



GRAND COURT AT GEORGE TOWN

CAUSE NO. GC_219_OF 2025

BETWEEN:

Joseph Bonsu-Akoto (Deceased)
Kim Avalon Samuels as personal representative of deceased

Plaintiff

AND:

Juan Manuel Martinez Carmona

Defendant 1

Kedean Kerri Ann Martinez

Defendant 2

AMENDED WRIT OF SUMMONS

To the **1st** Defendant **and 2nd** Defendant

THIS WRIT OF SUMMONS 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 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 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 **5th** day of **December** 2025

See overleaf for particulars of the **Plaintiff's** claim

This Writ of Summons was filed for Joseph Bonsu-Akoto (Deceased) by Kim Avalon Samuels as personal representative of the deceased whose address for service is 190 North Church Street, George Town, Grand Cayman; PO Box 11155 KY1-1008 email lx4sam@yahoo.com telephone 321 2274

PARTICULARS OF CLAIM

1. The **Plaintiff** owns title absolute Block 4C Parcel 608H20 known as 20 Suelles Estates, Aurora Drive, West Bay, Grand Cayman, Cayman Islands (the "Property")
2. The Defendants **have** been trespassing in the Property since **December** 2017.
3. The **Plaintiff** has made several attempts to remove the Defendant which were not complied with by the Defendants.
4. The **Plaintiff** has also made attempt to agree terms to rent the property and to occupy with a tenancy agreement and the Defendants **s** paying rent which have met with refusal and obstruction.
5. The Grant of Probate was issued by the Grand Court of the Cayman Islands on 4th October 2024 confirming Kim Avalon Samuels as the personal representative of the deceased (copy of Grant of Probate attached at Exhibit 1). As the personal representative of the deceased, the **Plaintiff** now wishes to obtain possession to enable completion of a sale to a third party who holds a valid offer to purchase with the **Plaintiff**.
6. The Defendants **s** has paid no rent for living in the property.
7. The **Plaintiff** asks for possession of the Property at the earliest opportunity so that the sale may be concluded.
8. A 14-day notice was placed on the premises on 31st July 2025 asking the Defendants **s** to vacate. No communication or attempt to vacate has been made by the Defendants **s**.
9. The **Plaintiff** claims rent and penalties for the time of trespassing in the property in the following sums:

Rent 16th October 2017 to 15th August 2025 at a rent of KY\$2,000 per calendar month

Interest from **December** 2017 until this matter is settled at the rate of 5% per annum

Costs for service and filing of documents

And the Plaintiff claims:

- (1) The Sum of CI\$188,038.05 for non-payment of rent
- (2) Interest to be charged and continue until this matter is settled at the rate of 5% per annum.
- (3) Fixed costs of CI\$2,500.00.



Plaintiff's Signature

Plaintiff's address for service

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

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IN THE GRAND COURT AT GEORGE TOWN

CAUSE NO. GC_219____ OF 2025

BETWEEN:

Kim Avalon Samuels as personal representative of
Joseph Bonsu-Akoto (Deceased)

Plaintiff

AND:

Juan Manuel Martinez Carmona

Defendant 1

Kedean Kerri Ann Martinez

Defendant 2

ACKNOWLEDGEMENT OF SERVICE

If you intend to instruct an Attorney to act for you, give that Attorney 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 the Defendant may have to pay the costs of applying to set it aside.

1 State Defendant's name and address –

2 State whether the Defendant intends to contest the action

☐

Yes

☐

No

3 If the claim against the Defendant is for a debt or liquidated demand, AND the Defendant does not intend to contest the proceedings, state if the Defendant

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intends to apply for a stay of execution against any judgment entered by the Plaintiff (tick box)

☐

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 Writ is acknowledged accordingly.

1st Defendant's Signature OR Attorney for

DATED this day of 2025

See Overleaf

PARTICULARS OF DEFENCE

COUNTERCLAIM

AND the Defendant claims:

1st Defendant's Signature or Attorney for

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

Notes on address for service

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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 that Plaintiff's name, address and reference, if any, in the box below.

