

IN THE SUMMARY COURT AT GEORGE TOWN

CAUSE NO: SC 25 OF 2018

BETWEEN:

THE PROPRIETORS STRATA PLAN NO 531

Plaintiff

AND

SASHA IVANNIE TATUM-GALLEGOS

Defendant



PLAINT

TO:

Sasha Tatum-Gallegos
The Blossoms Block L, Apt. 33
P.O. Box 11293,
Grand Cayman KY1-1008
Cayman Islands



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 Complaint 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 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 Acknowledgment of Service form.

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

Issued this 8 day of February 2017

See overleaf for particulars of the Plaintiff's claim

PARTICULARS OF CLAIM

1. The Plaintiff is a strata corporation consisting of all Strata Proprietors contained in Strata Plan No. 531 pursuant to section 5(1) of the Strata Titles Registration Law (2013 Revision) (hereinafter "the Law"). The Plaintiff's address for service is care of its Attorneys, HSM Chambers, 68 Fort Street, George Town, P.O. Box 31726, Grand Cayman, KY1-1207, Cayman Islands.
2. The Defendant is an individual who resides in the Cayman Islands with a mailing address of P.O. Box 11293, Grand Cayman KY1-1008 Cayman Islands. The Defendant is the registered proprietor of the property known and situate as Registration Section Savannah, Block 28B, Parcel 233H33, The Blossoms, Block L, Apartment 33 ("the Property"), a residential development subject of Strata Plan No. 531. Exhibited as "POC1" is a copy of the Cayman Islands Land Registry Search.
3. The Duties and Powers of Strata Plan No. 155 are set out in section 6 of the Law, which states *inter alia*, as follows:

"...(2) The powers of a corporation include the following- (a) to establish a fund for administrative expenses sufficient in the opinion of such corporation for the control, management and administration of the common property, for the payment of any premiums of insurance and for the discharge of any of its other obligations; (b) to determine, from time to time, the amounts to be raised for the fund referred to in paragraph (a) and to raise amounts so determined by levying contributions on the proprietors in proportion to the unit entitlement of their respective lots."

Exhibited as "POC2" is a copy of the relevant pages to the Strata Titles Registration Law (2013 Revision).

4. The Plaintiff exercised such powers by both establishing a fund for administrative expenses and by determining from time to time the amounts to be raised for the fund for administrative expenses.
5. In accordance with section 21 of the Law the control, management, administration, use and enjoyment of Strata Plan No. 624 must be regulated by Bylaws.
6. Pursuant to the Schedule 1 of the Law section 21(1)(b) the Defendants must "*pay all rates, taxes, charges, outgoings and assessments that may be payable in respect of his strata lot.*"

Exhibited as "POC3" is a copy of the relevant pages of the Law.

7. The Plaintiff levied such contributions by way of monthly invoices sent the Defendant stating the payment due for that month.
8. The Defendant defaulted on her strata payments and as of 1 February 2018, owed to the Plaintiff is the principal sum of CI\$17,203.75. The Plaintiff has not charged any interest on the outstanding amounts to date. Exhibited as "POC4" is a copy of the Defendant's account showing all strata fees charges, any payments made by the Defendants.
9. The Defendant has either failed or neglected to make full payment to the Plaintiff notwithstanding a Demand for the monies served upon her on 6 November 2017.
10. As a result of the above, the Plaintiff is entitled to the relief claimed in this proceeding for breach of contract, that contract being the Strata Bylaws which exist and are legally enforceable as between the Plaintiff and Defendant pursuant to Section 21 of the Law.

AND THE PLAINTIFF claims:

- a) CI\$17,203.75 being the principal sum due.
- b) Pre- and post-judgment interest from 8 February 2018 pursuant to Section 34 of the *Judicature Law (2017 Revision)* and the *Judgment Debts (Rates of Interest) Rules, 2012* at the rate of 2.38% per annum being CI\$1.12 per diem;
- c) CI\$175.00 fixed costs pursuant to Section 11 of the Summary Court Rules 2004; and
- d) Such further and other relief as this Court may deem just.

HSM Chambers

HSM Chambers
Attorneys for the Plaintiff

IN THE SUMMARY COURT AT GEORGE TOWN

CAUSE NO: SC OF 2018

B E T W E E N:

THE PROPRIETORS STRATA PLAN NO 531

Plaintiff

AND

SASHA IVANNIE TATUM-GALLEGOS

Defendant

EXHIBIT "POC1"

