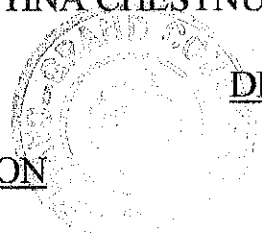


IN THE GRAND COURT OF THE CAYMAN ISLANDS
CAUSE NO: 191 of 2006

BETWEEN: CADIAN EBANKS Plaintiff

AND : (1) P.A. KYLE BROADHURST
(2) CATHERINE ANN DELAPHNA CHESTNUT
(3) ANDRE DACRES



DEFENDANTS

WRIT OF SUMMON

THIS WRIT OF SUMMONS has been issued against you, by the above-name Plaintiff in respect of Severe Damage to Character and Loss of my Construction Firm . with full details set out on the next page.

With-in (21days) after the service of this Writ on you, counting the day of service you must either satisfy the claim or return to the Courts Office P.O. Box 495 George Town Grand Cayman, the accompanying Acknowledgment of service sating therein whether you intend to contest these proceedings.

If you fail to satisfy the claim or to return the acknowledgment 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 21 day of April 2006

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

IMPORTANT

Directions for acknowledgement of service are given with the accompanying form.

**STATEMENT OF CLAIM
CHARGE
LIBEL PER SE AND DEFAMATION PER SE**

1. First Defendant who is employed by the National Drug Council whose address is P.O. Box 11297 APO. Grand Cayman.
2. Second Defendant is an Attorney in the firm of Broadhurst Attorneys with offices at 40 Linwood George Town Gr. Cayman.
3. Third Defendant is self-employed as a Construction worker
4. That you produced in the Grand Court in Aug. 5th 6th 2003 Affidavits with it: contents which is Libel and Defamatory in Nature against the Plaintiff which was sworn to be true as key evidence.
5. That you produced in the Grand Court in Aug. 5th 6th 2003 a personal letter that was hand delivered to the Plaintiff dated December 29, 2000 which is Libel and Defamatory in Nature against the Plaintiff as key evidence.
6. That you in corroboration with one another in Aug 5th and 6th 2003 produced in the Grand Court a document namely an Expert Witness Statement that is Libel and Defamatory in Nature against the Plaintiff Cadian Ebanks. Willfully and knowingly the contents to be false.
7. the business firm Canadian Construction which was licensed in the Cayman Islands since 1980 no longer exists due to Defamatory statements produced by you which was proved in the Grand Court to be false.
8. That you in corroboration with one another on or about April to Sept. 2002 was asked to produce a document namely an Expert Witness Statement knowingly to be false against the Plaintiff and his character an the Plaintiff have suffered much loss and Damage To his character The Plaintiff now claims from the Defendants for Defamation of Character through the Grand Court . Under Defamation per se .

9. That you in corroboration with one another about April to sept 2002 was requested by the Defendant Attorney to produce an expert Witness statement in defense against the plaintiff (Cadian Ebanks) knowingly to be false the Plaintiff have suffered much loss and damage by the closure of his construction firm The Plaintiff now claims for loss and damages of the firm from the defendants Under Libel per se

10. That you in corroboration with one another produced in an open Court Room on 5th 6th August 2003 in the form of an Affidavit alleging wrongful acts done by the plaintiff which proved in Court to be false ,and have severely damaged the Plaintiff Character and the Plaintiff have suffered much loss and damages and The Plaintiff claims for Punitive and Defamation of character from the Defendants Under Defamation per se.

11. That you in corroboration produced in an open Court Room a letter as Key Evidence that was hand delivered dated December 29, 2000 which The contents are libel per se against the Plaintiff construction and business firm Which have alleged wrongful acts done by the Plaintiff and firm which have Caused severe damages and loss of business and clouser of the firm and the Plaintiff claims from the Defendants for loss and damages suffered Under Libel per se .

AND The Plaintiff further claims

- 1 The Plaintiff Claims Punitive and general and Defamation per se damages
- 2 Interest there on from Aug. 5th 2003 until the date of payment at 5% per annum
- 3 Cost of the action

Alternatively the Plaintiff claims interest on the damages
Pursuant to section 34 of the Judicature Law (1995 Revision) and interest at
the current rate per annum from August 5, 2003

Dated the 21 day of April 2006



CADIAN EBANKS

This Writ was issued by Cadian Ebanks the Plaintiff whose address for service is P.O.
Box 223 WB West Bay Grand Cayman , Cayman Islands.

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 14 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 Writ of 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.

Binder
Copy

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO: 191 OF 2006
PLAINTIFF

BETWEEN: CADIAN EBANKS

AND: (1) P.A. KYLE BROAHURST
(2) CATHERINE ANN DELAPHNA CHESTNUT
(3) ANDRE DACRES

DEFENDANTS

ACKNOWLEDGMENT OF SERVICE
OF WRIT OF SUMMONS

If you intend to instruct an Attorney to act for you, give him this form **IMMEDIATELY**.

Important. Read the accompanyin
Directions and notes afor guidance carefully
Before completing this form. If any
Information required is ommitted or
Given wrongly, THIS FORM MAY
HAVE TO BE RETURNED.

Delay may result in judgement being
against a Defendant whereby he may have
pay the costs of applying to set it aside.

1. State the full name of the Defendant by whom or on whose behalf the service of
the Writ is being acknowledged.

2. State whether the Defendant intends to contest the proceedings (tick appropriate box)
 yes no

3. If the claim against the Defendant is for a debt or liquidated demand, AND he does not
intend to contest the proceedings, state if the Defendant intends to apply for a stay
of execution against any judgment entered by the Plaintiff (tick box)
 yes no

Service of the Writ is acknowledged accordingly

(Signed).....
Attorney for

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.

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

Cadian Ebanks
Po Box 223 WB
207A Fountain Rd.
West Bay 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.