



COURT OF THE CAYMAN ISLANDS

IN

CAUSE NO.

OF 2026

BETWEEN:

KENNETH GARRICKS

PLAINTIFF

-AND-

**(1) CHERYLM MEEHAN
(2) CAYMAN LUXURY RENTAL CARS**

DEFENDANTS

WRIT OF SUMMONS

**TO: Cherylm Meehan
1009 Chesterfield Drive
Murphy, Texas**

**AND TO: Cayman Luxury Rental Cars
13, 46 Canal Point Drive
Grand Cayman,
Cayman Islands KY1-1204**

AND AS A NOTICED PARTY TO

Insurance Company of the West Indies (Cayman) Ltd.
150 Smith Road, George Town
P.O. Box 461
Grand Cayman

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 the Writ on you, counting the day of service, you must either satisfy the claim or return to the Court Office, P.O. Box 495, George Town, Grand Cayman, 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 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 ____ day of _____ 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 renewed by order of the Court.

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

STATEMENT OF CLAIM

1. At all material times, the Plaintiff was and remains an Air Conditioning Technician and was the authorized driver of a White Ford F 150 motor vehicle with registration number **107 340** on or about 31st of March 2023.
2. The 1st Defendant was at all material times the agent or otherwise the authorized driver of a Silver 2020 Kia Rio motor vehicle with registration number **189 008**, operating the said vehicle with the full knowledge, permission, and consent of the Second Defendant.
3. The 2nd Defendant is and was at all material times the registered owner of motor vehicle registration number **189 008** and is a limited liability company incorporated under the laws of the Cayman Islands.
4. On or about 31 March 2023, the Plaintiff was lawfully operating his said motor vehicle in an easterly direction along Shamrock Road in the vicinity of Brightview Drive on the left and had come to a stop in the vicinity of Calla Lily Drive on his right with his indicator on and intending to making a lawful right turn into Calla Lily Drive. He was waiting for the traffic travelling west on shamrock to clear to execute his turn.
5. At the said time and place, the First Defendant, who was operating motor vehicle registration number **189 008** and travelling directly behind the Plaintiff, negligently failed to stop and collided into the rear of the Plaintiff's stationary vehicle.
6. The collision was caused solely by the negligence of the First Defendant. The Second Defendant is vicariously liable for the negligent acts and/or omissions of the First Defendant pursuant to the common law principles of agency and/or master and servant.

Particulars of Negligence and Breach of Duty of Care of the 1st Defendant

- (a) Driving at an excessive or unsafe speed in the circumstances;
 - (b) Failing to maintain any or any proper lookout;
 - (c) Failed to keep at a safe distance between motor vehicles;
 - (d) Failed to apply the brakes in due time or at all;
 - (e) Failing to have sufficient regard for the presence and position of the Plaintiff's vehicle;
 - (f) Caused motor vehicle registered **189 008** to collide into the rear end of motor vehicle registered **107 340**;
 - (g) Failed to stop slow down, steer or otherwise control her motor car so as to avoid the collision; and
7. Failing to take reasonable steps to avoid the said collision.
By reason of the aforesaid, the Plaintiff has suffered personal injury, loss, and damage.

Particulars of Injuries

- a. Lower back pain;
 - b. Pain in the back of the right leg;
 - c. Disc bulge in S1;
 - d. Lumbar lordosis;
 - e. Herniated disc;
 - f. 9/10 Lumbar pain;
 - g. Retrolisthesis L4 on L5, L5 on S1;
 - h. Disc protrusion at L4-L5;
 - i. Annular Tear at L5-S1;
 - j. Multifocal facet degenerative disease;
 - k. Lower back pain with radiculopathy;
 - l. Lumbar spondylosis; and
 - m. Right Sacroiliac Joint Pain and Dysfunction.
8. Further Particulars of the Plaintiff's injury and treatment will be provided by way of schedule of loss and hereto attached medico-legal report.

Particulars of Special Damage

9. The Plaintiff has incurred and will continue to incur expenses and financial loss, particulars of which will be supplied later by way of schedule of loss including but not limited:
- a. Medical expenses (past and ongoing);
 - b. Transportation.
 - c. Loss of earnings (past and future);
 - d. Cost of rehabilitation and therapy; and
 - e. Care

Statement as to Interest

10. The Plaintiff claims interest pursuant to section 34 of the **Judicature Law (2021 Revision)**, or such other rate and for such period as this Honourable Court deems just and appropriate.

AND THE PLAINTIFF CLAIMS:

- A. Damages;
- B. Special Damages
- C. Interest in accordance with the Judicature Law [2021 Revision];
- D. Costs;
- E. Such further or other relief that this Honourable Court deems fit.

CP Attorneys

CP ATTORNEYS
Attorneys-at-Law for the Plaintiff

DIRECTIONS FOR ACKNOWLEDGMENT OF SERVICES 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 "Statements of Claim" appear on the top of page 2) the Defence must be served within 28 days after the time for acknowledging service of the Writ, unless in the meantime a summons for judgement is served on the Defendant.

If the Statement of Claim is not indorsed on the Writ, the Defence need not be served until 28 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 judgement 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

This **WRIT AND STATEMENT OF CLAIM** is filed by **CP Attorneys**, Attorneys-at-Law for and on behalf of the **Plaintiff**, whose address for service is Unit 228, Elizabethan Square, 80 Shedden Road, George Town, P.O. Box 561, Grand Cayman KY1-1602, Cayman Islands.

Notes for Guidance

1. Each Defendant (if there is 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 28 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 (.....)” 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.

This **WRIT AND STATEMENT OF CLAIM** is filed by **CP Attorneys**, Attorneys-at-Law for and on behalf of the **Plaintiff**, whose address for service is Unit 228, Elizabethan Square, 80 Shedden Road, George Town, P.O. Box 561, Grand Cayman KY1-1602, Cayman Islands.

THE GRAND COURT OF THE CAYMAN ISLANDS

CIVIL DIVISION

CAUSE NO.

OF 2026

BETWEEN:

KENNETH GARRICKS

PLAINTIFF

-AND-

(1) CHERYLM MEEHAN
(2) CAYMAN LUXURY RENTAL CARS

DEFENDANTS

ACKNOWLEDGMENT OF SERVICE

If you intend to instruct an Attorney to act for you, give him this form IMMEDIATELY.

Important. Read the accompanying Delay may result in judgment being entered directions and notes for guidance carefully against a Defendant whereby he may have before completing this form. If any to pay the costs of applying to set it aside. information required is omitted or given wrongly, THIS FORM MAY HAVE TO BE RETURNED.

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)

YesNo
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)

YesNo

Service of this Writ is acknowledged accordingly

(Signed) _____
Defendant/Attorney for the Defendant

Please complete overleaf

This **WRIT AND STATEMENT OF CLAIM** is filed by **CP Attorneys**, Attorneys-at-Law for and on behalf of the **Plaintiff**, whose address for service is Unit 228, Elizabethan Square, 80 Shedden Road, George Town, P.O. Box 561, Grand Cayman KY1-1602, Cayman Islands.

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 communication 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 Plaintiffs if suing in person) of his name, address and reference, if any, in the box below.

CP Attorneys
228 Elizabethan Square
80 Shedden Road
George Town
P.O. Box 561
Grand Cayman KY1-1602
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 AND STATEMENT OF CLAIM** is filed by **CP Attorneys**, Attorneys-at-Law for and on behalf of the **Plaintiff**, whose address for service is Unit 228, Elizabethan Square, 80 Shedden Road, George Town, P.O. Box 561, Grand Cayman KY1-1602, Cayman Islands.