



No. 1
Plaint

SUMMARY COURT AT GEORGE TOWN

Cause No. SC _____ of 20__

BETWEEN:

Wastewater Purification Systems, Ltd.

Plaintiff

AND:

Christopher Jackson /
Caribbean Construction Co. Ltd.

Defendant

To the Defendant

Christopher Jackson
P.O. Box 444GT
23 Bernard Drive, North Sound Road
George Town, Grand Cayman KY1-1106
Cayman Islands

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

Within 14 days after service of this Plaintiff 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 26 day of May 2025

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. The Plaintiff, Wastewater Purification Systems, Ltd., provided wastewater treatment systems, lift stations, water supply, site layout, engineered drawings, and Water Authority approval services to the Defendant at Block 28B Parcel 365 ("Frangipani Villas").
2. On 20th July 2022, the Plaintiff issued an invoice to the Defendant for the sum of CI\$7,400.00, being the remaining balance due for the services provided.
3. Despite numerous requests for payment and acknowledgment of the debt by the Defendant in correspondence dated 30th June 2023, 6th November 2023, and 22nd April 2024, the Defendant has only made one partial payment of CI\$3,000.00 on 12th April 2024, leaving an outstanding balance of CI\$4,400.00.
4. The Plaintiff has been patient and provided the Defendant with ample time to settle the outstanding amount, but the Defendant has failed to pay the remaining balance despite acknowledging the debt.

AND the Plaintiff claims:

- 1 The sum of CI \$4,4000.
- 2 Interest in the sum of \$ CI \$297.88 calculated at the prescribed rate from to date.
- 3 Fixed costs of \$ CI \$25, alternatively costs to be assessed.



Plaintiff's Signature

Plaintiff's address for service

553 Old Robin Rd, #6
 PO Box 1751
 Grand Cayman, KY1-1109
 Cayman Islands

No. 2

Acknowledgment of Service

IN THE SUMMARY COURT AT GEORGE TOWN

Cause No. SC _____ of 20__

Between: Wastewater Purification systems, Ltd Plaintiff

AND: christopher Jackson
Caribbean Construction Co 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 Plaint is acknowledged accordingly.

Defendant's Signature

Dated this ____ day of _____, 20__

See Overleaf

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 14 days of receipt otherwise a default judgment may be entered against you.



*Wastewater Purification
Systems, Ltd.*

INVOICE

Date: 20th July 2022

To Chris Jackson
Caribbean Construction Co
Ltd. (Cayman Islands)

Salesperson	Job	Payment Terms
Justin Miller	Caribbean Construction Site 28B 365	Due on receipt

Qty	Description	Line Total
1	Remaining Balance Due for Wastewater Treatment Plants	4,000.00
1	Remaining Balance Due for Lift Stations	1,150.00
1	7,550 Gallons of Water	450.00
1	Site Layout, Engineered Drawings & Water Authority Approval	1,800.00
		CI\$ 7,400.00

Thank you for your business!

Please make check payable to Wastewater Purification Systems Ltd or pay through Electronic funds transfer to the following:

Please pay to: Wastewater Purification Systems Ltd
Bank: CIBC FirstCaribbean (25 Main St. Branch)
Account: 2514117 (CI\$ Checking) Reference: (Caribbean Construction)
P.O. Box 1751, Grand Cayman KY1-1109 Phone: 1 (345) 916-0003

Email: wastewaterpurification@gmail.com Website: www.wastewaterpurificationsystems.com

Evidence of email correspondence between Wastewater Purification and Christopher Jackson, Caribbean Construction Co Ltd.

From: **wastewater purification** <wastewaterpurification@gmail.com>

Date: Mon, Apr 22, 2024 at 3:30 PM

Subject: Re: Frangipani Final Payment Request

To: Christopher Jackson <chggroup@icloud.com>

Good afternoon, Chris,

As discussed, I'm just confirming the receipt of CI\$3,000.00 on Friday, 12th April 2024.

This leaves an outstanding balance of CI\$4,400.00.

Please let me know the next time you're able to make a payment towards the balance.

Thank you,

Justin

On Mon, Nov 6, 2023 at 12:20 PM **wastewater purification** <wastewaterpurification@gmail.com>

wrote:

Thank you for the update.

That would be a great help.

Take care,

Justin

On Mon, Nov 6, 2023 at 12:02 PM Christopher Jackson <chggroup@icloud.com> wrote:

Noted Justin.

As per my last email I am going through a divorce and all monies have been frozen and I have your invoice listed as a debt that has to be paid once divorce is finalized. I advised you that I had cash a couple months ago. Unfortunately currently I am not in the same position. I have alot of debt owed to my company as well! You will get paid hopefully in full before end of year. I am selling a cement mixer and a few other items that I have and am waiting on the other contractor to pay he said by Friday 9 am. If this comes through I can give you 3k Friday 10 am. I will work to have this debt paid one way or the other.

