

IN THE GRAND COURT OF THE CAYMAN ISLANDS
HOLDEN AT GEORGE TOWN

Cause No. 0165 of 2009

IN THE MATTER OF THE GUARDIANSHIP AND CUSTODY OF CHILDREN
LAW 1996 (REVISED)

AND

IN THE MATTER OF AN APPLICATION RELATING TO JAVON NATHANIEL
WATSON (a minor who was born on 24th June 2004)

AND

IN THE MATTER OF AN APPLICATION BY TABITHA EBANKS, the biological
mother of the said minor

BETWEEN: TABITHA EBANKS

PLAINTIFF

AND: DRAYSON MARLON WATSON

DEFENDANT

ORIGINATING SUMMONS

To: DRAYSON MARLON WATSON

c/o Department of Public Works

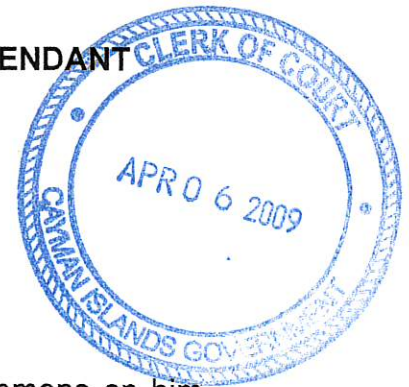
North Sound, Road

Grand Cayman

LET THE DEFENDANT within 14 days after service of this Summons on him counting the day of service, return the accompanying Acknowledgement of Service to the Courts office, P.O. Box 495G, George Town, Grand Cayman.

By this Summons, issued on the applicant of **TABITHA EBANKS** Staten Island, New York, United States of America the Plaintiff claim against the Defendant for guardianship, custody, care and control of their minor child **JAVON NATHANIEL WATSON** under section 7 of the Guardianship and Custody of Children Law 1996 (revised) and for the following orders to be made;

1. That the Plaintiff be granted guardianship, sole custody, care and control of the minor child **JAVON NATHANIEL WATSON** born 24th June 2004.
2. That the Defendant immediately return the said child to the care and control of the Plaintiff.
3. That the Defendant be restrained whether by himself, his servants and /or agents from removing or attempting to remove **JAVON NATHANIEL WATSON** from the care of the Plaintiff without the express written consent of the Plaintiff or this Honourable Court.



4. That the Defendant's access to the minor child be defined in accordance as to what is in the best interest of the child.
5. That the Defendant provides an undertaking to this Honourable Court to return the child to the Plaintiff at the end of his visitation periods.
6. That a social inquiry report be prepared as to the issue of access of the minor child and that the Defendant's access only commences after such report has been presented to this Honourable Court.
7. That the Defendant pay child maintenance each month to the Plaintiff in a sum assessed reasonable by this Honorable Court
8. That all travel expenses for the said child be borne solely by the Defendant.
9. That the Defendant be restrained from harassing, molesting and/or assaulting the Plaintiff with penal consequence for breach of the same.
10. Such further or other relief as this Honourable Court deems just.
11. That the Defendant pay the Plaintiff costs incidental to these proceedings.

If the Defendant does acknowledge service, such judgment may be given or order made against or in relation to him as the Court may think just and expedient.

Dated the 3rd day of April 2009



BROOKS & BROOKS

Attorneys-at-Law for the Plaintiff

NOTE: 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.

IMPORTANT

Directions for Acknowledgement of Service are given with accompanying form

THIS ORIGINATING SUMMONS was issued by Brooks & Brooks, Attorneys-at-Law for the Plaintiff whose address for service is P.O. Box 1355 KY1-1108 George Town Grand Cayman. One Artillery Court, Shedden Road, Grand Cayman Phone:345-949-9377 Fax:345-949-9344.

Acknowledgment of service of originating summons (O.10, r.5)

DIRECTIONS FOR ACKNOWLEDGMENT OF SERVICE OF ORIGINATING SUMMONS

The accompanying form of acknowledgement 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 acknowledgement of service and return it to the Courts Office.
2. If you wish to defend claims made in the originating summons, or intend to attend the proceedings and to participate in them so far as necessary (although not necessarily in an adversarial manner) you should tick the "Yes" box in paragraph 2 of the acknowledgement of service.
3. For the purpose of calculating the period of 14 days for acknowledgement of service, a writ served on the Defendant personally is treated as having been served on the day it was delivered to him.
4. 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)".
5. 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.
6. Where the Defendant is used 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.

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.

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

Brooks & Brooks
Attorneys-at-Law
One Artillery Court
Shedden Road
George Town
Grand Cayman

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

[Empty box for Defendant's Attorney indorsement]