



Plaint

IN THE SUMMARY COURT AT GEORGE TOWN

CAUSE NO. SC ____ OF 2021

BETWEEN:

PROCOLLECT INTERNATIONAL

Plaintiff

AND:

MARTHA RANKINE

Defendant

PLAINT

To the Defendant

*Marth Rankine
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 day of 2021

See overleaf for particulars of the Plaintiff's claim

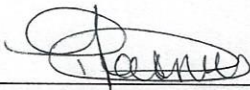
PARTICULARS OF CLAIM

(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. The Plaintiff is a License and registered process server in the Cayman Islands,
2. The Plaintiff has been serving legal documents for Brady's Attorneys at law for over 2 years
3. On March 31 whilst in Brady's Attorneys at law the Plaintiff was approached by the defendant Martha Rankin to serve a Plaintiff
4. The plaintiff took the plaint and the necessary telephone numbers and addresses to serve said documents.
5. The plaint was served, and an invoice was given to the defendant for payment (Exhibit 1)
6. On April 12, 2021, the plaintiff wrote to the defendant informing her that he no longer wanted her to continue with a court case that she was supposed to be doing and requested payment for the plaint.
7. On April 26, 2021, the defendant wrote to the plaintiff stated that she would make arrangements for the plaintiff to be paid,
8. Up until July 16, 2021, the plaintiff did not receive any payment for serving the plaint. The plaintiff emailed the defendant on July 16, 2021, requesting payment for the service done and reminded her that the serving of the plaint was between the defendant and the plaintiff and not some other third party,
9. On Wednesday July 21 the defendant wrote to the plaintiff stating that her client (Trudane) and the plaintiff was in some sort of collusion to slander her name and she would be blocking the plaintiff as she does not suffer fools and to take heed not to communicate with her again, but she does not expect the plaintiff to possess the wisdom to take heed.
10. The defendant is an attorney at law in the Cayman Islands and such bullying, threatening behavior is not becoming of someone who is an officer of the court
11. As such as of Wednesday July 21, 2021, the defendant owes the plaintiff \$65.00. and interest of \$1.00 and interest \$0.01 per day

AND the Plaintiff claims:

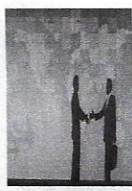
1. The sum of \$65.00
2. Interest of \$1.00 and interest at \$0.01 per day
3. Fixed costs of \$175.00, \$25.00 filing fee and process server fee \$125.00 alternatively costs to be assessed.
4. Total cost \$391.00



Plaintiff's Signature

Procollect International
P.O. Box 1145

Filed by Procollect International P.O. Box 1145 KY1-1101 George Town Grand Cayman



Pro-collect Intl

Invoice

Bill To: Martha Rankin
Claire@bradyattorneysatlaw.com

Invoice No: 54
Date: 04/08/2021
Terms: NET 30
Due Date: 05/08/2021

Description	Quantity	Rate	Amount
Serve Plaintiff to JERMAINE VALENTINE	1	\$65.00	\$65.00

Subtotal	\$65.00
TAX 0%	\$0.00
Total	\$65.00
PAID	\$0.00

Balance Due \$65.00



RE: PLEASE COLLECT REFUND AND DOCUMENTS TODAY 21 July 2021

From: Martha Rankine (martha.rankine@outlook.com)

To: pro_collect@yahoo.com

Cc: martha@msr-attorneys.com; bradyregionalsafetyconsultants@gmail.com

Date: Wednesday, July 21, 2021, 07:57 AM CDT

Please note I have been out of the office sick since last week Thursday.

I am now back in the office.

You are welcome to collect your C1\$750.00 refund and accompanying documents; including detailed invoices, and documents for work completed. Please note you are required to sign confirming receipt of same on collection.

I have spoken to both Trudane and yourself regarding the service of documents. You previously stated that you dealt with Trudane directly with regards to payment of the process server. This was also confirmed by Trudane to me in April 2021. I requested Trudane to email you to this effect copying me for my records. He refused and from all indications, it appears you both are in collusion to create further issues and continued slandering of my name. I am therefore putting you on notice, to cease and desists your misguided attempts to discredit my integrity.

To be clear to not contact me again as I do not suffer fools (Trudane included) with malicious intent. .

Note, as we have no further need for communication, I will be blocking you from contacting me via email going forward as I do not expect you possess the wisdom to take heed to my request.

Yours sincerely,

Martha S Rankine

MSR Attorneys

13457433202 | 13455476725 | Martha@MSR-Attorneys.com

Second Floor Anderson Square Building 64 Shedden Road George Town P.O. Box 1191

Grand Cayman KY1-1503 Cayman Islands

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Kindly note we will not accept service of proceedings by email until and unless written confirmation is given that service will be accepted by email.

