

Plaint

IN THE SUMMARY COURT AT GEORGE TOWN

CAUSE NO. SC 186 OF 2019

BETWEEN:

NOVA CLINIC CAYMAN

Plaintiff

AND:

KRISTIN BROWN

Defendant



PLAINT

To the Defendant



*Kristin Brown
George Town
Grand Cayman
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 **Plaint** on you, counting the day of service, you must either satisfy the claim or return to the Court Office, PO Box 495, George Town, Grand Cayman KY1-1106, Cayman Islands, 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 defense** 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 defense, the Plaintiff may apply for a **default Judgment** without any further notice to you.

Issued this 5 day September of 2019

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)

- 1 On October 19 2017 You attended Novo Clinic Cayman for various beauty treatments(Botox)
- 2 Upon completion of the work done you requested that your outstanding balance of \$643.50 to be billed to you.(exhibit 1)
- 3 Since October 19 2017 the plaintiff has called the defendant only to be met with promises that she would pay.
- 4 On July 18 2019 the plaintiff contacted a debt collection agency (Procollect International) to collect said funds from the defendant
- 5 The plaintiff paid the collection agency a total of \$206.50 for collection fees.
- 6 On August 9 2019 a demand letter was hand delivered to the defendant (exhibit 2)
- 7 The defendant has not responded to the plaintiff concerning the matter

- 8 As such as of September 5 2019 the defendant owes the plaintiff the principal amount of \$643.50 \$206.50 for debt collector simple interest of 2.38% on the amount of \$643.50. 675 days at \$0.04 a total of \$28.32.

AND the Plaintiff claims:

1. The sum of \$850.00
2. Simple interests of 2.38% on the amount of \$643.50 \$28.32
3. Fixed costs of \$175.00, \$25.00 filing fee and process server fee \$125.00 alternatively costs to be assessed.
4. Total cost \$1,203.32.

Plaintiff's Signature

Novo Clinic Cayman
P.O. Box 1145
Grand Cayman KY1-1101
Cayman Islands

No. 2 - Acknowledgment of Service

IN THE SUMMARY COURT AT GEORGE TOWN

CAUSE NO. SC ____ OF 20__

BETWEEN: *NOVA CLINIC CAYMAN*

Plaintiff

AND: *KRISTIN BROWN*

Defendant

ACKNOWLEDGEMENT OF SERVICE

1 State Defendant's name and address -

*Kristin Brown
George Town
Grand Cayman
Cayman Islands*

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 defense overleaf.

Service of the Plaint is acknowledged accordingly.

KRISTIN BROWN

Defendant's Signature

DATED this day of , 2019

See Overleaf

NovoClinic Cayman Ltd
 Eastern Ave 236 BritCay house
 George Town, - 00000-0000
 Tel: (345)746-6080 Fax: (345)746-6080

Detailed - Patient Aging Report

Name: Brown, Kristin

MR#: 5084

DOB: 09/18/1983

Legal Entity:

Last Claim

Sent:	Total Amount
Sent To:	Billed: 643.50
Statement sent:	Paid by Patient: 0.00
Payment Received:	Paid by Insurance: 0.00
	Adjustment/Written Off: 0.00
	Refund: 0.00

Outstanding Claims: 1 Nos. **Total Balance Due: 643.50**

Last Appt: 10/19/2017 02:30 PM **On Account: 0.00**
 Next Appt:

#	Case #	Case Type			Case Name				PR INS.			SE INS.			TR INS.					
		#	DOS From -To	POS	Provider Code	CPT / Rev. Code	Mod.	Dx	Charge	To Co-Pay	To Ded.	To Co-Ins.	Patient Paid	PR	SE	TR	Adj.	Adj. Reason	Balance	Line Status
1	5084-14899				Self Pay		self pay													
	1	10/19/2017-10/19/2017	11	SS	BOTOX		99999	643.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		643.50	BILI_TO_PT	
Sub Total								643.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		643.50		
Total:								643.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		643.50	
Total Copay Paid:									0.00											

Aging Details	Current	31-60	61-90	91-120	121-150	151-180	>180	Total \$
INSURANCE	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PATIENT	0.00	0.00	0.00	0.00	0.00	0.00	643.50	643.50

PROCOLLECT INTERNATIONAL

'Managing All Your Collection Needs'

Kristin Brown
George Town
Grand Cayman

DEMAND LETTER

Re: Outstanding Payment Novo Clinic Cayman in the amount of \$850.00

Dear Ms. Kristin Brown

On behalf of our client Nova Clinic Cayman

This letter is pursuant to the overdue amount on your invoice # 5098.

On October 19 2017 you attended Novo Clinic Cayman for various beauty treatments (botox)

On completion of the work done your outstanding balance was \$643.50 to which you requested that it be billed to you.

NovoClinic has made several attempts to collect these funds where they were met with a lot of promises.

As such the outstanding balance has been turned over to ProCollect International for collection on the outstanding balance including interest and finance charges.

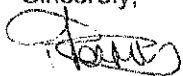
You have 7 days from this Letter to pay Pro Collect International a total of **\$850.00** including collection fees, interest and charges our office located on the 4 floor Cardinal Building Cardinal Avenue or pay directly to Cayman National Bank in the account name of ProCollect. A/C 011-15470 (should you chose to pay directly please inform us)

If unable to pay the full amount please contact us so that further arrangements can be made.

If you fail to respond to this Demand Letter within the seven days of receipt of this demand letter this will give ProCollect just cause to Pursue with Legal action and all legal, interest and attorney fees will be applied to your outstanding balance

Thank you in advance for your prompt attention to this matter. I look forward to hearing from you. If you have any questions, please do not hesitate to contact me at 1-345-929-7065

Sincerely,



Tyrone Farnum
ProCollect International

4 Floor Cardinal Plaza
Cardinal Avenue
P.O.Box 1145 KY 1-1101
George Town
Grand Cayman
Phone: 1-345-929-7065
Email: pro_collect@yahoo.com
www.procollect.com