C - INCUMBRANCES SECTION

Entry No.	Date	Instrument No.	Nature of Incumbrance	Further Particulars	Signature of Registrar
5	01/03/10	S.P. NO. 531	Rest. Agrmnts	Subject to the Restrictive Agreements as listed in the By-Laws and any amendments thereof.	G. A. Mascall
6	01/10/10	11050/10	Charge	Principal Sum: CI\$154,000.00. Interest rate of 1% p.a. above the Chargee's Prime Lending rate for CI\$. Repayable on demand. Note: Chargee has the right to tack & consolidate (RLL Secs. 81 & 82) HL	H Lingard
7	01/10/10	11050/10	Proprietors	Proprietors: CAYMAN NATIONAL BANK LTD., P.O.Box 1097, Grand Cayman KY1-1102 Cayman Islands.	H Lingard
8	01/10/10	11051/10	Sec.Chg	Principal Sum: CI\$53,900.00. Interest rate is Prime + 1% p.a. Repayment date unspecified. Note: Chargee has the right to tack & consolidate (RLL Secs. 81 & 82) HL	H Lingard
9	01/10/10	11051/10	Proprietors	Proprietors: CAYMAN ISLANDS GOVERNMENT, Government Administration Building, Flgin Ave, George Town, Grand Cayman.	H Lingard
10	04/06/15	4765/15	Charging Order	For details see filed Instrument	A Singh

IN THE SUMMARY COURT AT GEORGE TOWN

CAUSE NO: SC OF 2018

B E T W E E N:

THE PROPRIETORS STRATA PLAN NO 531

Plaintiff

AND

SASHA IVANNIE TATUM-GALLEGOS

Defendant

EXHIBIT "POC2"

CAYMAN ISLANDS



Supplement No. 14 published with Gazette No. 21 of 21st October, 2013.

STRATA TITLES REGISTRATION LAW

(2013 Revision)

Law 14 of 1973 consolidated with Laws 1 of 1983, 14 of 1994, 8 of 2005 and 10 of 2012.

Revised under the authority of the Law Revision Law (1999 Revision).

Originally enacted:

Law 14 of 1973-25th October, 1973
Law 1 of 1983-22nd February, 1983
Law 14 of 1994-23rd September, 1994
Law 8 of 2005-24th February, 2005

- (f) contain such other particulars and be accompanied by such certificates and other documents as may be prescribed.
- (2) The reference of the parcel and the number of the strata lot shall together be a sufficient reference to a strata lot.
- (3) The common boundary between any two strata lots or between a strata lot and common property shall, unless otherwise specified in the relevant strata plan, be the boundary line or the centre line of the floor, wall or ceiling between such strata lots or between such strata lot and the common property, as the case may be.
- (4) The unit entitlement of each strata lot shall, as respects the proprietor of such strata lot, determine-
 - (a) the quantum of his share in the relevant corporation; and
 - (b) the proportion payable by him of contributions levied pursuant to paragraph (b) of section 6(2).

PART III- Corporations

- 5. (1) The proprietors of all the strata lots contained in any strata plan shall, upon registration of the strata plan, become a body corporate (hereafter referred to as "a corporation") under the name "The proprietors, Strata Plan No." (with the appropriate number of the strata plan inserted in the blank space). Establishment of a corporation
- (2) Every corporation shall have perpetual succession, a common seal and be capable of suing and being sued in its name.
- (3) Any enactment providing for the incorporation, regulation and winding-up of companies shall not apply to corporations.
- 6. (1) The duties of a corporation shall include the following- Duties and powers of a corporation
 - (a) to insure and keep insured the building to the replacement value thereof against fire, earthquake, hurricane and such other risks as may be prescribed, unless the proprietors by super-majority resolution otherwise determine;
 - (b) to effect such insurance as it may be required by law to effect;
 - (c) to insure against such risks other than those referred to elsewhere in this subsection as the proprietors may, from time to time by unanimous resolution, determine;
 - (d) subject to section 23(2) and (3) and to such conditions as may be prescribed, to apply insurance moneys received by it in respect of damage to the building in rebuilding and reinstating the building so far as it may be lawful so to do;

- (e) to pay premiums on any policies of insurance effected by it;
- (f) to keep in a state of good and serviceable repair and properly maintain the common property;
- (g) to comply with notices or orders by any competent public or local authority requiring repairs to, or work to be done in respect of, the parcel; and
- (h) to comply with any reasonable request for the names and addresses of the members of the executive committee.

(2) The powers of a corporation include the following-

- (a) to establish a fund for administrative expenses sufficient in the opinion of such corporation for the control, management and administration of the common property, for the payment of any premiums of insurance and for the discharge of any of its other obligations;
- (b) to determine, from time to time, the amounts to be raised for the fund referred to in paragraph (a) and to raise amounts so determined by levying contributions on the proprietors in proportion to the unit entitlement of their respective lots;
- (c) to recover from any proprietor, by an action for debt in any court of competent jurisdiction, any sum of money expended by the corporation for repairs to or work done by it or at its direction in complying with any notice or order by a competent public or local authority in respect of that portion of the building which constitutes or includes the strata lot of that proprietor; and
- (d) to enter any strata lot and effect repairs or carry out work pursuant to its duty under paragraph (g) of subsection (1).

