



COURT OF THE CAYMAN ISLANDS
JUDICIAL OFFICE

CAUSE NO: OF 2025

IZAZA ROBINSON

PLAINTIFF

AND

PROVEN BANK (CAYMAN) LIMITED

1st DEFENDANT

THE PROPRIETORS STRATA PLAN, NO.69

2nd DEFENDANT

CAYMAN FINANCIAL CENTRE

3rd DEFENDANT

ROYAL STAR ASSURANCE LIMITED

4th DEFENDANT

WRIT OF SUMMONS

TO: Proven Bank (Cayman) Limited Dr. Roy's Drive, George Town Grand Cayman Cayman Islands	TO: The Proprietors Strata Plan, No.69 George Town, Grand Cayman Cayman Islands
TO: Cayman Financial Centre George Town, Grand Cayman Cayman Islands	TO: Royal Star Assurance Limited c/o Vanguard Risk Solution George Town, Grand Cayman Cayman Islands

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

Within Fourteen days (14) 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 495, Grand Cayman KYI-1106, the accompanying Acknowledgement of Service stating therein whether you intend to contest these proceedings

If you fail to satisfy the claim or to return the Acknowledgement within the time stated, or if you return the Acknowledgement without stating therein an intention to contest the

This **WRIT** is filed by Paragon Law Cayman Limited, Attorneys for the Petitioner, whose address for service is PO Box 11159, Elizabethan Square, George Town, Grand Cayman KY1-1008, Cayman Islands, tel: 345-623-2519.

proceedings, the Plaintiffs may proceed with the action and judgment may be entered against you forthwith without further notice.

Issued this 31st day of October, 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.

IMPORTANT

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

PARTICULARS OF CLAIM

1. The Plaintiff is an employee of Proven Bank Cayman Limited, located in the Cayman Financial Centre on Dr. Roy's Drive, George Town, Grand Cayman. ("the Plaintiff").
2. The 1st Defendant, Proven Bank Cayman Limited, was at all material times a registered commercial bank licensed with the Cayman Islands Monetary Authority to operate as a commercial bank in the Cayman Islands under the laws of the Cayman Islands ("the Employer").
3. The 2nd Defendant, The Proprietors Strata Plan, No.69, was at all material times the registered Strat Plan with the Cayman Islands Land Registry for the premises and buildings located at Cayman Financial Centre, Dr. Roy's Drive, George Town, Grand Cayman ("the Strata").
4. The 3rd Defendant, Cayman Financial Centre, was at all material times the location of the Plaintiff's place of employment, located on Dr. Roy's Drive, George Town, Grand Cayman ("Place of Work").
5. The 4th Defendant, Royal Star Assurance Limited, was at all material times a limited liability company incorporated under the laws of the Commonwealth of the Bahamas and licensed under the laws to operate as a property and casualty insurance in the Cayman Islands under the laws of the Cayman Islands ("the Insurers").
6. On the 2nd day of November 2022, the Plaintiff fell down the stairs as she was leaving her Place of Work and was unable to break her fall as there was no handrail. As a result of the fall, she suffered severe pain and had to attend the hospital for treatment. The Plaintiff eventually had to have surgery because of the injury she received from the fall.
7. The Plaintiff subsequently claimed the public liability policy of her Place of Work, but was denied.

Negligence:

- a) The 1st, 2nd, and 3rd Defendant failed to ensure that the steps on the stairs were safe by complying with the standard building code for the Cayman Islands, thus

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breaching its common law duty of care to ensure the Plaintiff was reasonably safe in using the premises;

- b) Failed to maintain, remove and /or lay proper carpeting that was reasonably safe for the Plaintiff and other members of staff;
 - c) Failed in its duty to give the Plaintiff any or any sufficient warning of the state and condition of the steps and carpet;
 - d) The 1st Defendant was aware and should have been aware that the stairs were faulty and or hazardous, but did not make any effort to replace them; and
 - e) In all circumstances, failed to discharge its common law duty of care to the Plaintiff as well as its statutory duty to her under the Cayman Islands Building Code and Labour Act, and is in breach of the said Law.
8. As a result of the 1st, 2nd, and 3rd Defendant's negligence, the Plaintiff suffered pain, suffering, damage and loss of amenities of life.

Particulars of Injuries:

- 9. The Plaintiff sustained injuries to her shoulder and wrist. She also sustained bruising to her knee.
- 10. The Plaintiff attended the hospital where she was treated for pain, assessed then released. She was referred to physiotherapy.
- 11. The Plaintiff eventually had to have surgery on her shoulder and continues to attend physiotherapy.
- 12. The Plaintiff is in continuous agonizing pain and struggles with day-to-day chores.
- 13. The Plaintiff has an infant child that she is unable to lift or carry for any period of time due to the injury.

Statement of Claim:

AND THE PLAINTIFF claims:

1. Damages in the amount of KYD200,000.00 (two hundred thousand Cayman Dollars) for;
 - i. Pain and suffering and loss of amenities of life
 - ii. Future loss of earning capacity
 - iii. Future medical care
 - iv. Miscellaneous
2. Interest to be calculated daily after service of the Writ.
3. Costs and any other relief the court deems fit.

PLC

Paragon Law Cayman Limited

Acknowledgement of service of writ of summons (0.12, r.3)**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

Notes for Guidance

This **WRIT** is filed by Paragon Law Cayman Limited, Attorneys for the Petitioner, whose address for service is PO Box 11159, Elizabethan Square, George Town, Grand Cayman KY1-1008, Cayman Islands, tel: 345-623-2519.

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.

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IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO: OF 2025

BETWEEN:

IZAZA ROBINSON

PLAINTIFF

AND

PROVEN BANK CAYMAN LIMITED

1st DEFENDANT

THE PROPRIETORS STRATA PLAN, NO.69

2nd DEFENDANT

CAYMAN FINANCIAL CENTRE

3rd DEFENDANT

ROYAL STAR ASSURANCE LIMITED

4th 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 notes for guidance to carefully before completing this form. 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 pay the costs of applying to set it aside. If

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:

Please complete overleaf

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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.

Paragon Law Cayman Limited
Attorneys-at-Law
Amerigo House, Elizabethan Square
P.O. Box 11159
Grand Cayman KY1-1008
Cayman Islands

For service or delivery of documents, please call
345-623-2519

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

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