



COURT OF THE CAYMAN ISLANDS

CAUSE NO: OF 2022³ //

IN THE MATTER OF SECTION 23(2) OF THE IMMIGRATION (TRANSITION) ACT (2022 REVISION)

IN THE MATTER OF ORDER 55 OF THE GRAND COURT RULES

AND IN THE MATTER OF THE REVOCATION OF A RESIDENCY AND EMPLOYMENT RIGHTS CERTIFICATE PURSUANT TO SECTION 40(1) OF THE IMMIGRATION (TRANSITION) ACT (2022 REVISION)

BETWEEN:

LISA GAYE SMILEY

APPELLANT

AND

THE IMMIGRATION APPEALS TRIBUNAL

RESPONDENT

NOTICE OF MOTION

TAKE NOTICE that the Court, at the Law Courts, George Town, Grand Cayman will be moved on day the day of 2023 at am/pm, or as soon thereafter as Counsel can be heard, by Counsel on behalf of Lisa Gaye Smiley ("the Appellant"), for an Order that the decision of the Immigration Appeals Tribunal, conveyed to the Appellant by the letter from the Immigration Appeals Tribunal dated 26th May 2023, be set aside and that her Residency and Employment Rights Certificate be restored.

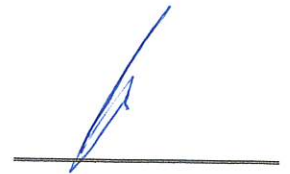
AND for an Order that the costs of and incidental to this appeal be provided for

AND FURTHER TAKE NOTICE that the grounds of this appeal are that the Immigration Appeals Tribunal -

1. Failed to make appropriate enquiries, being enquiries that no reasonable authority could have failed to make.
2. Ignored relevant factors.
3. Took into account irrelevant factors.
4. Failed to direct itself properly in law.

5. Failed to give the Applicant the benefit of the doubt, where there was clearly doubt.
6. Failed to make findings of fact and/or failed to give adequate reasons for its decision.
7. Failed to put basic issues to the Appellant.
8. Reached a decision totally at variance with the facts or for which there is no factual basis.
9. Failed to act in accordance with the objects and principles of the relevant Act.

Dated this 20th day of June 2023

A handwritten signature in blue ink, appearing to read 'Robert Jones', is written over a horizontal line.

Robert Jones Attorney at Law

To: The Clerk of Court

And To: The Chairperson of the Immigration Appeals Tribunal