

IN THE SUMMARY COURT OF THE CAYMAN ISLANDS

CAUSE NO. SC OF 2021

BETWEEN:

THE PLAZA LTD

PLAINTIFF

AND:

CHRIS WOOLERY t/a SECURITY SOURCES LTD

DEFENDANT

PLAINT

To: Chris Woolery t/a Security Sources Ltd
PO Box 32012
Grand Cayman KY1-1208



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, P.O. Box 495, 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 *Acknowledgment of Service* form.

IF YOU FAIL to satisfy the claim or fail 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 25th day of June 2021

See overleaf for particulars of the Plaintiff's claim.

PARTICULARS OF CLAIM

1. On 17 October 2016 the Plaintiff and Defendant entered into a written agreement for the lease of a unit at Queen's Court, West Bay Road, Grand Cayman (Registration Section West Bay Beach South, Block 13B, Parcel 64 ("the Property")) to the Defendant for the sum of CI\$954.10 per month ("the Rent"). Rental fees were reduced during April and May 2020 to CI\$698.00 due to COVID restrictions.
2. Payment of the Rent was to be paid by the Defendant to the Plaintiff on the 1st day of each month.
3. Due to accumulated unpaid rent the Plaintiff's property managers, Plum, wrote to the Defendant on 7 July 2020 advising that unless all amounts due were paid within 7 days the lease would be terminated. The Defendant did not make payment and the lease came to an end on 14 July 2020 and the Defendant vacated the Property on 31 July 2020.
4. On 14 October 2020 the Plaintiff instructed attorneys to issue a letter before action requesting payment be made in full within seven day of receipt of the demand or a reasonable repayment plan be agreed between the parties. The letter of demand was personally served on the Defendant on 18 January 2021.
5. The Defendant has only made one payment in the amount of CI\$243.90 on 26 March 2021.
6. Despite repeated demands by the Plaintiff, the Defendant has failed or refused to make payment of the Rent due to the Plaintiff.
7. As at 18 June 2021 the Defendant is indebted to the Plaintiff in the amount of CI\$5,173.09.

AND THE PLAINTIFF CLAIMS:

1. The said sum of CI\$5,173.09.
2. Costs or alternatively fixed costs in the sum of CI\$500.00 plus filing fees and bailiff's fee for service.

If within the time for returning Acknowledgement of Service the Defendants pay to the Plaintiff Attorneys-at-Law the total amount claimed of CI\$5,173.09 (together with costs of CI\$500.00) all further proceedings will be stayed.

Dated this 25th day of June 2021

Dated this day of June 2021

A handwritten signature in black ink, consisting of the letters 'KSG' in a stylized, cursive font.

KSG

Attorneys for the Plaintiff

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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 defense overleaf.

Service of the Plaint is acknowledged accordingly.

Defendant's Signature

Dated this day of , 2021

See Overleaf

PARTICULARS OF DEFENCE

(Here set out in numbered paragraph 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, PO Box 495, George Town, Grand Cayman within 14 days of receipt otherwise a default judgment may be entered against you.