Thank you ,

**Christopher M Jackson Sr. PMP : Senior Project Manager/ Managing Director
: Caribbean Construction Co Ltd. (Cayman Islands)**

PO Box 444GT : 23 Bernard Drive : North Sound Road : George Town : Grand Cayman : Cayman Islands

Tel [+345 926-2886](tel:+3459262886) : Fax [+345 949-2745](tel:+3459492745) : Email – chggroup@icloud.com

On 6 Nov 2023, at 10:29 AM, **wastewater purification** <wastewaterpurification@gmail.com>

wrote:

Good morning Chris,

I've been more than patient in getting this settled.

Should I not receive a settlement of the outstanding balance by Friday, I will begin legal proceedings for payment.
Justin

From: **wastewater purification** <wastewaterpurification@gmail.com>
Date: **Mon, Sep 11, 2023 at 2:03 PM**
Subject: Re: final payment
To: Christopher Jackson <chgggroup@icloud.com>

Hi Chris,
I hope all is well on your end.
It has been some time since we last spoke, I'm just following up to see if we might be able to get this settled.
Thanks,
Justin

On Fri, Jul 14, 2023 at 11:38 AM wastewater purification <wastewaterpurification@gmail.com> wrote:
Hi Chris,

Hope all is well on your end.

Please let me know once the EFT has been made.
Please pay to: Wastewater Purification Systems Ltd
Bank: CIBC FirstCaribbean (25 Main St. Branch)
Account: 2514117 (CIS\$ Checking)

Thank you,
Justin

On Fri, Jun 30, 2023 at 11:03 AM Christopher Jackson <chgggroup@icloud.com> wrote:
Good morning Justin,

As per our phone conversation five minutes ago I need the wastewater plant signed off on building A B20-0196. Spoke with Trenton and he says if guys are on site he will come and sign off so I can get CO today. If we get CO today I can forward to the bank and the bank has assured me that the final draw will be issued within two business days of CO. I am sending this email to confirm that you will be paid the balance owed as per your last invoice with immediate effect as funds are received!

Thank you ,

**Christopher M Jackson Sr. PMP : Senior Project Manager/ Managing Director
: Caribbean Construction Co Ltd. (Cayman Islands)**

PO Box 444GT : 23 Bernard Drive : North Sound Road : George Town : Grand Cayman : Cayman Islands
Tel [+345 926-2886](tel:+3459262886) : Fax [+345 949-2745](tel:+3459492745) : Email – chgggroup@icloud.com



Wastewater Purification Systems, Ltd.

P.O. Box 1751; KY1-1109 George Town, Grand Cayman, Cayman Islands

Phone: 345-916-0003

Email: wastewaterpurification@gmail.com

Website: www.wastewaterpurificationsystems.com

Date: 28th Oct. 20

Recipient: Christopher Jackson
Caribbean Construction Co Ltd. (Cayman Islands)

QUOTATION

DAILY FLOW (4,500GPD per request)

PRODUCT

Wastewater Treatment Systems:

Two (3) –1,500 G.P.D Model Clearstream Wastewater Extended Aeration Treatment Systems

Pre-tank:-

ONE (2) -1500Gal Polyethylene Pretreatment Tank

Overview and Recommendations of Sewage Treatment Systems.

Systems are planned for Gravity Flow and no provision for Lift Stations is included.

NOTE: - Aerators (compressors) must be kept running 24 hrs. a day or warranty will be void.

PERFORMANCE AND OPERATIONS

Clearstream Wastewater Treatment Systems are N.S.F approved with a Class 1 rating which is approved by the Water Authority-Cayman. The systems are capable of treating domestic wastewater (average concentration of 240/240 mg/L BOD/TSS) to an effluent quality of 30/30 mg/L BOD/TSS which meets the Water Authority-Cayman's effluent quality standards.

For the Clearstream Aerobic Treatment Unit to function properly it must be used for the treatment of domestic wastewater from residences or other waste flows with similar loading characteristics. Typical domestic wastewater consists of the flow from toilets, lavatories, sinks bathtubs/showers, and washing machines. To prevent malfunctions of your Clearstream Unit, the following guidelines should be followed:

1. Any sewage system, whether aerobic or septic, should not have inorganic materials (plastics, cigarette butts, throwaway diapers, feminine napkins, condoms, etc.), that the bacteria cannot consume, discharged into the system.
2. Large amounts of harsh chemicals, oil, grease, high sudsing detergents, discharge from water softeners, disinfectants or any other chemical or substance that kills bacteria should not be discharged into the system.

