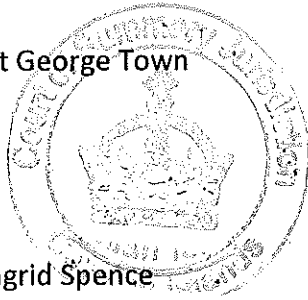


Plaint

In the Summary Court at George Town

Cause No. SC 0008 of 20 16

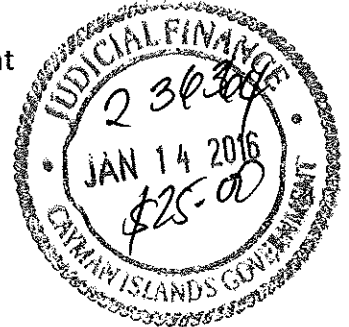
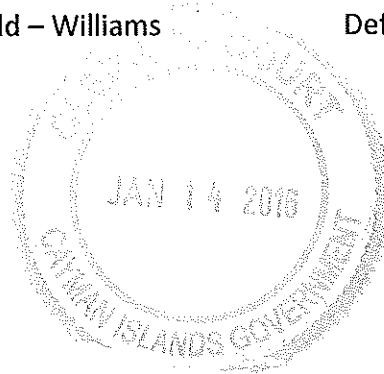


Between: Ingrid Spence Plaintiff

And: Nichola Broomfield – Williams Defendant

To the defendant:

Nichola Broomfield – Williams
54 Elderberry Drive, Newlands
Bodden Town, Grand Cayman



This plaint 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 plaint on you, counting the day of service, you must either satisfy the claim or return to the Court Office, P.O. Box 495 GT, George Town, Grand Cayman, the accompanying Acknowledgement of Service form stating therein whether you intend to contest this action. If you intend to defend the action, in whole or in part, you must set out full particulars of your defence in the space provided in the Acknowledgement of Service form.

If you fail to satisfy the claim or fail to return the Acknowledgement of Service form containing full particulars of your defence, the Plaintiff may apply for a default judgement without any further notice to you.

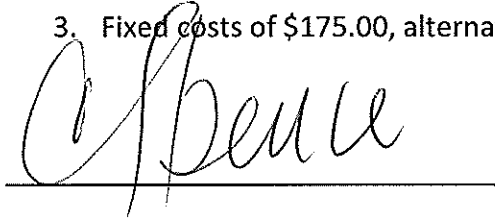
Issued this 14th day of January, 20 16.

Particulars of Claim

Please see attached particulars

AND the Plaintiff claims:

1. The sum of \$2,030.00
2. Interest in the sum of \$_____ calculated at the prescribed rate from to date
3. Fixed costs of \$175.00, alternatively costs to be assessed.

A handwritten signature in cursive script, appearing to read 'A. Bence', is written over a horizontal line.

Plaintiff's Signature

Plaintiff's address for service

54 Elderberry Drive, Newlands

Bodden Town, Grand Cayman

PARTICULARS OF CLAIM

1. The Defendant and her husband Kirk Williams are tenants of the Plaintiff at # 54 Elderberry Drive, Savannah Newlands, Bodden Town, Grand Cayman. The Plaintiff also resides on the premises.
2. On Wednesday the 9th day of December 2015 sometime in the afternoon, the Defendant drove motor vehicle - Registration #162-471, 1999 Blue Mitsubishi Nativa, unto the premises at # 54 Elderberry Drive, Savannah Newlands, Bodden Town, Grand Cayman and damaged the Plaintiff's RUDD 3.5 – 4.0 ton Central Condensing Unit (Air Condition Unit) which services the entire section of the house where the Plaintiff occupies.
3. The collision of the vehicle into the Air Condition Unit caused the following to occur:
 - (a) The connection of the electrical pipes was torn away from the Air Condition Unit as a result of which there was a short circuit causing an explosion.
 - (b) The pipes were separated from the building which caused leaking from the evaporation coil.
 - (c) The Air Conditioning Unit was assessed to be totally inoperable and had to be replaced.
4. The destruction of the Central Air Condition Unit has caused daily discomfort to the Plaintiff in that there was no air conditioner to cool her premises.
5. The Defendant accepted responsibility of this damage and expressed her willingness to have the Air Conditioning Unit replaced as soon as possible upon the Plaintiff providing various quotations from different Air Condition Companies. The Plaintiff made it plain to the defendant that she was only responsible to replace the Condensing Unit and all other material and labour involved in the installation.
6. On the 14th day of December 2015, the Plaintiff showed the Defendant a quotation from Parson's Air Conditioning dated December 14th 2015, outlining three (3) options involving different costs of each option to rectify the problem along with brochures from Cayman Air Conditioning and Supply identifying different Air Condition Units and their prices. The Plaintiff did not receive a response from the Defendant in relation to these documents.
7. Subsequently, the Plaintiff obtained a quotation from Dream Maker Air-condition Cooling System dated December 29th, 2015 and gave it to the Defendant. The Plaintiff met with the Defendant and explained what was required of her. The Defendant took the quotation and did not respond to the Plaintiff.

