



GRAND COURT OF THE CAYMAN ISLANDS
CAUSE NO: G OF 2026

BETWEEN:

NADINE O'CONNOR

PLAINTIFF

AND:

GREIGFIELD OMAR SHELDON SPIKE

DEFENDANT

WRIT OF SUMMONS

TO: The Defendant

And as a Noticed Party To: Cayman First Insurance Company Limited
Cayman First Centre
17 Vibert Bodden Drive, George Town
P.O. Box 2171
Grand Cayman KY1-1105
Cayman Islands

THIS WRIT OF SUMMONS has been issued against you by the above-named Plaintiff of 7 Lustrous Court, Bodden Town, Grand Cayman, Cayman Islands in respect of the claim set out on the next page.

Within 14 days after the service of this Writ on you, counting the day of service, you must either satisfy the claim or return to the Court Office, P.O. Box 495G, George Town, Grand Cayman, the accompanying Acknowledgment of Service stating therein whether you intend to contest these proceedings.

If you fail to satisfy the claim or to return the Acknowledgment within the time stated, or if you return the Acknowledgment without stating therein an intention to contest the proceedings, the Plaintiff may proceed with the action and judgment may be entered against you forthwith without further notice.

Issued this 24th day of September 2026.

NOTE - This Writ may not be served later than 4 calendar months (or, if leave is required to effect service out of the jurisdiction, 6 months) beginning with the date of issue unless renewed by order of the Court.

This **Writ and Statement of Claim** is issued by KSG Attorneys at Law for the Plaintiff whose address for service is 4th Floor, One Capital Place, 136 Shedden Road, George Town, Grand Cayman. P.O. Box 2255, KY1-1107.

IMPORTANT

Directions for Acknowledgment of Service are given with the accompanying form.

STATEMENT OF CLAIM

1. At all material times, the Plaintiff was the driver and owner of a 2022 Chevrolet Captiva motor vehicle bearing registration number 212572, and the Defendant was the driver of a 2007 Honda Accord motor vehicle bearing registration number 187443.
2. At all material times, the Defendant's vehicle was insured with Cayman First Insurance Company Limited which had issued a policy of insurance in accordance with the Motor Insurance (Third Party Risks) Act and which was served with notice of these proceedings.
3. On 19 October 2023 at approximately 4:38 pm, the Plaintiff was driving her motor vehicle east along Rex Crighton Boulevard approaching its junction with Hirst Road in Bodden Town, when she stopped due to traffic ahead.
4. The Defendant was driving his motor vehicle directly behind the Plaintiff and failed to stop, colliding with the rear of the Plaintiff's vehicle.
5. The accident was caused solely by the negligence of the Defendant.

PARTICULARS OF NEGLIGENCE

6. The Defendant was negligent in that he:
 - (a) collided with the rear of the Plaintiff's vehicle;
 - (b) failed to keep any or any proper lookout;
 - (c) failed to see the Plaintiff's vehicle when he ought to have done;
 - (d) failed to maintain a safe stopping distance;
 - (e) failed to apply his brakes whether in time or at all;
 - (f) failed to stop, slow down, steer or control his vehicle so as to avoid the collision;
 - (g) drove at a speed which was excessive in the circumstances, having regard to the traffic conditions and wet roadway;
 - (h) drove without due care and attention; and
 - (i) failed to take reasonable care in all the circumstances.
7. The Plaintiff also relies on the doctrine of *res ipsa loquitur*.
8. By reason of the matters aforesaid, the Plaintiff (who was born on 22 January 1982 and was aged 41 years at the date of the accident) sustained personal injury and suffered loss and damage.

