



**ND COURT OF THE CAYMAN ISLANDS
ND ADMINISTRATION**

**CAUSE NO. G OF 2026
P 43 of 2023**

IN THE MATTER OF THE ESTATE OF OLGA VIENNA ADAM, DECEASED

**BETWEEN: Timothy Paterson Adam
Michael Thomas Adam**

Plaintiffs

AND: William Herbert Adam

Defendant

WRIT OF SUMMONS

To: WILLIAM HERBERT ADAM

50 Canal Lane, Apt 1
P.O. Box 2673 Grand Cayman
Cayman Islands, KY1-1111

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 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 495G, 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 Acknowledgment without stating therein an intention to contest the proceedings, the Plaintiff may proceed with the action and judgment may be entered against you forthwith without further notice.

Issued this day of August, 2026.

NOTE – This Writ 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 the date of issue unless renewed by order of the Court.

IMPORTANT

Directions for Acknowledgement of Service are given with the accompanying form.

**IN THE GRAND COURT OF THE CAYMAN ISLANDS
PROBATE AND ADMINISTRATION**

**CAUSE NO. G OF 2026
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**BETWEEN: Timothy Paterson Adam
 Michael Thomas Adam**

Plaintiffs

AND: William Herbert Adam

Defendant

STATEMENT OF CLAIM

1. The Plaintiffs are the lawful sons of the late Olga Vienna Adam ("the Deceased") and are beneficiaries under her Last Will and Testament.
2. The Defendant is the lawful son of the Deceased, a beneficiary and is the duly appointed Executor of her estate.
3. The Deceased died on 11 December 2011. The Defendant did not apply for a Grant of Probate until more than eleven years after her death, and the Grant of Probate was issued to him on 27 June 2023.
4. Despite the inordinate delay in obtaining the Grant of Probate, the Defendant has continued to delay the administration of the estate and has failed and/or refused to properly administer the estate, including by failing to provide a full and proper account of the estate's assets, liabilities, income, expenditures, and administration.
5. The estate comprises, among other assets:
 - (a) real property situated in George Town, Grand Cayman, being land and a multi-tenant residential rental property registered as George Town South, Block 14E, Parcel 98; and
 - (b) funds held in at least one bank account.
6. The Defendant has asserted, or has sought to assert, a personal interest in part of the estate contrary to the terms of the Last Will and Testament of the Deceased.
7. The Defendant has failed and/or refused to distribute the assets of the estate in accordance with the terms of the Last Will and Testament.

8. The Plaintiffs believe that the Defendant's continued delay in administering the estate has operated to his personal benefit, in that he has retained control of estate property while he and members of his immediate family have continued to occupy and/or use portions of the estate property for their own benefit.
9. There has been an inordinate and inexcusable delay in the administration of the estate and the distribution of its assets.
10. The Defendant's conduct has been inconsistent with the duties and fiduciary obligations of an Executor and Trustee and has constituted a failure to administer the estate with due diligence and impartiality.
11. The Defendant is in a position of conflict by reason of his role as Executor, while simultaneously asserting, or seeking to retain an interest in estate assets to benefit his ownership and use of the adjacent property, Block 14E, Parcel 97 contrary to the terms of the Last Will and Testament of the Deceased.

And the Plaintiffs Claim:

- a. Revocation of the Grant of Probate of the Last Will and Testament of Olga Vienna Adam to the Defendant and grant same to the Plaintiffs or one of them;
- b. An Order that the Defendant produce a proper accounting of the assets, liabilities, income and expenses of the estate from the death of Olga Vienna Adam to present and/or until revocation;
- c. Interim distribution of estate assets;
- d. An Injunction to restrain the Defendant from dispensing with, doing any thing that might decrease the income of, diminish or devalue the estate property;
- e. An injunction to restrain the Defendant from selling the estate property without the written permission of the Plaintiffs or Order of the Court;
- f. Costs against the Plaintiff personally on an indemnity basis;
- g. Such further and other relief as this Honourable Court deems fit and proper.

