



IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. P[] OF 20[]

PROBATE AND ADMINISTRATION NO. 9 OF 1994

IN THE ESTATE OF FRENCH CARLEY BARNETT, DECEASED

IN THE MATTER OF S.8 OF THE SUCCESSION ACT (2006 REVISION)

BETWEEN:

- (1) SHANNAH J. KAUFMAN
 - (2) FRANK LAUREN BARNETT
 - (3) SHIRLEY M. BARNETT
 - (4) BEATILEE C. BARNETT
 - (5) JULET E. J. BARNETT
 - (6) CASANDRA BARNETT
- EXECUTOR OF THE ESTATE OF
THOMAS J BARNETT**

APPLICANTS

AND:

FRANK MIKE BARNETT

RESPONDENT

ORIGINATING SUMMONS

TO: Frank Mike Barnett
of P.O. Box 2490
Grand Cayman, KY1-1104
Cayman Islands

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

BY THIS SUMMONS, which is issued on the application of Applicants who seek the following relief:

1. An Order pursuant to s.8 of the Succession Act (2006 Revision) for the removal of the Respondent, a co-administrator of the Estate of French Carley Barnett, deceased on the grounds of:
 - 1.1. Breach of fiduciary duty;
 - 1.2. Failure to provide accounts; and
 - 1.3. Failure to administer the estate lawfully and in good faith.
2. The appointment of Sophia Armanda Dilbert and Cassandra Barnett as co-administrators of the Estate in place of Beatilee Barnett and the Respondent.

That the Respondent, a co-administrator of the intestate estate of French Carley Barnett, file a full and verified inventory of the estate, including:

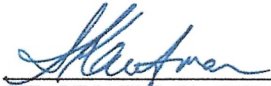
- All rent, income, and capital received from estate assets since the date of death;
 - All bank accounts, investments, and distributions received or made;
 - A complete accounting from the date of the grant of administration to the present.
4. That the Respondent be ordered to repay to the estate all sums not used for the benefit of the estate, withheld, or otherwise wrongfully used, together with interest and costs.
 5. That the Respondent's beneficial share in the estate be:
 - Withheld and frozen, pending full restitution and accounting;
 - Set off against any amounts found to be due and owing by the Respondent to the estate, whether through rent collected, unauthorised use of estate funds, or breach of fiduciary duty;
 - Denied distribution, unless and until all outstanding funds, interest, and costs have been repaid in full.
 6. An interim order freezing all estate-related bank accounts, rental income, and other assets under the control of the Respondent, pending the outcome of this application.
 7. An order that the Respondent do pay the Applicants, costs of and incidental to this application on the indemnity basis, or such other basis as the Court sees fit.
 8. Such further or other relief as this Honourable Court sees just.

THE GROUNDS for this Originating Summons are:

1. The letter before action dated 20 August, 2025 sent by the Applicants to the Respondent requesting inventory, accounts and proper details of the administration of the Estate of the French Carley Barnett, deceased.
2. Supporting affidavits from the Applicants as beneficiaries of the Estate of French Carley Barnett, deceased.

IF THE RESPONDENT does not acknowledge service, or if service is dispensed with, such judgment may be given or order made against or in relation to her as the Court may think just and expedient.

DATED this 7 day of November 2025



SHANNAH J. KAUFMAN

Address: 19 Vibe Lane, Mount Pleasant, West Bay, Grand Cayman PO Box 407, Grand Cayman, KY1-1106



FRANK LAUREN BARNETT

Address: 15 Vibe Lane, Mount Pleasant, West Bay, Grand Cayman PO Box 407, Grand Cayman, KY1-1106



SHIRLEY M. BARNETT

Address: 12 Suellis Estate, Capt. Joe and Osbert Lane, Birch Tree Hill, West Bay, PO Box 407, Grand Cayman, KY1-1106



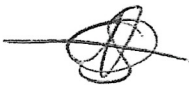
BEATILEE C. BARNETT

Address: 18 Reverand Blackman Road, West Bay, PO Box 26WB, Grand Cayman, KY1-1103



JULET E. J. BARNETT

Address: 263B Mount Pleasant, West Bay, PO Box 407, Grand Cayman, KY1-1106



CASANDRA BARNETT

EXECUTOR OF THE ESTATE OF THOMAS J BARNETT

Address: 2 Delacree Court, West Bay PO Box 407 Grand Cayman, KY1-1106

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 Acknowledgment of Service are given with the accompanying form.

This Originating Summons is issued by [], whose address for service is [].

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 Respondent or by the Respondent if acting in person. After completion it must be delivered or sent by post to the Law Courts, P.O. Box 495, George Town, Grand Cayman KY1-1106.

Notes for Guidance

1. Each Respondent (if there are more than one) is required to complete an Acknowledgment 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 acknowledgment of service.
3. For the purpose of calculating the period of 14 days for acknowledging service, a writ served on the Respondent personally is treated as having been served on the day it was delivered to him.

4. Where the Respondent 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 Respondent 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 Respondent 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.
7. Where the Respondent 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 its behalf.
8. Where the Respondent is a MINOR or a MENTAL PATIENT, the form must be completed by an Attorney acting for a guardian ad litem.
9. A Respondent acting in person may obtain help in completing the form at the Courts Office.

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. P[] OF 20[]

PROBATE AND ADMINISTRATION NO. 4 OF 1994

IN THE ESTATE OF FRENCH CARLEY BARNETT, DECEASED

IN THE MATTER OF S.8 OF THE SUCCESSION ACT (2006 REVISION)

BETWEEN:

- (1) SHANNAH J. KAUFMAN
- (2) FRANK LAUREN BARNETT
- (3) SHIRLEY M. BARNETT
- (4) BEATILEE C. BARNETT
- (5) JULET E. J. BARNETT
- (6) CASANDRA BARNETT
EXECUTOR OF THE ESTATE OF
THOMAS J BARNETT

APPLICANTS

AND:

FRANK MIKE BARNETT

RESPONDENT

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

.....

-
2. State whether the Respondent intends to contest or otherwise participate in the proceedings (tick appropriate box)

☐

yes

☐

no

Service of the Originating Summons is acknowledged accordingly

(Signed).....

[Attorney] for

[Respondent in person]

Address for service:

Notes on address for service

Attorney: where the Respondent is represented by an attorney, state the attorney's place of business in the Cayman Islands. A Respondent may not act by a foreign attorney.

Respondent in person: where the Respondent 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.

Indorsement by Applicant's Attorney of name, address and reference, if any, in the box below.

Shannah Kaufman, Address: 19 Vibe Lane, Mount Pleasant, West Bay, Grand Cayman PO Box 407, Grand Cayman, KY1-1106

Frank Lauren Barnett, Address: 15 Vibe Lane, Mount Pleasant, West Bay, Grand Cayman PO Box 407, Grand Cayman, KY1-1106

Shirley M. Barnett, Address: 12 Suellis Estate, Capt. Joe and Osbert Lane, Birch Tree Hill, West Bay, PO Box 407, Grand Cayman, KY1-1106

Beatilee C. Barnett, Address: 18 Reverand Blackman Road, West Bay, PO Box 26WB, Grand Cayman, KY1-1103

Julet E. J. Barnett, Address: 263B Mount Pleasant, West Bay, PO Box 407, Grand Cayman, KY1-1106

Casandra Barnett, Executor of The Estate of Thomas J Barnett, Address: 2 Delacree Court, West Bay PO Box 407 Grand Cayman, KY1-1106

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