8. On Monday January 4th 2016, the Plaintiff approached the Defendant requesting an update on the matter because the Plaintiff had not heard anything pertaining to the fixing of the Air Conditioning Unit. The Defendant directed the Plaintiff to her husband, Kirk Williams who produced an Invoice from Cayman Air Conditioning & Supply showing the price for the Condensing Unit – over CI\$1,200.00. There was no quotation for labour and other miscellaneous items necessary to install the Condenser. The Plaintiff did not accept this quotation.
9. That same day, the Plaintiff contacted Mr. Dennis Morgan, part- owner of Dream Maker Air-condition Cooling Systems to attend the residence and speak with the Defendant to explain what was required to rectify the situation and how much it would cost to replace the unit. Mr. Morgan attended the residence and spoke with the Defendant and her husband.
10. On Tuesday January 5th 2016, Mr. Dennis Morgan provided a quotation dated that same day in the name of the Defendant's husband, Kirk Williams to the Plaintiff. The Plaintiff met with the Defendant and provided her with a copy of the quotation. This quotation reflected a sum of \$2,030.00 for the Defendant to rectify the damage that she had caused.
11. From the 5th of January 2016 until the 13th January 2016, of the filing of this plaint, the Plaintiff has not heard from the Defendant.
12. On Thursday January 07th 2016, the Plaintiff contacted Mr. Dennis Morgan and made arrangements for him to commence installation of her Air-conditioning Unit.
13. On Friday January 08th 2016, Mr. Dennis Morgan attended the Plaintiff's residence and installed the new Air-Conditioning Unit.

C. Pence



Parsons Air Conditioning

Refrigeration & Appliances
312 W. Church St., P.O. Box 327 West Bay KY1-1301
Ph: (345) 949-3945 Fax: (345) 945-5640
e-mail: info@parsonsac.com www.parsonsac.com

Proposal/Contract

Proposal Prepared for:	<u>MS. INGRID SPENCER</u>	<u>14 December 2015</u>
Address:	<u># 45 Edelberry Drive, Newlands</u>	Date
District:	<u>Savannah</u>	<u>Good for 30 Days</u>
Zip Code:	<u>P.O. Box Grand Cayman KY1-</u>	
Job#	<u>1334</u>	
Phone:	<u>926-1035</u>	
Email:	<u>ziknic@hotmail.com</u>	

Thank you for considering Parsons A/C & Refrigeration for your air conditioning needs. Please find below our quote for the replacement and upgrade AC Units, we are pleased to offer you the following:

SCOPE OF WORK: Dismantling and removal of the AC Units Air Handler, Condenser and existing AC Main Duct Plenum and Flex. Install new 4.0 Ton R410A A/C Units including secondary Drain Pan. Install PVC Drain lines and Float Switch. Fabricate and Install Main Duct Plenum. Flushed the refrigerant lines. Install new Refrigerant Sight Glass and Filter Drier. Connect insulated copper refrigerant line set, PVC Condensate Drain Lines and Low Voltage Wiring. Install new Thermostat Control and wirings. Charge-up the unit with new R410A Refrigerant. Check pressure, amperage and voltage and start-up the unit. Observe new unit air flow and operation.

