



COURT OF THE CAYMAN ISLANDS  
N

CAUSE No: GC OF 2026

JOY HOPE WRIGHT

PLAINTIFF

AND:

**SAMUEL ESMOND WRIGHT** as Administrator  
of the Estate of **JUSTIN CURTIS WRIGHT (Deceased)** DEFENDANT

**TO:** MCGRATH & TONNER  
ATTORNEYS-AT-LAW FOR THE DEFENDANT  
5TH FLOOR, GENESIS BUILDING  
GENESIS CLOSE | PO BOX 446  
GRAND CAYMAN, KY1-1106, CAYMAN ISLANDS

**THIS WRIT OF SUMMONS** has been issued against you by the above-named Plaintiff 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 Acknowledgment of Service stating therein whether you intend to contest these proceedings.

If you fail to satisfy the claim or to return the Acknowledgment 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 17 day of July 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 Acknowledgment of Service are given with the accompanying form.

**GENERAL ENDORSEMENT OF CLAIM**

The Plaintiff claims that:

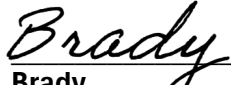
1. The late Justin Curtis Wright ("**the Deceased**") was the registered proprietor of Registration Section George Town Central, Block 14C, Parcel 28 ("**the Property**").
2. During or about 1982 the Deceased encouraged, authorised and permitted the Plaintiff, then married his son Edwin Rohelio Wright, to construct a dwelling house and substantial improvements to approximately one-half of the Property.
3. In reliance upon those assurances, permissions and encouragement, the Plaintiff expended substantial monies, labour and effort over many years constructing and improving that portion of the Property.
4. The Plaintiff has occupied that portion continuously for more than forty years as her home, maintained the improvements, and received rental income from portions of the improvements without objection from the Deceased during his lifetime or thereafter.
5. Having built her home and raised her family on that part of the Property in reliance on the Deceased's assurances, the Plaintiff would suffer real hardship if the Estate were now permitted to treat those assurances as though they were never given; in these circumstances it would be unconscionable for the Estate to resile from them and deny her equitable interest.
6. By reason of the foregoing:
  - (a) the Estate is estopped from denying the Plaintiff's equitable interest;
  - (b) alternatively, the Property is held upon constructive trust for the Plaintiff to such extent as the Court determines; and
  - (c) further alternatively the Plaintiff is entitled to equitable compensation for the value of her improvements and the enhancement in value thereby conferred upon the Property.
7. Letters of Administration with the Will annexed were granted to the Defendant in April 2024.

8. The Defendant has applied to remove the Plaintiff's registered Caution and has taken steps towards the proposed sale, transfer and distribution of the Property.
9. If the Defendant is permitted to sell, transfer or distribute the Property before the Plaintiff's equitable claim is determined, the home in which she has lived for over forty years may pass to a third party, or the proceeds of sale may be distributed among the beneficiaries and dissipated, before her interest can be established. No award of damages could restore to her the specific property she has occupied and improved over four decades, whereas the Estate loses very little by the Property remaining unsold until trial.
10. Accordingly, the Plaintiff seeks the intervention of this Honourable Court by way of an interlocutory injunction restraining any dealing with the Property pending the final determination of her claim or until further Order of the Court.
11. Upon the determination of this action, the Plaintiff further seeks:
  - (a) A declaration that the Plaintiff has acquired an equitable proprietary interest in Registration Section George Town Central, Block 14C, Parcel 28 by reason of proprietary estoppel and/or constructive trust;
  - (b) Alternatively, equitable compensation for improvements made to the Property with the encouragement, permission and acquiescence of the late Justin Curtis Wright;
  - (c) An interlocutory injunction restraining the Defendant, whether by himself, his servants, agents or any person acting on his behalf, from advertising, marketing, agreeing to sell, entering into any contract for sale, selling, transferring, conveying, mortgaging, charging, leasing, distributing or otherwise dealing with Registration Section George Town Central, Block 14C, Parcel 28 until the final determination of the Plaintiff's claim to an equitable interest in the Property or until further Order of this Honourable Court;
  - (d) A declaration that no distribution of the Property or the proceeds of sale thereof shall take place pending the determination of this action;
  - (e) Interest;

(f) Costs;

(g) Such further or other equitable relief as the Court considers just.

Dated this 17 day of July 2026.

A handwritten signature in cursive script that reads "Brady". The signature is written in black ink and is positioned above a horizontal line.

**Brady**  
Attorneys-at-Law for the Plaintiff

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 Plaintiffs (or on the Plaintiffs 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 Plaintiffs 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 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 guardian ad litem.
8. A Defendant acting in person may obtain help in completing the form at the Courts Office.

**IN THE GRAND COURT OF THE CAYMAN ISLANDS  
CIVIL DIVISION**

**CAUSE No: GC      OF 2026**

BETWEEN: **JOY HOPE WRIGHT** PLAINTIFF

AND: **SAMUEL ESMOND WRIGHT** as Administrator  
of the Estate of **JUSTIN CURTIS WRIGHT (Deceased)** DEFENDANT

**ACKNOWLEDGMENT OF SERVICE**  
**OF WRIT OF SUMMONS**

**TO:** MCGRATH & TONNER  
ATTORNEYS-AT-LAW FOR THE DEFENDANT  
5TH FLOOR, GENESIS BUILDING  
GENESIS CLOSE | PO BOX 446  
GRAND CAYMAN, KY1-1106, CAYMAN ISLANDS

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** she 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).....Attorney for the Defendant

**Please complete overleaf**

**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 Plaintiffs' Attorney (or by plaintiffs if suing in person) of his name, address, and reference, if any, in the box below.

Brady  
Attorneys-at-Law  
2<sup>nd</sup> Floor, Anderson Square  
George Town  
P.O. Box 1671  
Grand Cayman KY1-1109

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