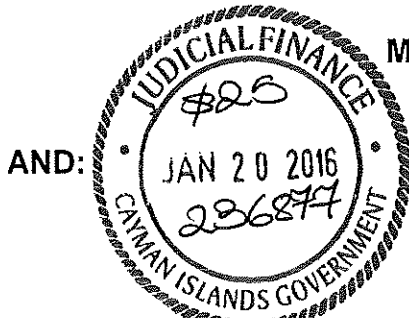


*Summary*  
IN THE GRAND COURT OF CAYMAN ISLANDS

CAUSE NO. 80016 OF 20 16

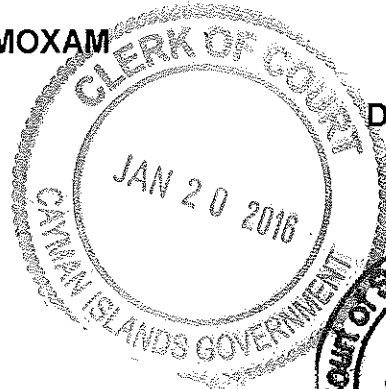
BETWEEN:



MURRAY & WESTERBORG

PLAINTIFF

RENARD MOXAM



DEFENDANT

TO THE DEFENDANT:

Mr. Renard Moxam  
Island Companies Ltd.  
George 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 fourteen (14) days** after the 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, George Town, Grand Cayman KY1-1106, Cayman Islands, the accompanying Acknowledgement of Service stating therein whether you intend to contest this action. If you intend to defend this action, in whole or in part, you must set out **full particulars of your defence** in the space provided in the Acknowledgment of Service Form.

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

Issued this 23<sup>rd</sup> day of December 2015

**IMPORTANT**

Directions for Acknowledgement of Service are given with the accompanying form.

**PARTICULARS OF CLAIM**

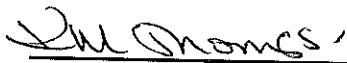
1. The Plaintiff is a firm of Attorneys-at-Law of the Cayman Islands with offices located on the Second Floor (South West Wing) of the Cayman Shipping Centre Building, 10 Shipping Lane, George Town, Grand Cayman.
2. The Defendant was at all material times a resident of Grand Cayman, Cayman Islands.
3. Sometime in the month of November 2010 the Defendant engaged the services of the Plaintiff in respect of matrimonial proceedings instituted by his wife, Annie Rose Moxam, being Cause D55 of 2006.
4. It was a term of the said engagement that the Defendant would pay the Plaintiff's fees for all attendances and work done on behalf of the Defendant with respect to the said proceedings.
5. The Plaintiff duly provided the retained representation to the Defendant from the date of engagement until on or about the 26<sup>th</sup> day of August 2013, when the Grand Court granted the Plaintiff's application to Come Off The Record and cease acting for the Defendant.
6. In keeping with the terms of the engagement the Plaintiff duly provided fee-notes to the Defendant at the end of each month on which such work was done..
7. In breach of the terms of the said engagement the Defendant has failed, despite demands so to do, to pay to Plaintiff balance of fees due to the Plaintiff in respect of the representation provided to him.

8. That as of the 17<sup>th</sup> October 2014, the date of the Defendant's last payment on account of his fees, a sum of CI\$11,467.00 remains due and owing to the Plaintiff.
9. That the said sum continues to remain due and owing to the Plaintiff.

**AND THE PLAINTIFF CLAIMS:**

1. The sum of CI\$11,467.00;
2. Interest at the statutory rate
3. Costs

If within the time for returning the acknowledgment of service the Defendant pays the total amount claimed of CI\$11,672.00 including costs further proceedings will be stayed. The money must be paid to the Plaintiff.



**KARIN M. THOMPSON**  
Attorney-at-Law for the Plaintiff

**THIS PLAINT IS ISSUED** by Karin M. Thompson, Attorney-at-Law for the Plaintiff whose address for service is that of her said Attorney-at-Law, #10 Shipping Lane, Cayman Shipping Centre (Second Floor), P.O. Box 1708, Grand Cayman KY1-1109.

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

CAUSE NO \_\_\_\_\_ OF 20 \_\_\_\_\_

BETWEEN:

MURRAY & WESTERBORG

PLAINTIFF

AND:

RENARD MOXAM

DEFENDANT

**ACKNOWLEDGEMENT OF SERVICE**

1. State Defendant's name and address –

\_\_\_\_\_

2. State whether the Defendant intends to contest the action (*tick appropriate box*)

Yes

No

\_\_\_\_\_

3. If you do not intend to contest the action, do you want time in which to pay the claim? (*tick box*)

Yes

No

\_\_\_\_\_

4. 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 \_\_\_\_\_ 2016

**PARTICULARS OF DEFENCE**

(Here set out in numbered paragraphs the grounds upon which the Defendant says that he is not liable to the Plaintiff, or is not liable for the full amount claimed)

\_\_\_\_\_  
Defendant's Signature

**REMINDER** – This form must be taken or sent to the Courts Office, P.O. Box 495 GT, George Town, Grand Cayman within 14 days of receipt otherwise a default judgment may be entered against you.

**This PLAINT** is filed by Karin M. Thompson, Attorney-at-Law for the Plaintiff whose address for service is that of her said Attorney-at-Law, #10 Shipping Lane, Cayman Shipping Centre (Second Floor), P.O. Box 1708, Grand Cayman KY1-1109.

**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 case of a limited company, "residence" means its registered or principle 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.*

Karin M. Thompson  
2<sup>nd</sup> Floor, Cayman Shipping Centre  
#10 Shipping Lane George Town,  
Grand Cayman  
Cayman Islands  
945-1230

*Indorsement by Defendant's attorney (or by defendant if suing in person) of his name, address and reference, if any, in the box below.*

### DIRECTIONS FOR ACKNOWLEDGMENT OF SERVICE

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 495, 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 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 "Statement of Claim" appear on the top of page 2), the Defence must be served within 14 days after the time for acknowledging service of the Writ, unless in the meantime a summons for judgment is served on the Defendant.

If the Statement of Claim is not indorsed 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 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 installments or otherwise.

***See over for notes for guidance***

**NOTES FOR GUIDANCE**

1. Each Defendant (if there are 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 14 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 (.....)" after his name.
6. Where the Defendant is a **LIMITED COMPANY** the form must be completed by an Attorney or by someone authorised to act on behalf of the Company, but the Company can take no further step in the proceedings without an Attorney acting on his 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.