



SUMMARY COURT OF THE CAYMAN ISLANDS

CAUSE No. SC of 2025

BETWEEN:**THE PROPRIETORS OF STRATA PLAN No. 485****PLAINTIFF****AND:****REEF SHORE LTD****DEFENDANT**

PLAINT

TO THE DEFENDANT:

Reef Shore Ltd
 Attn: Rex McCafferty
 Unit 208 South Shore
 700 Shamrock Road
 PO Box 10506 APO
 George Town
 Grand Cayman, KY1-1202

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 day of April 2025.

IMPORTANT

Directions for Acknowledgement of Service are given with the accompanying form.

See overleaf for particulars of the Plaintiff's claim.

This **PLAINT** was issued by KSG Attorneys at Law, Attorneys for the Plaintiff whose address for service is 3rd Floor One Capital Place, Shedden Road, P.O. Box 2255, KY1-1107, George Town, Grand Cayman. (Ref: KD/04265)

PARTICULARS OF CLAIM

1. At all material times, the Plaintiff is a strata corporation established under the Cayman Islands Strata Titles Registration Law (2013 Revision) ("the Law"), being the condominium development known as South Shore ("the Strata"). The Strata is capable of bringing proceedings by virtue of section 5(1) of the Law.
2. The Defendant is and was at all material times, an ordinary resident company registered in the Cayman Islands, under registration number 178962.
3. The Defendant, at all material times, is and was the registered owner of one of the Strata lots at South Shore, being Registration Section Spotts, Block 25B, Parcel 492H20, known as Unit 208, Building 2 ("the Property").
4. The control, management, administration, use and enjoyment of the Strata lots and the common property contained in the registered strata plan of the Plaintiff is regulated by its Strata By-Laws ("the By-Laws").
5. By virtue of section 21(7) of the Law, the By-Laws of a Strata in force at any time shall bind the owners of units at the Plaintiff strata including the Defendants.
6. Pursuant to section 5(2) of the By-Laws, it is the Defendants obligation to pay to the Plaintiff all rates, taxes, charges, outgoings and assessments that may be payable in respect of his Strata lot.
7. Pursuant to section 5(4) of the By-Laws, it is the Defendants obligation as Proprietor to pay to the Corporation within fourteen (14) days of demand or at such times as the Executive Committee determines his pro rata share of all money necessary in the Executive Committee's opinion to establish and maintain the funds referred to in By-law clauses 3(16) and 3(19) including any special contributions levied for those purposes, and also any expenses which the Corporation incurs in collecting any amount which the Proprietor owes the Corporation.
8. The Plaintiff levied charges and assessments by way of monthly invoices sent to the Defendant stating the payment due for that month which are payable in arrears.
9. Despite repeated demands by the Plaintiff, the Defendant has failed, refused or neglected to make payment of all the contributions assessed and levied by the Plaintiff.
10. As at 1 April 2025, the Defendant was and is indebted to the Plaintiff in the sum of CI\$17,196.14, including interest due under By-law 39, calculated at the rate of 12% per annum, with such interest accruing from day to day until payment.
11. By reason of the Defendants breach of the By-Laws and by reason of his failure to pay the contributions levied (as set out above), the Plaintiff has suffered loss and damage.

12. Further, the Plaintiff's entitlement to payment continues to accrue on a monthly basis and, if payment is not made in accordance with the By-Laws, the Plaintiff will add the accrued amounts to the sum claimed herein.
13. Further, the Plaintiff seeks and is entitled to interest from the date of filing this Plaint until the date of judgement and post-judgement interest calculated in accordance with the By-Laws continuing at the daily rate of CI\$5.65 until judgement or sooner payment calculated as follows:

Statement Amount (1 April)	\$17,196.14
Interest Rate	12%
Amt*12%/365	CI\$5.65
Days since Statement	0
Interest since Statement	0

14. Alternatively, the Plaintiff seeks and is entitled to interest pursuant to section 34(1) of the Judicature Act (2021 Revision) from and to such dates, and in such amounts, and at such rates, as this Honourable Court thinks just.
15. Pursuant to By-law 5(4) the Plaintiff is entitled to, and does, claim all costs associated with bringing these proceedings on an indemnity basis.

AND THE PLAINTIFF CLAIMS:

- a) The said sum of CI\$17,196.14 as monies due and owing.
- b) Pre and post judgment interest from the date of issue of Plaint and interest accruing thereafter on the said sum at CI\$5.65 daily until payment.
- c) Costs to be assessed or alternatively fixed costs in the sum of CI\$1,000.00 plus filing fees and bailiff's fee for service



KSG
Attorneys for Plaintiff

If within the time for returning the Acknowledgement of Service the Defendant pays to the Plaintiff's Attorneys the total amount claimed of **CI\$17,196.14** together with all costs and filing fees and all interest claimed all further proceedings will be stayed.

This **PLAINT** was issued by KSG Attorneys at Law, Attorneys for the Plaintiff whose address for service is 3rd Floor One Capital Place, Shedden Road, P.O. Box 2255, KY1-1107, George Town, Grand Cayman. (Ref: KD/04265)

Plaintiff's address for service:

3rd Floor, One Capital Place
Shedden Road
PO Box 2255
George Town, KY1-1107

This **PLAINT** was issued by KSG Attorneys at Law, Attorneys for the Plaintiff whose address for service is 3rd Floor One Capital Place, Shedden Road, P.O. Box 2255, KY1-1107, George Town, Grand Cayman. (Ref: KD/04265)

IN THE SUMMARY COURT OF THE CAYMAN ISLANDS

CAUSE No. SC of 2025

BETWEEN:

THE PROPRIETORS OF STRATA PLAN 485

PLAINTIFF

AND:

REEF SHORE LTD

DEFENDANT

ACKNOWLEDGMENT OF SERVICE

1 State Defendant's name and address -

2 State whether the Defendant intends to contest the action.

Yes

No

3 If you do not intend to contest the action, do you want time in which to pay the claim?

Yes

No

4 If you do intend to contest the action, in whole or in part, you must set out full particulars of your defence overleaf.

Service of the Plaintiff is acknowledged accordingly.

Defendant Signature

Dated this _____ day of _____ 2025

See Overleaf

This **PLAINT** was issued by KSG Attorneys at Law, Attorneys for the Plaintiff whose address for service is 3rd Floor One Capital Place, Shedden Road, P.O. Box 2255, KY1-1107, George Town, Grand Cayman. (Ref: KD/04265)

PARTICULARS OF DEFENCE

Here set out in numbered paragraphs the grounds upon which the Defendant says that he is not liable to the Plaintiff or is not liable for the full amount claimed.

Defendant's Signature

REMINDER - This form must be taken or sent to the Court Office, PO Box 495GT, George Town, Grand Cayman within fourteen (14) days of receipt otherwise a default judgment may be entered against you.