



SUMMARY COURT AT GEORGE TOWN

CAUSE NO. SC _____ OF 2025

BETWEEN:

CaribbeanMGT Ltd

Plaintiff

AND:

Henry Eli William Marsh & HEWM Properties Ltd

Defendant

PLAINT

To the Defendant

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 495, George Town, Grand Cayman KY1-1106, Cayman Islands, the accompanying Acknowledgement 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 Judgement** without any further notice to you.

Issued this 14th day of August 2025

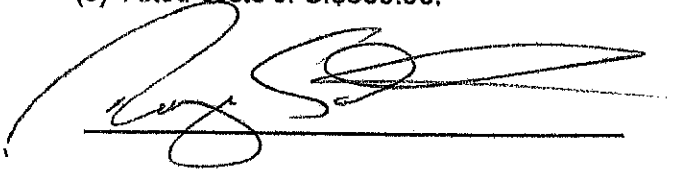
See overleaf for particulars of the Plaintiff's claim

PARTICULARS OF CLAIM

1. Since early roughly November 2022 Henry Marsh has requested various professional services from Roger Southam through CaribbeanMGT Ltd in relation to real estate projects and proposals.
2. Roger Southam has undertaken various works for Henry Marsh including setting up a Ltd company for him (HEWM Properties Ltd) valuing parcels of land, undertaking meetings with lawyers, Lands, banks and assisting and reviewing options and appraisals.
3. It was agreed the service would be charged for on a time charge basis plus costs and fixed costs for valuations.
4. In addition, CaribbeanMGT Ltd were engaged by Kim Samuels to undertake work for him, which was billed to Mr Samuels. Mr Samuels made payment in cash to Henry Marsh in the sum of \$1,550 to give to pass to CaribbeanMGT Ltd. This money has never been passed on and now forms part of this claim.
5. The amounts have been outstanding for a long time now and payment is well overdue.
6. This claim is for the following invoices which are appended to the letter before action at Exhibit 1:
 - 24-08-20 MGT315 Kim Samuels Scholars & Suelles
 - 24-08-20 MGT317 Henry Marsh HEWM Holdings LLC 34A4
 - 24-11-28 MGT426 Henry Marsh HEWM Corporate
 - 24-11-28 MGT427 Henry Marsh Consultancy Jan to Aug 24
7. A letter before action was served on the Defendant on Sunday 3rd August and a copy of the notice is shown at Exhibit 1.
8. The Defendant has made no attempt to settle the payments or pay us the money Kim Samuels gave to him for us.

And the Plaintiff claims:

- (1) The Sum of \$13,340.00
- (2) Interest to be charged and continue until this matter is settled at the rate of 5% per annum.
- (3) Fixed costs of CI\$500.00.

A handwritten signature in black ink, appearing to be 'R. S.', written over a horizontal line.

Plaintiff's Signature

Plaintiff's address for service

190 North Church Street
George Town
PO Box 11155
Grand Cayman
KY1-1008

IN THE SUMMARY COURT AT GEORGE TOWN

CAUSE NO. SC _____ OF 2025

BETWEEN:

CaribbeanMGT Ltd

Plaintiff

AND:

Henry Eli William Marsh and HEWM Properties Ltd

Defendant

ACKNOWLEDGEMENT 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 2025

See Overleaf

PARTICULARS OF DEFENCE

COUNTERCLAIM

AND the Defendant claims:

Defendant's Signature

REMINDER – This form must be taken or sent to the Court Office, PO Box 495, Grand Cayman KYI-1106 Cayman Islands within 14 days of receipt otherwise a default Judgement may be entered against you.

EXHIBIT 1



CARIBBEAN MGT

3rd August 2025

Henry Marsh & HEWM Properties Ltd
West Bay
Grand Cayman

Delivered By Hand and Email to m2procurementllc@gmail.com

Dear Mr Marsh

Fees Due to CaribbeanMGT Ltd for work undertaken for you and money you received from Kim Samuels for our fee to him
LETTER BEFORE ACTION

I write to give 7 days' notice of the intention to proceed to a small claims application for the payment of outstanding fees scheduled below. I would be grateful if you would please settle the attached invoices now due in the sum of CI\$13,340 in the next 7 days.

If we do not receive payment within 7 days the please accept this as a letter before action where we will refer the matter to the Small Claims Court and submit our case accordingly.

Below I set out for your ease the basis of our claim:

1. Since early roughly November 2022 Henry Marsh has requested various professional services from Roger Southam in relation to real estate projects and proposals.
2. Roger Southam has undertaken various works for Henry Marsh including setting up a Ltd company for him (HEWM Properties Ltd) valuing parcels of land, undertaking meetings with lawyers, Lands, banks and assisting and reviewing options and appraisals.
3. It was agreed the service would be charged for on a time charge basis plus costs and fixed costs for valuations.
4. The work done for Kim Samuels was billed to Mr Samuels, and he gave you cash in the sum of \$1,550 to give to me, which you have never passed on to me.
5. The amounts have been outstanding for a long time now and payment is well overdue.



CARIBBEAN
MGT

Should payment not be made we will be seeking the outstanding fees due along with accrued interest and costs.

