



No. 1
Plaint

IN THE SUMMARY COURT AT GEORGE TOWN

Cause No. SC 130 of 2018

BETWEEN:

Veloneek Caverlyn Blake

Plaintiff

AND:

Phillip Dixon

Defendant



To the Defendant

43 Stepping Stones, Frank Sound
Grand Cayman, Cayman Islands
Ph. 322-1030

THIS PLAINT has been issued against your 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, PO Box 495GT, George Town, Grand Cayman, the accompanying Acknowledgment 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 judgment** without any further notice to you.

Issued this 22 day of June 20 18

See overleaf for particulars of the Plaintiff's claim

PARTICULARS OF CLAIM

(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)

AND the Plaintiff claims:

- 1 The sum of 3010.50.
- 2 Interest in the sum of \$ 0 calculated at the prescribed rate from to date.
- 3 Fixed costs of \$ 150, alternatively costs to be assessed.

Blake

Plaintiff's Signature

Plaintiff's address for service

55 DICKENS STREET
BODDEN TOWN, Grand CAYMAN
CAYMAN ISLANDS

PARTICULARS OF CLAIM

- 1.) The Plaintiff works at Pinnacle Media located on 319 Shedden Road, George Town, Cayman Islands. Pinnacle Media is in the Compass Centre which borders two main roads, namely North Sound Road and Shedden Road. On the morning of May 16th, 2018, the Plaintiff had parked her black Acura MDX registration 139-765 in the front road side parking lot facing south on the Shedden Road side of the property.
- 2.) On the afternoon of May 16th 2018 at approximately 2:30pm, the Defendant came inside the reception area of Pinnacle Media and reported to Barbara Bodden that he had accidentally hit a black vehicle in the parking lot while reversing his vehicle.
- 3.) Mrs. Barbara Bodden did not know who the vehicle belonged to at the time and the Defendant left his business card with his contact details for the owner to call him back. The Defendant then left the office of Pinnacle Media.
- 4.) Two other co-workers came to where the black Acura MDX was parked and recognized it belonged to the Plaintiff. They contacted the Plaintiff right away. The Plaintiff obtained the Defendant's mobile number and called the Defendant a few mins later. The Defendant returned shortly after to speak with the Plaintiff.
- 5.) The Defendant admitted to accidentally reversing his vehicle, registration 172-267 into the Plaintiff's vehicle registration 139-765. The Plaintiff's vehicle sustained damage to the front passenger side door, fender and side mirror.
- 6.) The Defendant told the Plaintiff to obtain quotes from auto body shops for the repairs.
- 7.) The Defendant obtained two quotes from separate auto body shops. A.) Fred's Auto Body & Repairs dated May 16th 2018 in the amount of \$2,913 KYD and B.) H&R Auto Body Shop dated May 18th 2018 in the amount of \$3,010.50 KYD.
- 8.) The Plaintiff emailed the two quotes on May 18th to the Defendant.
- 9.) The Plaintiff was to meet the Defendant at ICWI on May 24th but the Defendant was unable to do so due to the inclement weather. However, the Plaintiff has been in contact with Mr. Charles Turner, a Motor Inspector with ICWI.

The Plaintiff is claiming for damage to property caused by a motor vehicle accident. As of June 22, 2018, Mr. Charles Turner of the Defendant's insurance company ICWI has advised the Plaintiff that the Defendant has not completed the necessary forms for the insurance claim to be processed.

The Plaintiff has made several attempts to contact the Defendant to have the matter resolved but the Plaintiff claims the quotes are too high and the Defendant has yet to proceed with filing the claim with ICWI.

Veloneek Blake

From: Veloneek Blake <tyvelan@icloud.com>
Sent: Friday, June 22, 2018 8:31 AM
To: Veloneek Blake
Subject: Fwd: Estimate
Attachments: Veloneek Blake 139765.xls

Sent from my iPhone

Begin forwarded message:

From: Veloneek Blake <tyvelan@icloud.com>
Date: May 18, 2018 at 4:18:57 PM EST
To: islandsmartconstruction@gmail.com
Subject: Fwd: Estimate

Good day ,
Please see attached quote .

Thanks

Date: 05/17/2018 11:48 AM
 Estimate ID: 2862
 Estimate Version: 0
 Preliminary
 Profile ID: * Mitchell

H&R AUTO BODY SHOP

10 Durham Drive, GT PO Box 10440, Grand Cayman KY1-1104
 (345) 949-5525 ext. 4355
 Fax: (345) 949-8615
 Email: rodolfo.membreno@carcitycayman.com

Damage Assessed By: Rodolfo Membreno
 Classification: Audit

Deductible: UNKNOWN

Owner: VELONEEK BLAKE
 Telephone:

Cell Phone: (345) 916-2771

Mitchell Service: 910686

Description: 2007 Acura MDX
 Body Style: 4D Ut
 VIN: 2HNYD28247H528617
 OEM/ALT: A
 Color: black