AC UNITS :

COST

OPTION 1 : 24.5 SEER DAIKIN AC UNITS :

1 Set DAIKIN 4.0 Ton 24.5 SEER Variable Speed Inverter R410A Air Handle (DV48PVCC14) and Condensing Unit (DX20VC0481) to include all Materials and Labor. **CI\$ 7,955.00**

OPTION 2 : 16 SEER DAIKIN AC UNITS

1 Set DAIKIN 4.0 Ton 18 SEER Two Stage Central AC Units Air Handling Unit (DV48PTCD14) and Condenser Unit (DX18TC0481) **CI\$ 6,889.00**

OPTION 3 : 16 SEER WESTINGHOUSE AC UNITS

1 Set WESTINGHOUSE 4.0 Ton 16 SEER Dual Stage Air Handler (B6VMAX48K-C) and Condensing Unit (FS4BF-048KB) to include all Materials and Labor. **CI\$ 6,675.00**

WARRANTY: All parts and labor are warranted by the above named company for One Year and Five Years on the Ac Unit Compressor. Any work carried out by another company within the warranty period will cancel all warranty agreements. Terms of Warranty starts on the day work is completed. Work is completed when all equipment and AC Materials are installed.

TERMS : Please note that this proposal becomes a contract when signed by both parties. A deposit of 70% is due upon acceptance of the signed proposal. The remaining 30% is due upon completion and successful commissioning of the units. Payment is due in full upon completion and any outstanding balance remaining over 30 days will incur **2% Finance Fee per month**. If for some reason Electricity is not ready upon completion, payment is due in full and we will return to commission the unit at no Additional Cost.

Client Initial : _____





Parsons Air Conditioning

Refrigeration & Appliances
312 W. Church St., P.O. Box 327 West Bay KY1-1301
Ph: (345) 949-3945 Fax: (345) 945-5640
e-mail: info@parsonsac.com www.parsonsac.com

Proposal/Contract

EXCEPTIONS : Any Carpentry required for the removal and/or replacement of AC Equipment and Ducts will be the owners expense. All other works which are civil in nature and not specified in the above scope of work.

NOTE: Owner to provide Electrical Supply for A/C and Slab for Condensing Units.

All material is guaranteed to be as specified. All work to be completed in a professional manner according to standard practices. **ANY ALTERATION OR DEVIATION FROM THE ABOVE SPECIFICATION INVOLVING EXTRA COST WILL BE EXECUTED ONLY UPON WRITTEN ORDERS AND WILL BECOME AN EXTRA CHARGE OVER AND ABOVE THE ESTIMATE.** All agreements are contingent upon delays beyond our control. Purchaser agrees to pay all costs of collection including attorney's fees. This proposal may be withdrawn by us if not accepted by the above due date.

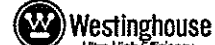
Authorized Signature

Acceptance Signature

Date

Parsons AC & Refrigeration

MS. INGRID SPENCER





**CAYMAN
AIR
CONDITIONING
& SUPPLY**



Serving Cayman Since 1972

PO Box 10672
342B Dorcy Drive, Airport Industrial Park
Grand Cayman KY1-1006, CAYMAN ISLANDS
Phone: (345) 949-2822
Facsimile: (345) 949-7727
Email: dellonair@candw.ky

