



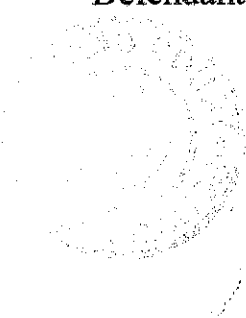
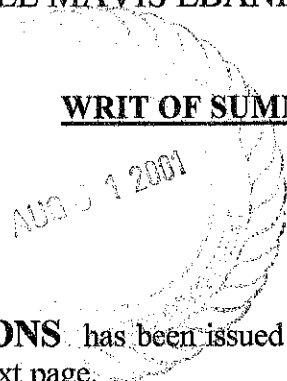
IN THE GRAND COURT
CAYMAN ISLANDS
CAUSE NO. 530 OF 2001

BETWEEN: NEVILLE W. LEVY Plaintiff

AND: VERNELL MAVIS EBANKS Defendant

WRIT OF SUMMONS

To: Mavis Vernell Ebanks
Crewe Road.



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

Within fourteen (14) days of service of this Writ on you, counting the day of service, you must either satisfy the claim or return to the Court Office, P. O. 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 Acknowledgement within the time stated, or if you return the Acknowledgement 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 30th August, 2001.

NOTE: This Writ may not be served later than 4 calendar months (or, if leave is required to effect service out of the jurisdiction, within 6 months) beginning with the date of issue unless renewed by the order of the Court.

IMPORTANT

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

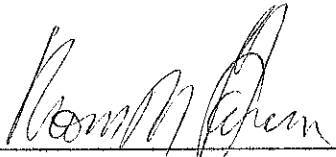
STATEMENT OF CLAIM

1. The plaintiff is the registered owner of Parcel 149 Block 14CJ George Town Central, formerly 47 and 49.
2. The defendant is the registered owner of Parcel 46 Block 14CJ George Town Central, which has a 6 feet access over the northern boundary of Parcel 149, formerly Parcel 49.
3. In or about August, 1995 the plaintiff, through a licensed Land Surveyor, Patrick C. Broderick & Co., applied for and obtained a fixed boundary survey to ascertain the precise boundaries of both parcels and to combine them into one parcel.
4. Upon carrying out the survey, it was discovered that the defendant had built a wooden house with a concrete slab as its floor so that part of the house encroached upon the plaintiff's land; and that she had also fenced in part of his land to the south
5. On the 13th December, 1996, the plaintiff, in the presence of the defendant's son and occupier of the said Parcel 46, made an offer to the defendant to exchange the encroached portion of his property for equal area of the defendant's property so that he could construct a 22 feet road at the northern end of Parcel 46 to access both properties. However, the defendant refused and agreed with her son that she would knock down the fence and remove the part of the house which was encroaching on the plaintiff's property.
6. In August or September, 1997, the defendant removed the fence but not the encroachment of the house.
7. In or about June, 2000, the defendant, using the concrete slab as floor, replaced the wooden walls of the house, about 18 inches from the plaintiff's boundary, with concrete blocks. The construction appeared to have been completed in or about June, 2001 but the defendant failed to remove the slab from the plaintiff's property.
8. By letter dated 6th July, 2001, the plaintiff, through his Attorney, demanded that the defendant removed the concrete slab from his land but she has refused to do so.

Therefore the Plaintiff's claim is for:

1. An order that the defendant do forthwith dig up and remove the concrete slab from the plaintiff's land, Parcel 149 Block 14CJ George Town Central;
2. Damages for trespass;
3. Further or other relief;
4. Costs to be taxed or agreed

Dated this 30th August, 2001



Morris Garcia

Filed by Morris Garcia, Attorney-at-Law for and on behalf of the plaintiff herein whose address for service is that of the said Attorney at Room # 2 180 Shedden Road, George Town.

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.

Morris Garcia
NevLaw Building,
180 Shedden Road,
George Town.
P. O. Box 2178.