Digitally signed by Advance Performance Exponents Inc
Date: 2023.10.05 15:18:10 -05:00
Reason: Apex Certified
Location: Apex

No. 1

Plaint

IN THE SUMMARY COURT AT GEORGE TOWN

Cause No. SC ___ of 20__

BETWEEN: LANA LAURI WATLER-ROWELL Plaintiff

AND: LINDA ANNETTE GOODMAN Defendant

To the Defendant

LINDA ANNETTE GOODMAN C/O Mr. Nick Dunne at Walkers Global Law Firm

THIS PLAINT has been issued against you by the above-named Plaintiff in respect of the claim set out on the next page.

Within 14 days after service of this Plaint on you, counting the day of service, you must either satisfy the claim or return to the Court Office, PO Box 495GT, George Town, Grand Cayman, the accompanying Acknowledgment of Service form stating therein whether you intend to contest this action. If you intend to defend the action, in *whole or in part, you must set out* ***full particulars of your defence*** *in the space* provided in the Acknowledgement of Service form.

If you fail to satisfy the claim or fail to return the Acknowledgement of Service form containing full particulars of your defence, the Plaintiff may apply for a **default judgment** without any further notice to you.

Issued this 5th day of October, 2023.

See overleaf for particulars of the Plaintiff's claim.

PARTICULARS OF CLAIM

(Here set out in numbered paragraphs the grounds upon which the Plaintiff claims that the Defendant is indebted to him or is liable to pay damages to him)

1) Failure to repay the personal loan for new employee housing, made on the 6th of October, 2017 via bank transfer at Butterfield Bank to defendant's account ending in 10016 in the amount of Four Thousand ($4000.00) Cayman Dollars, less $1582.50 previously repaid, with the total balance owed of $2417.50.

2) Failure to repay the personal loan, made on the 25th of September, 2018 via bank transfer at Butterfield Bank to defendant's account ending in 10016 in the amount of Seven Thousand ($7000.00) Cayman Dollars.

AND the Plaintiff claims :

1. The sum of $9417.50.

2. Interest in the sum of $ $0. LWR calculated at the prescribed rate from to date.

3. Fixed costs of $ $ 205.— LWR, alternatively costs to be assessed.

Lana Lauri Watler-Rall
Plaintiff's Signature

Plaintiff's address for service

388 Prospect Point Road, #12
PO Box 1499
George Town, KY1-1110 Cayman Islands

drlanawatler@gmail.com
tel: 345-925-7387

Allen Hoke <allen@caymananimalhospital.ky>

[redacted]
4 messages

Allen Hoke <allen@caymananimalhospital.ky> Tue, Mar 14, 2023 at 10:19 PM
To: twindragonvet@gmail.com
Bcc: Allen Hoke <allen@caymananimalhospital.ky>

Linda,

Attached is the OOH report and your paystub for your final OOH for Q1 2023. The amount has been applied towards the balance of your personal loans advanced.

Please see the attached emails for reference to the loans.

Allen

---------- Forwarded message ---------
From: **Dr. Linda Goodman** <drlinda@caymananimalhospital.ky>
Date: Wed, Feb 15, 2023 at 1:58 PM
Subject: Re: LG Loan Repayment Plan
To: Lana Watler <drlanawatler@gmail.com>

Hi Lana,
I had planned to pay the balance on March 1st as agreed today by phone.
Thanks,
Linda

---------- Forwarded message --------- Text
From: **Lana Watler** <drlanawatler@gmail.com>
Date: Wed, Feb 15, 2023 at 10:25 AM
Subject: LG Loan Repayment Plan
To: Linda Goodman <twindragonvet@gmail.com>, Linda Goodman <uchzor@hotmail.com>, Linda Goodman <drlinda@caymananimalhospital.ky>
Cc: CAH Accounts <accounts@caymananimalhospital.ky>

Hi Linda,

Per our previous conversations, I need to establish a repayment plan with you for your loan balance. We can do two options: 1) two lump sum(s) this month and next; or 2) a monthly amount of minimum $2000 as a payroll deduction.

