



**ND COURT OF THE CAYMAN ISLANDS
ION**

CAUSE NO: OF 2026

**(1) REGINA ANDREWS
(2) KEVIN ANDREWS**

PLAINTIFFS

AND:

**(1) K.P's HEAVY EQUIPMENT LIMITED
(2) DWIGHT WRIGHT**

DEFENDANTS

WRIT OF SUMMONS

TO: **KP's Heavy Equipment Limited** with registered address being P.O. Box 11461
944 High Rock Drive, East End Grand Cayman KY1-1009 and **DWIGHT WRIGHT** of 22
Bodden Town Road, Grand Cayman.

And as a Noticed Party To: **Island Heritage Insurance Company Limited**
Island Heritage House
128 Lawrence Boulevard
P.O Box 2501
Grand Cayman

THIS WRIT OF SUMMONS has been issued against you by the above-named Plaintiff of 12610
Quoting Poet CT, Bowie, Maryland, United States of America 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 Courts Office, P.O. Box 495, George Town, Grand Cayman,
KY1-1106, Cayman Islands, 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 any intention to contest the
proceedings, the Plaintiff may proceed with the action and judgment may be entered against
you forthwith without further notice.

DATED THIS 14TH day of JANUARY 2026

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 that date of original issuance
unless renewed by order of the Court.

IMPORTANT

Directions for the Acknowledgement of service are given with the accompanying form.

This WRIT & STATEMENT OF CLAIM was filed by Samson Law Associates, Attorneys-at-Law for the
Plaintiffs whose address for service is 20 Genesis Close, PO Box 2425, Grand Cayman, KY1-1105,
Cayman Islands. (Attn: Alexandria Fennell email: afennell@samsonlaw.ky)

STATEMENT OF CLAIM

1. The 1st Plaintiff, at all material times, was the front seat passenger in a Kia Picanto rental vehicle with registration number 214154, which was rented from Hertz Car Rental.
2. The 2nd Plaintiff, at all material times, was the driver of a Kia Picanto rental vehicle with registration number 214154, which was rented from Hertz Car Rental.
3. The 1st Defendant, at all material times, was an ordinary resident company registered in the Cayman Islands, with its registered address being P.O. Box 11461 944 High Rock Drive, East End Grand Cayman KY1-1009. The 1st Defendant is also the registered owner of a 2004 Sterling LT9500 Dump Truck with registration number 150890.
4. The 2nd Defendant, at all material times, was the authorized and/or permitted driver of the 2004 Sterling LT9500 Dump Truck with registration number 150890. The 2nd Defendant, at all material times, was an employee and servant and/or agent of the 1st Defendant.
5. On or about the 18 January 2023, the 1st Plaintiff was the front seat passenger in a Kia Picanto motor vehicle, which was being driven by the 2nd Plaintiff and was travelling east along Seaview Road. The Kia Picanto (Vehicle 3) was driving behind a Nissan Serena motor vehicle (Vehicle 1) which was also driving in the said direction as the Kia. Behind the Kia motor vehicle, was a Sterling Dump Truck (Vehicle 4), also travelling in the eastward direction along Seaview Road. For further clarity, vehicles 1, 3 and 4 were all travelling in an eastward direction along Seaview Road.
6. In the opposite lane, a Toyota Camry motor vehicle (Vehicle 2), was driving westbound along Seaview Road. Upon reaching the vicinity of 568 Seaview Road, the driver of Vehicle 2 veered into the eastbound lane and a collision occurred with Vehicle 1 and 2. In an effort to avoid colliding into both vehicles 1 and 2, the 2nd Plaintiff swerved left onto the soft shoulder of the road.
7. Vehicle 3, was on the soft shoulder trying to avoid a collision when, the 2nd Defendant being the authorized and/or permitted driver and the servant and/or agent of the 1st Defendant, so negligently drove, managed and/or controlled Vehicle 4 owned by the 1st Defendant, and collided into the right rear section of Vehicle 3, causing it to rotate and collide into Vehicle 3 a second time, thereafter pushing it into the bushes up against trees.

8. The accident was caused by the negligence of the 2nd Defendant.

PARTICULARS OF NEGLIGENCE

9. The 2nd Defendant was negligent in that he:
- a. Failed to keep any or any proper look out;
 - b. Failed to apply his brakes within sufficient time or at all;
 - c. Failed to steer or control his vehicle so as to avoid the said collision;
 - d. Failed to stop, slow down, swerve or take the necessary or any necessary precaution so as to avoid the collision.
 - e. Collided into motor vehicle with registration number 214154 which was on the soft shoulder of the road in an attempt to avoid a collision.

The Plaintiffs also rely on the doctrine of res ipsa loquitur.

