



GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. /2026

IN THE MATTER OF THE REGISTERED LAND ACT (2018 REVISION) (THE “ACT”)

**AND IN THE MATTER OF THAT PARCEL OF LAND DESCRIBED AS SAVANNAH
BLOCK 28C PARCEL 610 (THE “PARCEL”)**

BETWEEN:

FORGET ME NOT LTD

PLAINTIFF

AND

THE REGISTRAR OF LANDS

DEFENDANT

ORIGINATING SUMMONS

TO: The Registrar of Lands
Department of Lands and Survey
Government Administration Building
133 Elgin Avenue
George Town, Grand Cayman

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

By this Summons, which is issued on the application of Forget Me Not Ltd, c/o Hampson and Company, Apollo House East, 4th Floor, 87 Mary Street, George Town, Grand Cayman, the Plaintiff seeks the following relief:

1. Directions of the Court including to the extent as may be necessary:
 - (i) a declaration that a certain application for a caution (the “Caution Application”) said to have been presented by one Elaine Gibbs to the Land Registry in 2022 and rejected by the Land Registry and returned to her at that time, is not a registered caution within s.129 of the Act and is null, void and of no effect in relation to the Parcel and the Plaintiff’s title in the Parcel under the Act;
 - (ii) an order by way of mandatory injunction directing the Defendant to disregard the Caution Application and, to the extent it has any application or relevance to title to the Parcel, to remove or expunge it from title to the Parcel; and/or

- (iii) an order by way of mandatory injunction directing the Defendant permit the Plaintiff to deal with the Parcel in accordance with the Act and to register forthwith such stay of registration under s.42 of the Act, and Transfer of Land under s.83 of the Act, and such other instruments as the Plaintiff may request or present for registration from time to time; and/or
- 2. An assessment of Plaintiff's damages, including for slander of title, and any loss or damages incurred as a result of the loss of the sale of the Parcel, as a result of the actions of the Defendant in failing to permit the Plaintiff to lawfully deal with its Parcel in accordance with the Act.
- 3. The costs of this application and such further and other relief as to this Honourable Court may seem just.

If the Defendant does not 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 this 1st day of May 2026

Hampson and Co.

Hampson and Company
Attorneys 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 Acknowledgment of Service are given with the accompanying form.

This Originating Summons is issued by Hampson and Company attorneys for the Plaintiff, whose address for service is that of its said attorneys, Apollo House East, 4th Floor, 87 Mary Street, George Town, P.O. Box 698, Grand Cayman KY1-1107

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 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 495, George Town, Grand Cayman KY1-1106.

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

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FORGET ME NOT LTD

PLAINTIFF

AND

THE REGISTRAR OF LANDS

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

.....

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2. State whether the Defendant 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

[Defendant in person]

Address for service:

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 principal office.

Please complete overleaf

Indorsement by Plaintiff's attorney of his name, address and reference, if any, in the box below.

Hampson and Company
Apollo House East, 4th Floor
87 Mary Street,
P.O. Box 698,
Grand Cayman KY1-1107
Cayman Islands

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