Please let me know today to start the process.

Thanks,
Lana

Begin forwarded message:

From: Lana Watler <drlanawatler@gmail.com>
[redacted]
Date: 16 January 2023 at 12:40:53 PM GMT-5

To: DrLana Watler Gmail <drlanawatler@gmail.com>

Hi Dr Linda,

[redacted]

There was no decrease in your salary but a $1000 deduction for a small payment towards the 2017/2018 loans of $11,500. CAH would prefer a lump sum payment to be able to clear outstanding prior to year end. However until we discussed, the 1000 was a nominal amount to get started. As much as I wish CAH could forgive loans this is not possible and it needs to be cleared off the books. I have mentioned the repayment need to you numerous times from September. This was main thing I hoped to discuss with you yesterday in person. I processed late yesterday and will ask Allen to send out the pay stub tonight.

It is uncomfortable, awkward for me to request repayment on loans and overdue accounts multiple times from employees. I personally have only ever borrowed from a bank or my mother and had regular payments scheduled beforehand. Your situation was unique [redacted] and I was happy to be able to help you at that time. Over the years, I have extended other personal loans to many but have been advised that this is poor business practice. Apart from complicating the accounting and payroll it has the potential to cause discord so moving forward I realise that "neither a borrower nor a a lender be" is the best policy. I hope that the team will understand.

I am in appointments and cannot come in until later today, if at all. [redacted] we can meet on Wednesday.

Begin forwarded message:

From: DrLana Watler Gmail <drlanawatler@gmail.com>
Subject: Re: Loan
Date: 26 September 2018 at 12:18:07 AM GMT-5
To: Linda Goodman <drlinda@caymananimalhospital.ky>

No worries at all Linda, I am glad that I could help you out. [redacted] had to put a deposit for a business cc after 10 years. You are such a dedicated employee and wonderful person, I hope that things sail smooth for you.

> *On 25 Sep 2018, at 10:20 PM, drlinda* <drlinda@caymananimalhospital.ky> wrote:
>
> Dear Dr Lana
> I have been unable to find the words to thank you for your generosity. As you know, the past few years have been challenging- and this situation seemed to be the "straw and the camels back".
> You are a remarkable and kind person - with everything happening in your life at the moment, you somehow sensed my predicament and I am very grateful. There is a Ted Talk video I saw a long time ago. I will try to find the link and forward to you.
> Big hugs
> Linda
>
> Sent from my Samsung Galaxy smartphone.

Begin forwarded message:

From: Linda Goodman <uchzor@hotmail.com>
Subject: Re: LG Housing Loan 2017-10-05 : To be reimbursed by Year End 2017-12-31
Date: 6 October 2017 at 9:43:40 AM GMT-5
To: DrLana Watler Gmail <drlanawatler@gmail.com>

Dear Dr. Lana,
Thank you so much.
Linda

2 attachments

Image 12-03-2023 at 6.13 PM.jpg
80K

LG Housing Loan.pdf
31K

[redacted]

Cayman Animal Hospital
394 Crewe Road
P.O. Box 1499
Grand Cayman KY1-1110

Linda Goodman (Doctor)

OOH Q1 2023

Employee Pay Stub Check number: bb of Pay Period: 01/01/2023 - 03/31/2023 Pay Date: 03/13/2023

Employee

Linda Goodman (Doctor)

Earnings and Hours	Qty	Rate	Current	YTD Amount
OOH Doctors	1:00	582.50	582.50	[redacted]
Salary Doctors				
Paid Sick Leave				
	1:00		582.50	[redacted]

Taxes	Current	YTD Amount
Federal Withholding	0.00	0.00

Adjustments to Net Pay	Current	YTD Amount
Advances	-582.50	-1,582.50
Pension Emp'ee 5%		[redacted]
Health Ins		
Stipend LG		
	-582.50	[redacted]
Net Pay	**0.00**	[redacted]