Joseph Bonsu-Akoto (Deceased)
Kim Avalon Samuels as personal representative of the deceased
190 North Church Street, George Town, Grand Cayman
PO Box 11155 KY1-1008
lx4sam@yahoo.com
321 2274

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

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BETWEEN:

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Joseph Bonsu-Akoto (Deceased)

Plaintiff

AND:

Juan Manuel Martinez Carmona

Defendant 1

Kedean Kerri Ann Martinez

Defendant 2

ACKNOWLEDGEMENT OF SERVICE

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

5 State Defendant's name and address –

6 State whether the Defendant intends to contest the action

☐

Yes

☐

No

7 If the claim against the Defendant is for a debt or liquidated demand, AND the Defendant does not intend to contest the proceedings, state if the Defendant

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intends to apply for a stay of execution against any judgment entered by the Plaintiff (tick box)

☐

Yes

☐

No

- 8 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 Writ is acknowledged accordingly.

2nd Defendant's Signature OR Attorney for

DATED this day of 2025

See Overleaf

PARTICULARS OF DEFENCE**COUNTERCLAIM**

AND the Defendant claims:

2nd Defendant's Signature or Attorney for

REMINDER – This form must be taken or sent to the Court Office, PO Box 495, Grand Cayman KY1-1106 Cayman Islands within 14 days of receipt otherwise a default Judgement may be entered against you.

Notes on address for service

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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 that Plaintiff's name, address and reference, if any, in the box below.

Joseph Bonsu-Akoto (Deceased)
Kim Avalon Samuels as personal representative of the deceased
190 North Church Street, George Town, Grand Cayman
PO Box 11155 KY1-1008
lx4sam@yahoo.com
321 2274

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

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Form No. 8

Acknowledgment of Service of Writ of Summons (O.10, r.1; O.12, r.3; O.15, rr.3, 7 & 13A; O.16, r.3; O.75, r3)

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 the Defendant's Acknowledgment of Service that the Defendant 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 that Defendant's defence within the appropriate time, the Plaintiff may enter judgment against the Defendant 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 the Defendant intends to apply for a stay, execution will be stayed for 14 days after that Defendant's Acknowledgment, but the Defendant must, within that time, issue a Summons for a stay of execution, supported by an affidavit of the Defendant's means. The affidavit should state any offer which the Defendant desires to make for payment of the money by instalments or otherwise.

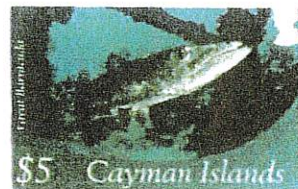
See over for notes for guidance

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Notes for Guidance

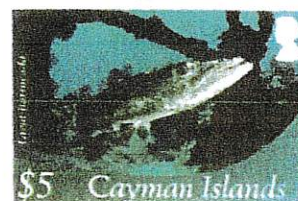
1. Each Defendant (if there are more than one) is required to complete an Acknowledgment of Service and return it to the Courts Office.
2. For the purpose of calculating the period of 14 days for acknowledging service, a writ served on the Defendant personally is treated as having been served on the day it was delivered to the Defendant.
3. Where the Defendant is sued in a name different from the Defendant's own, the form must be completed by the Defendant 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 that Partner's name.
5. Where the Defendant is sued as an individual TRADING IN A NAME OTHER THAN THAT PERSON'S OWN, the form must be completed by the Defendant with the addition in paragraph 1 of the description "trading as (.....)" after that Defendant's 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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2025-12-05

08 2025



THE GRAND COURT OF THE CAYMAN ISLANDS
E PROBATE AND ADMINISTRATION DIVISION

CAUSE NO. _____ OF 2024
PROBATE AND ADMINISTRATION NO. 155 OF 2024

In the Estate of Joseph Bonsu-Akoto, Deceased

GRANT OF PROBATE

BE IT KNOWN that on the 4th day of October 2024, the last will and testament a true copy hereof is hereunto annexed of **JOSEPH BONSU-AKOTO** late of 16 Suelles Town House, West Bay, Grand Cayman, Cayman Islands who died on the 3rd of July 2024, was proven and registered in the said court and administration of all the estate which by law devolves and vests in the personal representatives of the said deceased was granted by the aforesaid court to **KIM AVALON SAMUELS** the executrix named in the will, he having been sworn well and faithfully to administer the same, by paying the just debts of the deceased and the legacies contained in his Will and to exhibit a true and perfect inventory of all and singular the said estate and effects, of the said deceased, and to render just and true accounts thereof whenever required by law to do so.

DATED this 8th day of October 2024.

CLERK OF THE COURT



This Application for Grant of Probate is filed by CP Attorneys, Attorneys-At-Law for the Applicant, whose address for service is Suite 228 Dolphin House, Elizabethan Square, 80 Shedden Road, George Town, P.O. Box 561, Grand Cayman, KY1-1602, Cayman Islands.