



IN THE MATTER OF
THE CHILD ABDUCTION AND CUSTODY (CAYMAN
ISLANDS) ORDER 1997

-AND-

IN THE MATTER OF
THE HAGUE CONVENTION OF 25TH OCTOBER 1980
ON THE CIVIL ASPECTS OF INTERNATIONAL
CHILD ABDUCTION

-AND-

IN THE MATTER OF
AN APPLICATION FOR THE RETURN OF THE
MINOR CHILDREN, NAMELY:

- (i) Farrah Katherine Salman D.O.B. October 12, 1987
- (ii) Rebecca Nazanin Salman D.O.B. August 14, 1990
- (iii) Alishah Christine Salman D.O.B. April 27, 1992

BETWEEN:

FARID SALMAN

PLAINTIFF

AND:

BECKY SALMAN (aka BECKY RUSSEL)

DEFENDANT

ORIGINATING SUMMONS

LET THE DEFENDANT, **BECKY SALMAN** (aka **BECKY RUSSELL**) presently of West Bay, Grand Cayman, attend before the Judge in Chambers at the Law Courts, George Town, Grand Cayman on the *3* day of ~~April~~ ^{May} 2002 at *9:00* o'clock on the hearing of an application by the Plaintiff **FARID SAIMAN** of 12544 Pewter Place, Fishers, IN 46038 that the children, **Farrah Katherine Salman**, **Rebecca Nazanin Salman** and **Alishah Christine Salman**, be returned forthwith to the Plaintiff in the State of Indiana, U.S.A.

1. That the children in respect of whom this application is brought are **Farrah Katherine Salman**, **Rebecca Nazanin Salman** and **Alishah Christine Salman**.
2. That the Plaintiff and the Defendant are the parents of the said children.

3. That the person who wrongfully removed the children from Fishers, Indiana is the Defendant and the children are presumed to be with the Defendant.
4. The Children are suspected to be at #7 Genevieve Boddan Drive, West Bay, Grand Cayman.
5. The Plaintiff is the children's father, who in Cause No. 29D02-9911-DR-00642 in the Hamilton Superior Court, Civil Division, Indiana, was granted an Order for custody of the children on the 6th day of March 2002. The Defendant's visitation rights to the children was stayed pending further Orders.
6. That the children have been improperly removed from the State of Indiana, and the United States in breach of those Orders and in breach of the Plaintiff's rights of custody.
7. That the time for the hearing of this Application be abridged.

AND LET THE DEFENDANT within 4 days after the service of this Summons on him counting the day of service, return the accompanying Acknowledgment of Service to the Court's Office.

DATED this 25th day of April 2002


QUIN & HAMPSON
Attorneys-at-Law for the Plaintiff

- NOTE: (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 the Defendant 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 Messrs. Quin & Hampson, Attorneys-at-Law for the Plaintiff herein whose address for service and correspondence is that of his said Attorneys-at-Law, 3rd Floor, Harbour Centre, PO Box 1348, George Town, Grand Cayman, Cayman Islands, BWI.

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 Defendant or by the Defendant 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 Defendant (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 [4] days for acknowledging service, a writ served on the Defendant personally is treated as having been served on the day it was delivered to him.
3. Where the Defendant 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 on the Originating Summons*)".
4. Where the Defendant 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 Defendant is sued as 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 Defendant 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 his behalf.
7. Where the Defendant is a **MINOR** or a **MENTAL PATIENT**, the form must be completed by an Attorney acting for a guardian *ad litem*.
8. A Defendant acting in person may obtain help in completing the form at the Courts Office.

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. OF 2002

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BETWEEN: FARID SALMAN

PLAINTIFF

AND: BECKY SALMAN (aka BECKY RUSSEL)

DEFENDANT

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 Defendant by whom or on whose behalf the service of the Originating Summons is being acknowledged.

2. State whether the Defendant intends to contest the proceedings (*tick appropriate box*)

yes

no

Service of the Originating Summons is acknowledged accordingly

(Signed)

[Attorney] for

[Defendant in person]

Address for service:

Notes on address for service:

Attorneys: 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 principal office.

Please complete overleaf

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

Messrs. Quin & Hampson
Attorneys-at-Law
3rd Floor, Harbour Centre,
PO Box 1348
George Town,
Grand Cayman

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