From: TYRONE FARNUM <pro_collect@yahoo.com>
Sent: 16 July 2021 08:18
To: Martha Rankine <martha.rankine@outlook.com>
Cc: Martha Rankine <martha@msr-attorneys.com>; bradyregionalsafetyconsultants@gmail.com
Subject: Re: Gallow Loan -

Good day Ms. Rankine

In regards to your email dated April 26 2021, you stated that my refund of CI\$750.00 would be ready for pick up and I should advise you what time I will pick up same.

I have called Brady's At Law on two separate occasions to enquire if my funds were there and was advise by Ms. Clair that nothing was there.

Please note that at 10am Friday July 16 2021 I will be coming to pick up said refund as it has been from April 26 2021.

The process server fee of \$65.00 for serving a plaint in North Side for your client Trudane.

Please be reminded that I did not make any arrangements with any of your clients and as such I will not contact them or make any arrangements with them to collect such funds. It is you who gave me the papers to serve, it is you who is responsible to pay for such services.

Please have the CI\$815.00 available to be picked up this morning Friday July 16 2021 (CI\$750.00 refund and \$65.00 service of plaint in North Side)

Should you fail or refuse to have our monies available this will give us just cause to pursue this matter thru the courts.

Regards

Tyrone

Sent from Yahoo Mail. [Get the app](#)

On Monday, April 26, 2021, 09:04:49 AM CDT, Martha Rankine <martha.rankine@outlook.com> wrote:

Tyrone,

Attached please find our invoice number 00124 for CI\$1250.00 for work completed to date. As advised, payment was deducted from CI\$2,000 retainer funds, which balance is now CI\$750.00. You can collect the CI\$750.00 cash along with your documents (along with the Writ and emails referred to in my invoice) this afternoon from reception. Please advise what time you wish to collect and I will have ready for you.

Note I spoke to Trudane Mesquita (3268848) on Friday as well as earlier today and he confirmed he will contact you directly to arrange payment of the CI\$50 owed for service of documents.

Grateful if you would advise once in receipt of payment from Trudane later today. In the event payment is not received from him, please advise and I will personally arrange for payment and thereafter collect from Trudane.

Yours sincerely,

Martha S Rankine

MSR Attorneys

13457433202 | 13455476725 | Martha@MSR-Attorneys.com

Second Floor Anderson Square Building 64 Shedden Road George Town P.O. Box 1191
Grand Cayman KY1-1503 Cayman Islands

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Kindly note we will not accept service of proceedings by email until and unless written confirmation is given that service will be accepted by email.

From: TYRONE FARNUM <pro_collect@yahoo.com>
Sent: 21 April 2021 13:27
To: Martha Rankine <martha.rankine@outlook.com>
Cc: Martha Rankine <martha@msr-attorneys.com>; bradyregionalsafetyconsultants@gmail.com
Subject: Re: Gallow Loan -

Good Day Ms. Rankine

Thank you for your reply as you have clearly shown your true colors.

My deadline is still as of Monday

You can continue to call me a liar however this is a case for the courts to decide. You will have the chance to fully explain to the courts

Please note all of your emails will be used as evidence

Thank you
Tyrone

Sent from Yahoo Mail. [Get the app](#)

On Wednesday, April 21, 2021, 02:03:33 PM EDT, Martha Rankine <martha.rankine@outlook.com> wrote:

Tyrone,

Bravo! You are a very accomplished liar, however you lack basic intellect or even a grain of common sense if you actually believe I will not be paid for my work! Moreover, you are one very sad and deluded cretin for maliciously attempting to tarnish my reputation because of my decision to discontinue work (where the individual or transaction is questionable).

Word of advice: I always keep a paper trail.

Now with regards to your complaint regarding my "conduct", yes please by all means write to the Chief Justice and tell him I refused to continue work or be complicit with your "questionable business practices" and that I am also minded to report you to the appropriate authorities for failure to comply with Due Diligence obligations under the Anti-Money Laundering legislation.

I will prepare and leave my invoice along with the remaining balance of the retainer deposit for you on Friday 23 April 2021.

With respect to your fees for Process service. We met (date to be confirmed) whereby I advised you of the KYC and other information I required in order to finalize the Writ I was working on. Remember I had a number of questions which you wrote down. You will also recall you emailed me some of the information requested, albeit minus the KYC information!

With respect to service of documents, during the said meeting you advised me that you had yet to complete the last process service for Blue Pavillion. As such, once service is completed, send me your invoice for payment.

At the time, you advised me there were two Pro Collect invoice due, I therefore paid CI\$50 cash however, you did not provide me with a receipt. Normally you would sign and write "paid" on the invoice, however, on this occasion I also did not have an invoice from you. You stated that you sent it or intended to send the invoice to Ms. Claire and with the paid stamp to acknowledge receipt of the CI\$50.00 I paid you.

I agree there is one outstanding payment of CI\$50.00 that is due for the service of the Valentine Demand letter. We agreed I would call Trudane Mesquita to bring the CI\$50.00 for your fees. I haven't had the chance to call Trudane however, I will personally pay this on Friday and sort with Trudane at a later date.

