

IN THE GRAND COURT OF THE CAYMAN ISLANDS

0031  
CAUSE NO. OF 2014

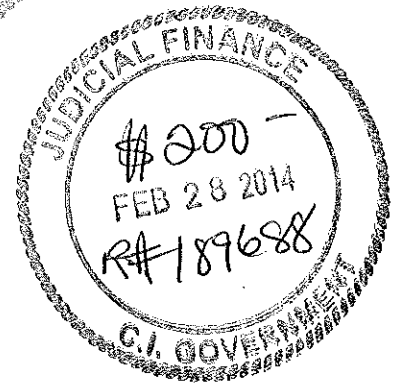
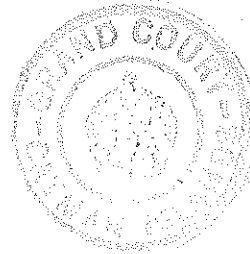
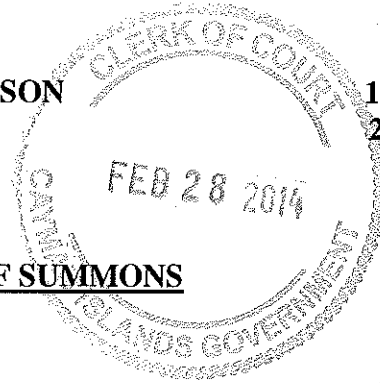
**BETWEEN:** **DOROTHY FAYE SIMMS** 1<sup>ST</sup> PLAINTIFF  
**CRYSTAL CAMPBELL** 2<sup>ND</sup> PLAINTIFF

**AND:** **LASCELLES JACKSON** 1<sup>ST</sup> DEFENDANT  
**AUSTIN JACKSON** 2<sup>ND</sup> DEFENDANT

**WRIT OF SUMMONS**

**TO:** Lascelles Jackson  
Occupier of the Premises  
23 Boxelder St, West Bay,  
Grand Cayman,  
Cayman Islands

**AND TO:** Austin Jackson  
Occupier of the Premises  
23 Boxelder St, West Bay,  
Grand Cayman,  
Cayman Islands



**THIS WRIT OF SUMMONS** has been issued against you by the above-named Plaintiffs in respect of the claim set out in the Statement of Claim.

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 28<sup>th</sup> day of Feb. 2014

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 of Summons was FILED by A. STEVE MCFIELD & ASSOCIATES of P.O. Box 680 GT, Grand Cayman, KY1-1107, Cayman Islands, Suite D2, Cayman Business Park, 10 Huldah Avenue, Attorneys-at-Law, whose address for service is that of his said Attorney-at-Law.**

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

**CAUSE NO. 0031 OF 2014**

<b>BETWEEN:</b>	<b>DOROTHY FAYE SIMMS</b>	<b>1<sup>ST</sup> PLAINTIFF</b>
	<b>CRYSTAL CAMPBELL</b>	<b>2<sup>ND</sup> PLAINTIFF</b>
<b>AND:</b>	<b>LASCELLES JACKSON</b>	<b>1<sup>ST</sup> DEFENDANT</b>
	<b>AUSTIN JACKSON</b>	<b>2<sup>ND</sup> DEFENDANT</b>

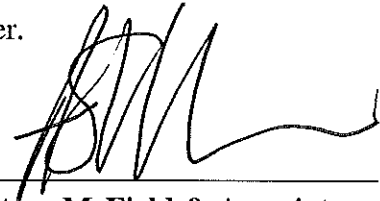
**STATEMENT OF CLAIM**

1. The 1<sup>st</sup> Plaintiff is the mother of the 2<sup>nd</sup> Plaintiff and they are the registered proprietors of the property Registration Section West Bay, North West ,Block 4D Parcel 149, located at 23 Boxelder Street ,West Bay, Grand Cayman (“the Property”).The Second Defendant is the son of the First Defendant. The Defendants are unlawful occupiers, of the property at 23 Boxelder Street, West Bay, Grand Cayman without licency lease or permission from the Plaintiffs.
2. On or about the middle of 2001 Nelly Jackson-Thomas, the aunt of the 2<sup>nd</sup> Plaintiff and wife of the First Defendant was purported to be given a license by the late Joseph Willard Ebanks the uncle of the 1<sup>st</sup> Plaintiff, to erect a dwelling house on the said property.
3. On completion of the said Dwelling house on the said premises by Nelly Jackson-Thomas, the First Defendant and the Second Defendant move into the said dwelling house with Nelly Jackson-Thomas.
4. On or about 2005, Nelly Jackson-Thomas and the First Defendant were divorced and Nelly Jackson-Thomas relinquished possession of the property and moved therefrom. However, the Defendants who had no license to occupy the property refused to give up possession of the property.
5. On or about 2012 the Plaintiffs purchased the said property and on or about 31 August 2012 the Plaintiffs’ Attorney by letter served the Defendants with 30 days notice to vacate the property. At the ends of the 30 days notice to vacate. Defendants failed to vacate the property.

6. On or about 16 October 2012 the Plaintiffs' attorney by letter again served the Defendants with a final Notice to vacate the property. The Defendants ignored the Plaintiffs' Attorney said final Notice and again failed to vacate the property.
7. On or about the 21<sup>st</sup> September 2012 the Plaintiffs' received a letter from the 1<sup>st</sup> Defendant's Attorney, inter alia, claiming that the 1<sup>st</sup> Defendant had acquired quiet possession of the property on the basis of being in undisturbed occupation of the property in excess of 12 years. On or about 15 November 2012 the Plaintiffs' Attorney replied to the 1<sup>st</sup> Defendant's Attorney letter denying the Defendants Claim to quiet possession of the property.
8. The Plaintiffs' said uncle purported grant of a license to the Defendant to occupy the said property was and is without legal authorities that vest no legal or equitable rights in the Defendants to continue occupation of the Plaintiffs' said property.
9. By Reason of the premises the Plaintiff's have been and are wrongfully deprived of the peaceful enjoyment and vacancy of the said property.

And The Plaintiff Claims:

1. That the Defendants be ordered to vacate Block 4D Parcel 149 and give up possession of the said Block 4D Parcels 149 to the Plaintiffs.
2. Damages
3. Cost
4. Such further or other Relief as the Court deems proper.



**A. Steve McField & Associates**  
**Attorneys-at-Law for the Plaintiffs**

**Dated this 24 day of February 2014**

**THIS Statement of Claim was FILED by A. STEVE MCFIELD & ASSOCIATES of P.O. Box 680 GT, Grand Cayman, KY1-1107, Cayman Islands, Suite D2, Cayman Business Park, 10 Huldah Avenue, Attorneys-at-Law, whose address for service is that of his said Attorney-at-Law.**

**BETWEEN:**                    **DOROTHY FAYE SIMMS**                    **1<sup>ST</sup> PLAINTIFF**  
                                          **CRYSTAL CAMPBELL**                    **2<sup>ND</sup> PLAINTIFF**

**AND:**                            **LASCELLES JACKSON**                    **1<sup>ST</sup> DEFENDANT**  
                                          **AUSTIN JACKSON**                    **2<sup>ND</sup> DEFENDANT**

**ACKNOWLEDGMENT 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 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*)

Service of the Writ is acknowledged accordingly

(Signed) .....

[Attorney] for

[Defendant in person]

Address for service:

Notes on address for service

*Please complete overleaf*

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.*

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