



CAUSE NO: OF 2025

**ND COURT OF THE CAYMAN ISLANDS
CIVIL DIVISION**

BETWEEN:

GLOVE HOLDINGS LIMITED

PLAINTIFF

AND:

**(1) JOHN FURNISS
(2) SHERILL RANSOME FURNISS**

DEFENDANTS

WRIT OF SUMMONS

TO: (1) JOHN FURNISS (2) SHERILL RANSOME FURNISS
Of 10 Hydesville Close, West Bay, Grand Cayman, Cayman Islands

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

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, P.O. Box 495G, 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 Plaintiff may proceed with the action and judgment may be entered against you forthwith without further notice.

Issued this 27 day of June 2025

This Writ and Statement of Claim is issued by KSG Attorneys at Law, Attorneys for the Plaintiff whose address for service is 3rd Floor, One Capital Place, Shedden Road, George Town, Grand Cayman. P.O. Box 2255 GT, KY1-1107.

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.

STATEMENT OF CLAIM

The Parties

1. At all material times:

- 1.1. The Plaintiff has been the corporate proprietor, and entitled to possession, of premises situated at Number 26, Willie Farrington Drive, West Bay, Grand Cayman, Cayman Islands and known as Registration Section West Bay South, Block 5C, Parcel 456 ("the Plaintiff's Property").
- 1.2. The Defendants have been the jointly registered proprietors of adjacent land known as Registration Section West Bay South Block 5C, Parcel 46 ("the Defendants' Property").
- 1.3. On or about 31 July 2023, the parties (together with Offsite Marketing Ltd) purchased the land known as Registration Section West Bay South Block 5C, Parcel 43 and they subsequently re-parcelled Parcel 43 so as to combine 21% thereof with the Plaintiff's Property and 79% thereof with the Defendants' Property.

The Facts

2. On numerous dates since at least 2019 and without the licence or consent of the Plaintiff, the Defendants and/or each of them have:
 - 2.1. Repeatedly entered onto the Plaintiff's Property both before and following the purchase of Parcel 43 and the combination of 21% thereof into the Plaintiff's Property, on many occasions verbally harassing tenants and/or lawful visitors.
 - 2.2. Repeatedly parked their vehicles on the Plaintiff's Property, and frequently blocked residents and lawful visitors from having access to and from it.
 - 2.3. On 1 June 2025, caused a bucket truck to be driven across the Property despite being told by the Plaintiff that this was not allowed.
 - 2.4. Removed a property marker establishing the boundary between the Plaintiff's Property and the Defendants' Property and erected a fence approximately 20 feet within the Plaintiff's Property in about October 2019.

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- 2.5. Placed plant pots and garden furniture on the Plaintiff's Property.
- 2.6. Located their garbage enclosure on the Plaintiff's Property.
- 2.7. Dumped landscaping and other garbage and yard waste on the Plaintiff's Property and in a work truck belonging to a director of the Plaintiff.
- 2.8. Removed sections of chain link fencing belonging to the Plaintiff from the Plaintiff's Property on multiple occasions.
- 2.9. Planted plants and sited a stone border on the Plaintiff's Property.
- 2.10. Moved, or caused to be moved, landscaping boulders which the Plaintiff had caused to be placed on the Plaintiff's Property. In October 2023 and again on 30 May 2025 the Defendants and/or each of them caused a backhoe to come onto the Property to remove the landscaping boulders.
- 2.11. Added locks to one or more gates belonging to the Plaintiff and erected on the Plaintiff's Property, thereby preventing the Plaintiff's officers and lawful visitors from accessing the Plaintiff's Property.
- 2.12. Driven metal stakes through the Plaintiff's pedestrian gate. The Second Defendant has also entered onto the Plaintiff's Property to erect "Keep Out" and "Do Not Block" signs on the Plaintiff's gate.
- 2.13. Removed sections of the Plaintiff's fencing on the Plaintiff's Property.
- 2.14. On 3 November 2024, the Second Defendant went onto the Plaintiff's Property with a gasoline container and poured fuel around the base of the house.
3. On each of the aforementioned occasions, the Defendants and/or each of them have unlawfully intruded onto, and been trespassers on, the Plaintiff's Property.
4. Despite having been warned by the Plaintiff to desist from committing acts of trespass, the Defendants and/or each of them have continued and are continuing to do so, and will continue to do so unless restrained by the Court.

