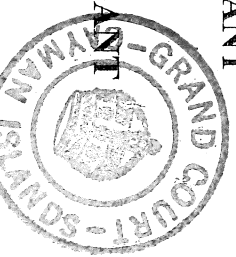


IN THE GRAND COURT OF THE CAYMAN ISLANDS
HOLDEN IN GEORGE TOWN, GRAND CAYMAN

90401
CAUSE NO. OF 2008

BETWEEN: WILBERT REEVES FIRST PLAINTIFF
ANDREA SMITH SECOND PLAINTIFF

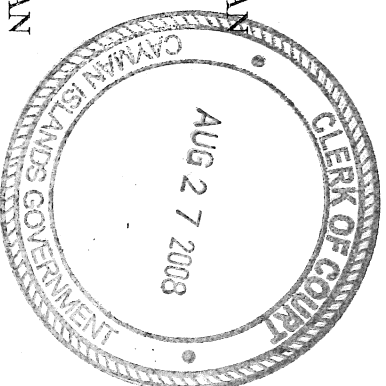
AND: LAMBERT HAUGHTON FIRST DEFENDANT
AND: ISLAND PRIDE CONSTRUCTION Ltd.
SECOND DEFENDANT



WRIT OF SUMMONS

TO: LAMBERT HAUGHTON
38 VIBE LANE
GEORGE TOWN, GRAND CAYMAN
CAYMAN ISLANDS

AND TO: ISLAND PRIDE CONSTRUCTION
C/O DIAMOND LAW
GEORGE TOWN, GRAND CAYMAN



THIS WRIT OF SUMMONS has been issued against you by the above-named Plaintiff in respect of the claim set out following.

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. 495 G.T., 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 27th day of Aug, 2008

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

IMPORTANT

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

This Writ is filed by McKinney Reid & Company, Attorneys-at-Law for and on behalf of the Plaintiff, whose address for service is 201 Elizabethan Square, Sheddin Road, George Town, Grand Cayman, Cayman Islands, B.W.I.

STATEMENT OF CLAIM

1. That at all material times the First Plaintiff was a construction worker resided in East End, Grand Cayman. He is a trained medical technologist in Jamaica, but was working as a construction worker in the Cayman Islands. On the 28th August 2005 at the material time he was a passenger in the Ford Contour registration number 81129 driven by the Second Plaintiff.
2. The Second Plaintiff at all material times was a Registered Nurse working with the Health Services of the Cayman Islands and residing in Prospect, Grand Cayman. She was the owner and driver of Ford Contour motor vehicle registration number 81129 at the material time.
3. The First Defendant at the material time was an employee of the Second defendant who resided at 38 Vibe Lane, George Town, Grand Cayman. He was the driver of a GMC motor vehicle registration number 888470 which was at all material times owned by the Second Defendant and insured by Cayman General Insurance Company Limited. The First Defendant in driving of the said motor vehicle was at all material times the servant and/or agent of the Second Defendant.
4. The Second Defendant is a limited liability company registered under the Companies Law of the Cayman Islands. The Second defendant is vicariously liable for the actions of the First Defendant at the material time.
5. At some time around 5:38pm on the 28th of August, 2005 the First Plaintiff and Second Plaintiff were driving east along Seaview Drive in East End, Grand Cayman in the left lane when the GMC motor vehicle registration number 88470 driven by

the First Defendant in a westerly direction, crossed the median of the carriage way and collided with the Ford Contour registration number 81129 causing extensive damage to the Ford Contour and pain an injury to the First and Second Plaintiffs.

6. The accident was caused by the negligence of the First Defendant.

PARTICULARS OF NEGLIGENCE

- (i) Failing to keep any or any proper look out;
- (ii) Driving too fast in all the circumstances;
- (iii) Leaving the correct side of the carriageway and crossing the median into the path of the First and Second Plaintiffs and colliding with the Ford Contour;
- (iv) Failing to steer or control the motor vehicle or to apply brakes adequately so as to avoid the collision;
- (v) Failing to take any or adequate care for the safety of other road users and in particular the First and Second Plaintiffs;

