

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CIVIL DIVISION

CAUSE NO. 160 OF 2019




IN THE MATTER OF SECTION 98D OF THE REGISTERED LAND LAW (2018 REVISION)

NOTICE OF INTENTION TO INTERVENE

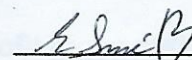
1. The Concerned Citizens Group (CCG) by and through the undersigned respectfully gives notice to the Court for leave to Intervene as a right of Public Interest.
2. The CCG is a nonprofit group registered in the Cayman Islands working, inter alia, to protect and preserve Beach Accesses throughout the Cayman Islands.
3. The CCG seeks leave of the Court to Intervene in the matter.
4. The CCG has a direct and tangible interest in this matter that will be necessarily impaired if the Applicant's application prevail and that interest is not adequately represented by the CCG.
5. The CCG charitable mission includes working to protect the citizen's right to access freely to the beaches in the Cayman Islands.
6. These interests will be directly and adversely impacted by the ex-parte application to remove the access without intervention. The Court should grant Intervention as of right.
7. There has been very little time since the CCG became aware of the matter, and therefore has an interest in it. There has been no time to prepare any further documentation but to advise the Court of the intention to Intervene. The matter has been noted on the Court List for Thursday 31st October 2019.

8. In considering the time of the Intervention the Court should consider the circumstance when the CCG knew of its interest in the cause. It was not until seeing the Court List published for the week for the 28th October 2019.
9. This is a matter of public interest and the CCG should be afforded legal counsel through the Legal Aid office.
10. The CCG submits that any orders the Court may make for any further filing will be adhered to. For the foregoing reasons outlined above it is believed that there is a good cause to Intervene.

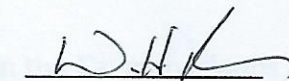
Dated this 30th day of October 2019.



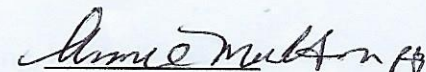
Alice Mae Coe



Ezmie Smith



William H. Adam



Annie A. Multon

Members of the Concerned Citizens Group

TO: **DENTONS** on behalf of the Applicants
3rd Floor, One Capital Place, George Town
Grand Cayman, Cayman Islands

This Notice is filed by the Concerned Citizens Group whose address for service is 159 Willie Farrington Drive, West Bay, P. O. Box 287, Grand Cayman KY1-1301 and/or 111 Up the Hill Road, West Bay, P. O. Box 524, Grand Cayman KY1-1107

Accepted

11:35 am on 30/10/19

Michael Wignar