I look forward to hearing from you and receiving settlement

Kind regards

Yours sincerely

Roger Southam

Attached invoices MGT/2024/426
MGT/2024/317
MGT/2024/315
MGT/2024/427

Terms & Conditions
Time sheet Jan to Aug 2024



CARIBBEAN
MGT

INVOICE

CaribbeanMGT Ltd
190 Miss June's Cottage, North Church Street
George Town, Cayman Islands
+1 345 323 0066
roger@caribbeanmgt.ly

INVOICE DATE	INV No.
28 Nov 2024	MGT/2024/426

Bill To:
Henry Marsh

No.	DESCRIPTION	AMOUNT
	HEWM Properties Ltd	
	Company set up	KYD 1,575.00
TOTAL:		KYD 1,575.00

Please make cheque payable to CaribbeanMGT Ltd

Bank Details:	
Account Name:	CaribbeanMGT Ltd
Account Number:	011-15990
Bank Name:	Cayman National Bank
Account Type	Chequing
Branch:	Elgin Avenue

Payment due on receipt of invoice
If paying by credit card a bank fee of 4% will be added to the invoiced amount



**CARIBBEAN
MGT**

CaribbeanMGT Ltd
190 Miss June's Cottage, North Church Street
George Town, Cayman Islands
+1 345 323 0066
roger@caribbeanmgt.ky

INVOICE

INVOICE DATE	INV No.
20 Aug 2024	MGT/2024/317

Bill To:
Henry Marsh
HEWM Holdings LLC

No.	DESCRIPTION	AMOUNT
	Valuation 34A4 80 acres land	KYD 1,500.00
	Land Registry 34A4	KYD 15.00
TOTAL:		KYD 1,515.00

Please make cheque payable to CaribbeanMGT Ltd

Bank Details:	
Account Name:	CaribbeanMGT Ltd
Account Number:	011-15990
Bank Name:	Cayman National Bank
Account Type	Chequing
Branch:	Elgin Avenue

Payment due on receipt of invoice

If paying by credit card a bank fee of 4% will be added to the invoiced amount



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INVOICE

INVOICE DATE	INV No.
20 Aug 2024	MGT/2024/315

Bill To:
Kim Samuels

No.	DESCRIPTION	AMOUNT
	Valuation of 16 units at Scholars Retreat 17 to 32	KYD 750.00
	Valuation of 4 units at Suelles Drive 16,17,18 & 20	KYD 500.00
	Land Registers for Scholars Retreat 16 @ \$15 per register	KYD 240.00
	Land Registers for Suelles Estates 4 @ \$15 per register	KYD 60.00
TOTAL:		KYD 1,550.00

Please make cheque payable to CaribbeanMGT Ltd

Bank Details:	
Account Name:	CaribbeanMGT Ltd
Account Number:	011-15990
Bank Name:	Cayman National Bank
Account Type	Chequing
Branch:	Elgin Avenue

Payment due on receipt of invoice
If paying by credit card a bank fee of 4% will be added to the invoiced amount



CARIBBEAN
MGT

CaribbeanMGT Ltd
190 Miss June's Cottage, North Church Street
George Town, Cayman Islands
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roger@caribbeanmgt.ky

INVOICE

INVOICE DATE	INV No.
28 Nov 2024	MGT/2024/427

Bill To:
Henry Marsh

No.	DESCRIPTION	AMOUNT
	Time charge consultancy January to August 2024	KYD 8,700.00
TOTAL:		KYD 8,700.00

Please make cheque payable to CaribbeanMGT Ltd

Bank Details:	
Account Name:	CaribbeanMGT Ltd
Account Number:	011-15990
Bank Name:	Cayman National Bank
Account Type	Chequing
Branch:	Elgin Avenue

Payment due on receipt of invoice
If paying by credit card a bank fee of 4% will be added to the invoiced amount



**CARIBBEAN
MGT**

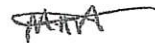
Terms & Conditions

CaribbeanMGT Ltd ("CMGT") has been instructed by Henry Marsh (the "Customer") to carry out the services, for the fees and during the period, specified below on the terms and conditions attached:

Services:	Initialed by Roger Southam	Initialed by Customer
Advising and assisting with the documents, handling, delivering of developments on various sites including Block 58A Parcel 14REM4, Luna Kai and others. Such other services as are required.		

	Details:	Initialed by Roger Southam	Initialed by Customer
Fee:	KY\$300 per hour		
Commencement Date:	1 st January 2024		
Term:	Until developments completed		

We (the "Customer") hereby agree to the attached terms and conditions.

Signed: 

Name: Henry Marsh (Customer)

Date: 21-01-2024

CaribbeanMGT Ltd

Client: Henry Marsh

Project: Consultancy

Period: Jan to Aug



Date	Description	Time (hrs)	Rate (\$)	Total
16-Jan	Time spent to date	15	\$300.00	\$4,500.00
16-Jan	Meeting re land & agreements	1	\$300.00	\$300.00
17-Jan	email land agreements	2	\$300.00	\$600.00
19-Feb	land JV	1	\$300.00	\$300.00
20-Feb	Melieck agreement	2	\$300.00	\$600.00
14-Aug	Deck for hedge fund	8	\$300.00	\$2,400.00
			\$300.00	\$0.00
			\$300.00	\$0.00
			\$300.00	\$0.00
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			\$300.00	\$0.00
			\$300.00	\$0.00
			\$300.00	\$0.00
			\$300.00	\$0.00
SUB TOTAL		29		\$8,700.00