



SUMMARY COURT OF THE CAYMAN ISLANDS
ION

CAUSE NO: OF 2026

BETWEEN:

DALTON MAXWELL MEDLEY

PLAINTIFF

AND:

- 1. MUKESH SRICHAND KHANCHANDANI**
- 2. HELEN MARGARITA EBANKS**

DEFENDANTS

PLAINT

TO:

MUKESH SRICHAND KHANCHANDANI of 820 Bodden Town Road 15, Bodden Town, Grand Cayman, Cayman Islands, and

HELEN MARGARITA EBANKS of 541 John McLean Drive, East End, Grand Cayman, Cayman Islands.

THIS PLAINT has been issued against you by the above-named Plaintiff with his address c/o Samson Law Associates, The White House, 20 Genesis Close, PO Box 2425, Grand Cayman, KY1-1105 in respect of the claim set out on the next page.

Within 14 days after service of this Complaint on you, counting the day of service, you must either satisfy the claim or return to the Courts Office, P.O. Box 495, George Town, Grand Cayman, KY1-1106, Cayman Islands, the accompanying Acknowledgement of Service form stating therein whether you intend to contest these proceedings.

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 Acknowledgement of Service form.

If you fail to satisfy the claim or to return the Acknowledgement of Service form containing full particulars of your defence within the time stated, the Plaintiff may apply for a default judgment without any further notice to you.

ISSUED THIS 25th day of MAY 2026

See overleaf for particulars of the Plaintiff's claim

PARTICULARS OF CLAIM

1. The Plaintiff, at all material times, was a pedal cyclist who was riding his bicycle along Eastern Avenue, George Town, Grand Cayman, Cayman Islands.
2. The 1st Defendant, at all material times, was the registered owner of a Black 2005 BMW 320I motor vehicle with registration number 180402. The 1st Defendant had an insurance policy with insurers for a private motor vehicle but rented his motor vehicle to the 2nd Defendant for hire, breaching his insurance policy.
3. The 2nd Defendant, at all material times, was the authorized driver of the 1st Defendant's motor vehicle at the time of the accident, having driver's licence number 115769. The 2nd Defendant also hired the said motor vehicle from the 1st Defendant for her use.
4. On or about the 31st May 2023, at approximately 9:47 am, the Plaintiff was involved in a motor vehicle collision with the 1st Defendant's motor vehicle which was being driven by the 2nd Defendant. The Plaintiff was riding his bicycle along Eastern Avenue and was travelling north along Eastern Avenue headed towards the West Bay direction. Upon reaching Washington Boulevard, in the vicinity of Kirk's Hardware, the Plaintiff, after carefully assessing the roadway, switched from the left lane to the right lane and kept riding northward along Eastern Avenue. After the Plaintiff passed BritCay House, the 2nd Defendant negligently drove out from a side road and into the path of the Plaintiff and collided into his right side causing him to sustain injuries.
5. The accident was caused by the 2nd Defendant's breach of statutory duty and the negligence of the Defendants.

PARTICULARS OF NEGLIGENCE OF THE 1ST DEFENDANT

6. The 1st Defendant was negligent in that:
 - a. He caused or permitted the 2nd Defendant to use his motor car contrary to the terms of his insurance policy and such pain, injury, loss and damage to the Plaintiff particularized below was caused by his negligence and breach of his insurance policy.

PARTICULARS OF NEGLIGENCE OF THE 1ST DEFENDANT

7. The 2nd Defendant was negligent in that she:
 - b. Failed to keep any or any proper lookout;

- c. Failed to see the Plaintiff or his bicycle in time or at all;
 - d. Failed to heed or observe either the presence or approach the Plaintiff;
 - e. Failed to stop, slow down, steer or otherwise control the motor car so as to avoid hitting the Plaintiff;
 - f. Drove without due care and attention;
 - g. Failed to take care in all the circumstances
8. By reason of the aforesaid, the Plaintiff has suffered personal injury, loss and damage.