(3) Subject to subsection (4), any contribution levied pursuant to subsection (2) shall be due and payable on the passing of a resolution to that effect and in accordance with the terms of such resolution, and may be recovered as a debt by a corporation in an action in any court of competent jurisdiction from the proprietor entitled at the time when such resolution was passed and from the proprietor entitled at the time when such action was instituted, both jointly and severally.

(4) A corporation shall, on the application of a proprietor or any person authorised in writing by him, certify-

- (a) the amount of any contribution determined as the contribution of that proprietor;
- (b) the manner in which such contribution is payable; and
- (c) the extent to which such contribution has been paid by that proprietor,

IN THE SUMMARY COURT AT GEORGE TOWN

CAUSE NO: SC OF 2018

B E T W E E N:

THE PROPRIETORS STRATA PLAN NO 531

Plaintiff

AND

SASHA IVANNIE TATUM-GALLEGOS

Defendant

EXHIBIT "POC3"

SCHEDULE 1

Bye-laws amendable only by unanimous resolution

section 21

Duties of proprietor

1. A proprietor shall-

- (a) permit his corporation and its agents, at all reasonable times on notice (except in case of emergency when no notice shall be required), to enter his strata lot for the purpose of inspecting it and maintaining, repairing or renewing pipes, wires, cables and ducts for the time being existing in the strata lot and capable of being used in connection with the enjoyment of any other strata lot or common property, or for the purpose of maintaining, repairing or renewing common property, or for the purpose of ensuring that the bye-laws are being observed;
- (b) pay all rates, taxes, charges, outgoings and assessments that may be payable in respect of his strata lot;
- (c) repair and maintain his strata lot, and keep it in a state of good repair, reasonable wear and tear, damage by fire, storm, tempest or act of God excepted;
- (d) use and enjoy the common property in such a manner as not unreasonably to interfere with the use and enjoyment thereof by other proprietors or their families or visitors;
- (e) not use his strata lot or permit it to be used in such manner or for such purpose as shall cause a nuisance or hazard to the occupier of any other strata lot (whether a proprietor or not) or any member of the household or any guest of such occupier; and
- (f) notify the corporation forthwith upon any change of ownership or of any mortgage charge or other dealing in connection with his strata lot.

Duties of corporation

2. Every corporation shall-

- (a) control, manage and administer the common property for the benefit of all proprietors;
- (b) keep in a state of good and serviceable repair and properly maintain the fixtures and fittings (including elevators) used in connection with the common property;
- (c) where practicable, establish and maintain suitable lawns and gardens on the common property;

IN THE SUMMARY COURT AT GEORGE TOWN

CAUSE NO: SC OF 2018

B E T W E E N:

THE PROPRIETORS STRATA PLAN NO 531

Plaintiff

AND

SASHA IVANNIE TATUM-GALLEGOS

Defendant

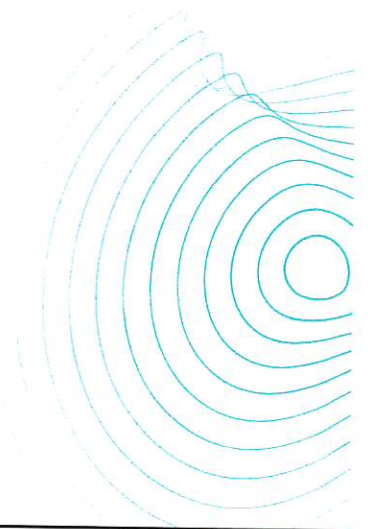
EXHIBIT "POC4"

Proprietors of Strata Plan No. 531

Statement

c/o P.O. Box 30082
Grand Cayman, KY1-1201

Bill To
Sasha Tatum-Gallegos (Unit H33)



Date	Amount Due	Enclosed
02/01/18	\$17,203.75	

Please make cheques payable to "Strata Plan No. 531"

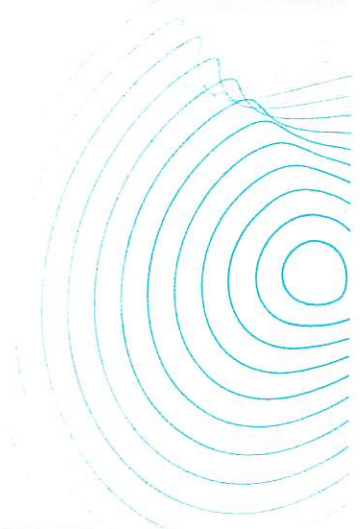
Date	Description	Amount	Balance		
12/31/00	Balance forward		0.00		
12/01/10	INV #31	264.00	264.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
12/17/10	PMT #ONLINE - Strata Fees - Online Tatum	-264.00	0.00		
01/01/11	INV #69	264.00	264.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
01/20/11	PMT #DIRECT DEPO - Strata Fees Paid - Sasha Tatum	-528.00	-264.00		
02/01/11	INV #105	264.00	0.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
03/01/11	INV #141	264.00	264.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
03/24/11	PMT #DIRECT PAYM - Payment - S Tatum	-325.00	-61.00		
04/01/11	INV #177	264.00	203.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
05/01/11	INV #213	264.00	467.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
05/24/11	PMT #DIRECT PYMT - Payment - S Gallegos	-350.00	117.00		
06/01/11	INV #249	264.00	381.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
06/01/11	PMT #DIRECT PYMT - Payment - S Tatum	-300.00	81.00		
06/24/11	PMT #ONLINE - Payment - S Tatum	-345.00	-264.00		
07/01/11	INV #285	264.00	0.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
08/01/11	INV #320	264.00	264.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
08/24/11	PMT #ONLINE - Payment - S Tatum	-264.00	0.00		
Current	1-30 Days Past Due	31-60 Days Past Due	61-90 Days Past Due	OVER 90 Days Past Due	Amount Due
\$1,225.00	\$325.00	\$325.00	\$325.00	\$15,003.75	\$17,203.75

