

Caribbean Brief

OCTOBER 2025

Collas Crill Caribbean Brief – key offshore updates in one place

Welcome to the Collas Crill Caribbean Brief – a concise round-up of significant recent decisions and legal developments affecting offshore and cross-border litigation.

This edition covers:

Judicial Committee of the Privy Council

[*Attorney General of Trinidad and Tobago v CL Financial Ltd \(In Liquidation\)* \[2025\] UKPC 41](#)

Level of detail required in support of approval of liquidators' remuneration on a time basis

[*Kenneth M Kryz \(as Liquidator of Fairfield Sentry Ltd \(In Liquidation\)\) v Farnum Place LLC* \[2025\] UKPC 43](#)

Material changes in circumstances as ground for retrospective sanction for successful US appeal

[*Fang Ankong & anr v Green Elite Ltd \(In Liquidation\)* \[2025\] UKPC 47](#)

Breach of fiduciary duty, payments for improper purpose, Duomatic principle

[*Maso Capital Investments Ltd and another v Trina Solar Ltd* \[2025\] UKPC 48](#)

Merger appraisals, share valuation methodology, approach to determination of appeals

Court of Appeal (Cayman Islands)

[*Suning International Group Co Limited and Suning.com Co Ltd v Carrefour Nederland BV* \[2025\] CICA \(Civ\) 11](#)

Enforcement of arbitration awards, New York Convention, GCR O.73 (Part II), relevance of service provisions under Hague Convention

Grand Court (Cayman Islands)

[*In the matter of TROOPS INC* \[2025\] CIGC \(FSD\) 76](#)

Ex parte application to appoint joint provisional liquidators, the necessity hurdle

This note is a summary of the subject and is provided for information only. It does not purport to give specific legal advice, and before acting, further advice should always be sought. Whilst every care has been taken in producing this note neither the author nor Collas Crill shall be liable for any errors, misprint or misinterpretation of any of the matters set out in it. All copyright in this material belongs to Collas Crill.

[Re: New Horizon Health Limited \[2025\] CIGC \(FSD\) 84](#)

Winding up, whether to appoint provisional liquidators or a restructuring officer, relevance of powers to be exercised by office holder to the appropriate appointment, sanction of engagement of attorneys

[Kryo Group Ltd v Securus Co Ltd and Another \[2025\] CIGC \(FSD\) 93](#)

GCR Order 63, rule 3, open justice, application to seal court file to protect allegedly confidential information in pleading, whether pleaded information is confidential

[Linksure Global Holding Limited v Infinite Solution Limited and Ors \[2025\] CIGC \(FSD\) 95](#)

Leave to serve out of the jurisdiction, reliance on GCR O.11, r.1(1)(ff) where defendant was director or officer of another defendant, extension of validity of writ to enable service by Hague Convention methods

[RCF VII Sponsor LLC and Another v Blue Gold Ltd \[2025\] CIGC \(FSD\) 94](#)

Injunction to restrain extraordinary general meeting, whether to excuse party from requirement to provide a cross-undertaking as to damages

To download the full update click [here](#).

Our multi-jurisdictional team brings a wealth of experience to resolve complex, sensitive disputes across the full range of cross-border and offshore matters in the commercial, fraud, insolvency and restructuring, and merger appraisal spheres.

For more information on these services see [here](#) and [here](#).

For more information please contact:



Nicholas Batten

Senior Associate | Cayman

t: +1 345 914 9619 | **e:** nicholas.batten@collascrill.com



Joshua Hamlet

Senior Associate | BVI

t: +1 284 852 6348 | **e:** joshua.hamlet@collascrill.com



Tom Goodwin

Associate | Cayman

t: +1 345 914 9642 | **e:** tom.goodwin@collascrill.com



Rocco Cecere

Partner | Cayman

t: +1 345 914 9630 | **e:** rocco.cecere@collascrill.com



Matthew Dors

Partner | Cayman

t: +1 345 914 9631 | **e:** matthew.dors@collascrill.com



Zachary Hoskin

Partner | Cayman

t: +1 345 914 9663 | **e:** zachary.hoskin@collascrill.com

Michael Adkins

Partner (Advocate) | Guernsey

t: +44 (0) 1481 734 231 | **e:** michael.adkins@collascrill.com



David O'Hanlon

Partner (Advocate) | Guernsey

t: +44 (0) 1481 734259 | **e:** david.ohanlon@collascrill.com