3. Excessive use of water, over the design flow of the system, or organic overloading in excess of design parameters will cause the system not to perform to its fullest capabilities.
4. The proper operation of this or any other sewage treatment system depends upon the proper organic loading and the life of the micro-organisms inside the system. Wastewater Purification Systems nor Clearstream is responsible for the in-field operation of the system, other than the mechanical and structural workings of the system itself. Field abuse and overloading of the system can only be cured by the user of the system.
5. When wastewater discharge, into a Clearstream Unit, is seasonal or intermittent to a point that the owner wishes to turn the electricity (for more than three (3) months) to the aerator, the aerator inlet and outlet should be sealed to keep out moisture until the unit is ready to be restarted.

CLEARSTREAM INSTALLATION INSTRUCTIONS

Before installation of the Clearstream Treatment unit, first install a pre-treatment tank (septic tank) with a volume of not less than 50% of the gallon per day rating of the Clearstream unit.

1. Prepare an excavation having minimum dimensions of at least one (1) foot larger than the dimensions of the tank. Make sure the depth of the excavation is deep enough to allow gravity flow to the inlet of the system and that the excavation bottom is level. Never install the Clearstream tank deeper than a depth that will require more than a maximum of 18 inches of riser depth. The access cover shall always be above final grade after tank installation. In applications where more than the maximum 18 inches of riser is required, install a lift pump upstream of the Clearstream tank in order to pump the pretreatment tank effluent to the Clearstream tank at normal grade.
2. Set the Clearstream tank in a prepared excavation that has a solid, level bottom that will eliminate tank settling. The excavation bottom should have no rocks or sharp object present.
3. Make sure the inlet 4" Sch. 40 PVC pipe is aligned properly to incoming sewage line.
4. For the Clearstream Unit to function properly, the tank must be level. To properly level the tank, lay three (3) foot level across the tank in several directions. Shift the tank in the hole as necessary, to make the tank level in all directions.
5. Fill the tank with clean potable water, checking periodically to make sure the tank remains level.
6. Connect the 4" Sch. 40 PVC Clearstream inlet pipe to the incoming sewage line. Make sure the incoming sewage pipe is level with or higher than the inlet pipe to the Clearstream Unit. The Clearstream Unit should only be connected to the plumbing system from a wastewater source which has been properly trapped and vented in compliance with local plumbing codes.
7. Back fill the excavation in layers with back fill material that will settle properly around the tank. Tamp the back-fill materials as each layer is placed around the tank. If necessary, use water to help settle the soil around the tank. Special care should be taken to either tamp soil under where inlet and outlet pipes are bridging the excavation or use some other method of supporting pipes across the excavation. Do not back fill the heavy clay or large rocks.

8. Before completing the back fill, be sure the electrical conduit from the tank to the Control Panel has been laid underground.
9. For below normal grade installations a Clearstream 20-inch diameter riser may be used. In no case shall more than 18 inches of additional riser depth be used on a Clearstream Unit to bring the access covers above final grade. All risers must be sealed with silicone to prevent ground water intrusion before back fill is completed.
10. Before leaving excavation site, be sure to securely fasten the Clearstream access covers in place with the tamper resistant bolt(s). Tighten bolts firmly to keel unauthorized personnel from gaining access to the inside of the tank.

CLEARSTREAM AERATOR AND CONTROL PANEL INSTALLATION

1. Mount one of the Clearstream Control Panel in a location that can be easily noticed by occupants.
2. Wire 115 Volt, 60Hz power from an electrical disconnect to Clearstream Control Panel. Wire from Control Panel to Clearstream Tank electrical junction box through conduit. Use wiring diagram provided for each version of the Clearstream Control Panel Model series. All electrical wiring should be installed by a licensed electrician.
3. Install Control Panel as close as practical to the tank, but in no case greater than one hundred (100) feet away from the Clearstream tank. Run ¾" Sch. 40 PVC air line from aerator connector to air line connection at Clearstream tank. Be careful to back fill underground airline in manner which will not cause air line to leak. Aerator must be installed in a location that is dry, non-dusty, highly ventilated.
4. Turn power on at electrical disconnect and check for proper system operation.

PRE- TANK INSTALLATION INSTRUCTIONS

1. The hole should be dug two (2) feet wider and two (2) feet longer that the external dimensions of the tank. The bottom should be leveled with four (4) inches of graded material in the bottom.
2. Access to the hole is the responsibility of the property owner/contractor. The area in front and around the hole must be flat and clear of fill and debris and the access to the hole should be solid and flat.
3. In areas with a high water table, excessive amounts of water must be removed from the hole before the tank can be set properly. If you are working below the water table you will need to immediately fill the tank with water to a minimum of ¾ full. It is the purchaser's responsibility to ensure these steps are followed.
4. The hole should be backfilled as soon as possible. Back fill the excavation in layers with back fill material that will settle properly around the tank. Tamp the back-fill materials as each layer is placed around the tank. If necessary, use water to help settle the soil around the tank. Special care should be taken to either tamp soil under where inlet and outlet pipes are bridging the excavation or use some other method of supporting pipes across the excavation. Do not back fill the heavy clay or large rocks.