turn to the experts 

2015

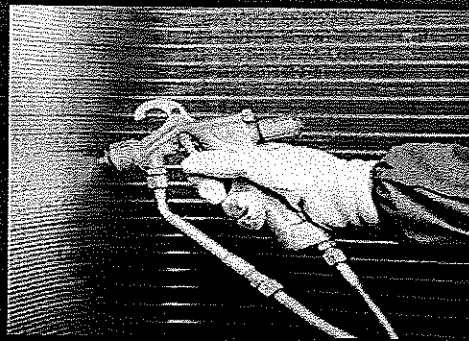
13-Seer R410 Standard System

TON	CONDENSER	Unit Price	AIR HANDLER	Unit Price	Total
1.8 TON	24ABB318A0N3	1,035.00	FB4CNP018L00	742.00	\$ 1,777.00
2.0 Ton	24ABB324A0N3	1,035.00	FB4CNP024L00	742.00	\$ 1,777.00
2.5 Ton	24ABB330A0N3	1,143.00	FB4CNP030L00	773.00	\$ 1,916.00
3.0 Ton	24ABB336A0N3	1,211.00	FB4CNP036L00	805.00	\$ 2,016.00
3.5 Ton	24ABB342A0N3	1,366.00	FB4CNP042L00	905.00	\$ 2,271.00
4.0 Ton	24ABB348A0N3	1,429.00	FB4CNP048L00	940.00	\$ 2,369.00
5.0 Ton	24ABB360A0N3	1,577.00	FB4CNP060L00	1,086.00	\$ 2,663.00

14-Seer R410 with Variable Speed AHU

TON	CONDENSER	Unit Price	AIR HANDLER	Unit Price	Total
1.8 TON	24ABB318A0N3	1,035.00	FV4CNF002L00	\$ 885.00	\$ 1,920.00
2.0 Ton	24ABB324A0N3	1,035.00	FV4CNF002L00	\$ 885.00	\$ 1,920.00
2.5 Ton	24ABB330A0N3	1,143.00	FV4CNF003L00	\$ 1,015.00	\$ 2,158.00
3.0 Ton	24ABB336A0N3	1,211.00	FV4CNF003L00	\$ 1,015.00	\$ 2,226.00
3.5 Ton	24ABB342A0N3	1,366.00	FV4CNF003L00	\$ 1,015.00	\$ 2,381.00
4.0 Ton	24ABB348A0N3	1,429.00	FV4CNF006L00	\$ 1,267.00	\$ 2,696.00
5.0 Ton	24ABB360A0N3	1,577.00	FV4CNF006L00	\$ 1,322.00	\$ 2,899.00

**Cond. Coil
Coating
Available!**



**Per Coil
\$ 200.00**

**Coil & Cabinet
\$ 250.00**



caymanacsupply.com
cacsupply@candw.ky



**CAYMAN
AIR
CONDITIONING
& SUPPLY**

Serving Cayman Since 1972
PO Box 10672
342B Dorcy Drive, Airport Industrial Park
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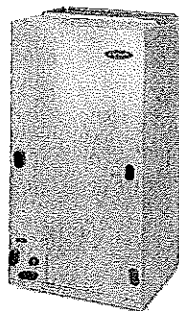
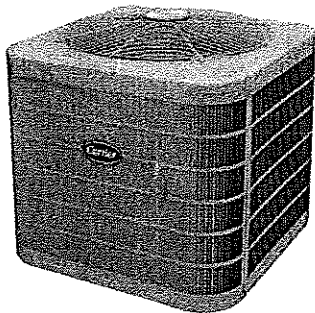
2015

24ABC6 [16] SEER CARRIER BASE Series 1 Stage

TON	CONDENSER	Unit Price	Var Spd AHU	Unit Price	Total
2.0 Ton	24ABC624A003	1,495.00	FV4CNF002L00	885.00	\$ 2,380.00
2.5 Ton	24ABC630A003	1,679.00	FV4CNF002L00	885.00	\$ 2,564.00
3.0 Ton	24ABC636A003	1,688.00	FV4CNF003L00	1,015.00	\$ 2,703.00
3.5 ton	24ABC642A003	1,985.00	FV4CNF003L00	1,015.00	\$ 3,000.00
4.0 Ton	24ABC648A003	2,025.00	FV4CNF005L00	1,177.00	\$ 3,202.00
5.0 Ton	24ABC660A003	2,195.00	FV4CNF006L00	1,322.00	\$ 3,517.00

**24ABC6 BASE
SERIES**

**VARIABLE SPEED
AHU**



**CARRIER BASE SERIES
16 SEER**

5 Years Warranty on Compressor
1 Year Warranty on Parts

Discount Price on select Tstat
with each purchase of a complete
system*
See in store for details