Dated this 21st day of August, 2026

McKinney Reid & Company

McKinney Reid & Company
Attorneys-at-Law for the Plaintiffs

To: The Clerk of Court

This Writ of Summons and Statement of Claim are issued by McKinney Reid & Company, Attorneys-at-Law, whose address for service is 10 Candover Street, Suit 2, P.O. Box 559, George Town, Grand Cayman, Cayman Island KY1-1107, email: kevaereid@gmail.com, Tel. 345 9172768.

IMPORTANT

Directions for Acknowledgment of Service are given with the accompanying form.

Acknowledgement of service of writ of summons (0.12, r.3)**DIRECTIONS FOR ACKNOWLEDGMENT OF SERVICE
OF WRIT OF SUMMONS**

1. 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 495G, George Town, Grand Cayman.

2. A Defendant who states in his Acknowledgment of Service that he intends to contest the proceedings must also serve a defence on the Attorney for the Plaintiff (or on the Plaintiff if acting in person).

If a Statement of Claim is indorsed on the Writ (i.e. the words "Statement of Claim" appear on the top of page 2), the Defence must be served within 14 days after the time for acknowledging service of the Writ, unless in the meantime a summons for judgment is served on the Defendant.

If the Statement of Claim is not indorsed on the Writ, the Defence need not be served until 14 days after a Statement of Claim has been served on the Defendant.

If the Defendant fails to serve his defence within the appropriate time, the Plaintiff may enter judgment against him without further notice.

3. A Stay of Execution against the Defendant's goods may be applied for where the Defendant is unable to pay the money for which any judgment is entered. If a Defendant to an action for a debt or liquidated demand (i.e. a fixed sum) who does not intend to contest the proceedings states, in answer to Question 3 in the Acknowledgment of Service, that he intends to apply for a stay, execution will be stayed for 14 days after his Acknowledgment, but he must, within that time, issue a Summons for a stay of execution, supported by an affidavit of his means. The affidavit should state any offer which the Defendant desires to make for payment of the money by instalments or otherwise.

See over for notes for guidance

Please complete overleaf

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. 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.
3. 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 Writ of Summons)".
4. 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.
5. 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.
6. 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.
7. Where the Defendant is a MINOR or a MENTAL PATIENT, the form must be completed by an Attorney acting for a guardian ad litem.
8. A Defendant acting in person may obtain help in completing the form at the Courts Office.

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Plaintiffs

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Defendant

**ACKNOWLEDGMENT OF SERVICE
OF WRIT OF 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.

Delay may result in judgment 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 Writ is being acknowledged.

-
2. State whether the Defendant intends to contest the proceedings (tick appropriate box)
- ☐ yes ☐ no

-
3. If the claim against the Defendant is for a debt or liquidated demand, AND he does not intend to contest the proceedings, state if the Defendant intends to apply for a stay of execution against any judgment entered by the Plaintiff (tick box)
- ☐ yes ☐ no
-

Service of the Writ is acknowledged accordingly

(Signed).....

Defendant

Notes on address for service

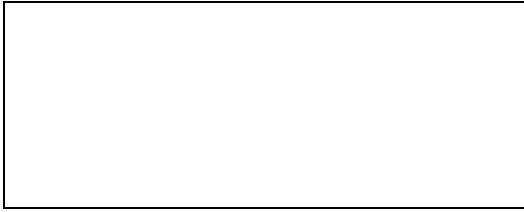
Attorney: where the Defendant is represented by an attorney, state the attorney's place of business in the Cayman Islands. A Defendant may not act by a foreign attorney.

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 or principal office.

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

McKinney Reid & Company
Suite 2
10 Candover Street
P.O. Box 559
Grand Cayman, KY1-1107
Cayman Islands
Email: kevaereid@gmail.com
Tel. 3459172768

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

A large empty rectangular box with a black border, intended for the indorsement by the defendant's Attorney or the defendant if acting in person. The box is currently blank.

