

November 19, 2024

Subject: Claims against the Apes Hill Club Homeowners Association Inc (“HOA”), Apes Hill (Barbados) Inc f/k/a Plantation Sanctuary Inc (“PSI”), Garden Wall Villa Association, Inc and the Directors of the HOA appointed by PSI (collectively “Defendants”)

Dear Fellow Members of the HOA:

As you know, the next hearing is now scheduled to be held in the High Court on 26 November 2024 before Justice Bryan Weekes. There are two applications before the Court, namely: (i) to determine preliminary issues (more particularly described in the attached submissions); and (ii) for specific disclosure. I have attached the final submissions from both the Claimants and the Defendants for your information.

Yours faithfully,

Paul Lamb
President
Apes Hill Benevolent Society, Inc

Attachments:

1. [2024.11.07-BundleofAuthoritiesreSpecificDisclosure](#)
2. [2024.11.07-ClaimantsWrittenSubmissionsinsupportofNoticeofApplicationforSpecificDisclosure](#)
3. [2024.11.07-ClaimantsWrittenSubmissionsonPreliminaryIssues](#)
4. [2024.11.07-IndexofAuthoritiesaccompanyingWrittenSubmissionsoftheClaimantsforDeterminationofaPreliminaryIssue](#)
5. [2024.11.08_FifthDefendantPrelimIssuesSubmissions-AHB2024.11.07](#)
6. [2024.11.08_FifthDefendantSpecificDisclosureSubmissions-AHB2024.11.07](#)
7. [2024.11.11_FirstSecondThirdandFourthDefendantsSubmissionsPreliminaryIssues](#)
8. [2024.11.11_FirstSecondThirdandFourthDefendantsSubmissionsSpecificDisclosure](#)