3202 A/C
2000-LAB
400-mat.

5602



QUOTATION

P.O Box 468
 Grand Cayman, KY1-1502
 Cayman Islands
 Tel: (345) 924-6480/949-7688
 Email: info@dreammaker.ky

Customer Name: Ingrid Spence

Date: December 29, 2015

Address: #54 Candle Wood Drive - Newlands

Phone: (345)-326-2829

PO Box: 236 Grand Cayman KY1-1601

Quotation: # 0238

Description				
<p>Dream Maker Air Conditioning Ltd. thanks you for the opportunity to submit this Proposal to supply and install one (1) new 4-ton Air Conditioning System at your property</p> <p><u>Scope of work to be done is as follows:</u> Remove and dispose of old R-22 AC System Remove and dispose of the existing Return and Supply Plenum Box Construct and install new Return and Supply Plenum Box Run new Refrigerant Lines and Communication Wires Install Unistrut and Threaded Rods to Hang the Air Handler Unit Spray Evaporator & Condensing Units with Anti-rust/ Corrosion Coating Supply and install one (1) new 4-ton R-410A Carrier high efficiency Air Conditioning System based on your selection of the Carrier Infinity Series** or the 16 Seer Comfort Series System options</p> <p>**NOTE: The Infinity series AC System comes with an Infinity Smart Wi-Fi Communicating Thermostat Control.</p> <p><u>System Options:</u></p> <table style="width: 100%;"> <tr> <td>Option A: Carrier Infinity 19 SEER</td> <td style="text-align: right;">CI\$8,106.00</td> </tr> <tr> <td>Option B: 16 SEER System</td> <td style="text-align: right;">CI\$5,817.00</td> </tr> </table> <p><u>Deposit:</u> For Option A, the Infinity Series, A Deposit of CI\$6,500.00 will be required to start this project with the balance to be paid upon completion of the Project.</p> <p><u>Option B, Comfort Series,</u> A Deposit of CI\$4,500.00 will be required to start this project with the balance to be paid upon completion of the Project.</p> <p><u>Warranty:</u> We offer a five-year warranty on all A/C Compressors and a one-year warranty on all other parts and labor.</p> <p>Any additional work outside of this quotation will be billed and charged separately.</p>	Option A: Carrier Infinity 19 SEER	CI\$8,106.00	Option B: 16 SEER System	CI\$5,817.00
Option A: Carrier Infinity 19 SEER	CI\$8,106.00			
Option B: 16 SEER System	CI\$5,817.00			

If you have any questions concerning this quotation please contact us.

THANK YOU FOR CHOOSING DREAM MAKER LTD.



QUOTATION

PO Box 468
 Grand Cayman, KY1-1502
 Cayman Islands
 Tel: (345) 924-6480/949-7688
 Email: info@dreammaker.ky

