

IN THE SUMMARY COURT AT GEORGE TOWN

Cause No. SC _____ of 20__

BETWEEN:

Igor Bielopolskyi

Plaintiff

AND:

Theodor O. Morgan

Defendant

PLAINT



To the Defendant

See Addendum A
Phone number: +1 (345) 924-7642

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, 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 March 2021

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 10th November 2020, the Plaintiff and the Defendant have entered into a written contract in a form of the promissory note (Exhibit A) for the sale of a vehicle (Exhibit B). The contract states that the Defendant promises to pay CI \$2,000 on December 15th.
- 2 The contract states no interest fees for late payment as a sign of good faith, and the contract states no deductions.
- 3 The contract has been entered into the digital record on the same day via WhatsApp Messenger (Exhibit C).

AND the Plaintiff claims:

- 1 The sum of CI \$2,000.
- 2 Interest calculated at the prescribed rate of 2.375% from 15th December 2020 to date.
- 3 Fixed costs of CI\$200.00, alternatively costs to be assessed.



Plaintiff's Signature

Plaintiff's address for service

SMB30485
Windward 3 – Regatta Park
West Bay Road
Grand Cayman, KY1-1108
Cayman Islands
Phone number: +1-312-978-1391
Email: igor@gcd.com

ADDENDUM A

Elaborates on the use of the Defendant's phone in lieu of the Defendant's address.
The Defendant has claimed their work address to be:

4th Floor, Government Administration Building
133 Elgin Avenue
George Town, Grand Cayman
Cayman Islands

However, the Plaintiff has a reason to believe that this has not been claimed truthfully according to other people statements.

Due to the fact that the Defendant resorts to baseless intimidation tactics and harassment during the conversations with the Plaintiff (Exhibit D), the Plaintiff considers that further attempts in personal contact (including requesting the address for service) are not going to be honoured.

EXHIBIT A

Copy of the promissory note held by both the Plaintiff and the Defendant:

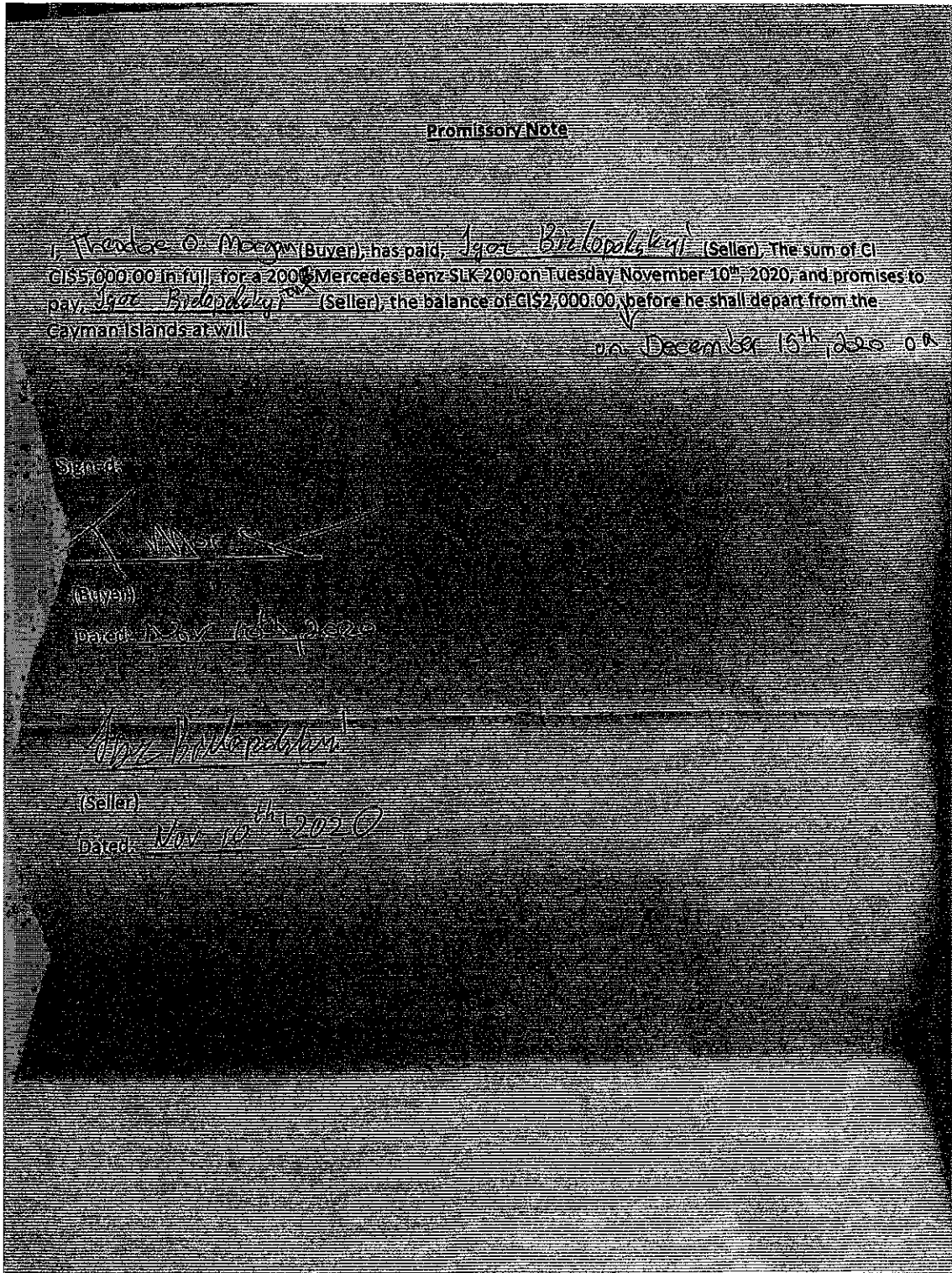


EXHIBIT B

Picture of the vehicle sold by the Plaintiff to the Defendant with license number 124606 made visible



EXHIBIT C

Enters promissory note (Exhibit A) into digital record with confirmation:

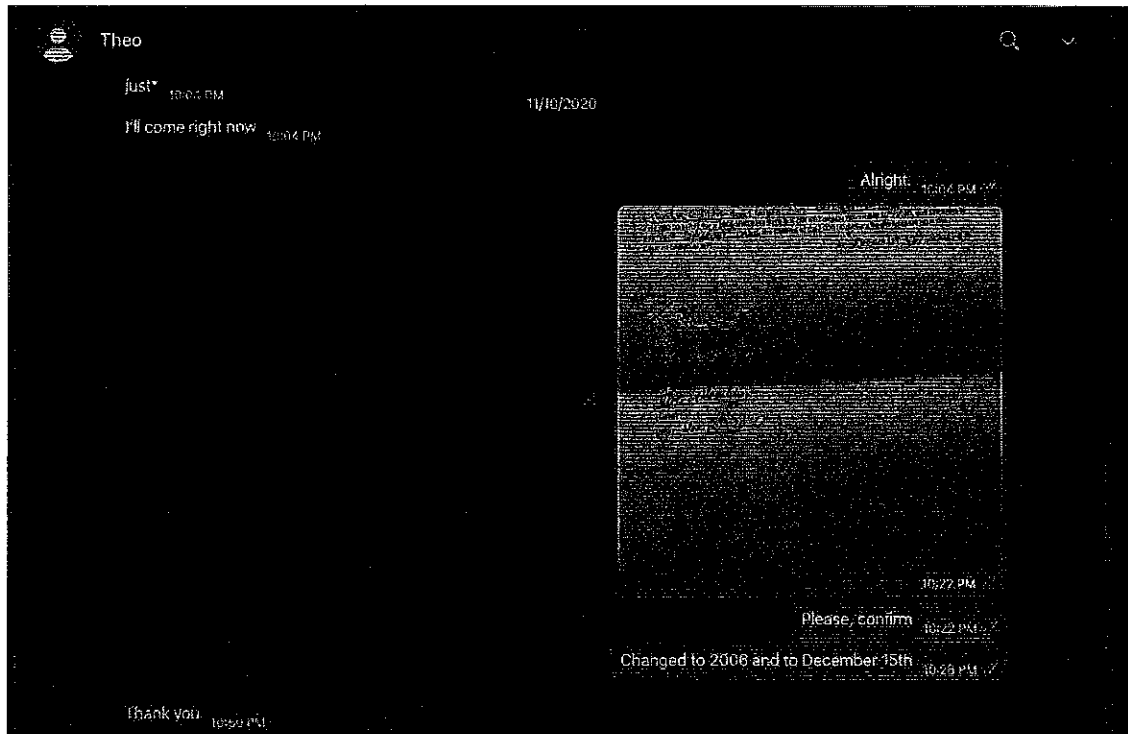
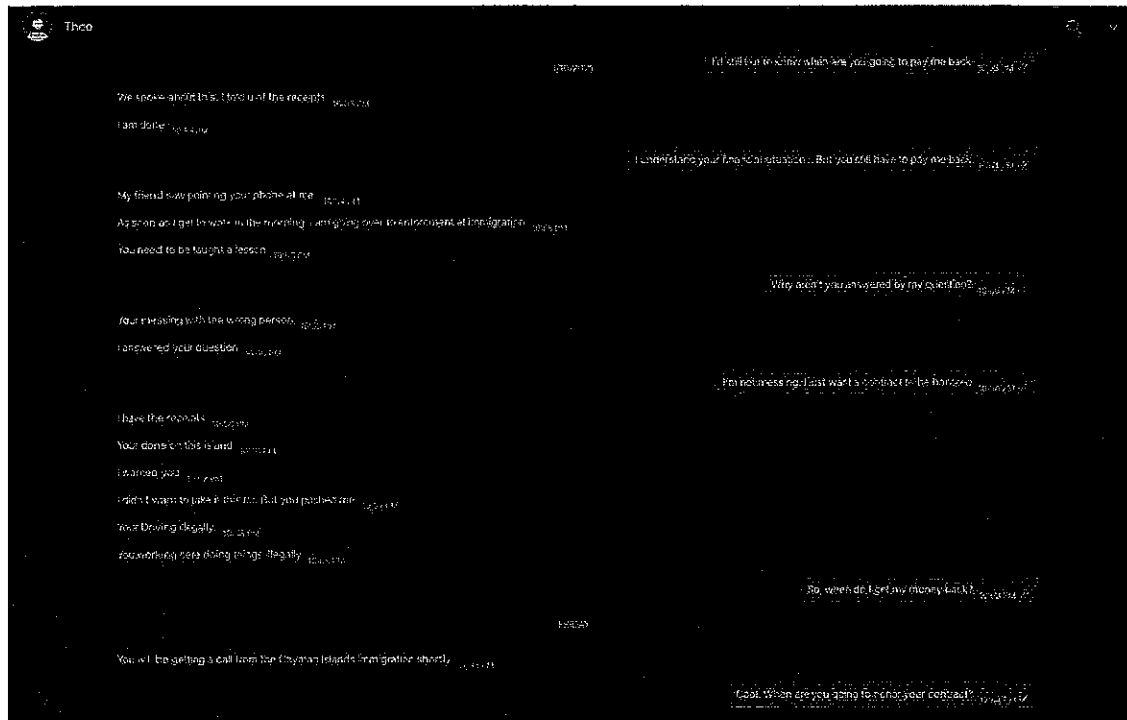


EXHIBIT D

Baseless intimidation and harassment tactics that the Defendant is resorting to for the apparent purpose of not honouring the contract (Exhibit A)



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Plaintiff

AND:

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Defendant

ACKNOWLEDGEMENT 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 Plaintiff 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