Proprietors of Strata Plan No. 531

Statement

c/o P.O. Box 30082
Grand Cayman, KY1-1201

Bill To
Sasha Tatum-Gallegos (Unit H33)



Date	Amount Due	Enclosed
02/01/18	\$17,203.75	

Please make cheques payable to "Strata Plan No. 531"

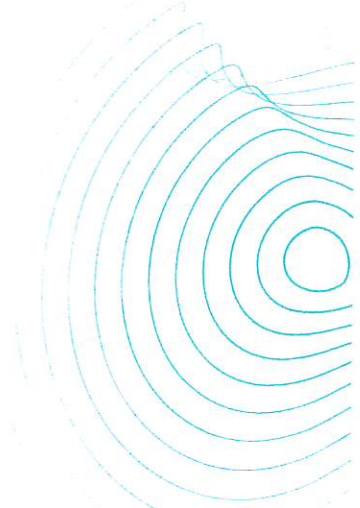
Date	Description	Amount	Balance		
09/01/11	INV #367	264.00	264.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
10/01/11	INV #402	264.00	528.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
10/24/11	PMT - Payment S Tatum	-264.00	264.00		
11/01/11	INV #441	264.00	528.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
11/24/11	PMT - Payment S Tatum	-264.00	264.00		
12/01/11	INV #468	264.00	528.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
01/01/12	INV #511	264.00	792.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
01/20/12	PMT - Payment - S Tatum	-528.00	264.00		
02/01/12	INV #543	264.00	528.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
03/01/12	INV #579	264.00	792.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
03/23/12	PMT - Payment S Tatum	-350.00	442.00		
04/01/12	INV #618	264.00	706.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
04/27/12	PMT - Payment S Tatum	-300.00	406.00		
05/01/12	INV #658	264.00	670.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
05/29/12	PMT - Payment S Tataum	-300.00	370.00		
06/01/12	INV #696	264.00	634.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
Current	1-30 Days Past Due	31-60 Days Past Due	61-90 Days Past Due	OVER 90 Days Past Due	Amount Due
\$1,225.00	\$325.00	\$325.00	\$325.00	\$15,003.75	\$17,203.75

Proprietors of Strata Plan No. 531

Statement

c/o P.O. Box 30082
Grand Cayman, KY1-1201

Bill To
Sasha Tatum-Gallegos (Unit H33)



Date	Amount Due	Enclosed
02/01/18	\$17,203.75	

Please make cheques payable to "Strata Plan No. 531"

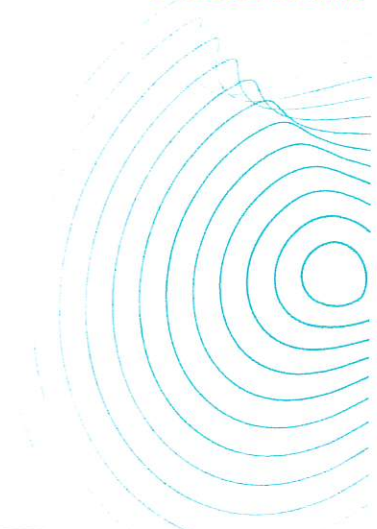
Date	Description	Amount	Balance		
07/01/12	INV #732	264.00	898.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
07/09/12	PMT - Payment S Tatum	-300.00	598.00		
08/01/12	INV #769	264.00	862.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
08/10/12	PMT - Payment - S Tatum	-650.00	212.00		
08/27/12	PMT - Payment S Tatum	-212.00	0.00		
09/01/12	INV #809	264.00	264.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
09/24/12	PMT - Payment S T Gallegos	-264.00	0.00		
10/01/12	INV #845	264.00	264.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
10/24/12	PMT - S T Gallegos	-264.00	0.00		
11/01/12	INV #883	264.00	264.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
12/01/12	INV #922	264.00	528.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
12/03/12	INV #972	200.00	728.00		
	- SPECIAL ASSESSMENT				
	--- Special Assessment, 1 @ \$200.00 = 200.00				
01/01/13	INV #996	264.00	992.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
02/01/13	INV #1033	264.00	1,256.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
03/01/13	INV #1070	264.00	1,520.00		
	--- Strata Fees, 1 @ \$264.00 = 264.00				
Current	1-30 Days Past Due	31-60 Days Past Due	61-90 Days Past Due	OVER 90 Days Past Due	Amount Due
\$1,225.00	\$325.00	\$325.00	\$325.00	\$15,003.75	\$17,203.75

