

FILE COPY

Our ref: JD/lcr/DLightbourne
Email: Jdurham@amicuslaw.bm

Thursday, September 05, 2013

Stephanie Hanson
Conyers, Dill & Pearman
Clarendon House
#2 Church Street
Hamilton, HM 12

Dear Ms. Hanson:

Re: Dilton Lightbourne -v- The Trustees of The James Richardson Trust

We are in receipt of your letter dated 27th August, 2013, and we note the contents therein.

In particular, we note your position as it relates to the Canadian Authority of *Carter et al. v. Pasadena Town*, at paragraph 11, regarding the enforcement of declarations. For the sake of clarity our position is that in general, there is no requirement for the enforcement of declarations. In particular, there would be no requirement for enforcement of a judgment as in the present matter, which subjects the property in question to the ordinary procedural operation of Probate law. In any event, as you have accepted the position that Catherine Amanda Williams took possession of the property in question, the above appears to be a mute point. As you state that the property was "carved out of the trust", we request that you provide us with copies of the deeds showing the said subdivision.

In the event that said subdivision has not taken place, we would propose as a matter of settlement that your clients undertake to do the same in light of the position that the property does not form part of the trust. Subsequent to this being carried out, our client would then be free to seek probate of Catherine Amanda William's Estate and thereby put and end to matters with your client.

We look forward to receiving your views on the above proposal shortly.

Yours faithfully,
Amicus Law Chambers Ltd.



Jaymo Durham