DIMENSIONS

Clearstream Treatment Systems:
1,500 G.P.D - 8ft. Diameter x 8' 10" High

Infiltrator Pre- Tanks:
1,500 Gal. – 176" L X 62" W X 55" H

TECHNICAL SERVICE

An after-installation service contract is recommended and is provided by Wastewater Purification Systems (A service contract will be provided upon request).

WARRANTY

The manufacturer warrants all materials for a period of one year from the date of installation provided proper installation, maintenance and operation has occurred during the period. Please note the Aerators (compressors) must be kept running 24 hrs. a day or warranty is void.

INSTALLATION

Our recommendation is that installation be done by Fisher Plumbing; a fully licensed Plumber and service provider. The quote for installation can only be done after the installer has visited the site to assess conditions.

CLIENTS RESPONSIBILITIES FOR INSTALLATION

1. Site excavation and preparation.
2. Half inch gravel to level the bottom of excavation.
3. Heavy Equipment for lifting tanks and backfilling hole.
4. Pumps & monitoring in the event of high water table.
5. Site leveling and backfilling (quarry sand or other light soft materials, no stones).
6. Tanks should be filled with potable water (city water not well or salty water).
7. Provide suitable electrical power supply (110volts, 20 amp breaker per system).
8. Deep well for final drainage or sub-surface irrigation. Deep well should be drilled prior to excavation and installation of system.

DELIVERY

Estimated delivery of 4 - 6 weeks from date of deposit.

PRICE AND PAYMENT TERM C1\$40,000.00

60% deposit upon signing of / ordering –Deposit
30% upon arrival in Grand Cayman
10% upon delivery.

This quotation is valid for 30 days from date of issue. Should shipping or duty rates change during the period new quotation will be issued.

Accepted by: _____

Date: _____

Agreed by: _____

Date: _____

Justin D. Miller
Wastewater Purification Systems Ltd.
Managing Director



Wastewater Purification Systems, Ltd.

P.O. Box 1751; KY1-1109 George Town, Grand Cayman, Cayman Islands

Phone: 345-916-0003

Email: wastewaterpurification@gmail.com

Website: www.wastewaterpurificationsystems.com

6th Jan. 2022

To: Christopher Jackson
Caribbean Construction Co Ltd. (Cayman Islands)

RE: 28B 365 Effluent Pump Station

To supply Two (2) of the following lift stations:

- 200 Gallon Capacity Duplex Fiberglass Pump Station 48" x 67" basin with 24" Diameter Access Cover
- Two (2) ½ HP 2" Little Giant , 115VAC, 11.0A, 60Hz, 1 Phase, 80 GPM @ 15ft of Head Pressure, Shut Off: 25ft, Max GPM: 120, 2" NPT Vertical Female Discharge, 2" Solids Handling. Includes 20ft Mechanical Float Switch for Automatic Operation
- Duplex Pump Control Panel 120/240VAC, Single Phase, 0-20 FLA, (3) Mechanical Floats w/ 20ft Cords, 360 degree red alarm light, High decibel audible buzzer (100 dB), Automatic Alternating Relay, Pump run light indicator, Pump Hand/Off/Auto heavy duty toggle, Alarm On/Test/Mute heavy duty toggle.

SITE WORKS, :-

All site works responsibility of the purchaser.

INSTALLATION: -

The installation of the actual pump stations will be done by Wastewater Purification.

DELIVERY TIMES: -

Three (3) to Five (5) weeks from date of payment of deposit.

PRICE QUOTE (Quote valid for 30 days)

CI\$12,000.00

90% of Quote due upon signing

10% of Quote due upon delivery

Accepted by: _____

Date: _____

Agreed by: _____

Date: _____

Justin D. Miller
Wastewater Purification Systems Ltd.
Managing Director

Thank you for your business!

Please make check payable to Wastewater Purification Systems Ltd or pay through Electronic funds transfer to the following:

Please pay to: Wastewater Purification Systems Ltd

Bank: CIBC FirstCaribbean (25 Main St. Branch)

Account: 2514117 (CI\$ Checking) Reference: (28B 365) P.O. Box 1751, Grand Cayman KY1-1109

Phone: 1 (345) 916-0003 Email: wastewaterpurification@gmail.com Website:

www.wastewaterpurificationsystems.com Wastewater Purification Systems Ltd