Proprietors of Strata Plan No. 531

Statement

c/o P.O. Box 30082
Grand Cayman, KY1-1201

Bill To
Sasha Tatum-Gallegos (Unit H33)



Date	Amount Due	Enclosed
02/01/18	\$17,203.75	

Please make cheques payable to "Strata Plan No. 531"

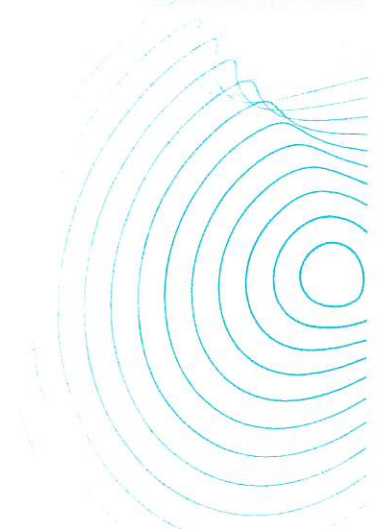
Date	Description	Amount	Balance		
03/19/13	PMT - S Tatum	-450.00	1,070.00		
04/01/13	INV #1106	325.00	1,395.00		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
04/01/13	INV #1157	200.00	1,595.00		
	--- Special Assessment \$200.00				
04/11/13	INV #1204	100.00	1,695.00		
	- Sasha Tatum				
	--- Legal Fees, 1 @ \$75.00 = 75.00				
	--- Debt Management, 1 @ \$25.00 = 25.00				
05/01/13	INV #1178	325.00	2,020.00		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
06/01/13	INV #1225	325.00	2,345.00		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
07/01/13	INV #1261	325.00	2,670.00		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
07/02/13	PMT #526653 - Sasha Tatum	-1,000.00	1,670.00		
07/22/13	INV #1291	245.00	1,915.00		
	- Sasha Tatum				
	--- Legal Fees, 1 @ \$150.00 = 150.00				
	--- Legal Fees, 1 @ \$25.00 = 25.00				
	--- Legal Fees, 1 @ \$70.00 = 70.00				
08/01/13	INV #1313	325.00	2,240.00		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
08/01/13	INV #1361	200.00	2,440.00		
	--- Special Assessment \$200.00				
Current	1-30 Days Past Due	31-60 Days Past Due	61-90 Days Past Due	OVER 90 Days Past Due	Amount Due
\$1,225.00	\$325.00	\$325.00	\$325.00	\$15,003.75	\$17,203.75

Proprietors of Strata Plan No. 531

Statement

c/o P.O. Box 30082
Grand Cayman, KY1-1201

Bill To
Sasha Tatum-Gallegos (Unit H33)



Date	Amount Due	Enclosed
02/01/18	\$17,203.75	

Please make cheques payable to "Strata Plan No. 531"

Date	Description	Amount	Balance		
09/01/13	INV #1387	325.00	2,765.00		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
09/10/13	PMT #526735 - Payment - Tatum	-505.00	2,260.00		
10/01/13	INV #1424	325.00	2,585.00		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
11/01/13	INV #1460	325.00	2,910.00		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
11/12/13	INV #1482	76.25	2,986.25		
	--- Legal Fees, 1 @ \$75.00 = 75.00				
	--- Legal Fees, 1 @ \$1.25 = 1.25				
12/01/13	INV #1503	325.00	3,311.25		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
01/01/14	INV #1546	325.00	3,636.25		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
02/01/14	INV #1575	325.00	3,961.25		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
03/01/14	INV #1611	325.00	4,286.25		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
04/01/14	INV #1647	325.00	4,611.25		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
05/01/14	INV #1683	325.00	4,936.25		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
06/01/14	INV #1719	325.00	5,261.25		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
07/01/14	INV #1753	325.00	5,586.25		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
Current	1-30 Days Past Due	31-60 Days Past Due	61-90 Days Past Due	OVER 90 Days Past Due	Amount Due
\$1,225.00	\$325.00	\$325.00	\$325.00	\$15,003.75	\$17,203.75

Proprietors of Strata Plan No. 531

Statement

c/o P.O. Box 30082
Grand Cayman, KY1-1201

Bill To
Sasha Tatum-Gallegos (Unit H33)