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PARTICULARS OF PERSONAL INJURY

9. At the time of the collision, the Plaintiff continued to experience symptoms arising from a previous motor vehicle accident, including lower back pain and occasional neck pain. The collision materially aggravated those symptoms and also caused injury to her left shoulder.
10. The Plaintiff attended George Town Hospital on 20 October 2023, where she reported lower back tightness, left shoulder pain and neck pain. On examination, she had tenderness in her lower back and left shoulder, with pain when moving her neck and shoulder. She was diagnosed with a whiplash injury to the neck and muscle spasm of the lower back, prescribed pain medication and referred for physiotherapy.
11. The Plaintiff commenced physiotherapy on 25 October 2023 and continued treatment until December 2023. She was found to have pain and reduced movement affecting her neck, left shoulder and lower back, together with functional limitation.
12. At the time of the collision, the Plaintiff suffered from post-traumatic stress disorder arising from the previous motor vehicle accident, for which she had received psychological treatment. The collision materially aggravated her post traumatic stress disorder.
13. Following the collision, the Plaintiff experienced increased anxiety and fear associated with driving, intrusive thoughts, flashbacks, disturbed sleep, hypervigilance and avoidance. Her symptoms affected her ability to drive comfortably and caused difficulty with concentration and her studies.
14. The Plaintiff required further psychological treatment for her post-traumatic stress disorder, including exposure therapy and techniques to manage her anxiety and trauma associated with motor vehicle accidents and driving. Her symptoms have persisted.
15. Further particulars of the Plaintiff's injuries, treatment and prognosis will be provided in due course.

PARTICULARS OF SPECIAL DAMAGE AND FUTURE LOSS

16. The Plaintiff has suffered loss and incurred expenses as a result of the accident, including medical and rehabilitation expenses and other consequential losses.
17. A Schedule of Damages will be provided in due course.
18. Further, the Plaintiff is entitled to and claims interest pursuant to section 34 of the Judicature Act (2021 Revision) on all damages owing to her at such rate and for such period as the Court considers appropriate.

This **Writ and Statement of Claim** is issued by KSG Attorneys at Law for the Plaintiff whose address for service is 4th Floor, One Capital Place, 136 Shedden Road, George Town, Grand Cayman. P.O. Box 2255, KY1-1107.

AND THE PLAINTIFF CLAIMS:

1. Damages;
2. Interest thereon, to be assessed;
3. Costs;
4. Such further or other relief as this Honourable Court deems just.



KSG Attorneys-at-Law
Attorneys for the Plaintiff

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**DIRECTIONS FOR ACKNOWLEDGMENT OF SERVICE
OF WRIT OF SUMMONS**

1. The accompanying form of Acknowledgment of Service should be completed by an Attorney acting on behalf of the Defendant or by the Defendant if acting in person.

After completion it must be delivered or sent by post to the Law Courts, P.O. Box 495G, George Town, Grand Cayman.

2. A Defendant who states in his Acknowledgment of Service that he intends to contest the proceedings must also serve a defence on the Attorney for the Plaintiff (or on the Plaintiff if acting in person).

If a Statement of Claim is indorsed on the Writ (i.e. the words "Statement of Claim" appear on the top of page 2), the Defence must be served within 14 days after the time for acknowledging service of the Writ, unless in the meantime a summons for judgment is served on the Defendant.

If the Statement of Claim is not indorsed on the Writ, the Defence need not be served until 14 days after a Statement of Claim has been served on the Defendant.

If the Defendant fails to serve his defence within the appropriate time, the Plaintiff may enter judgment against him without further notice.

3. A Stay of Execution against the Defendant's goods may be applied for where the Defendant is unable to pay the money for which any judgment is entered. If a Defendant to an action for a debt or liquidated demand (i.e. a fixed sum) who does not intend to contest the proceedings states, in answer to Question 3 in the Acknowledgment of Service, that he intends to apply for a stay, execution will be stayed for 14 days after his Acknowledgment, but he must, within that time, issue a Summons for a stay of execution, supported by an affidavit of his means. The affidavit should state any offer which the Defendant desires to make for payment of the money by instalments or otherwise.

