



GRAND COURT OF THE CAYMAN ISLANDS
IN

CAUSE NO: GC

OF 2025

BETWEEN:

BRUCE ANDREW STEPHENS-BLAKE

PLAINTIFF

AND:

CANOVER NORBERT WATSON

DEFENDANT

WRIT OF SUMMONS

TO: CANOVER NORBERT WATSON C/O His Majesty's Prison Northward, Northward Road, Grand Cayman, Cayman Islands.

THIS WRIT OF SUMMONS has been issued against you by the above-named Plaintiff, of 19 Marbel Drive, George Town, Grand Cayman, Cayman Islands in respect of the claims set out on the next page.

Within 14 days after service of this Writ on you, (or where this Writ is served on you out of the jurisdiction pursuant to an Order of the Court, within 28 days) counting the day of service, you must either satisfy the claim or return to the Courts Office, P.O. Box 495, George Town, Grand Cayman, KY1-1106, Cayman Islands the accompanying Acknowledgement of Service stating therein whether you intend to contest these proceedings.

If you fail to satisfy the claim or to return the Acknowledgement within the time stated, or if you return the Acknowledgement without stating therein any 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 10th day of April 2025.

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 that date of original issuance unless renewed by order of the Court.

IMPORTANT

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

THIS WRIT OF SUMMONS and STATEMENT OF CLAIM is filed by the Plaintiff whose address for service is that of his Attorneys at The White House, 20 Genesis Close, PO Box 2425, George Town, Grand Cayman KY1-1105 (Attn: Alexandria Fennell – email: afennell@samsonlaw.ky)

**IN THE GRAND COURT OF THE CAYMAN ISLANDS
CIVIL DIVISION**

CAUSE NO: GC

OF 2025

BETWEEN:

BRUCE ANDREW STEPHENS-BLAKE

PLAINTIFF

AND:

CANOVER NORBERT WATSON

DEFENDANT

STATEMENT OF CLAIM

1. The Plaintiff is an individual, ordinarily resident in Grand Cayman, Cayman Islands and is the former Vice President of the Cayman Islands Football Association.
2. The Defendant is the former Treasurer of the Cayman Islands Football Association and is currently serving a prison sentence at HMP Northward for money laundering offences.
3. The Plaintiff and the Defendant both entered into an oral agreement whereby the Defendant sought to borrow the sum of US \$100,000 from the Plaintiff in order to assist with his legal fees and the Plaintiff agreed to loan him the said sums.
4. On or about 13 November 2014, the Plaintiff sent US \$100,000 from his Cayman National Bank savings account to the Defendant by way of his Attorneys-at-Law, Samson & McGrath. On the said day, the Defendant acknowledged receipt of the funds as he confirmed his Attorneys-at-Law received the funds by applying same to his trust account.
5. The Defendant was sentenced to prison for money laundering offences on 5 February 2016, in the Grand Court of the Cayman Islands. He was sentenced to seven (7) years in prison. He was conditionally released in June 2018 but was subsequently arrested in relation to a second matter. This second matter was before the Courts until September 2024. The Defendant was convicted and is currently serving his sentence.

6. By way of a demand letter dated 24 October 2024, The Plaintiff wrote to the Defendant demanding the repayment of the loan in full within 21 days. This demand letter was delivered to him by way of process server at Northward Prison on 25 October 2024.
7. The Defendant has failed to respond to the written demand and has failed to make any payment to the Plaintiff in respect of the outstanding loan. The Defendant's failure to pay the sums due, amount to a breach of his contractual obligations to the Plaintiff and has caused the Plaintiff to suffer loss and damage as a result of the said breach.

AND THE PLAINTIFF CLAIMS:

- (i) An Order that the Defendant refunds the sum of US \$100,000 to the Plaintiff;
- (ii) Interest at a rate of $2\frac{3}{8}\%$ in accordance with section 24 of the Judicature Act (2021 Revision) and the Judgment Debts (Rates of Interest) Rules (2021 Revision), as amended from time to time;
- (iii) Costs; and
- (iv) Such further or other relief as the Court deems just.

DATED at Grand Cayman this 10th day of April 2025



Samson Law

Attorneys for the Plaintiff

TO: The Clerk of the Court

AND TO: The Defendant

INDORSEMENT

The amount claimed is US \$100,000. The amount of the filing fees to commence the proceeding is CI \$200 plus *ad valorem* fees of CI \$720.00. If, within the time for returning the acknowledgement of service, the Defendant pays the Plaintiff or its Attorneys-at-Law the total amount claimed in principal, interest and the costs of issuing the Writ of Summons, further proceedings will be stayed. The money must be paid to the Plaintiff or his Attorneys-at-Law.

INDORSEMENT REGARDING INTEREST

1. The prescribed rate of interest is 2.375% per annum in accordance with section 24 of the Judicature Act (2021 Revision) and the Judgment Debts (Rates of Interest) Rules (2021 Revision);
2. The date from which interest is payable is 13 November 2014;
3. The total amount of interest claimed at the date of the issue of this writ is CI \$24739.04
4. The amount of interest accruing each day is CI \$6.51.

DATED this the 10th day of April 2025.

A handwritten signature in black ink that reads "Samson Law". The signature is written in a cursive, flowing style.

Samson Law Associates
Attorneys-at-Law for the Plaintiff

**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 Law Courts, P.O. Box 495G, 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 Plaintiff (or on the Plaintiff 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.

If the Defendant fails to serve his defence within the appropriate time, the Plaintiff 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

THIS WRIT OF SUMMONS and STATEMENT OF CLAIM is filed by the Plaintiff whose address for service is that of his Attorneys at The White House, 20 Genesis Close, PO Box 2425, George Town, Grand Cayman KY1-1105 (Attn: Alexandria Fennell – email: afennell@samsonlaw.ky)

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 Courts 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.
8. A Defendant acting in person may obtain help in completing the form at the Courts Office.

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AND:

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DEFENDANT

**ACKNOWLEDGMENT 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 directions and notes for guidance carefully before completing this form. If any information required is omitted or given wrongly, THIS FORM MAY HAVE TO BE RETURNED.

Delay may result in judgment being entered against a Defendant whereby he may have to pay the costs of applying to set it aside.

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

Please complete overleaf

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, the Defendant must give the Defendant's post office box number and the physical address of the Defendant's residence or, if the Defendant does not reside in the Cayman Islands, the Defendant must give an address in Grand Cayman where communications for the Defendant 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.

Samson Law Associates
The White House,
20 Genesis Close,
PO Box 2425, Grand Cayman,
KY1-1105, Cayman Islands.

Attn: A Fennell

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