



**COURT OF THE CAYMAN ISLANDS
AT GEORGE TOWN**

Cause No.

JAVIER GRANT

Plaintiff

AND

UNIVERSITY COLLEGE CAYMAN ISLANDS

Defendant

WRIT OF SUMMONS

TO: UNIVERSITY COLLEGE CAYMAN ISLANDS
P O Box 702, KY1-1107
168 Olympic Way
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 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 day of September 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 Acknowledgment of Service are given with the accompanying form.

THIS WRIT is filed by Richards & Richards Attorneys-at-Law

STATEMENT OF CLAIM

1. At all material times the Plaintiff was a student at University College Cayman Islands. At the time of the incident the Plaintiff was a minor.
2. At all material times the Defendant is a body corporate responsible for the operation, maintenance, control and supervision of University College Cayman Islands, located at 168 Olympic Way, George Town, Grand Cayman.
3. On or about the 27th of October 2023 at approximately 10am, the Plaintiff was lawfully on the premises of University College Cayman Island's for the purpose of attending to his studies.
4. While walking into the student life building the Plaintiff was caused to slip and fall violently as a result of a wet hazardous surface in front of the One-Stop Centre.
5. At the time of this slip and fall, the corridor roof leading to the One Stop Centre was having construction performed on it.
6. The Defendant owed a duty of care to the Plaintiff to ensure that the school premises were reasonably safe for persons entering them pursuant to common law.
7. The Plaintiff's slip and resulting injuries were caused solely by the negligence of the Defendant, its servants, agents or employees.

Particulars of Negligence

8. The Defendant was negligent in that they:
 - a. Failed to maintain the premises in a safe condition;
 - b. Allowed a dangerous slipping / tripping hazard to exist when they knew or ought to have known, of its presence;

- c. Failed to inspect the premises adequately or at all to detect and remedy the hazard;
 - d. Failed to place warning signs, barriers, or cones around the hazard;
 - e. Failed to establish or enforce an adequate maintenance or safety policy
- 9.** As a direct result of the slip/ trip and fall, the Plaintiff sustained serious and painful injuries including, but not limited to:
- a. loss of three front teeth
 - b. enamel dental fractures
 - c. lateral luxation injuries
 - d. gingival lacerations
 - e. lacerations to his lips
 - f. generalized bruising
 - g. nervous shock, anxiety and sleep disruption
 - h. post-traumatic stress
- 10.** As a further result of these injuries, the Plaintiff has suffered and continues to suffer pain, physical limitations and loss of enjoyment of life.
- 11.** The Plaintiff has incurred, and will continue to incur, special damages and financial losses, including but not limited to:
- a. Medical expenses (ongoing)
 - b. Medication expenses
 - c. Travel expenses to and from medical appointments

AND THE PLAINTIFF CLAIMS

- 12.** In the premises, the Plaintiff is entitled to and claims:

- (1) General damages for pain suffering and loss of amenities assessed at CI\$33,000;
- (2) Special Damages as set out in the attached schedule;
- (3) Pre and Post Judgment Interest pursuant to the Judicature Law;
- (4) The costs of this action;
- (5) Such further and other relief as this Honorable Court deems just.

If, within the time for returning the Acknowledgment of Service, the Defendant pays the total amount of CI\$98,860.00 further proceedings will be stayed. The money must be paid to the Plaintiff Attorney's Bank Account at:

Online payments can be made to **Cayman National Bank**
Account Name: **Richards & Richards Attorneys-at-Law Ltd.**
Account Type: **KYD - Checking**
Account Number: **011-17352**
Put your reference in the Beneficiary Comments

Dated: 24 September 2026



Richards and Richards, Attorneys at Law for the Plaintiff

DIRECTIONS FOR ACKNOWLEDGEMENT OF SERVICE OF WRIT OF SUMMONS

1. The accompanying form of Acknowledgement of Service should be completed by an Attorney on behalf of the Defendant or by Defendant if acting in person.

After completion it must be delivered or sent by post to the Law Courts, PO 495G, George Town, Grand Cayman.

2. A Defendant who states in his Acknowledgement of Service that he intends to contest the proceedings must also serve a defense on the Attorney for the Plaintiff (or on the Plaintiff if acting in person).

If a Statement of Claim is not endorsed 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 Acknowledgement, 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 installments or otherwise.

See overleaf for notes for guidance

Please complete overleaf

Notes of Guidance

1. Each Defendant (if there are more than one) is required to complete an Acknowledgement 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 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 form 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 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. The Defendant acting in person may obtain help in completing the form at the Court Office.

**IN THE GRAND COURT OF THE CAYMAN ISLANDS
HOLDEN AT GEORGE TOWN**

BETWEEN

JAVIER GRANT

AND

UNIVERISTY COLLEGE CAYMAN ISLANDS

Cause No.

Plaintiff

Defendant

**ACKNOWLEDGEMENT OF SERVICE
OF WRIT OF SUMMONS**

1. **State** the full name of the Defendant's by whom or on whose behalf the service of the Writ is being acknowledged.

2. State whether the Defendant intends to contest the proceedings.

_____ **Yes**

_____ **No**

3. If the claim against the Defendant is for a debt or liquidation 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.

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

Richards & Richards Attorneys-at-Law
Harbour Center, 3rd Floor, Suite 5
159 Mary Street, George Town
Grand Cayman, 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.

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THIS WRIT is filed by for the Plaintiff, whose address for service is Harbour Center, 3rd Floor, Suite #5, 159 Mary Street, George Town, Grand Cayman,