Non-taxable Company Items	Current	YTD Amount
Pension Emp'er 5%		[redacted]

Memo

OOH Q1 2023

Company Message

OOH Q1 2023 less payment towards loans Advanced

Cayman Animal Hospital, 394 Crewe Road, P.O. Box 1499, Grand Cayman KY1-1110

Cayman Animal Hospital
394 Crewe Road
P.O. Box 1499
Grand Cayman KY1-1110

Linda Goodman (Doctor)

12/16/22-1/15/23

Employee Pay Stub Check number: bb ol Pay Period: 12/16/2022 - 01/15/2023 Pay Date: 01/15/2023

Employee

Linda Goodman (Doctor)

Earnings and Hours	Qty	Rate	Current	YTD Amount
Salary Doctors			[redacted]	[redacted]

Taxes	Current	YTD Amount
Federal Withholding	0.00	0.00

Adjustments to Net Pay	Current	YTD Amount
Health Ins	[redacted]	[redacted]
Stipend LG	[redacted]	[redacted]
Pension Emp'ee 5%	[redacted]	[redacted]
Advances	-1,000.00	-1,000.00
	[redacted]	[redacted]
Net Pay	[redacted]	[redacted]

Non-taxable Company Items	Current	YTD Amount
Pension Emp'er 5%	[redacted]	[redacted]

Memo

12/16/22-1/15/23

Company Message

Additional $322.92 deducted from direct deposit for employee account receivable balance

Cayman Animal Hospital, 394 Crewe Road, P.O. Box 1499, Grand Cayman KY1-1110

From: **DrLana Watler Gmail** drlanawatler@gmail.com
Subject: LG Housing Loan 2017-10-05 : To be reimbursed by Year End 2017-12-31
Date: 6 October 2017 at 9:40 AM
To: Linda Goodman uchzor@hotmail.com
Cc: CAH Accounts accounts@caymananimalhospital.ky

Internal Transfer - Confirmation

Reference Number:	11989437741800 2
Beneficiary Name:	Linda Goodman
From Account:	136156647001 1
To Account:	361499410016
From Amount:	4,000.00 KYD
To Amount:	4,000.00 KYD
From Account Currency:	KYD
To Account Currency:	KYD
Exchange Rate:	1.0000
Beneficiary Reference:	LG Housing Loan
User Reference:	LG Housing Loan
Charges and Taxes	
Charges:	0.00
FCPT(Applicable for Bermuda users):	0.00
Total From Amount:	4,000.00
Pay Now	06-10-2017

OK

Note

- Due to the fluctuation of the currency markets, we only process non KYD - USD cross-currency transfers or payments up to a maximum of USD 10,000.00 or equivalent after business hours.
- Any exchange rates displayed during the confirmation process are indicative only. The exchange rate relevant to the processing date will be applied during execution.

Allen Hoke <allen@caymananimalhospital.ky>

Fwd: LG Loan

1 message

R. Allen Hoke <rallenhoke@gmail.com> Mon, Mar
Reply-To: rallenhoke@gmail.com
To: Allen Hoke <allen@caymananimalhospital.ky>

DG

Gmail Appleid <drlanawatler@gmail.com>
Loan transferred
To: Linda Goodman <uchzor@hotmail.com>, Bcc: CAH Accounts <accounts@caymananimalhospital.ky>

Here it is, just pay back when you are able no rush.

Internal Transfer - Confirmation

Reference Number:	987717480968305
Beneficiary Name:	Linda Goodman
From Account:	1361566470011
To Account:	1361497410016
From Amount:	7,000.00 KYD
To Amount:	7,000.00 KYD
From Account Currency:	KYD
To Account Currency:	KYD
Exchange Rate:	1.0000
Beneficiary Reference:	LG Loan
User Reference:	LG Loan
Charges and Taxes	
Charges:	0.00
FCPT(Applicable for Bermuda users):	0.00
Total From Amount:	7,000.00
Pay Now	25-09-2018

OK

Note

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