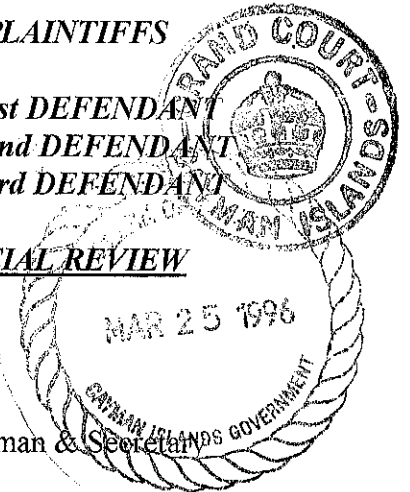


IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. 16 OF 1996

BETWEEN ELSWORTH GRANT & CHERRY CHIN
(as guardian ad litem for SHEMAIAH GRANT)
AND HERBERT CRAWFORD
AND THE CHIEF EDUCATION OFFICER
AND THE EDUCATION COUNCIL

PLAINTIFFS
1st DEFENDANT
2nd DEFENDANT
3rd DEFENDANT



EX-PARTE 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)	Elsworth Grant and Cherry Chin West Bay, Grand Cayman, Businessman & Secretary
Judgment, order, decision or other proceeding in respect of which relief is sought	The decision of the Education Council to uphold the decision of the decision of the First and Second Defendants to suspend/expel Shemaiah Grant from the West Bay Primary School with effect from the 9th day of January 1996 as a consequence of the said Shemaiah Grant wearing his hair in keeping with the religious persuasion of his faith.

Relief Sought

An Order for Certiorari to bring the said decision of the Education Council, The Chief Education Officer and Mr. H. Crawford before this Honourable Court in order to have the same investigated and quashed as being ultra vires and void.

Damages & Costs.

Name and address of Applicants' Attorneys: L.A. Samson & Co., Suite D1 Cayman Business Business Park, Thomas Russell Way, George Town, Grand Cayman.

Signed: L.A. Samson & Co.
L. A. Samson & Co.

Dated: 22 March 1996

GROUND ON WHICH RELIEF IS SOUGHT

1. *That the decision to suspend/expel Shemaiah Grant made by the First, Second and Third Defendants is ultra vires the Education Law and therefore null and void;*
2. *That the decision is ultra vires and void as being discriminatory of the religious faith and practice of the said Shemaiah Grant and accordingly is in breach of the Cayman Islands international treaty and convention obligations under the European Convention on Human Rights; the Universal Declaration of Human Rights; the International Convention on Civil and Political Rights; the Convention against Discrimination in Education and the Convention on the Rights of the Child.*