

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO *610* OF 1999

BETWEEN:

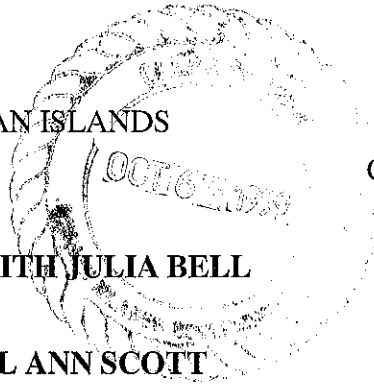
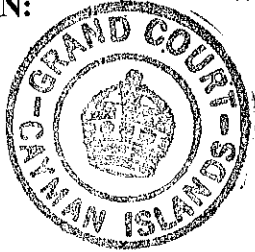
MERREDITH JULIA BELL

PLAINTIFF

AND:

CAROL ANN SCOTT

DEFENDANT



WRIT OF SUMMONS

TO: CAROL ANN SCOTT, North Side, Grand Cayman.

THIS WRIT OF SUMMONS 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 the service of this Writ on you, counting the day of service, you must either satisfy the claim or return to the Court Office, PO Box 495G, George Town, Grand Cayman, the accompanying Acknowledge of Service stating therein whether you intend to contest these proceedings.

If you fail to satisfy the claim or to return the Acknowledgement within the time stated, or if you return the Acknowledgement 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 *6th* day of *October* 19*99*.

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.

IMPORTANT

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

STATEMENT OF CLAIM

1. The Plaintiff resides in the District of Prospect, Grand Cayman, Cayman Islands.
2. The Defendant resides in the District of North Side, Grand Cayman, Cayman Islands.
3. Since around May 1998, the Plaintiff has been involved in a relationship with Sergeant Kurt Walton of the Royal Cayman Islands Police, who presently resides in Cayman Brac, but who formerly resided in Grand Cayman.
4. The said Kurt Walton had a brief relationship with the Defendant, which relationship ended approximately four years ago.
5. Since June 1998 the Defendant has either by herself or by her servants or agents harassed, molested and stalked the Plaintiff; has threatened to physically harm the Plaintiff and has caused damage to the Plaintiff's property.

PARTICULARS

- (1) In or around June 1998, the tyres on the Plaintiff's motor vehicle were slashed.
- (2) In or around early October 1998, a cement block was thrown on the Plaintiff's motor vehicle causing further damage thereto.
- (3) In October 1998, the Defendant was convicted in the Summary Court of the Cayman Islands of causing criminal damage to property belonging to the aforementioned Sergeant Kurt Walton and was incarcerated between October and December 1998.
- (4) On the Defendant's release from prison, the harassment and molestation of the Plaintiff continued. On the 17th day of March 1999, both the front and the back windscreens of the Plaintiff's motor vehicle were smashed.
- (5) On or around the 5th day of May 1999 the rear windscreen of the Plaintiff's motor vehicle was smashed.
- (6) Between that time and Monday the 27th day of September 1999 the Plaintiff has received numerous harassing telephone calls from the Defendant and / or her

servants or agents both at her home and at her place of work. During the course of such telephone conversations, threats have been made against the Plaintiff and inter alia the Defendant has threatened to “send the Plaintiff home, to send the Plaintiff home chopped up, to send the Plaintiff home in a box.”

- (7) The Plaintiff has been forced to take precautions against the Defendant’s actions and has in the interim fitted an alarm on her car and taken to parking it close to the window of the room in which she sleeps.
- (8) Since Monday the 27th day of September 1999 the Plaintiff and the aforementioned Kurt Walton have been subjected to daily harassment and molestation and have received threats of violence from the Defendant.
- (9) On Monday the 27th day of September 1999 the Defendant went to the residence of Kurt Walton, damaged his motor vehicle and verbally abused him.
- (10) On Tuesday the 28th day of September 1999 the Defendant went to the residence of Kurt Walton at around 3 p.m., knocked on the door and had to be physically removed from the premises.
- (11) On Wednesday the 29th day of September 1999, the Defendant repeatedly telephoned the said Sergeant Kurt Walton at his place of employment between the hours of 9:30 a.m. and 3:00 p.m. and made threats of physical violence against the Plaintiff, used profane language and left obscene messages.
- (12) On Thursday the 30th of September 1999, the Defendant telephoned the Plaintiff and threatened her with physical violence. Later that evening an unknown man came to the Plaintiff’s residence looking for her.
- (13) On Friday the 1st of October 1999 the Plaintiff went on a field trip with the Grace Christian Academy to the botanical gardens. The Defendant was seen following the Plaintiff and a police report was made. The Plaintiff received a threatening telephone call from the Defendant at the botanical gardens.
- (14) On Saturday the 2nd of October 1999 the Defendant followed the Plaintiff and the said Kurt Walton from the Red Rabbit Liquor Store in Red Bay to the Plaintiff’s house. The Defendant thereafter telephoned the Plaintiff and issued threats.
- (15) On Saturday the 2nd of October 1999 an unknown male left a message on the Plaintiff’s answering machine threatening violence.
- (16) On Sunday the 3rd of October 1999 a male telephoned and left a message on the Plaintiff’s answering machine. The male identified himself as the same person who had called and issued threats the day before and further stated that “Carol had told him to smash Kurt Walton’s windscreen”. The male caller indicated that he had not smashed the windscreen, but that the Plaintiff and Sergeant Walton should

be warned.

(17) On the evening of Sunday the 3rd of October 1999 the windscreen of Sergeant Walton's motor vehicle was smashed. At this time, the said vehicle was parked at the Plaintiff's residence.

6. As a result of the Defendant's aforementioned action, the Plaintiff has suffered damage to property, fear and mental anguish. Full particulars of the cost of the damage to the Plaintiff's property will be provided on discovery.

AND THE PLAINTIFF claims:

1. An injunction to restrain the Defendant whether by herself or by her servants and/or agents or otherwise from assaulting, threatening, molesting, stalking, communicating with or otherwise interfering with the Plaintiff or damaging her property.
2. An injunction to restrain the Defendant whether by herself or by her servants and/or agents or otherwise from entering upon or coming within 100 metres of the Plaintiff's residence known as Apartment 1, 22 Mahogany Way, Prospect, Grand Cayman and within 100 metres from the Plaintiff's place of work at the Grace Christian Academy, Crescent Close, Off Boltins Avenue, West Bay, Grand Cayman.
3. Damages.
4. Interest.
5. Costs.

C.S. Gill & Co.

C.S. GILL & CO.

Attorneys-at-Law for the Plaintiff

THIS WRIT was issued by C.S. Gill & Co, Attorneys-at-Law, whose address for service is 4th Floor, Genesis Building, P.O. Box 945, George Town, Grand Cayman, B.W.I.