

**AND**

**WARRANT OF PROPERTY HELD IN TRUST FOR TRISTON OMAL DELL
IN THE MATTER OF THE TRUSTS ACT (2021 REVISION)**

TRISTON OMAL DELL**Plaintiff****NICHOLAS OMAL DELL****Defendant**

WRIT OF SUMMONS

TO: NICHOLAS OMAL DELL

P O Box 32166 SMB
Grand Cayman
Cayman Islands
KY1-1208

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 2nd day of June 2026.

THIS WRIT is filed by Richards & Richards, Attorneys-at-Law for the Applicant whose address for service is Artemis House, 67 Fort Street, George Town, Grand Cayman, Cayman Islands.

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.

STATEMENT OF CLAIM

1. The Plaintiff is the son of the Defendant.
2. On or about the 10th May 2010, the Defendant registered the purchase of a property ("the Property") located at Midland East Block 54D, Parcel 5 to be held on trust by him for the benefit of the Plaintiff. At the time of registration, the Plaintiff was a minor child.
3. Throughout the Plaintiff's minority the Defendant has failed to disclose any information concerning the Trust despite requests from the Plaintiff's primary carer, his mother.
4. In or around 2018, the Defendant indicated to the Plaintiff's mother that he intended to purchase a warehouse at Block 20B, Parcel 243 H3 ("the Warehouse Property"). He entered into a sales agreement for monthly payment to be completed by October 2019. In June 2020 Nicholas Dell Purchased this property with payment in full.
5. In or around late 2018, the Defendant indicated that he would need to sell the Property to get himself out of the financial difficulty and that he would add the Plaintiff's name to the warehouse property purchased, holding on trust the same amount that was realized by the sale of the Property.

THIS WRIT is filed by Richards & Richards, Attorneys-at-Law for the Applicant whose address for service is Artemis House, 67 Fort Street, George Town, Grand Cayman, Cayman Islands.

6. In or around 2026 when the Defendant and the Plaintiff's mother became involved in divorce proceedings the warehouse property registration was disclosed. The land register indicated that the trust had not been registered and the Plaintiff was not listed as either a legal title holder or beneficial owner. The warehouse property as bene listed as an asset of the defendant.
7. The Defendant has dissolved the trust, used the money invested for the Plaintiff for him to further his own interest while fraudulently indicating that he would register the Plaintiff as an owner of the Warehouse Property or register the Warehouse Property as held on trust for the Plaintiff.
8. On or about the 10th April 2026, the Plaintiff instructed Richards & Richards Attorneys at Law to write to the Defendant asking him to account for the property / monies held on trust for me.
9. On or about the 16th April 2026 the Defendant responded indicating that he would not provide any details and that the Plaintiff would need to take the matter to Court.
10. The Defendant has never provided any information concerning the trust including but not limited to:
 - a. Trust accounts
 - b. Records of any sale or investment
 - c. The location of the funds held on trust for me
 - d. Vesting information of the trust for me.
11. The Plaintiff now seeks
 - (i) A full accounting of the trust property;
 - (ii) The vesting of the trust to the full amount of the value

THIS WRIT is filed by Richards & Richards, Attorneys-at-Law for the Applicant whose address for service is Artemis House, 67 Fort Street, George Town, Grand Cayman, Cayman Islands.

AND THE PLAINTIFF CLAIMS

12. In the premises, the Plaintiff is entitled to and claims:

- (1) the principal sum of the value of the Trust Property together with;
- (2) Interest under the Judicature Law
- (3) Court fees and Bailiff Fees \$250.
- (4) Costs.

If, within the time for returning the Acknowledgment of Service, the Defendant pays the total amount of the trust property (including fees and interest, in accordance paragraphs 8 and hereof, and costs of KY\$4,500, further proceedings will be stayed. The money must be paid to the Plaintiff's Attorney at:

Cayman National Bank

Account Name: Richards & Richards Attorneys-at-Law Ltd.

Account Type: KYD - Checking

Account Number: 011-17352

Please put your reference in the Beneficiary Comments

Dated: 2nd June 2026



Richards & Richards
Attorney at Law for the Plaintiff

THIS WRIT is filed by Richards & Richards, Attorneys-at-Law for the Applicant whose address for service is Artemis House, 67 Fort Street, George Town, Grand Cayman, Cayman Islands.

DIRECTIONS FOR ACKNOWLEDGEMENT OF SERVICE OF WRIT OF SUMMONS

1. The accompanying form of Acknowledgement of Service should be completed by an Attorney on behalf of the Defendant or by Defendant if acting in person.

After completion it must be delivered or sent by post to the Law Courts, PO 495G, George Town, Grand Cayman.

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

If a Statement of Claim is not endorsed 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 Acknowledgement, 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 installments or otherwise.

See overleaf for notes for guidance

Please complete overleaf

THIS WRIT is filed by Richards & Richards, Attorneys-at-Law for the Applicant whose address for service is Artemis House, 67 Fort Street, George Town, Grand Cayman, Cayman Islands.

Notes of Guidance

1. Each Defendant (if there are more than one) is required to complete an Acknowledgement 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 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 form 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 authorized to act on behalf of the Company, but the Company can take no further step in the proceedings without an Attorney 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. The Defendant acting in person may obtain help in completing the form at the Court Office.

THIS WRIT is filed by Richards & Richards, Attorneys-at-Law for the Applicant whose address for service is Artemis House, 67 Fort Street, George Town, Grand Cayman, Cayman Islands.

**IN THE MATTER OF PROPERTY HELD IN TRUST FOR TRISON OMAL DELL
AND IN THE MATTER THE TRUSTS ACT (2021 REVISION)
BETWEEN**

TRISTON OMAL DELL
Plaintiff

AND

NICHOLAS OMAL DELL
Defendant

**ACKNOWLEDGEMENT OF SERVICE
OF WRIT OF SUMMONS**

1. **State** the full name of the Defendant's by whom or on whose behalf the service of the Writ is being acknowledged.

2. State whether the Defendant intends to contest the proceedings.

_____ **Yes**

_____ **No**

3. If the claim against the Defendant is for a debt or liquidation 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.

_____ **Yes**

_____ **No**

Service of the Writ is acknowledged accordingly.

(Signed).....

Attorney for _____

**Please complete overleaf
Notes on address for service**

THIS WRIT is filed by Richards & Richards, Attorneys-at-Law for the Applicant whose address for service is Artemis House, 67 Fort Street, George Town, Grand Cayman, Cayman Islands.

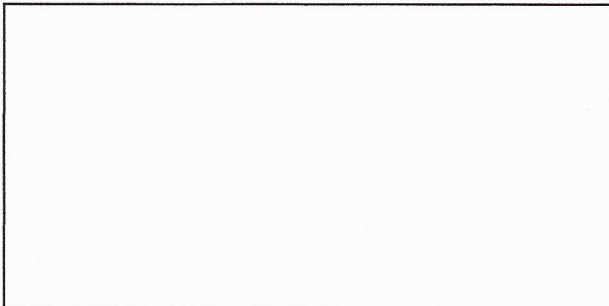
Attorney: where the Defendant is represented by an attorney, state the attorney's place of business in the Cayman Islands. A Defendant may not act by a foreign attorney.

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.

Richards & Richards Attorneys-at-Law
Artemis House, 67 Fort Street
George Town, Grand Cayman
Cayman Islands
345-916-0040

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



THIS WRIT is filed by Richards & Richards, Attorneys-at-Law for the Applicant whose address for service is Artemis House, 67 Fort Street, George Town, Grand Cayman, Cayman Islands.