



IN THE GRAND COURT OF THE CAYMAN ISLANDS

FINANCIAL SERVICES DIVISION

CAUSE NO: FSD OF 2025 (J)

BETWEEN: (1) DICKENSON BAY HOTEL MANAGEMENT LIMITED

(2) WEST BAY MANAGEMENT LIMITED

(3) CLEARVIEW MANAGEMENT LIMITED

(4) GRANDE CASS. MANAGEMENT (BARBADOS) LIMITED

(5) GRENLAS MANAGEMENT GRENADA LIMITED

(6) BAY ROC LIMITED

(7) SANDALS ROYAL MANAGEMENT LIMITED

(8) SANDALS OCHO RIOS LIMITED

(9) RIOS HOTEL MANAGEMENT LIMITED

(10) BEACHES BOSCOBEL HOTEL MANAGEMENT COMPANY LIMITED

(11) SANDALS NEGRIL LIMITED

(12) BEACHES MANAGEMENT LIMITED

(13) OCHO RIOS HOTEL MANAGEMENT COMPANY LIMITED

(14) SANDALS WHITEHOUSE MANAGEMENT LIMITED PLAINTIFFS

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(15) SANDY BAY MANAGEMENT LIMITED

(16) CICERON MANAGEMENT LIMITED

(17) JAIRO MANAGEMENT LIMITED

(18) ROYAL BAY RESORT & VILLAS LTD.

(19) SANDALS RESORTS INTERNATIONAL 2000 INC.

AND: LANDON INSURANCE LTD

DEFENDANT

WRIT OF SUMMONS

TO: LANDON INSURANCE LTD.

c/o Regus, The White House, 20 Genesis Close, George Town, PO Box 30600, Grand Cayman, KY1-1203, Cayman Islands

THIS WRIT OF SUMMONS has been issued against you by the above-named Plaintiffs in respect of the claim set out on the next page.

Within 14 days after the service of this Writ on you, counting the day of service, you must either satisfy the claim or return to the Court Office, PO Box 495, George Town, Grand Cayman, the accompanying Acknowledgment of Service stating therein whether you intend to contest these proceedings.

If you fail to satisfy the claim or to return the Acknowledgment within the time stated, or if you return the Acknowledgment without stating therein an intention to contest the proceedings, the Plaintiffs may proceed with the action and judgment may be entered against you forthwith without further notice.

Issued this 3rd of March 2025

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NOTE – This Writ may not be served later than 4 calendar months (*or, if leave is required to effect service out of the jurisdiction, 6 months*) beginning with the date of issue unless renewed by order of the Court.

IMPORTANT

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

GENERAL INDORSEMENT

The Plaintiffs are the operators of 18 hotel resorts variously located in Antigua, the Bahamas, Barbados, Grenada, Jamaica, St Lucia, and the Turks & Caicos Islands. The First to Eighteenth Plaintiffs are ultimate subsidiaries of, and within the same corporate group as, the Nineteenth Plaintiff. The Defendant is a captive insurer within the same corporate group as the Plaintiffs.

The Plaintiffs are each insured by a policy of insurance underwritten by the Defendant for the period 24 March 2019 to 7 April 2020 which includes coverage for business interruption losses. The Defendant is reinsured in respect of that policy by various reinsurers at various levels and participations. The Plaintiffs now claim indemnity under that policy in respect of business interruption losses suffered by the Plaintiffs, in respect of each of the resorts, as a result of the COVID-19 pandemic.

Dated 3rd of March 2025

Walkers (Cayman) LLP

WALKERS (CAYMAN) LLP

Attorneys At Law for the Plaintiffs

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(17) JAIRO MANAGEMENT LIMITED

(18) ROYAL BAY RESORT & VILLAS LTD.

(19) SANDALS RESORTS INTERNATIONAL 2000 INC.

AND: LONDON INSURANCE LTD DEFENDANT

DIRECTIONS FOR ACKNOWLEDGMENT OF SERVICE OF
WRIT OF SUMMONS

1. The accompanying form of *Acknowledgment of Service* should be completed by an Attorney acting on behalf of the Defendant or by the Defendant if acting in person.

After completion it must be delivered or sent by post to the Courts Office, PO Box 495GT, George Town, Grand Cayman.