See over for notes for guidance

Please complete overleaf

This **Writ and Statement of Claim** is issued by KSG Attorneys at Law for the Plaintiff whose address for service is 4th Floor, One Capital Place, 136 Shedden Road, George Town, Grand Cayman. P.O. Box 2255, KY1-1107.

Notes for Guidance

1. Each Defendant (if there are more than one) is required to complete an Acknowledgment of Service and return it to the Courts Office.
2. For the purpose of calculating the period of 14 days for acknowledging service, a writ served on the Defendant personally is treated as having been served on the day it was delivered to him.
3. Where the Defendant is sued in a name different from his own, the form must be completed by him with the addition in paragraph 1 of the words "sued as (the name stated on the Writ of Summons)".
4. Where the Defendant is a FIRM and an attorney is not instructed, the form must be completed by a PARTNER by name, with the addition in paragraph 1 of the description "Partner in the firm of (.....)" after his name.
5. Where the Defendant is sued as an individual TRADING IN A NAME OTHER THAN HIS OWN, the form must be completed by him with the addition in paragraph 1 of the description "trading as (.....)" after his name.
6. Where the Defendant is a LIMITED COMPANY the form must be completed by an Attorney or by someone authorised to act on behalf of the Company, but the Company can take no further step in the proceedings without an Attorney acting on its behalf.
7. Where the Defendant is a MINOR or a MENTAL PATIENT, the form must be completed by an Attorney acting for a guardian ad litem.
8. A Defendant acting in person may obtain help in completing the form at the Courts Office.

**IN THE GRAND COURT OF THE CAYMAN ISLANDS
CIVIL DIVISION****CAUSE NO: OF 2026****BETWEEN:****NADINE O'CONNOR****PLAINTIFF****AND:****GREIGFIELD OMAR SHELDON SPIKE****DEFENDANT****ACKNOWLEDGMENT OF SERVICE OF WRIT OF SUMMONS**

If you intend to instruct an Attorney to act for you, give him this form IMMEDIATELY.

Important. Read the accompanying directions and notes for guidance carefully before completing this form. If any information required is omitted or given wrongly, THIS FORM MAY HAVE TO BE RETURNED.

Delay may result in judgment being entered against a Defendant whereby he may have to pay the costs of applying to set it aside.

1. State the full name of the Defendant by whom or on whose behalf the service of the Writ is being acknowledged.

2. State whether the Defendant intends to contest the proceedings (tick appropriate box)

☐

yes

☐

no

3. If the claim against the Defendant is for a debt or liquidated demand, AND he does not intend to contest the proceedings, state if the Defendant intends to apply for a stay of execution against any judgment entered by the Plaintiff (tick box)

☐

yes

☐

no

Service of the Writ is acknowledged accordingly

(Signed).....
Attorney for

Please complete overleaf

This **Writ and Statement of Claim** is issued by KSG Attorneys at Law for the Plaintiff whose address for service is 4th Floor, One Capital Place, 136 Shedden Road, George Town, Grand Cayman. P.O. Box 2255, KY1-1107.

Notes on address for service

Attorney: where the Defendant is represented by an attorney, state the attorney's place of business in the Cayman Islands. A Defendant may not act by a foreign attorney.

Defendant in person: where the Defendant is acting in person, he must give his post office box number and the physical address of his residence or, if he does not reside in the Cayman Islands, he must give an address in Grand Cayman where communications for him should be sent. In the case of a limited company, "residence" means its registered or principal office.

Indorsement by plaintiff's Attorney (or by plaintiff if suing in person) of his name, address and reference, if any, in the box below.

KSG Attorneys-at-Law
4th Floor One Capital Place
Shedden Road
PO Box 2255
George Town
KY1-1107
Grand Cayman

Indorsement by defendant's Attorney (or by defendant if suing in person) of his name, address and reference, if any, in the box below.

This **Writ and Statement of Claim** is issued by KSG Attorneys at Law for the Plaintiff whose address for service is 4th Floor, One Capital Place, 136 Shedden Road, George Town, Grand Cayman. P.O. Box 2255, KY1-1107.