



THE EASTERN CARIBBEAN SUPREME COURT
IN THE HIGH COURT OF JUSTICE
SAINT CHRISTOPHER AND NEVIS
SAINT CHRISTOPHER CIRCUIT

Submitted Date:22/05/2024 13:46

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Fees Paid:52.00

CLAIM NO. SKBHCV2024/

BETWEEN: **MSR MEDIA SKN LIMITED** -Claimant

AND

HON. DR. TERRANCE DREW
(in his capacity as Minister of National Security of the
Federal Government of Saint Christopher and Nevis) -Defendant

FIXED DATE CLAIM FOR JUDICIAL REVIEW

The Claimant, **MSR MEDIA SKN LIMITED** a limited liability company incorporated under the Nevis Companies Ordinance with its registered office situate at C/O Joseph Rowe, Unit #5 Long Stone House, Main Street, Charlestown, Nevis, applies to the Court for an Administrative Order under Part 56 of the Civil Procedure Rules 2023, in particular, an order for judicial review.

The Relief Sought:

- 1) an order of mandamus directed to the Defendant requiring him to call in and cancel all certificates of citizenship granted to main applicants and their dependents who obtained citizenship of St. Kitts and Nevis by purchasing Alternative Investment Options granted to Caribbean Galaxy Real Estate Limited in connection with the construction of a prison at Estridge Estate, St. Kitts
- 2) Such further or other relief as the Court considers just.

NOTICE TO THE DEFENDANT –

The first hearing of this Claim will take place at the High Court of Justice, East Independence Square, Basseterre, St. Kitts on _____ the _____ day of _____, 2024.

If you do not attend at that hearing, judgment may be entered against you in accordance with the claim.

If you attend the Judge may:-

- (a) deal with the claim, or
- (b) give directions for the preparation of the case for a further hearing.

A statement of claim or an affidavit giving full details of the claimant's claim should be served on you with this claim form. If not and there is no order permitting the claimant not to serve the statement of claim or affidavit you should contact the court office immediately.

You should complete the form of acknowledgement of service served on you with this claim form and deliver or send it to the court office (address below) so that they receive it within 28 days of service of this claim form on you. The form of acknowledgement of service may be completed by you or a legal practitioner acting for you.

You should consider obtaining legal advice with regard to this claim. See the notes on the back of this form or on the next page.

This claim form has no validity if it is not served within 6 months of the date below unless it is accompanied by an order extending that time.

Dated this 22nd day of May, 2024.

The Court Office is at East Independence Square, Basseterre, St. Kitts. Telephone number 465- 2195, Fax No. 465-2482. The office is open between 9:00 a.m and 3:30 p.m Mondays to Fridays and between 9:00 a.m and 12:00 noon on Saturdays except Public Holidays.

The Claimant's Attorneys-at-Law are Kelsick, Wilkin & Ferdinand of Chambers, South Independence Square Basseterre, St. Kitts. The name of the Solicitor dealing with this matter is Damian Kelsick, KC.

The Claimant's address for service is at the Chambers of its Attorneys-at-Law, South Independence Square, Basseterre, St. Kitts.

Tel: 465-2440 Fax: 465-7808

NOTES FOR DEFENDANT (FIXED DATE CLAIM FORM)

The claimant is seeking an order from the court as set out in the claim form on the basis of facts or evidence set out in the statement of claim or affidavit served with it. The claimant will not be entitled to enter judgment against you without a hearing.

You may:-

A. Admit the claim

If so, you should complete and return the form of acknowledgement of service to the court office within 28 days stating this. You may attend the first hearing if you wish to do so.

B. Dispute the claim

If so, you should complete and return the form of acknowledgement of service as under A. You should also file at the court office and serve on the claimant's legal practitioner (or the claimant if the claimant has no legal practitioner):

(a) a defence if the claim form was accompanied by the claimant's statement of claim, OR

(b) an affidavit in answer if the claim form was accompanied by an affidavit sworn by or on behalf of the claimant.

within 28 days of the day on which the claim form was served on you. Your defence or affidavit must set out briefly ALL the facts on which you will rely to dispute the claim made against you.

You should attend the first hearing. If you do not the judge may deal with the claim in your absence.

C. Make a claim against the claimant

If so, you should complete and return the form of acknowledgement of service as under A. You must file a statement of claim (a counterclaim) setting out full details of what you claim against the claimant and the facts on which you will rely. This must be done within 28/42 days of the date on which the claim form was

served on you. The statement of claim should set out ALL the facts on which you rely in disputing any part of the claimant's claim against you.

You should also attend the first hearing. If you do not, the judge may deal with the claim in your absence.

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FIXED DATE CLAIM

DAMIAN E. S. KELSICK, KC

PARTNER

KELSICK, WILKIN & FERDINAND

ATTORNEYS-AT-LAW FOR THE CLAIMANT