10. By reason of the aforesaid, the Plaintiffs have suffered personal injury, loss and damage.

PARTICULARS OF INJURY OF THE 1st PLAINTIFF

11. The 1st Plaintiff, whose date of birth is 2 August 1962, was 60 years old at the date of the accident.
12. The collision was high impact, and the 1st Plaintiff lost consciousness upon impact and was assisted by a bystander out of the vehicle and was thereafter taken to the George Town Hospital by ambulance for treatment.
13. The 1st Plaintiff sustained the following injuries:
- a. Chest pain;
 - b. Sternal tenderness;
 - c. Mild neck tenderness;
 - d. Occipital laceration;
 - e. Head pain and severe dizziness;
 - f. Left sided neck pain and stiffness;
 - g. Bruising of both wrists, right chest wall, left forehead, posterior left calf, right hip/pelvis, right buttocks and inferior to both knees;
 - h. Abrasions to occiput and left forearm
14. The 1st Plaintiff, after being assessed at the George Town Hospital, was discharged home with medication and issued head injury precautions.
15. On the 20 January 2023, the 1st Plaintiff was seen at the Health City Hospital reporting

persistent dizziness, episodes of near syncope, disturbed gait, mild headache and chest and shoulder soreness. An MRI was ordered and the results led to a diagnosis of vertigo. She was treated with Stemetil medication and discharged the same day on Betahistine medication with instructions to follow up with neurology.

16. On 25 January 2023, the 1st Plaintiff was assessed by Dr. Romnesh Mario De Souza, Neurologist, and she was diagnosed with post-concussion syndrome and was advised to begin physiotherapy for balance training upon returning to the USA.
17. Upon her return to the USA, she attended physiotherapy sessions at Absolute Rehabilitative Therapy from 2 February – 16 March 2023. On 30 March 2023 she attended another Neurologist, Dr. Shariff Dunlap, who documented that she had episodic vertigo and headaches. Dr. Dunlap also diagnosed her as having post-concussion syndrome and conservative management was advised.
18. Throughout the period of 18 March – 1 May 2024, the 1st Plaintiff underwent physical therapy at MD-Bowie Physical Therapy & Sports Medicine for left shoulder pain. After attending twelve sessions she reported significant improvement and pain was reduced.
19. She continued physical therapy at FYZICAL Therapy & Balance Centers addressing dizziness/ vertigo, cervicgia, benign paroxysmal vertigo, thoracic pain and right hip soft-tissue strain. She continued to experience dizziness, oscillopsia, headaches and imbalance. A structured vestibular rehabilitation program was initiated.
20. On 12 January 2024, the 1st Plaintiff underwent vestibular evaluation at FYZICAL, Annapolis reporting brief episodes of lightheadedness and headaches with reading. She was recommended to have a five-week course of vestibular rehabilitation. Her neurology records from 28 February 2024 with Dr. Dunlap document ongoing brief episodes of dizziness and migraine-like headaches occurring 4-5 days per month.
21. On 9 July 2024, Dr. Dunlap documented that the 1st Plaintiff continued to experience dizziness which was triggered by head movement and headaches provoked by prolonged computer use.
22. On 8 May 2025, the 1st Plaintiff went back to Dr. Dunlap and the medical records reveal that she was still experiencing persistent dizziness, headaches, visual strain, balance problems, sleep disturbance and driving anxiety. Mental health support was recommended.
23. On 3 June 2025, the FYZICAL Annapolis discharge summary noted that she achieved improved symptom management, however, she continued to experience transient lightheadedness with quick movements.

24. Dr. Boucher produced a medical report which gives a report on his assessment with Mrs. Andrews, along with an overview of all the assessments that the 1st Plaintiff underwent. The assessment with Dr. Boucher was done on 21 March 2023. At the time of his assessment, he diagnosed her injuries as being consistent with a chronic post traumatic symptom profile in which dizziness, headaches and musculoskeletal pain may continue to fluctuate rather than resolve completely.
25. The 1st Plaintiff's disabilities are permanent, and she has been assessed as having an **11%** whole person impairment rating. She is unable to return to her pre-collision lifestyle, for example, not being able to resume activities such as gym classes, gardening, theatre attendance, high intensity aerobics and sports along with highway driving.
26. Further details of the 1st Plaintiff's injuries are set out in the following medical records:
 - a. George Town Hospital medical records – 18 January 2023
 - b. Health City Cayman Islands medical records – 20 January 2023
 - c. Progress notes – Valerie Streeb – 27 January 2023
 - d. FYZICAL Therapy & Balance Centers Physical Therapy Notes
 - e. Dr. Michael Boucher Medical Report – 5 December 2025

PARTICULARS OF INJURY OF THE 2nd PLAINTIFF

27. The 2nd Plaintiff, whose date of birth is 24 August 1962, was 60 years old at the date of the accident.
28. Based on the impact of the collision, the 2nd Plaintiff was taken to George Town Hospital by ambulance for treatment.
29. The 2nd Plaintiff sustained the following injuries:
 - a. Neck stiffness
 - b. Abrasion to right forehead and right elbow
 - c. Neck pain
 - d. Pain to right side of chest/lower ribs especially on moving
 - e. Soft tissue injury
 - f. Cervical spondylosis
 - g. Minor superficial abrasions and transient right foot bruising
30. The 2nd Plaintiff, after being assessed at the George Town Hospital, was discharged home with medication.