Declaration

5. There is an easement of a pedestrian right of way which passes directly through the house on the Plaintiff's Property to land owned by the Defendants. The Plaintiff accordingly seeks Declarations, pursuant to section 96(1) Registered Land Act (Revised) that:
 - 5.1. The easement of a Pedestrian Right of Way on Registration Section West Bay South, Block 5C, Parcel 456 indicated in red ink on the plan attached hereto shall be modified to move the Pedestrian Right of Way to the position shown in green ink on the attached.

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- 5.2. The Registry Map shall be modified to show the discharge of the Pedestrian Right of Way indicated in red ink on the plan for Registration Section West Bay South, Block 5C, Parcel 456 and its new location as shown in green ink.
- 5.3. The Registrar shall cause the existence of the modified Pedestrian Right of Way to be entered in the Land Register for Registration Section West Bay South, Block 5C, Parcel 456.

Injunctive Relief

6. Further, the Plaintiff claims a final injunction restraining the Defendants and/or each of them from pursuing any conduct or action which amounts to a trespass on the Plaintiff's Property, including:
- 6.1. An Order prohibiting the First and Second Defendants and each of them, whether by themselves, their employees or agents, from entering onto any part of the property known as Registration Section West Bay South, Block 5C, Parcel 456 without the prior consent in writing of a director of Glove Holdings Ltd.
- 6.2. An Order prohibiting the First and Second Defendants and each of them, whether by themselves, their employees or agents, from driving any vehicle onto, or parking any vehicle on, any part of the property known as Registration Section West Bay South, Block 5C, Parcel 456 without the prior consent in writing of a director of Glove Holdings Ltd.
- 6.3. An Order prohibiting the First and Second Defendants and each of them, whether by themselves, their employees or agents, from dumping any landscaping waste, garden waste or material of any kind on any part of the property known as Registration Section West Bay South, Block 5C, Parcel 456, or the Plaintiff's 21% share of Parcel 5C,43.

Loss and damage

7. Further and/or in the alternative, by reason of the aforementioned acts of trespass on the Plaintiff's Property, the Defendants and/or each of them have caused the Plaintiff to suffer loss and damage.

Particulars of Loss and Damage

A Schedule giving full details of the Loss and Damage suffered by the Plaintiff as a result of the acts of trespass committed by the Defendants and/or each of them will be supplied at a later date.

8. Further, the Plaintiff is entitled to and claims interest upon all damages owing to it pursuant to section 34 of the Judicature Act (2021 Revision) at one-half of the rate prescribed under the Judgment Debts (Rates of Interest) Rules (as amended) from 26 October 2019, alternatively at such rate and for such period as the Court shall deem fit.

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And the Plaintiff claims:

1. Declarations in the terms set out at paragraph 5 above.
2. Injunctions restraining the First and Second Defendants in the terms set out at paragraph 6 above.
3. Damages
4. Interest, to be assessed
5. Costs



KSG Attorneys-at-Law
Attorneys for the Plaintiff

This Writ and Statement of Claim is issued by KSG Attorneys at Law, Attorneys for the Plaintiff whose address for service is 3rd Floor, One Capital Place, Shedden Road, George Town, Grand Cayman. P.O. Box 2255 GT, KY1-1107.

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 and Statement of Claim is issued by KSG Attorneys at Law, Attorneys for the Plaintiff whose address for service is 3rd Floor, One Capital Place, Shedden Road, George Town, Grand Cayman. P.O. Box 2255 GT, KY1-1107.

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.

This Writ and Statement of Claim is issued by KSG Attorneys at Law, Attorneys for the Plaintiff whose address for service is 3rd Floor, One Capital Place, Shedden Road, George Town, Grand Cayman. P.O. Box 2255 GT, KY1-1107.

CAUSE NO: GC

OF 2025

**IN THE GRAND COURT OF THE CAYMAN ISLANDS
CIVIL DIVISION****BETWEEN:****GLOVE HOLDINGS LIMITED****PLAINTIFF****AND:****(1) JOHN FURNISS
(2) SHERILL FURNISS****DEFENDANTS****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).....

This Writ and Statement of Claim is issued by KSG Attorneys at Law, Attorneys for the Plaintiff whose address for service is 3rd Floor, One Capital Place, Shedden Road, George Town, Grand Cayman. P.O. Box 2255 GT, KY1-1107.

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, 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.

KSG Attorneys-at-Law
3rd Floor, One Capital Place
136 Shedden Road
PO Box 2255
George Town
KY1-1107
Grand Cayman

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

This Writ and Statement of Claim is issued by KSG Attorneys at Law, Attorneys for the Plaintiff whose address for service is 3rd Floor, One Capital Place, Shedden Road, George Town, Grand Cayman. P.O. Box 2255 GT, KY1-1107.

