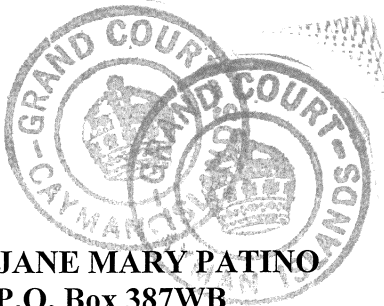


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IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE No.: 099 of 2001

BETWEEN: PAMELA JENNIFER WATLER FIRST PLAINTIFF
AND: HENRY I. JACKSON SECOND PLAINTIFF
AND: JANE MARY PATINO DEFENDANT



WRIT OF SUMMONS



TO: JANE MARY PATINO
P.O. Box 387WB
WEST BAY
GRAND CAYMAN

THIS WRIT OF SUMMONS has been issued against you by the above-named Plaintiffs in respect of the claim set out on the next page.

Within fourteen (14) days after the service of this Writ on you, counting the day of service, you must either satisfy the claim or return to the Court Office, P.O. Box 495GT, George Town, Grand Cayman, the accompanying Acknowledgement of Service stating therein whether you intend to contest these proceedings.

If you fail to satisfy the claim or to return the Acknowledgement within the time stated, or if you return the Acknowledgement without stating therein an intention to contest the proceedings, the Plaintiffs may proceed with the action and judgement may be entered against you forthwith without further notice.

Issued this day of , 2001.

NOTE: This Writ may not be served later than four (4) calendar months, (or, if leave is required to effect service out of the jurisdiction, six (6) months) beginning with the date of issue unless renewed by order of the Court.

THIS WRIT OF SUMMONS was issued by A. Steve McField & Associates, Attorney-at-Law for and on behalf of the Plaintiff whose address is that of his said Attorney, P.O. Box 680GT, Mary Street, George Town, Grand Cayman.

DIRECTIONS FOR ACKNOWLEDGEMENT OF SERVICE OF ORIGINATING SUMMONS

The accompanying form of Acknowledgement of Service should be completed by an Attorney acting on behalf of the Defendants or by the Defendants if acting in person. After completion it must be delivered or sent by post to the Law Courts, P.O. Box 495GT, George Town, Grand Cayman.

Notes for Guidance

1. The Defendants are 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 acknowledging service, an originating summons served on the Defendants personally is treated as having been served on the day it was delivered to them.
4. Where the Defendants are sued in a name different from their own, the form must be completed by them 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 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 Defendants are 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 Defendants are a LIMITED COMPANY, the form must be completed by an Attorney or by someone authorised to act on the 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 Defendants are 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 Court's Office.

IN THE GRAND COURT OF THE CAYMAN ISLANDS

HOLDEN AT GEORGE TOWN, GRAND CAYMAN

CAUSE NO.: 99 OF 2000

BETWEEN: PAMELA JENNIFER WATLER PLAINTIFF
AND: JANE MARY PATINO DEFENDANT

ACKNOWLEDGEMENT OF SERVICE

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.

Delay may result in judgement being entered against a Defendant whereby he may have to pay the costs of applying to set it aside.

1. State the full name of the Defendant by whom or on whose behalf the service of the originating Summons is being acknowledged.

2. State whether the Defendant intends to contest the proceedings (tick appropriate option).

YES _____ NO _____

Service of the Originating summons is acknowledged accordingly

(Signed) _____

(Attorney) for _____

(Defendant in person) _____

Address for service: _____

Notes on 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 principle office.



**A. Steve McField & Associates
Attorneys-at-Law for the
Plaintiffs/Applicants**

**Attorneys-at-Law for the
Respondent**

**FILED BY: A. Steve McField & Associates, Attorneys-at-Law for and on behalf of the Plaintiffs,
whose address for service is that of their said Attorney, P.O. Box 680GT, Mary Street, George
Town, Grand Cayman, Cayman Islands, B.W.I.**

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO.: 99 OF 2000

BETWEEN: PAMELA JENNIFER WATLER FIRST PLAINTIFF
AND: HENRY I. JACKSON SECOND PLAINTIFF
AND: JANE MARY PATINO DEFENDANT

STATEMENT OF CLAIM

1. The First Plaintiff is and was at all material times, the eldest daughter of the Second Plaintiff Henry I. Jackson, the original Proprietor of the property now registered in the Land Registry as West Bay North East Block 9A Parcel 477, and she is in possession of a Power of Attorney in respect of the said property pursuant to section 613 of The Registered Land Law. Given by the Second Plaintiff.
2. The Defendant's last known address is P.O. Box 387WB, West Bay, Grand Cayman. However, the Defendant is believed to be now residing in the United States.
3. Henry Irvin Jackson, herein after called "Jackson", is retired living at the Pines Retirement Home, George Town, Grand Cayman. He is no longer capable of handling his own affairs.
4. On or about the 25th March 1995 Jackson is purported to have signed a Notarised Note, purporting to sell the Defendant two Parcels of land, inter alia, for the consideration of debts owed to the Defendant by the Plaintiff. The said purported two parcels of land were not identified and ascertained.
5. On or about 31st March 1995, Jackson by Form RL1 purported to transfer the property then registered in the Land Registry as West Bay North East Block 9A Parcel 476 to the Defendant.
6. At the time of the said transfer, Jackson was not the registered proprietor of Block 9A Parcel 476.
7. The Defendant attempted to register the said transfer of Block 9A Parcel 476 but the Land Registry refused to do so because the transferor, Jackson, was not the registered proprietor and had no power to transfer.

8. On or about 12th October 1998 Henry Irvin Jackson became the registered proprietor of Block 9A Parcel 477.
9. On or about 11th November 1999 the Defendant tendered the said transfer of Land Document dated 31st March 1995 to the Land Registry for registration. This time the Defendant by herself or other persons falsely recklessly and negligently marked off Parcel 476 on the said transfer and falsely recklessly or negligently substituted Parcel 477 in its place.
10. The said transfer containing the false Parcel 477 was then tendered and did receive registration in the Land Registry in the Proprietor Section in the name of the Defendant.
11. The said transfer was a false and fraudulent transfer.
12. Further and or in the alternative the said Transfer was received by the Land Registry and registered by mistake.

AND the Plaintiff claims: -

1. Rectification of the Land Register in relation to Block 9A Parcel 477 for fraud or mistake.
2. That Block 9A Parcel 477 be registered in the name of Henry I Jackson.
3. That the First Plaintiff's Power of Attorney be registered against the Title to Block 9A Parcel 477.
4. That the Honourable Court grant an Order inhibiting the registration of any dealings with respect to Block 9A Parcel 477 until further order of the Court.
5. Damages.
6. Cost.
7. Such further or other relief as the Court deems fit.

Dated this ^{14th} ~~31st~~ day of ^{February} ~~October~~ 2000.



A. Steve Mcfield
Attorney for the Plaintiff

TO: The Clerk of the Court

And To: The Defendant

FILED BY: A. Steve McField & Associates, Attorneys-at-Law for and on behalf of the Plaintiffs, whose address for service is that of their said Attorney. P.O. Box 680GT, Mary Street, George Town, Grand Cayman, Cayman Islands, B.W.I.