

IN THE MATTER OF AN APPLICATION BY
CITIZENS OF THE CAYMAN ISLANDS
AND IN THE MATTER TO
PRESERVE ALL BEACH ACCESS (RIGHT-OF-WAYS)
IN THE CAYMAN ISLANDS
UNDER THE PRESCRIPTION LAW
AND IN THE MATTER OF
THE REGISTERED LAND LAW

AFFIDAVIT IN SUPPORT

1, Paul A. Hurlston being duly sworn make oath and say as follows:

- 1 I reside at South Sound in the island of Grand Cayman and I am an ethnic Caymanian.
2. That was born on 11. 1. 1931 in the Cayman Islands. I am 70 years of age.
3. I am familiar with the beach accesses in Grand Cayman, especially in the District of George Town, and, in particular the South Sound area.
4. In the South Sound area I have used the beach accesses from the time I can remember.
5. These accesses fall within the vegetative area which stretches from the junction of the Old Prospect Road running along the south side of South Sound road (sea side) on the vegetative stretch of shore line.
6. On the vegetative stretch there are quite a number of accesses which could be estimated in the range of some 19 free accesses. Along the vegetative stretch there is evidence to show that cars have parked along the entire stretch to enjoy the scenery.

7. All Caymanians and residents, especially South Sounders, have used this vegetative area uninterrupted, unhindered, by peaceful enjoying for a period of much longer than twenty years.
8. I have enjoyed using these accesses for picnicking, boating, fishing, camping and other recreational purposes for many years. These accesses have been used continuously during my lifetime. The use of these accesses have continued to be unchanged for over twenty years.
9. That these rights have been enjoyed by myself and other Caymanians undisturbed ever since their existence. Caymanians have continued to use these accesses without hindrance.
10. In addition to protecting the above South Sound area. Also I wish to see that all existing beach accesses to the sea and waterways in the District of George Town and South Sound are preserved forthwith.

I humbly ask that immediate action be taken to preserve and claim all of the above mentioned accesses in the South Sound area and in the District of George Town.

What is stated above is true and correct

Sworn to before me

At ~~West Bay~~/George Town, Grand Cayman

This ^{June} 4 day of ~~May~~, 2001

OVER

Justice of the Peace

OVER

Further to the above, I would like to state other accesses in this area which have been used:

1) The Lighthouse Road, which was located on the west side of the property located on the west side of the George Hicks United Church. I remember using that road to go to the Lighthouse from the time I was 6 years old, in 1937. The Lighthouse was built by Government and the road to it maintained by Government.

I have used
② The road to beach that runs by the South Sound Cemetery since I was a child. I remember that Mr. Val Hurleston had a boat shed on the beach where he kept his boat.

③ The park with boulders blocking access to the beach in South Sound was on a stretch that was used by all South Sounders as a picnic area and for access to the sea from the time I can remember. Please take the boulders away so we can get to the sea!

Sworn before me
this 4 June 2001
mmmm

L. LEMUEL HURLSTON
JUSTICE OF THE PEACE
CAYMAN ISLANDS

Paul Hurleston
Law A Hurleston