



**GRAND COURT OF THE CAYMAN ISLANDS**  
**FINANCIAL SERVICES DIVISION**

Cause No. 122 of 2022  
LACV 0021/2022

**IN THE MATTER OF S 159 OF THE COMPANIES ACT (2021 REVISION)**  
**AND IN THE MATTER OF O. 102, r. 18**  
**AND IN THE MATTER OF MANGO JAM CHARTERS LTD**

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PETITION

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TO: THE GRAND COURT OF THE CAYMAN ISLANDS

This Humble Petition of Ms Shamilia Wright ("**the Petitioner**") c/o KSG Attorneys, 4<sup>th</sup> Floor, Harbour Centre, 42 North Church Street, Grand Cayman, Cayman Islands shows that:

1. Mango Jam Charters Ltd. ("**the Company**") was incorporated and registered (registration no. 341971) on the 31<sup>st</sup> August 2018 under the Companies Act.
2. The Company was struck off the Register of Companies by the Registrar on the 30<sup>th</sup> April 2021.
3. Prior to being struck off, the registered office of the Company was at P.O. Box 307, 75 Omega Drive, Prospect, KY1-1104, Grand Cayman, Cayman Islands.
4. The amount of the reinstatement fee payable upon restoring the Company to the register of companies is KYD\$300.
5. Your Petitioner has a claim against the Company for personal injury, loss and damage:
  - 5.1. The Company carried on a business as a tour operator supplying boating and water sport activities to consumers. It was the registered owner and operator of a 32' Wellcraft Scarab motorboat called *Pepper Jelly*.
  - 5.2. On the 11<sup>th</sup> August 2019 the *Pepper Jelly* was being operated in the North Sound, Grand Cayman by an employees of the Company. The Petitioner was one of three

occupants aboard a different vessel, a 24' motorboat called the *Godfrey Hurricane* ("the Petitioner's Boat"), also cruising the North Sound.

- 5.3. At some time between 6pm and midnight on the 11<sup>th</sup> August 2019, the *Pepper Jelly* struck the Petitioner's boat due to the negligence of the employee Captain and/or the Company. Two of the occupants of the Petitioner's boat were killed. The Petitioner was thrown overboard into the North Sound, where she remained for some hours before being rescued.
- 5.4. As a result of the accident, the Petitioner suffered very serious head injuries, including a subarachnoid hemorrhage in the bilateral high parietal region and a diffuse axonal/vascular brain injury. She has also suffered consequential loss.
6. The Petitioner seeks to restore the Company to the register to allow her to bring a claim for damages for personal injury against the Company. On the date of the accident, the Company was subject to an insurance policy issued by Island Heritage (Heritage YachtCover Policy Number SPT000213). The Petitioner therefore believes that the Company would be in a position to satisfy judgment if restored.
7. If the Company is not restored to the register, the Petitioner will have no effective means of seeking damages for her injury.
8. In the circumstances, it is just and equitable that the Company be restored to the Register of Companies. The Petitioner respectfully requests that the Court reinstate the Company to the Register of Companies so that the Petitioner can bring her claim against it.

YOUR PETITIONER THEREFORE HUMBLY PRAYS THAT:

1. The Company be restored to the Register.
2. The Court directs that the Petitioner does not pay the Company's penalties.
3. Such other order or directions may be made as the Court thinks fit.

Dated this 1<sup>st</sup> day of June 2022

Filed this 16<sup>th</sup> day of June 2022



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**KSG**

**Attorneys for the Petitioners**

The petition is intended to be served on:-

1. The Registrar of Companies;
2. The Company at its last known registered office.

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**NOTICE OF HEARING**

**LET ALL PARTIES CONCERNED** attend before the Honourable Justice Kawaley at the Law Courts, George Town, Grand Cayman, on the 22<sup>nd</sup> June 2022 at 10 a.m. for the Petitioner's application to reinstate the company Mango Jam Charters Ltd.

**DATED** this 16<sup>th</sup> day of June 2022

**FILED** this 16<sup>th</sup> day of June 2022



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**KSG Attorneys-at-Law**  
**Attorneys for the Petitioner**

**TO:** The Registrar of the Financial Services Division  
**AND TO:** The Registrar of Companies  
**AND TO:** The last known registered office of the company

**Time Estimate:** 1 hour

This Notice was filed by KSG Attorneys-at-Law, Attorneys for the Petitioner, whose address for service is 4<sup>th</sup> Floor, Harbour Centre, 42 North Church Street, George Town P.O. Box 2255, KY1-1107.