Date	Amount Due	Enclosed
02/01/18	\$17,203.75	

Please make cheques payable to "Strata Plan No. 531"

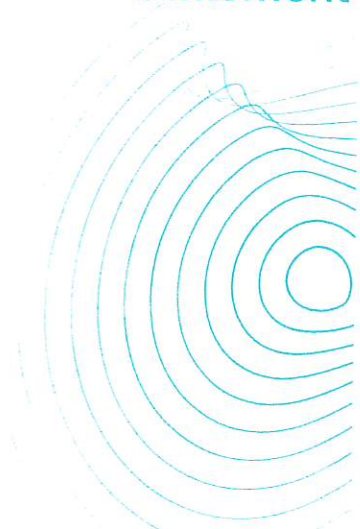
Date	Description	Amount	Balance		
08/01/14	INV #1791 --- Strata Fees, 1 @ \$325.00 = 325.00	325.00	5,911.25		
09/01/14	INV #1827 --- Strata Fees, 1 @ \$325.00 = 325.00	325.00	6,236.25		
09/03/14	INV #1847 - Legal Fees --- Legal Fees, 150 @ \$1.00 = 150.00 --- Legal Fees, 25 @ \$1.00 = 25.00 --- Legal Fees, 70 @ \$1.00 = 70.00	245.00	6,481.25		
10/01/14	INV #1866 --- Strata Fees, 1 @ \$325.00 = 325.00	325.00	6,806.25		
11/01/14	INV #1905 --- Strata Fees, 1 @ \$325.00 = 325.00	325.00	7,131.25		
12/01/14	INV #1940 --- Strata Fees, 1 @ \$325.00 = 325.00	325.00	7,456.25		
12/31/14	INV #1995 - Samson & McGrath invoice 19041 dated 7th January 2014 --- Legal Fees, 1 @ \$75.00 = 75.00	75.00	7,531.25		
12/31/14	INV #2002 - Samson & McGrath invoice 19041 dated 7th January 2014 --- Legal Fees \$1.25	1.25	7,532.50		
01/01/15	INV #1976 --- Strata Fees, 1 @ \$325.00 = 325.00	325.00	7,857.50		
Current	1-30 Days Past Due	31-60 Days Past Due	61-90 Days Past Due	OVER 90 Days Past Due	Amount Due
\$1,225.00	\$325.00	\$325.00	\$325.00	\$15,003.75	\$17,203.75

Proprietors of Strata Plan No. 531

Statement

c/o P.O. Box 30082
Grand Cayman, KY1-1201

Bill To
Sasha Tatum-Gallegos (Unit H33)



Date	Amount Due	Enclosed
02/01/18	\$17,203.75	

Please make cheques payable to "Strata Plan No. 531"

Date	Description	Amount	Balance		
02/01/15	INV #2025 --- Strata Fees, 1 @ \$325.00 = 325.00	325.00	8,182.50		
02/02/15	INV #2051 - Debt Management 2014 --- Debt Management, 1 @ \$200.00 = 200.00	200.00	8,382.50		
03/01/15	INV #2076 --- Strata Fees, 1 @ \$325.00 = 325.00	325.00	8,707.50		
04/01/15	INV #2114 --- Strata Fees, 1 @ \$325.00 = 325.00	325.00	9,032.50		
05/01/15	INV #2151 --- Strata Fees, 1 @ \$325.00 = 325.00	325.00	9,357.50		
06/01/15	INV #2187 --- Strata Fees, 1 @ \$325.00 = 325.00	325.00	9,682.50		
06/23/15	INV #2208 - Legal Fees --- Legal Fees \$225.00 --- Charging Order application and affidavit drafted and sent to filing --- Legal Fees \$225.00 --- Attendance At Court - ex-parte charging order granted --- Legal Fees \$135.00 --- AEO appln and affidavit, email to defendant --- Legal Fees \$25.00 --- Fillin Fee- Ex parte Originating Motion. --- Legal Fees \$64.00	749.00	10,431.50		
Current	1-30 Days Past Due	31-60 Days Past Due	61-90 Days Past Due	OVER 90 Days Past Due	Amount Due
\$1,225.00	\$325.00	\$325.00	\$325.00	\$15,003.75	\$17,203.75

Proprietors of Strata Plan No. 531

Statement

c/o P.O. Box 30082
Grand Cayman, KY1-1201

Bill To
Sasha Tatum-Gallegos (Unit H33)



Date	Amount Due	Enclosed
02/01/18	\$17,203.75	

Please make cheques payable to "Strata Plan No. 531"