PARTICULARS OF INJURY OF THE PLAINTIFF

9. The Plaintiff, whose date of birth is 27 March 1973, was 49 years old at the date of the accident.
10. The Plaintiff sustained the following injuries:
- a. Pain to left shoulder
 - b. Pain to left elbow
 - c. Pain to left hip
 - d. Numbness and tingling to left upper extremity
 - e. Lower back pain
 - f. Numbness and tingling in the left lower extremity
11. The Plaintiff was taken to the George Town Hospital after the accident. He was assessed in the accident and emergency department. He underwent x-ray imaging of his cervical spine, left elbow, left hip and pelvis.
12. On 7 June 2024, the Plaintiff was assessed by Dr. Michael Boucher. At this assessment he had the following complaints:
- a. Intermittent dull pain to the neck which radiates to his left shoulder
 - b. Lower back ache
 - c. Constant pain at the shoulder's anterior aspect
 - d. Persistent pain to the posterior and lateral aspect of the left elbow.
13. Further details of the Plaintiff's injuries are set out in the following medical records:
- a. George Town Hospital medical records – 21 June 2023
 - b. Dr. Michael Boucher Medical Report – 21 November 2024

PARTICULARS OF SPECIAL DAMAGE

14. The special damages claimed by the Plaintiff is set out in the schedule of losses served with this Plaintiff.

AND THE PLAINTIFF CLAIMS:

- a. General Damages;
- b. Special Damages;
- c. Interest in accordance with the Judicature Act (2021 Revision);
- d. Costs; and
- e. Such further or other relief that his Honourable Court deems just.

DATED THIS 25th day of MAY 2026A handwritten signature in black ink that reads "Samson Law". The signature is written in a cursive, flowing style. The word "Samson" is written in a larger, more prominent script, and "Law" is written in a slightly smaller, more compact script to its right. The signature is positioned above a horizontal line.

Samson Law Associates
Attorneys-at-Law for the Plaintiff

To: The Clerk of the Court
AND TO: The Defendants

**IN THE SUMMARY COURT OF THE CAYMAN ISLANDS
CIVIL DIVISION**

CAUSE NO: OF 2026

BETWEEN:

DALTON MAXWELL MEDLEY

PLAINTIFF

AND:

- 1. MUKESH SRICHAND KHANCHANDANI**
- 2. HELEN MARGARITA EBANKS**

DEFENDANTS

SCHEDULE OF LOSSES OF PLAINTIFF

GENERAL DAMAGES

CI\$

- | | |
|--|----------------|
| 1. Pain, suffering and loss of amenity | To be assessed |
|--|----------------|

SPECIAL DAMAGES

- | | |
|---------------------------------|--------|
| 1. Police Report - | \$100 |
| 2. Cost of Secondhand Bicycle - | \$100 |
| 3. Medical Report - | \$1400 |

LOSS OF EARNINGS

1. Mr. Medley earns \$16 per hour for each hour worked for six days per week. He works from Monday to Saturday from 7 am to 5:30 pm. He lost out on two weeks of pay due to his inability to return to work after his accident. Based on his salary, he lost out on **\$2016** for the two weeks he was unable to work.

AND THE PLAINTIFF CLAIMS:

- a. General Damages;
- b. Special Damages;
- c. Interest in accordance with the Judicature Act (2021 Revision);
- d. Costs; and
- e. Such further or other relief that his Honourable Court deems just.

DATED THIS 25th day of MAY 2026



Samson Law Associates
Attorneys-at-Law for the Plaintiff

This PLAINT was filed by Samson Law Associates, Attorneys-at-Law for the Plaintiff whose address for service is 20 Genesis Close, PO Box 2425, Grand Cayman, KY1-1105, Cayman Islands. (Attn: Alexandria Fennell email: afennell@samsonlaw.ky)

**IN THE SUMMARY COURT OF THE CAYMAN ISLANDS
CIVIL DIVISION****CAUSE NO: OF 2026****BETWEEN:****DALTON MAXWELL MEDLEY****PLAINTIFF****AND:****1. MUKESH SRICHAND KHANCHANDANI
2. HELEN MARGARITA EBANKS****DEFENDANTS****ACKNOWLEDGMENT OF SERVICE**

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

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

☐ Yes ☐ No

-
3. If you do intend to contest the action, in whole or in part, you must set out full particulars of your defence overleaf.

☐ Yes ☐ No

Service of this Plaint is acknowledged accordingly

(Signed).....

[The Defendant]/ [Attorney for the Defendant]

Address for service: Please complete 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 GT, George Town, Grand Cayman within 14 days of receipt otherwise a default judgment may be entered against you.