7. The accident was caused by the negligence of the First Defendant.

PARTICULARS OF INJURY, LOSS AND DAMAGE TO THE FIRST PLAINTIFF

- 8. (a) (i) The First Plaintiff suffered multiple lacerations to his face, cut to the right ear, a deep laceration to the right shoulder which gave rise to chronic recurrent musculigamentous strain of the cervical spine, C5-6 nerve root injury, tendinosis of the right subcapularis tendon and also suffered unconsciousness. He has suffered permanent injury to the right shoulder as he continues to have limited use of the right arm and suffers pain in the right shoulder, arm, neck and back.
- (ii) The First Plaintiff was taken from the accident scene by ambulance and regained consciousness while en route to the hospital but went in and out of consciousness. He was treated at the George Town

Hospital and subsequently saw other private physicians in the Cayman Islands and Jamaica.

- (ii) He continues to suffer pain and significant limited use of his right arm and shoulder and pain in his head, neck and back. His injuries caused him to lose time at work.

PARTICULARS OF INJURY, LOSS AND DAMAGE TO THE SECOND

PLAINTIFF

- 8. (b) (i) The Second Plaintiff was diagnosed with C4-5/C5-6 facet arthropathy, Lumbar articular dysfunction, mechanical dysfunction of the neck and lower back and sprain of the left ankle and combined tibial/talar ligament and deltoid ligament sprain.
- (ii) As a result the Second Plaintiff has great difficulty in the execution of her nursing duties, specifically those that required static loading of her back and neck. Her capacity to lift, carry, push, pull etc. remain limited. She also has difficulty walking and sitting for long periods and required back support especially when sitting for long periods. As a result she has had to modify her life style and has been advised not to return to her work as Labour and Delivery midwife and the regular duties of a nurse.

In the premises the First and Second Plaintiffs claim against the Defendants or one or other of them:

- 1. Damages;
- 2. Special Damages for medical expenses(\$6,000.00), which are continuing and loss of wages (\$10,944.00) at June 2007 and continuing;
- 3. Interest pursuant to the Judicature Law and the Grand Court Rules.
- 4. Costs;
- 5. Such further and/or other relief as may be just.

McKinney Reid & Co.

MCKINNEY REID & COMPANY
Attorney-at-Law for the Plaintiff

TO: The Clerk of the Court

AND TO: The First and Second Defendants
Grand Cayman

THIS WRIT was issued by McKinney Reid & Company, Attorneys-at-Law whose address for service is
Suite 201 Elizabethan Square, P. O. Box 1573 Grand Cayman KY1-1110 Cayman Islands

FORM 2

Acknowledgment of Service (Rule.11)

DIRECTIONS FOR ACKNOWLEDGEMENT OF SERVICE

IF YOU INTEND TO INSTRUCT AN ATTORNEY TO ACT FOR YOU GIVE HIM THIS FORM IMMEDIATELY

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.
2. After completion it must be signed by the Defendant and his attorney (if any) and must be delivered or sent by post to the Law Courts, P.O. Box 495 G.T., George Town, Grand Cayman.
3. The Acknowledgment of Service must be filed at court and served on the attorney for the Plaintiff (or on the Plaintiff if acting in person) within fourteen days service of the Writ of Summons.
4. A Defendant who states in his Acknowledgment of Service that he intends to contest the proceedings must also serve an Answer on the attorney for the Plaintiff (or on the Plaintiff if acting in person within fourteen days after service of the Writ of Summons.
5. In case of Writ of Summons is served outside the Cayman Islands the periods within which the Respondent must file an Acknowledgment of Service and any Answer are extended by fourteen days.

Please complete overleaf

NOTE: Notice of your intention to defend may be given by:

- a) an endorsement on the Acknowledgment of Service.
- b) by notice of such intention lodged in the Registry within fourteen days of the service of this Writ of Summons, or
- c) at any time by leave of the Court prior to the date fixed for trial.

The following persons must be served:-

The Defendants

Defendant

Defendant's Attorney

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 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.

Indorsement by the Plaintiff's attorney (or by the Plaintiff if suing in person) of his name and address in the box below.

McKinney Reid and Company
Attorneys-At-Law
201 Elizabethan Square
P.O. Box 1573 G.T.
George Town Grand Cayman

Indorsement by Defendant's attorney (or by the Defendant if acting in person) of his name and address in the box below.