

IN THE GRAND COURT OF THE CAYMAN ISLANDS



CAUSE NO: 358 OF 1995

BETWEEN:

CAREY MCFIELD

PROFESSIONAL PROTECTION SERVICES LTD.

FIRST PLAINTIFF

SECOND PLAINTIFF

AND:

DERRICK CAMPBELL

DEFENDANT

WRIT OF SUMMONS

TO:

Derrick Campbell
P.O. Box 250, Windsor Park
George Town, Grand Cayman



THIS WRIT OF SUMMONS has been issued against you by the above-named Plaintiffs 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 Plaintiffs may proceed with the action and judgment may be entered against you forthwith without further notice.

Issued this 21st day of August, 1995.

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 the Service are given with the accompanying form.

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STATEMENT OF CLAIM



1. The First Plaintiff is a director and officer of the Second Plaintiff.
2. The Second Plaintiff is a company duly registered under the laws of the Cayman Islands and carries on the business of security and safety of persons and property.
3. The Defendant was an employee of the Second Defendant and was supervised by the First Defendant whilst so employed.
4. Between approximately June 14 and June 21, 1995 the Defendant falsely and maliciously spoke and published of and concerning the Plaintiffs to certain other employees of the Second Defendant (namely, Laban Harris, Kevin Bodden, Dervol Henry, Amos Onfry and Vinnett Judson), and to other members of the public whose names are at present unknown to the Plaintiffs, the words following, that is to say:

"Carey McField is submitting false documents and invoices to the government."

"The company [the Second Defendant] is going to lose the Port Authority Contract."

"McKeva Bush has a personal vendetta against carey McField."

"Carey McField and the company [the Second Defendant] owes me money for vacation pay. I will sue Carey McField and the company [the Second Defendant] in Court so that the company will be left without funds to pay its employees."

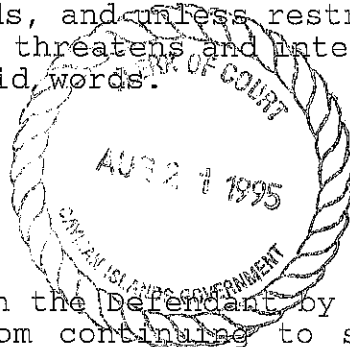
"Several people are currently suing Carey McField in Court."

"I will do whatever I have to do to make the company [the Second Plaintiff] go under."

5. The Defendant meant and was understood to mean thereby that the Plaintiffs were dishonest and fraudulent in their dealings and not fit to be trusted or employed to carry out any public service.
6. In consequence of the said words the Plaintiffs were greatly injured in their credit and reputation and in their said profession of security to persons and property.
7. The Defendant is still continuing to speak and publish, of the Plaintiffs, the same words, and unless restrained by an Order of This Honourable Court, threatens and intends to continue to speak and publish the said words.

AND THE PLAINTIFFS claim:

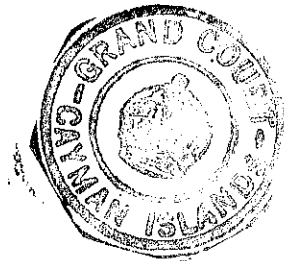
- (1) Damages; and
- (2) An injunction to restrain the Defendant by himself or by his servants, or agents, from continuing to speak and publish slanders or libels concerning the Plaintiffs' profession or concerning the Plaintiffs' themselves.



[If, within the time for returning the Acknowledgment of Service, the Defendant pays the total amount claimed (including interest and costs) further proceedings will be stayed. The money must be paid to the Plaintiffs or his Attorney.]

A handwritten signature in black ink, appearing to read "A. McField".

A. STEVE MCFIELD & ASSOCIATES,
ATTORNEYS FOR THE PLAINTIFFS



THIS WRIT was issued by A. Steve McField & Associates, whose address for service is P.O. Box 680, George Town, Grand Cayman, attorneys for the Plaintiffs.

BETWEEN:

CAREY MCFIELD

FIRST PLAINTIFF

PROFESSIONAL PROTECTION SERVICES LTD.

SECOND PLAINTIFF

AND:

DERRICK CAMPBELL

DEFENDANT



ACKNOWLEDGMENT OF SERVICE
OF WRIT OF SUMMONS

If you intend to instruct an Attorney to act, 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 appropriate box).

Yes

Service of the Writ is acknowledged accordingly

(Signed) _____

[Attorney] for:
[Defendant in person]

Address for service: _____

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 of, 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.

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

A. Steve McField & Associates
Attorneys-at-Law, on behalf of the
Plaintiffs
P.O. Box 680, Mary Street
George Town, Grand Cayman

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