31. Upon return to the USA, on the 31 January 2023, the 2nd Plaintiff visited his primary care physician, Dr. Gadiwalla, where he was assessed as having musculoskeletal injury secondary to MVA. He also noted that he had rib pain on the right side, pain to right foot and neck pain.
32. Further details of the 2nd Plaintiff's injuries are set out in the following medical records:
- a. George Town Hospital medical records – 18 January 2023
 - b. Progress notes – Seema Gadiwalla – 31 January 2023
 - c. Dr. Michael Boucher Medical Report – 13 October 2025

PARTICULARS OF SPECIAL DAMAGE

33. The special damages claimed by the Plaintiffs are set out in the schedule of past and future expenses and losses served with this Writ & Statement of Claim.

STATEMENT AS TO INTEREST

34. The Plaintiffs will claim interest pursuant to section 34 of the Judicature Act (2021 Revision) at half the rate as prescribed under the Judgment Debts (Rates of Interest) Rules (as amended) from 19 January 2023 to trial.

AND THE PLAINTIFFS CLAIM:

- a. General Damages;
- b. Special Damages;
- c. Interest in accordance with the Judicature Act (2021 Revision);
- d. Costs; and
- e. Such further or other relief that his Honourable Court deems just.

DATED THIS 14TH day of JANUARY 2026



Samson Law Associates
Attorneys-at-Law for the Plaintiffs

To: The Clerk of the Court
AND TO: The Defendants

This WRIT & STATEMENT OF CLAIM was filed by Samson Law Associates, Attorneys-at-Law for the Plaintiffs whose address for service is 20 Genesis Close, PO Box 2425, Grand Cayman, KY1-1105, Cayman Islands. (Attn: Alexandria Fennell email: afennell@samsonlaw.ky)

**IN THE GRAND COURT OF THE CAYMAN ISLANDS
CIVIL DIVISION**

CAUSE NO: OF 2026

BETWEEN:

(1) REGINA ANDREWS
(2) KEVIN ANDREWS

PLAINTIFFS

AND:

(1) K.P's HEAVY EQUIPMENT LIMITED
(2) DWIGHT WRIGHT

DEFENDANTS

SCHEDULE OF PAST AND FUTURE EXPENSES AND LOSSES

OF PLAINTIFFS

1ST Plaintiff

GENERAL DAMAGES

US\$

- | | |
|--|----------------|
| 1. Pain, suffering and loss of amenity | To be assessed |
| 2. Handicap on the labour market | To be assessed |

SPECIAL DAMAGES

Cayman Islands

FOOD EXPENSES (resulting from extended stay after MVA)

- | | |
|---|----------|
| 1. Extended Cayman Islands Hotel (Locale Hotel)
(24-26 January 2023) | \$762.77 |
| 2. Peppers Steakhouse – 24 Jan 2023 | \$65.76 |
| 3. Brooklyn Pizza & Pasta – 25 Jan 2023 | \$61.06 |
| 4. Coconut Joes- 26 Jan 2023 | \$32.61 |

TAXI EXPENSES

- | | |
|---|----------|
| 1. Taxi to Health City ER – 20 Jan 2023 | \$108.00 |
| 2. Taxi from Health City ER- 20 Jan 2023 | \$95.00 |
| 3. Taxi to Health City – Neurologist- 25 Jan 2023 | \$95.00 |
| 4. Taxi from Health City - Neurologist- 25 Jan 2023 | \$95.00 |

This WRIT & STATEMENT OF CLAIM was filed by Samson Law Associates, Attorneys-at-Law for the Plaintiffs whose address for service is 20 Genesis Close, PO Box 2425, Grand Cayman, KY1-1105, Cayman Islands. (Attn: Alexandria Fennell email: afennell@samsonlaw.ky)

MEDICAL EXPENSES

1. HSA Visit – 18 Jan 2023	\$5284.60
2. Health City CI – 20 Jan 2023	\$4662.86
3. Health City CI Pharmacy – 25 Jan 2023	\$11.93
4. Health City Neurologist Visit – 25 Jan 2023	\$190.70

