



ANDS

ND COURT

CIVIL DIVISION

CAUSE NO.

OF 2025

BETWEEN

CARLENE MOORE

PLAINTIFF

AND

AMMARICA JORDAN

1st DEFENDANT

AND

KENMORE JORDAN

2nd DEFENDANT

WRIT OF SUMMONS

To: The Defendants

KENMORE & AMMARICA JORDAN

668 High Rock Drive

East End

And as a Noticed Party To:

ISLAND HERITAGE INSURANCE

128 Lawrence Boulevard

Grand Cayman

KY1-1104

THIS WRIT OF SUMMONS has been issued against you by the above-named Plaintiff of 28 Northward, Bodden Town, Grand Cayman in respect of the claim set out on the next page.

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 day of **September 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 the date of issue unless renewed by order of the Court.

This Writ and Statement of Claim is Issued by Brady Attorneys at Law whose address for service is 2nd Floor, Anderson Square, 64 Shedden Road, P.O. Box 1671, George Town Grand Cayman, KY1-1109, Cayman Islands.

IMPORTANT

Directions for Acknowledgment of Service are given with the accompanying form.

STATEMENT OF CLAIM

1. The Plaintiff, 52 years old Janitor and was at all material times a lawful passenger in motor vehicle registration **151 965** driven by Devon Brown.
2. The **1st Defendant** was at all material times the owner of motor vehicle registration **186 210**.
3. The **2nd Defendant** was at all material times the driver of motor vehicle registration **186 210**, and agent and/or servant or authorized driver of the **1st Defendant**.
4. That on or about the 2nd day of September 2022 the Plaintiff was travelling as a passenger in above-mentioned motor vehicle when the 2nd Defendant agent and/or servant or authorized driver of the 1st Defendant negligently, caused or permitted motor vehicle registration **186 210** to collide into the rear of motor vehicle registration **151 965**.
5. As a result of reason aforesaid, the Plaintiff has suffered personal injury, loss and damage and incurred expenses.

PARTICULARS OF NEGLIGENCE

6. The Defendants were negligent in that he:
 - (a) failed to keep any or any proper look out;
 - (b) failed to keep a safe distance behind motor vehicle registration **151 965**;
 - (c) failed to see the motor vehicle registration **151 965** in time or at all;
 - (d) failed to apply his brakes whether in time or at all;
 - (e) failed to steer or control his vehicle so as to avoid the said collision;
 - (f) Driving too fast at a rate of speed in all circumstances;
 - (g) Failing to stop, slow down, swerve, or otherwise conduct the operation of the said motor vehicle so as to avoid the said collision.

PARTICULAR OF INJURY

7. Following the accident, the Plaintiff attended the George Town Hospital and other private medical facilities where she was assessed, x-rays done, treated and discharged. she was diagnosed as having suffered the following injuries:
 - i. Mild anterior osteophytic L2& S1
 - ii. Disc reduction & partial fusion of L3-L4 vertebral bodies
 - iii. Facet antrophy at L5-S1
 - iv. Spondylotic changes in lower cervical spine
 - v. Non-union anterior syndesmophytes at the C4-C5;
 - vi. Severe tenderness in the lumbar region

This Writ and Statement of Claim is Issued by Brady Attorneys at Law whose address for service is 2nd Floor, Anderson Square, 64 Shedden Road, P.O. Box 1671, George Town Grand Cayman, KY1-1109, Cayman Islands.

- vii. Severe muscle spasm of cervical paraspinal muscles
- viii. 2% WPI

8. FUTURE MEDICAL CARE

i. Physiotherapy treatment \$5639.56

9. The injuries suffered have significantly debilitated the Plaintiff due to recurring neck, shoulder and back pain. As a result, she is unable to sit, stand or walk for long periods, as he used to do, without pain. The injuries affected her sleeping ability and her ability to do physical activities and has such been disadvantaged on the labour market.
10. The Plaintiff was unable to return to work and lost income in the sum of \$352.00.
11. The Plaintiff's medical treatment and expense are continuing.

PARTICULARS OF SPECIAL DAMAGE

- i. Clinical Assessment & Report \$12,335.35
- ii. Transportation \$ 200.00

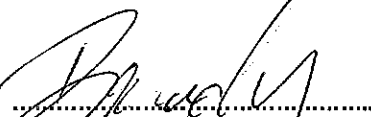
(particulars of special damages maybe be added when they are given)

Pursuant to the provisions of the Civil Procedure Rules and the Evidence Act, the Plaintiff intends at the hearing of this Claim to tender into evidence the following documents (copies of which are attached hereto):

- 1. Clinical Report of Dr. Tenson Edmonds.
- 2. Medical notes of George Town Hospital
- 3. Receipt evidencing expense

AND THE PLAINTIFF CLAIMS:

- 1. General Damages;
- 2. Special Damages;
- 3. Loss of Income
- 4. Future medical expenses;
- 5. Interest in accordance with the Judicature Law (2017 Revision);
- 6. Costs;
- 7. Any other relief this court deems necessary



EVERTON J. DEWAR

BRADY

Attorneys-at-Law for the Plaintiff

This Writ and Statement of Claim is Issued by Brady Attorneys at Law whose address for service is 2nd Floor, Anderson Square, 64 Shedden Road, P.O. Box 1671, George Town Grand Cayman, KY1-1109, Cayman Islands.

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

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.

CAYMAN ISLANDS

**IN THE GRAND COURT
CIVIL DIVISION**

CAUSE NO. OF 2025

BETWEEN

CARLENE MOORE

PLAINTIFF

AND

AMMARICA JORDAN

1st DEFENDANT

AND

KENMORE JORDAN

2nd 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 Delay may result in judgment being entered against a Defendant notes for guidance carefully before completing this whereby he may have to pay the costs of applying to set it aside. form. If any information required is omitted or given wrongly, THIS FORM MAY HAVE TO BE RETURNED.

-
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, 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.

BRADY

Attorneys-at-Law

2nd Floor, Anderson

Square, 64 Shedden Road,

P.O. Box 1671, George

Town Grand Cayman, KY1-

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

CAYMAN ISLANDS

This Writ and Statement of Claim is issued by Brady Attorneys at Law whose address for service is 2nd Floor, Anderson Square, 64 Shedden Road, P.O. Box 1671, George Town Grand Cayman, KY1-1109, Cayman Islands.