



IN THE GRAND COURT OF THE CAYMAN ISLANDS

FINANCIAL SERVICES DIVISION

FSD NO. OF 2025 ()

IN THE MATTER OF THE GRAND COURT ACT (AS REVISED)

BETWEEN

INTERNATIONAL MANAGEMENT SERVICES LIMITED

Plaintiff

AND

SEAN INGGS

Defendant

WRIT OF SUMMONS

TO: SEAN INGGS of 6 Coastal Groves, Snug Harbour, 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 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 6th day of November 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.

AND THE PLAINTIFF claims –

1. The sums and other relief claimed in the accompanying and indorsed Statement of Claim;
2. The claims made and remedies sought against the Defendant include damages for breaches of contract and/or fiduciary duty, all accounts including an account of profits as may be necessary or appropriate, and further orders to give effect to the outcome of such accounts or inquiries, all other orders as may be necessary or appropriate to require the Defendant to disgorge profits or benefits in respect of which they ought to account to IMS or to reverse any unjust enrichment of the Defendant, all such injunctions as may be necessary or appropriate, whether before or after judgment, all such declarations as may be necessary or appropriate, including to give effect to any constructive trust or trusts in favour of IMS and/or to declare the Defendant liable to account to IMS in equity, and all such equitable liens as may be appropriate, as set out in the accompanying and indorsed Statement of Claim
3. Interest on all sums due, as follows:
 - (a) Interest pursuant to s.34 of the Judicature Act (2021 Revision) and the Judgment Debts (Rates of Interest) Rules 2021 for such period and at such rate as the Court thinks just; or
 - (b) Interest pursuant to the Court's equitable jurisdiction, compounded in equity at quarterly rests, for such period and at such rate as the Court thinks just; or
 - (c) Interest otherwise payable at common law.
4. Costs.



Signature of Plaintiff's Attorney

THIS WRIT was issued by Johnstone Law whose address for service is Unit 9, Tropic Centre, 18 Earth Close, George Town, Grand Cayman, 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 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.

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.