Customer Name: Ingrid Spence

Date: December 29, 2015

Address: # 54 Elderberry Drive - Newlands

Phone: 345- 326-2829

PO Box: 904 Grand Cayman KY1-1103

Quotation: # 0241

Description	Materials								
<p>Dream Maker Air Conditioning Ltd, thank you for the opportunity to submit this Proposal to Supply and Install One (1) new 4 Ton <i>Carrier Comfort Series</i> Air Conditioning System.</p> <p>Scope of work to be done is as follows: Remove and dispose of old R-22 AC System Remove and dispose of the existing Return and Supply Plenum Box Construct and install new Return and Supply Plenum Box Run new Refrigerant Lines and Communication Wires Install Unistrut and Threaded Rods to Hang the Air Handler Unit Spray Evaporator & Condensing Units with Anti-rust/ Corrosion Coating Supply and Installed new 4 Ton 16 Seer Carrier Comfort Series High efficiency Air Conditioning System</p> <p>Warranty: 5-Year Compressor Warranty and a 1-Year Warranty on all other Parts and Labor</p> <p>Deposit: A Deposit of C\$4,500 will be required to start this project with the Balance to be paid upon completion of Project.</p> <p>Any additional work outside of this quotation will be billed and charged separately.</p>	<p>Materials: One (1) 5-ton 16 Seer Conditioning Unit C\$2,025.00</p> <p>One (1) 4- 16 Seer Air Handler Unit \$1,177.00</p> <p>One Box 1" Duct Board \$ 250.00</p> <p>One (1) 30 x 66 Emergency Drain Pan \$65.00</p> <p>Three (3) Lengths of Unistrut \$80.00</p> <p>(4) Lengths Threaded Rods \$20.00</p> <p>One (1) 7/8" Suction Line Filter Dryer \$54.00</p> <p>One (1) Float Switch C\$24.00</p> <p>Two (2) Rolls 7/8 Refrigerant Pipes \$440.00</p> <p>Two (2) Rolls 3/8 Refrigerant Pipes \$120.00</p> <p>Twelve (12) Lengths Pipe Insulation \$ 48.00</p> <p>]</p> <p>Cost Break Down:</p> <table border="0"> <tr> <td>1. AC Unit & Materials</td> <td>\$4303.00</td> </tr> <tr> <td>2. Labour</td> <td>\$1,350.00</td> </tr> <tr> <td>3. Service Materials</td> <td><u>\$ 100.00</u></td> </tr> <tr> <td></td> <td>\$5,753.00</td> </tr> </table>	1. AC Unit & Materials	\$4303.00	2. Labour	\$1,350.00	3. Service Materials	<u>\$ 100.00</u>		\$5,753.00
1. AC Unit & Materials	\$4303.00								
2. Labour	\$1,350.00								
3. Service Materials	<u>\$ 100.00</u>								
	\$5,753.00								
<p>Total materials and labor</p>	<p>C\$5,753.00</p>								

If you have any questions concerning this quotation please contact us.

THANK YOU FOR CHOOSING DREAM MAKER LTD.



QUOTATION



P.O. Box 468
 Grand Cayman, KY1-1502
 Cayman Islands
 Tel: (345) 924-6480/949-7688
 Email: info@dreammaker.ky

Customer Name: Kirk Williams

Date: January 5, 2016

Address: #54 Elderberry Drive - Newlands

Phone: (345) 323-8047 ⁰⁸⁴⁷

P.O. Box: Grand Cayman, Cayman Islands

Quote: # 0247

Description	Materials
<p>Dream Maker Air Conditioning Ltd. thanks you for the opportunity to submit this Proposal to supply and install One (1) new 4 ton Condenser Unit at property #54 Elderberry Drive – Newlands.</p> <p>Scope of work to be done is as follow:</p> <ul style="list-style-type: none"> • Flush Refrigerant Lines with Nitrogen Compressed air • Spray the Condensing Unit with Anti-rust/ Corrosion Coating • Supply and install one (1) new 4 Ton 13 Seer R-410a Carrier Condensing Unit. • Extend the Refrigerant Lines • Install Suction Line Filter Dryer • Vacuum and leak test the AC System • Start up and commission the AC System <p>Deposit: This project requires 100% prepayment.</p> <p>Warranty: We offer a five-year warranty on all A/C Compressors and a one-year warranty on all other parts and labor.</p> <p>Any additional work outside of this quotation will be billed and charged separately.</p>	
	<p>Total: CI\$ 2,030.00</p>

We accept cash or check payments. Please make all checks payable to Dream Maker. If you have any questions concerning this invoice please contact us.

THANK YOU FOR CHOOSING DREAM MAKER LTD.

Acknowledgement of Service

IN THE SUMMARY COURT AT GEORGE TOWN

Cause No. SC____ of 20____

BETWEEN: Ingrid Spence Plaintiff

AND: Nichola Broomfield- Williams Defendant

Acknowledgement of service

State Defendant's name and address:

Nichola Broomfield – Williams

54 Elderberry Drive, Newlands. Bodden Town, Grand Cayman

State whether the Defendant intends to contest the actions

YES NO

If you do not intend to contest the action, do you want time in which to pay the claim?

YES NO

If you do intend to contest the action, in whole or in part, you must set out full particulars of your defence overleaf.

Service of the Plaint is acknowledged accordingly

Defendant's Signature

Dated this _____ day of _____, 20_____

PARTICULARS of DEFENCE

Defendant's Signature