Date	Description	Amount	Balance		
	INV #2208				
	- Legal Fees				
	--- Legal Fees \$225.00				
	--- Charging Order application and affidavit drafted and sent to filling				
	--- Legal Fees \$225.00				
	--- Attendance At Court - ex-parte charging order granted				
	--- Legal Fees \$135.00				
	--- AEO appln and affidavit, email to defendant				
	--- Legal Fees \$25.00				
	--- Fillin Fee- Ex parte Originating Motion.				
	--- Legal Fees \$64.00				
07/01/15	INV #2233	325.00	10,756.50		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
08/01/15	INV #2269	325.00	11,081.50		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
09/01/15	INV #2305	325.00	11,406.50		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
09/07/15	INV #2367	76.25	11,482.75		
	- Samson & McGrath Fee Note 23794				
	--- Legal Fees, 1 @ \$1.25 = 1.25				
	--- Legal Fees, 1 @ \$75.00 = 75.00				
10/01/15	INV #2341	325.00	11,807.75		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
10/07/15	INV #2369	323.00	12,130.75		
Current	1-30 Days Past Due	31-60 Days Past Due	61-90 Days Past Due	OVER 90 Days Past Due	Amount Due
\$1,225.00	\$325.00	\$325.00	\$325.00	\$15,003.75	\$17,203.75

Proprietors of Strata Plan No. 531

Statement

c/o P.O. Box 30082
Grand Cayman, KY1-1201

Bill To
Sasha Tatum-Gallegos (Unit H33)



Date	Amount Due	Enclosed
02/01/18	\$17,203.75	

Please make cheques payable to "Strata Plan No. 531"

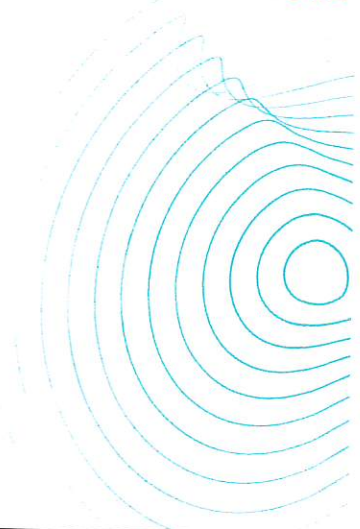
Date	Description	Amount	Balance		
10/14/15	INV #2369				
	PMT #41484 - Payment - S Tatum	-650.00	11,480.75		
10/26/15	PMT #42100 - Payment - S Tatum	-650.00	10,830.75		
11/01/15	INV #2392	325.00	11,155.75		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
11/11/15	INV #2413	205.00	11,360.75		
	- Court Awarded Interest				
	--- Interest, 1 @ \$205.00 = 205.00				
12/01/15	INV #2437	325.00	11,685.75		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
12/04/15	PMT - Payment - Gallegos	-650.00	11,035.75		
12/31/15	INV #DM117	550.00	11,585.75		
	- Debt Management Fees 2015				
	--- Debt Management, 1 @ \$550.00 = 550.00				
01/01/16	INV #2496	325.00	11,910.75		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
01/13/16	PMT #43876 - Strata Fees-Tatum	-650.00	11,260.75		
02/01/16	INV #2627	325.00	11,585.75		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
02/01/16	PMT #44510 - Payment - S Tatum	-650.00	10,935.75		
03/01/16	INV #2666	325.00	11,260.75		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
03/07/16	PMT #45314 - Payment - S Tatum	-650.00	10,610.75		
04/01/16	INV #DM218	325.00	10,935.75		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
04/13/16	PMT #46114 - Payment -Sasha Tatum	-650.00	10,285.75		
Current	1-30 Days Past Due	31-60 Days Past Due	61-90 Days Past Due	OVER 90 Days Past Due	Amount Due
\$1,225.00	\$325.00	\$325.00	\$325.00	\$15,003.75	\$17,203.75

Proprietors of Strata Plan No. 531

Statement

c/o P.O. Box 30082
Grand Cayman, KY1-1201

Bill To
Sasha Tatum-Gallegos (Unit H33)



Date	Amount Due	Enclosed
02/01/18	\$17,203.75	

Please make cheques payable to "Strata Plan No. 531"

Date	Description	Amount	Balance		
04/25/16	PMT - Payment -S Tatum	-650.00	9,635.75		
05/01/16	INV #2621LF	325.00	9,960.75		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
06/01/16	INV #2657LF	325.00	10,285.75		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
06/03/16	PMT #47603 - Payment S Tatum	-650.00	9,635.75		
07/01/16	INV #2695	325.00	9,960.75		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
08/01/16	INV #2729	325.00	10,285.75		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
09/01/16	INV #2765	325.00	10,610.75		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
10/01/16	INV #2801	325.00	10,935.75		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
11/01/16	INV #2837	325.00	11,260.75		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
12/01/16	INV #2873	325.00	11,585.75		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
12/31/16		300.00	11,885.75		
	Debt Management 2016				
	--- Debt Management, 6 @ \$50.00 = 300.00				
01/01/17	INV #2911	325.00	12,210.75		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
02/01/17	INV #2947	325.00	12,535.75		
	--- Strata Fees, 1 @ \$325.00 = 325.00				
Current	1-30 Days Past Due	31-60 Days Past Due	61-90 Days Past Due	OVER 90 Days Past Due	Amount Due
\$1,225.00	\$325.00	\$325.00	\$325.00	\$15,003.75	\$17,203.75