2. A Defendant who states in his Acknowledgment of Service that he intends to contest the proceedings *must also serve a defence* on the Attorney for the Plaintiffs (or on the Plaintiffs if acting in person).

If a Statement of Claim is indorsed on the Writ (i.e. the words "Statement of Claim" appear on the top of page 2), the Defence must be served within 14 days after the time for acknowledging service of the Writ, unless in the meantime a summons for judgment is served on the Defendant.

If the Statement of Claim is not indorsed on the Writ, the Defence need not be served until 14 days after a Statement of Claim has been served on the Defendant.

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If the Defendant fails to serve his defence within the appropriate time, the Plaintiffs may enter judgment against him without further notice.

3. A *Stay of Execution* against the Defendant's goods may be applied for where the Defendant is unable to pay the money for which any judgment is entered. If a Defendant to an action for a debt or liquidated demand (i.e. a fixed sum) who does not intend to contest the proceedings states, in answer to Question 3 in the Acknowledgment of Service, that he intends to apply for a stay, execution will be stayed for 14 days after his Acknowledgment, but he must, within that time, *issue a Summons* for a stay of execution, supported by an affidavit of his means. The affidavit should state any offer which the Defendant desires to make for payment of the money by instalments or otherwise.

See over for notes for guidance

Please complete overleaf

Notes for Guidance

1. Each Defendant (if there are more than one) is required to complete an Acknowledgment of Service and return it to the Court's office.
2. For the purpose of calculating the period of 14 days for acknowledging service, a writ served on the Defendant personally is treated as having been served on the day it was delivered to him.
3. Where the Defendant is sued in a name different from his own, the form must be completed by him with the addition in paragraph 1 of the words "sued as (*the name stated on the Writ of Summons*)".
4. Where the Defendant is a FIRM and an attorney is not instructed, the form must be completed by a PARTNER by name, with the addition in paragraph 1 of the description "Partner in the firm of (.....)" after his name.
5. Where the Defendant is sued as an individual TRADING IN A NAME OTHER THAN HIS OWN, the form must be completed by him with the addition in paragraph 1 of the description "trading as (.....)" after his name.
6. Where the Defendant is a LIMITED COMPANY the form must be completed by an Attorney or by someone authorised to act on behalf of the Company, but the Company can take no further step in the proceedings without an Attorney acting on its behalf.
7. Where the Defendant is a MINOR or a MENTAL PATIENT, the form must be completed by an Attorney acting for a guardian *ad litem*.

A Defendant acting in person may obtain help in completing the form at the Court's office.

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ACKNOWLEDGEMENT OF SERVICE
OF WRIT OF SUMMONS

If you intend to instruct an Attorney to act for you, give him this form **IMMEDIATELY**.

Important. Read the accompanying Delay may result in judgment being directions and notes for guidance carefully entered against a Defendant whereby he before completing this form. If any information may have to pay the costs of applying to required is omitted or given wrongly, THIS set it aside.
FORM MAY HAVE TO BE RETURNED.

1. State the full name of the Defendant by whom or on whose behalf the service of the Writ is being acknowledged.

2. State whether the Defendant intends to contest the proceedings (*tick appropriate box*)

yes no

3. If the claim against the Defendant is for a debt or liquidated demand, AND he does not intend to contest the proceedings, state if the Defendant intends to apply for a stay of execution against any judgment entered by the Plaintiff (*tick box*)

yes no

Service of the Writ is acknowledged accordingly

(Signed) _____

[Attorney] for

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[Defendant in person]

Address for service:

Please complete overleaf

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Notes on address for Service

Attorney: where the Defendant is represented by an attorney, state the attorney's place of business in the Cayman Islands. A Defendant may not act by a foreign attorney.

Defendant in person: where the Defendant is acting in person, he must give his post office box number and the physical address of his residence or, if he does not reside in the Cayman Islands, he must give an address in Grand Cayman where communications for him should be sent. In the case of a limited company, "residence" means its registered or principal office.

Indorsement by plaintiff's Attorney (or by plaintiff if suing in person) of his name, address and reference, if any, in the box below.

Walkers (Cayman) LLP Attorneys at Law 190 Elgin Avenue George Town, Grand Cayman, KY1-9001 FAO Nicholas Dunne Ref: ND/RM/IA/177266

Indorsement by Defendant's Attorney (or by defendant if suing in person) of his name, address and reference, if any, in the box below.

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