Martha Rankine

Sent from Mail for Windows 10

From: TYRONE FARNUM
Sent: 16 April 2021 13:33
To: Martha Rankine
Subject: Re: Gallow Loan

Good day Ms Martha,

It appears that we have a breakdown in the proposed court case, as such I do not like the back and fort arguments I was very offended to have you hang up the phone on me whilst talking to you .

I try my best to always be professional when it comes to business, however I will not dwell on this.

Om March 31 2021 Procollect International paid CI\$2,000.00 to take one of our customers to Grand Court , before we paid I informed you on the whole case, 16 days later we have not begun to do anything concerning the case.

As such we are instructing you to cease any work for Procollect international and refund our monies less whatever work you have done prior to April 16 and to show the work done.

We met in your office to discuss the case however nothing has materialized.

Thank you for hearing me out but it is clear that we are not seeing eye to eye on this matter.

It would be wise for us to seek another attorney or do it ourselves to avoid any further problems.

I understand that you are very busy and I appreciate that, however at this point I can no longer be your client.

Please be so kind to refund our monies by Wednesday April 21 2021 to Procollect International

Thanking you once again

Tyrone

Sent from Yahoo Mail. [Get the app](#)

On Friday, April 16, 2021, 08:51:43 AM EDT, TYRONE FARNUM <pro_collect@yahoo.com> wrote:

Hi Ms Martha

Sorry I did not reply yesterday as I was feeling a bit sick, I have answered your two questions please advise when we can finish this

But first please clarify whether the company remains active and in good standing as it appears that you are saying that is no longer the case??? The company closed its branch in the Cayman Islands and as such handed over its bad debts to Signature Commercial for collection in the USA and Procollect International in the Cayman islands

Also please forward me copies of your due diligence compliance documents on your client please? I have no idea what you are referring to

In short Summary

Dr Moses Gallow borrowed some money from a real estate company who assist people with purchasing their House

Because of the Pandemic they closed their offices in the Cayman Islands

Because of no payment from Gallow Signature Commercial was hired to collect said debt as such Procollect International was hired to collect said debt in the Cayman Islands

Procollect met with Gallow on several occasions to where he signed two promissory agreements but refused to comply with the agreement.

I know that you are busy however by the 21 April 2021 I will need this to be submitted to the court

It has been 2 weeks and I keep receiving calls from Signature who has advised me that they want tist done by Tuesday 21 April which will be 3 weeks

Tyrone

Sent from Yahoo Mail. [Get the app](#)

On Thursday, April 15, 2021, 08:21:40 AM EDT, Martha Rankine <martha.rankine@outlook.com> wrote:

Good morning Tyrone,

Based on the information provided, i expect the earliest would be next week. But first please clarify whether the company remains active and in good standing as it appears that you are saying that is no longer the case???

Also please forward me copies of your due diligence compliance documents on your client please.

I am tied up work wise this morning as such unavailable until late this evening. You can nonetheless email your reply and any queries.

Martha

On 12 Apr 2021 9:41 am, TYRONE FARNUM <pro_collect@yahoo.com> wrote:

Good day Ms Rankine

In relation to Mr Gallow loan here are some further information

- 1.. Johnson Family Cayman was a registered company in the Cayman Islands until 2019.
2. It was operating as a real estate company.
- 3.The company closed its branch in the Cayman Islands and as such handed over its bad debts to Signature Commercial for collection.
4. Signature Commercial is a company located in Iowa USA
5. Signature Commercial reached out to ProCollect International (which is a registered company in the Cayman islands to collect it bad debts.
- 6.The money loaned was not cash or transfer it was a deposit towards purchasing a home in lower valley 31A 154H1 &154H3
7. Moses Gallow current address is 531 Prospect Drive Prospect Grand Cayman
8. I was informed to charge Gallow 17.13% for signature and Procollect fees

I know that you are very busy however can you give a estimate of when this will be filed in court

Sent from Yahoo Mail. [Get the app](#)

Tyrone

On Wednesday, March 31, 2021, 04:02:25 PM EDT, TYRONE FARNUM <pro_collect@yahoo.com> wrote:

Sent from Yahoo Mail. [Get the app](#)

No. 2 - Acknowledgment of Service

IN THE SUMMARY COURT AT GEORGE TOWN

CAUSE NO. SC ____ OF 20__

BETWEEN:

PROCOLLECT INTERNATIONAL

Plaintiff

AND:

MARTHA RANKINE

Defendant

ACKNOWLEDGEMENT OF SERVICE

1 State Defendant's name and address -

*Martha Rankine
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 Plaintiff is acknowledged accordingly.

Martha Rankine

DATED this day of, 2021

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 495, Grand Cayman KY1-1106 Cayman Islands within 14 days of receipt otherwise a default Judgment may be entered against you.