Proprietors of Strata Plan No. 531

Statement

c/o P.O. Box 30082
Grand Cayman, KY1-1201

Bill To
Sasha Tatum-Gallegos (Unit H33)



Date	Amount Due	Enclosed
02/01/18	\$17,203.75	

Please make cheques payable to "Strata Plan No. 531"

Date	Description	Amount	Balance		
03/01/17	INV #2983 --- Strata Fees, 1 @ \$325.00 = 325.00	325.00	12,860.75		
04/01/17	INV #3020 --- Strata Fees, 1 @ \$325.00 = 325.00	325.00	13,185.75		
05/01/17	INV #3056 --- Strata Fees, 1 @ \$325.00 = 325.00	325.00	13,510.75		
06/01/17	INV #3091 --- Strata Fees, 1 @ \$325.00 = 325.00	325.00	13,835.75		
07/01/17	INV #3127 --- Strata Fees, 1 @ \$325.00 = 325.00	325.00	14,160.75		
08/01/17	INV #3163 --- Strata Fees, 1 @ \$325.00 = 325.00	325.00	14,485.75		
09/01/17	INV #3196 --- Strata Fees, 1 @ \$325.00 = 325.00	325.00	14,810.75		
10/01/17	INV #3230 --- Strata Fees, 1 @ \$325.00 = 325.00	325.00	15,135.75		
10/11/17	INV #3257 --- Legal Fees, 1 @ \$168.00 = 168.00	168.00	15,303.75		
11/01/17	INV #3277 --- Strata Fees, 1 @ \$325.00 = 325.00	325.00	15,628.75		
12/01/17	INV #3330 --- Strata Fees, 1 @ \$325.00 = 325.00	325.00	15,953.75		
12/31/17	Debt Management 2017 --- Debt Management \$600.00	600.00	16,553.75		
Current	1-30 Days Past Due	31-60 Days Past Due	61-90 Days Past Due	OVER 90 Days Past Due	Amount Due
\$1,225.00	\$325.00	\$325.00	\$325.00	\$15,003.75	\$17,203.75

Proprietors of Strata Plan No. 531

Statement

c/o P.O. Box 30082
Grand Cayman, KY1-1201

Bill To
Sasha Tatum-Gallegos (Unit H33)



Date	Amount Due	Enclosed
02/01/18	\$17,203.75	

Please make cheques payable to "Strata Plan No. 531"

Date	Description	Amount	Balance		
01/01/18	INV #3366 --- Strata Fees, 1 @ \$325.00 = 325.00	325.00	16,878.75		
02/01/18	INV #3405 --- Strata Fees, 1 @ \$325.00 = 325.00	325.00	17,203.75		
Current	1-30 Days Past Due	31-60 Days Past Due	61-90 Days Past Due	OVER 90 Days Past Due	Amount Due
\$1,225.00	\$325.00	\$325.00	\$325.00	\$15,003.75	\$17,203.75

INDORSEMENT

The principal amount claimed in respect of the debt is CI\$17,203.75 as of the date of filing. The amount of the filing fees to commence the proceeding is CI\$25.00 (US\$30.49). If, within the time for returning the acknowledgement of service, the defendants pay the plaintiff or its attorneys-at-law the total amount claimed in principal and the costs of issuing the Plaintiff, further proceedings will be stayed. The money must be paid to the plaintiff or to its attorneys-at-law.

INDORSEMENT REGARDING INTEREST

Interest at a rate in accordance with Section 34 of the *Judicature Law (2017 Revision)* and the *Judgment Debts (Rates of Interest) Rules, 2012* as set out at in the prayer above.

This Plaintiff was filed by HSM Chambers, Attorneys-at-Law for the Plaintiff whose address for service is 68 Fort Street, George Town, PO Box 31726, Grand Cayman, KY1-1207, Cayman Islands (ref: 419947.0019).

IN THE SUMMARY COURT AT GEORGE TOWN

CAUSE NO: SC OF 2018

B E T W E E N:

THE PROPRIETORS STRATA PLAN NO 531

Plaintiff

AND

SASHA IVANNIE TATUM-GALLEGOS

Defendant

ACKNOWLEDGMENT OF SERVICE

1. State Defendant's name and address:--

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

Yes

No

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

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 2018.

See overleaf

PARTICULARS OF DEFENCE

1. *[Here set out in numbered paragraphs the grounds upon which the Plaintiff claims that the Defendant is indebted to him or is liable to pay damages to him]*

Defendant's Signature

REMINDER -This form must be taken or sent to the Court Office, P.O. Box 495, Grand Cayman KY1-1106 within 14 days of receipt otherwise a default judgment may be entered against you.