



IN THE GRAND COURT OF THE CAYMAN ISLANDS
GEORGE TOWN GRAND CAYMAN
ON

CAUSE NO. OF 2026

CLODEN DOUGLAS JR.

PLAINTIFF

AND

JEFFERSON'S PIZZA SERVICES LTD
T/A DOMINO'S PIZZA

DEFENDANT

WRIT OF SUMMONS

TO: JEFFERSON'S PIZZA SERVICES LTD
T/A DOMINO'S PIZZA
% P.O. Box 30489
Room-G, Barnett Music Centre
George Town, 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 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 Acknowledgement of Service, stating therein whether you intend to contest these proceedings.

If you fail to satisfy the claim or return the Acknowledgement within the time stated, or if you return the Acknowledgement without stating therein an intention to contest the proceedings the Plaintiff may proceed with the action and judgement may be entered against you forthwith without further notice.

Issued this 21st 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 the date of issue unless renewed by order of the Court.

IMPORTANT

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

STATEMENT OF CLAIM**The Parties**

1. At all material times:

1.1. The Plaintiffs, Cloden Douglas Jr., was a retiree and resident of the Cayman Islands who was periodically hired as a musician to perform at various establishments throughout these islands.

1.2. The Defendant, Jefferson's Pizza Services Ltd. T/A Domino's Pizza has been a company incorporated under the laws of the Cayman Islands and operating various Domino's Pizza Locations to include a location in Savannah, Grand Cayman.

The Facts

2. On October 17, 2022, the Plaintiff sustained a personal injury at the Defendant's premises, Domino's Pizza Store located in Savannah, Grand Cayman.

3. The injury occurred when the Plaintiff slipped and twisted his left ankle while walking down a wet ramp at the Defendant's premises. The ramp was wet due to rain and/or was not properly maintained or marked as hazardous, which constitutes negligence on the part of the Defendant.

4. As a result of the fall, the Plaintiff suffered a bimalleolar fracture dislocation of the left ankle, which required extensive medical treatment, including surgery, insertion of pins and plates, physiotherapy, and prolonged recovery.

5. The Plaintiff was unable to work for a period of 14 months, resulting in significant financial loss and a reduction in his quality of life.

Loss and damage

6. By reason of the Defendant's negligence, the Plaintiff has suffered loss and damage.

Particulars of Loss and Damage

7. General Damages for Pain, suffering, and loss of amenities.

7.1. The injury caused significant reduction in the Plaintiff's enjoyment of life, as he was unable to attend social functions and other activities for approximately 14 months.

8. Special Damages to include loss of earnings in the amount of CI\$85,500.00.

8.1. CI\$64,500.00 for loss of income from twice-weekly performances at Peppers Restaurant at CI\$1,075.00 per week for 14 months.

- 8.2. CI\$21,000.00 for loss of income from once-weekly performances at Ritz Carlton Hotel or Kimpton Hotel at CI\$1,500.00 per month for 14 months.
- 8.3. Medical Expenses in the amount of CI\$3,408.04 for medical treatment, including surgery, physiotherapy, and medication.
- 8.4. Care and Assistance: CI\$7,000.00 for hiring landscapers to maintain the Plaintiff's private home and six apartments during the 14-month recovery period.
- 8.5. Attorney's Fees.
9. A Schedule giving full details of the Loss and Damage suffered by the Plaintiffs as a result of the acts of the Defendants will be supplied at a later date.
10. Further, the Plaintiff is entitled to and claim interest upon all damages owing to it pursuant to Section 34 of the Judicature Act (2021 Revision) at such rate and for such period as the Court shall deem fit.

Statement as Regards Interest

11. The prescribed rate of interest as of October 17, 2022, to present is 2.38% per annum.

Particulars of Interest

12. $\text{CI\$}114,498.04 \times 2.38\% \times (365/365) = \text{CI\$}7.47$ per diem.

Statement as to Interest

13. Interest currently accrues at the rate of CI\$7.47 per diem.

And the Plaintiffs Claim:

1. General damages for pain, suffering, and loss of amenity.
2. Special damages in the sum of CI\$114,408.04.
3. Interest on the above amounts at the statutory rate of CI\$7.47 per diem.
4. Costs

Dated this 21st day of January 2026


Murray & Westerborg

**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

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.

IN THE GRAND COURT OF THE CAYMAN ISLANDS
HOLDEN AT GEORGE TOWN GRAND CAYMAN
CIVIL DIVISION

CAUSE NO. OF 2026

BETWEEN

CLODEN DOUGLAS JR.

PLAINTIFF

AND

JEFFERSON'S PIZZA SERVICES LTD
T/A DOMINO'S PIZZA

DEFENDANT

ACKNOWLEDGEMENT 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 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 he may have to pay the costs of 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 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 Plaintiffs' Attorney (or by plaintiff if suing in person) of his name, address and reference, if any, in the box below.

*Murray & Westerborg,
Attorneys-at-Law
No. 10 Shipping Lane, 2nd Floor
Cayman Shipping Centre Building
PO Box 10067,
Grand Cayman, KY1-1001,
Cayman Islands.*

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

THIS WRIT OF SUMMONS is filed by Murray & Westerborg, Attorneys-at-Law, for and on behalf of the Plaintiff whose address for service is that of her said Attorneys-at-Law, The Second Floor (Southwest Wing), Cayman Shipping Centre Building, 10 Shipping Lane, George Town, Grand Cayman, Cayman Islands