



SUMMARY COURT AT GEORGE TOWN

CAUSE NO. SC ____ OF 2025

Advanced Land Holdings, T/A Refuel

The Plaintiff

AND:

Ms. Jordyn Foster

The Defendant

PLAINT

To the Defendant:

Ms. Jordyn Leigh Foster whose
address is

149 Rackley Boulevard, P.O. Box
11840, Bodden Town, Grand Cayman
KY1-1009, Cayman Island

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 495GT, George Town, Grand Cayman, the accompanying Acknowledgment 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 judgment** without any further notice to you.

Issued this 13 day of November 2025

PARTICULARS OF CLAIM

The Parties agreed that the Defendant was to pay the Plaintiff an amount of **CI\$10,916.58.**

To provide context, the original debt was accumulated over the period from 13 October 2023 to 28 June 2024. Although the Defendant made some payments towards this debt, by 12 November 2024, the outstanding balance stood at CI\$13,115.70. On that same date, the Defendant transferred CI\$1,819.43 to the Plaintiff, which reduced the remaining balance to CI\$10,916.58. The Defendant subsequently agreed to settle the remaining amount by making weekly payments of CI\$1,819.43, starting from 24 January 2025 and concluding on 28 February 2025, thereby clearing the debt in full. However, apart from the payment made on 12 November 2024, no further instalments were received, despite the Defendant having provided written confirmation of this arrangement.

The parties then entered into a Payment Agreement on 24 March 2025 as follows:

- I. Payment of CI\$1,000 on Monday 17 March 2025.
- II. Payment of CI\$1,000 on Friday 21 March 2025.
- III. Payment of CI\$1,000 bi-weekly, commencing Friday 28 March 2025 and ending on Friday 11 July when the final payment of CI\$916.58 will be paid.

The funds were to be paid via Bank Transfer on the dates mentioned above.

Unfortunately, payments were either late or never arrived, despite numerous promises to pay, following emails, telephone calls and WhatsApp messages to the Defendant. The last payment was received on 3 October 2025, whereas if payments had been made as per the Payment Agreement, the debt should have been paid in full by 11 July 2025. The amount now outstanding is CI\$3,916.58 which does not include daily interest.

Debt Solutions Limited, a Debt Collection Company based in the Cayman Islands, sent a Letter Before Action via email to the Defendant on 22 October 2025 (the Defendant was not on island for the Letter to be hand delivered). The Defendant subsequently responded on the following day, i.e. 23 October 2025 to confirm that there had been an issue with the payment that was initiated through Proven Bank, and that she would send the payment via CIBC that date. As of now, the payment has not been received.

AND the Plaintiff Claims:

1. The sum of CI\$**3,916.58**
2. Interest in the sum of CI\$**661.47** calculated at the prescribed rate from 12 November 2024 to the date of this Plaint.
3. Fixed costs of CI\$**175.00**, alternatively costs to be assessed.



Plaintiff's Signature

Plaintiff's Address for service:

Mr. Michael Sandford
Advanced Land Holdings, T/A Refuel
Island Heritage Roundabout
ETH
PO Box 12422
Grand Cayman KY1-1010
Cayman Islands

Telephone Number: (+345) 925 2943

Email Address: michael@fincayinc.com

IN THE SUMMARY COURT AT GEORGE TOWN

CAUSE NO. SC ____ OF 2025

BETWEEN:

Advanced Land Holdings, T/A Refuel

The Plaintiff

AND:

Ms. Jordyn Foster

The Defendant

ACKNOWLEDGEMENT OF SERVICE

1. State Defendant's name and address:

Ms. Jordyn Leigh Foster whose
address is
149 Rackley Boulevard, P.O. Box
11840, Bodden Town, Grand
Cayman KY1-1009, Cayman Islands

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 November 2025

PARTICULARS OF DEFENCE

(Here set out in numbered paragraphs the grounds upon which the Defendant says that she is not liable to the Plaintiff, or is not liable for the full amount claimed)