Drive Train: 3.7L Inj 6 Cyl AWD
 License: 139-765
 Search Code: B1013311

Options: CD CHANGER, PASSENGER AIRBAG, POWER DRIVER SEAT, POWER LOCK, POWER WINDOW
 POWER STEERING, REAR WINDOW DEFOGGER, AIR CONDITION, REAR WINDOW WIPER
 CRUISE CONTROL, TILT STEERING COLUMN, AM/FM STEREO, DRIVER AIRBAG
 HEATED EXTERIOR MIRROR, REAR (DUAL-ZONE) AC, LEATHER SEAT, POWER PASSENGER SEAT
 FRONT SIDE AIRBAG WITH HEAD PROTECTION, ANTI-LOCK BRAKE SYS., TRACTION CONTROL
 FOG LIGHTS, ALUM/ALLOY WHEELS, TIRE INFLATION/PRESSURE MONITOR, MEMORY SEAT
 ANTI-THEFT SYSTEM, AUXILIARY INPUT, BLUETOOTH WIRELESS CONNECTIVITY
 LEATHER STEERING WHEEL, SATELLITE RADIO, CD PLAYER
 POWER ADJUSTABLE EXTERIOR MIRROR, SUNROOF/MOONROOF, PRIVACY GLASS
 GENUINE WOOD TRIM, AUTO AIR CONDITION, TRIP COMPUTER, FIRST ROW BUCKET SEAT
 UNIVERSAL GARAGE DOOR OPENER, THIRD ROW SEAT
 REAR HEATING, VENTILATION & AIR CONDITIONING, ALL WHEEL DRIVE, SIDE AIRBAGS
 AUTOMATIC HEADLIGHTS, MP3 PLAYER, DAYTIME RUNNING LIGHTS
 DRIVER SEAT WITH POWER LUMBAR SUPPORT, ELECTRONIC STABILITY CONTROL
 EXTERIOR MEMORY MIRRORS, FRONT HEATED SEATS, KEYLESS ENTRY SYSTEM, REAR SPOILER
 STEERING WHEEL AUDIO CONTROLS

Line Item	Entry Number	Labor Type	Operation	Line Item Description	Part Type/ Part Number	Dollar Amount	Labor Units
1	001781	REF	BLEND	R Fender Outside			C 0.8
2	002058	BDY	REMOVE/REPLACE	R Frt Door Shell	67010-STX-A90ZZ	1,595.00 *	6.0 #
3	AUTO	REF	REFINISH	R Frt Door Outside			C 2.1
4	AUTO	REF	REFINISH	R Frt Add For Jambs & Interior			C 1.0
5	001620	BDY	REMOVE/REPLACE	R Frt Door Mirror Housing	76201-STX-A01ZG	243.00 *	C 0.8
6	003034	REF	BLEND	R Rear Door Outside			C 0.3
7	003043	BDY	REMOVE/INSTALL	R Rear Otr Door Belt Moulding			0.2
8	003047	BDY	REMOVE/INSTALL	R Rear Door Rear Sash Moulding			0.8 #
9	003055	BDY	REMOVE/INSTALL	R Rear Otr Door Handle			1.6
10	AUTO	REF	ADD'L OPR	Clear Coat			
11	AUTO		ADD'L COST	Paint/Materials		220.50 *	

ESTIMATE RECALL NUMBER: 05/17/2018 07:24:21 2862

Mitchell Data Version: OEM: APR_18_V

MAPP: APR_18_V

Software Version: 7.1.228

Copyright (C) 1994 - 2018 Mitchell International
 All Rights Reserved

* - Judgment Item
 # - Labor Note Applies
 C - Included in Clear Coat Calc

Estimate Totals

I. Labor Subtotals						II. Part Replacement Summary	
	Units	Rate	Add'l Labor Amount	Sublet Amount	Totals		Amount
Body	7.3	70.00	0.00	0.00	511.00	Non-Taxable Parts	1,838.00
Refinish	6.3	70.00	0.00	0.00	441.00	Total Replacement Parts Amount	1,838.00
Non-Taxable Labor					952.00		
Labor Summary	13.6				952.00		
III. Additional Costs						IV. Adjustments	
Non-Taxable Costs					220.50	Customer Responsibility	0.00
Total Additional Costs					220.50		
Paint Material Method: Rates Init Rate = 35.00 , Init Max Hours = 99.9, Addl Rate = 0.00							
						I. Total Labor:	952.00
						II. Total Replacement Parts:	1,838.00
						III. Total Additional Costs:	220.50
						Gross Total:	3,010.50
						IV. Total Adjustments:	0.00
						Net Total:	3,010.50

This is a preliminary estimate.
Additional changes to the estimate may be required for the actual repair.

Thank You For Your Business

This Is Only An Estimate Teardown Is Needed For Proper Estimate

No. 2

Acknowledgment of Service

IN THE SUMMARY COURT AT GEORGE TOWN

Cause No. SC _____ of 20__

Between:

Veloneek Caverlyn Blake

Plaintiff

AND:

Phillip Dixon

Defendant

ACKNOWLEDGMENT OF SERVICE

1 State Defendant's name and address -

43 Stepping Stones, Frank Sound
Grand Cayman, Cayman Islands
Ph. 322-1030
PHILLIP DIXON

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 _____, 20__

See Overleaf

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 Court Office, PO Box 495GT, George Town, Grand Cayman within 14 days of receipt otherwise a default judgment may be entered against you.