USA**MEDICAL EXPENSES**

1. John Hopkins NP Visit – 27 Jan 2023	\$24.00
2. John Hopkins – Dr. Giles Neuro visit -13 Feb 2023	\$24.00
3. John Hopkins – 16 Mar 2023	\$190.70
4. Walgreens – medication from Streeb appointment 27 Jan 2023	\$12.93
5. Luminus Health – Dr. Dunlap – 30 Mar 2023	\$36.00
6. FYZICAL Therapy – Bowie – 2 Feb – 16 Jun 2023 (Vestibular Therapy)	\$1440.00
7. FYZICAL Therapy – Tulsa – 25 Aug -20 Oct 2023 (Vestibular Therapy)	\$1275.00
8. FYZICAL Therapy – Tulsa – 25 Aug 2023 (Consultation)	\$110.00
9. FYZICAL Therapy – Annapolis – 12 Jan -13 Feb 2024 (Vestibular Therapy)	\$333.00
10. FYZICAL Therapy – Bowie (Left Arm Neuro Muscular/Therapeutic Therapy) 18 Mar – 1 May 2024	\$444.00
11. Luminus Health – Dr. Dunlap -28 Feb 2024	\$37.00
12. MRI – 13 Mar 2024	\$37.00
13. Luminus Health- Dr. Shaiganyi – 22 Mar 2024	\$37.00
14. Luminus Health – VNB Tester – 15 Apr 2024	\$37.00
15. Luminus Health – Dr. Dunlap – 9 July 2024	\$37.00
16. Luminus Health – Dr. Dunlap – 8 May 2025	\$38.00
17. FYZICAL Therapy – Annapolis – 1 May – 3 Jun 2025 (Vestibular Therapy)	\$342.00
18. Dr. Boucher Medical Report	\$3725.00 (Canadian \$)
19. Company Search for 1 st Defendant details	\$36.59 (KYD\$)

MISCELLANEOUS EXPENSES

1. Eyeglasses replacement- 18 Jan 2023	\$433.00
2. Public taxi to Police Station -23 Jan 2023	\$4.00
3. US Postal Service – Insurance Appeal mail 19 Apr 2023	\$26.70
4. USPS mail receipt for reimbursement 25 Mar 2023	\$11.53
5. Cancelled travel to Singapore – 30 Jan 2023	\$2656.00

This WRIT & STATEMENT OF CLAIM was filed by Samson Law Associates, Attorneys-at-Law for the Plaintiffs whose address for service is 20 Genesis Close, PO Box 2425, Grand Cayman, KY1-1105, Cayman Islands. (Attn: Alexandria Fennell email: afennell@samsonlaw.ky)

6. Police Report – 21 June 2023	\$100 (KYD\$)
7. Legal Fees for previous Attorneys (KSG)	\$4396.02

2nd Plaintiff**GENERAL DAMAGES****US\$**

1. Pain, suffering and loss of amenity	To be assessed
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SPECIAL DAMAGES

1. HSA Visit – 19 Jan 2023	\$1269.20
2. Legal Fees for previous Attorneys (KSG)	\$2141.79

AND THE PLAINTIFFS CLAIM:

- a. General Damages;
- b. Special Damages;
- c. Interest in accordance with the Judicature Act (2021 Revision);
- d. Costs; and
- e. Such further or other relief that his Honourable Court deems just.

DATED THIS 14TH day of JANUARY 2026**Samson Law Associates**

Attorneys-at-Law for the Plaintiffs

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 495, 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

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 (or 28 days in the case of a writ served outside the jurisdiction pursuant to an order of the Court), 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 authorized 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.

**IN THE GRAND COURT OF THE CAYMAN ISLANDS
CIVIL DIVISION****CAUSE NO: OF 2026****BETWEEN:****(1) REGINA ANDREWS
(2) KEVIN ANDREWS****PLAINTIFFS****AND:****(3) K.P's HEAVY EQUIPMENT LIMITED
(4) DWIGHT WRIGHT****DEFENDANTS****ACKNOWLEDGMENT OF SERVICE OF WRIT OF SUMMONS**

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 applying to set it aside

-
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 the Defendant 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).....

[The Plaintiff]/ [Attorney for the Plaintiff]

Address for service: Please complete overleaf

This WRIT & STATEMENT OF CLAIM was filed by Samson Law Associates, Attorneys-at-Law for the Plaintiffs whose address for service is 20 Genesis Close, PO Box 2425, Grand Cayman, KY1-1105, Cayman Islands. (Attn: Alexandria Fennell email: afennell@samsonlaw.ky)

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 Plaintiffs Attorney (or by Plaintiff if suing in person) of his name, address and reference, if any, in the box below.

Samson Law Associates

The White House,
20Genesis Close,
PO Box 2425, Grand Cayman,
KY1-1105, Cayman Islands.

Attn: Alexandria Fennell

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