respondent 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 in the Originating Summons*)".
4. Where the Respondent 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 Respondent is 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 Respondent 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 Respondent is a **MINOR** or a **MENTAL PATIENT**, the form must be completed by an Attorney acting for a guardian *ad litem*.
8. A Respondent acting in person may obtain help in completing the form at the Courts Office.

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**BETWEEN JONATHAN PIERCY APPLICANT
AND OMERIA GORDON RESPONDENT**

**ACKNOWLEDGMENT OF SERVICE
OF ORIGINATING 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.

1. State the full name of the Respondent by whom or on whose behalf the service of the Originating Summons is being acknowledged.
2. State whether the Respondent intends to contest the proceedings (tick appropriate box)

()yes ()no

Service of the Originating Summons is acknowledged accordingly.

(Signed)
[Attorney] for

[Respondent in person]

Address for service

Notes on address for service

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

Respondent in person: where the Respondent 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 principal office.

Please complete overleaf

Indorsement by Applicant's Attorney (or by Applicant if suing in person) of his name, address and reference, if any, in the box below:

Samson Murray Jackson
Attorneys-at-Law
The Ground Floor (West Wing)
Sigma Building
Smith/Hospital Roads
PO Box 10067 APO
George Town, Grand Cayman

Indorsement by Respondent's Attorney (or by Respondent if suing in person) of his name, address and reference, if any, in the box below: