

**SUMMARY COURT OF THE CAYMAN ISLANDS****CIVIL DIVISION****CAUSE No. S2026-0087****BETWEEN VAMSHI KOTTUR PLAINTIFF****AND ALLAN WAYNE EBANKS t/a DEFENDANT****A & D RECRUITMENT AGENCY & IMMIGRATION SERVICES****PLAINT**

To the Defendant **Allan Wayne Ebanks t/a
A & D Recruitment Agency & Immigration Services**
Block 27E, Parcel 168, 35 Brushwood Way
Bodden Town
Grand Cayman
Cayman Islands

Email: info@ad-immigrationservices.com
Tel: +1 (345) 922-8602

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 Complaint on you, counting the day of service, you must either satisfy the claim or return to the Court Office, P.O. 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 defence 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 defence, the Plaintiff may apply for a Default Judgment without any further notice to you.

Issued this **21st** day of **July** 2026

See overleaf for particulars of the Plaintiff's claim.

PARTICULARS OF CLAIM

1. The Plaintiff is Vamshi Kottur, an individual whose address for service is Flat 66, Block I, Lakeside Apartments, Grand Cayman, Cayman Islands.
2. The Defendant is Allan Wayne Ebanks, trading as A & D Recruitment Agency & Immigration Services ('the Defendant'), with email address info@ad-immigrationservices.com and telephone number +1 (345) 922-8602. Despite reasonable efforts, including internet searches and enquiries made in the course of the parties' previous communications, the Plaintiff has been unable to identify the Defendant's current physical address for service.
3. However the website of the Department of Commerce & Investment, Cayman Islands at <https://www.dci.gov.ky/licensing/trade-business-licensing/reports>, contains a document titled *Trade and Business Licenses – June 2026*. In that list there are two listings pertaining to ALLAN WAYNE EBANKS T/A A & D IMMIGRATION SERVICES and ALLAN WAYNE EBANKS T/A A & D RECRUITMENT AGENCY. Respectively the Trade and Business Licence No. for each, respectively is, 120145 and 114465.
4. True copies of the documents to which the Plaintiff shall refer in this Plaint are marked 'Exhibit–VK1'. Save where the contrary is stated, or the context otherwise requires, reference in this Plaint to pages, are pages in 'Exhibit–VK1'.
5. On 24 July 2025, the Plaintiff retained the Defendant to provide recruitment and immigration services.

This **PLAINT** is filed by the Plaintiff, **Vamshi Kottur** as a litigant-in-person whose address for service is Flat 66, Block I, Lakeside Apartments, George Town, Grand Cayman, Cayman Islands.

6. Before commencing the process, the Defendant requested payment from the Plaintiff and represented that the process would be completed within approximately four to five weeks.
7. In reliance on those representations, the Plaintiff paid the Defendant as follows: on 24 July 2025, the sum of KYD \$1,150.00; and on 25 July 2025, the sum of KYD \$1,150.00; being a total of KYD \$2,300.00 paid in full. Copies of the payment confirmations are exhibited hereto as **pages 01-02 of Exhibit–VK1**.
8. Following payment, the Plaintiff complied with every request made by the Defendant, including supplying all documents requested for the purposes of the engagement.
9. The Defendant repeatedly assured the Plaintiff that the process was progressing.
10. Despite almost one year passing since the Defendant was retained, the promised services were not completed.
11. Over many months, the Plaintiff repeatedly contacted the Defendant by telephone, WhatsApp and email, seeking updates on the progress of the engagement, accountability for the monies paid, and completion of the agreed services. True copies of the WhatsApp conversations are exhibited hereto as **pages 03-20 of Exhibit–VK1**, and true copies of the email correspondence are exhibited hereto as **pages 21-30 of Exhibit–VK1**.

This **PLAINT** is filed by the Plaintiff, **Vamshi Kottur** as a litigant-in-person whose address for service is Flat 66, Block I, Lakeside Apartments, George Town, Grand Cayman, Cayman Islands

12. The Defendant continually delayed the matter and failed to provide satisfactory explanations for the delay.
13. When it became apparent that the agreed services would not be completed, the Plaintiff repeatedly requested a refund of the monies paid. True copies of the Plaintiff's refund requests are exhibited hereto as **pages 31-35** of **Exhibit-VK1**.
14. Communication between the parties eventually ceased, and the Defendant blocked the Plaintiff from contacting him, such that the Plaintiff was unable to continue attempting to resolve the matter privately.
15. When the Plaintiff requested accountability for the monies paid and raised the prolonged delay in completing the services, the Defendant threatened to report the Plaintiff to the Department of Workforce Opportunities and Residency Cayman ('WORC') instead of addressing the Plaintiff's legitimate concerns.
16. Having exhausted every reasonable attempt to resolve the matter privately, the Plaintiff lodged a complaint with the Department of Commerce and Investment ('DCI'). True copies of the DCI correspondence are exhibited hereto as **pages 36-40** of **Exhibit-VK1**.
17. DCI advised the Plaintiff that recovery of the monies paid was a civil matter. The Plaintiff has therefore commenced these proceedings in the Summary Court to recover the sums paid.

18. The Plaintiff has also reported the matter to the Royal Cayman Islands Police Service for consideration. True copies of the Civil Registry correspondence are exhibited hereto as **pages 41-45** of **Exhibit-VK1**, and any further supporting documents are exhibited hereto from **page 46** onwards of **Exhibit-VK1**.

AND THE PLAINTIFF CLAIMS:

1. Principal of \$ 2,300.00 ;
 2. Simple interest of \$ Nil on the principal claimed at the prescribed rate of 2 $\frac{3}{4}$ %. pursuant to the *Judgment Debts (Rates of Interest) Rules (2021 Revision)* calculated from **Not applicable – pre-judgment interest not claimed** when the cause of action arose/when the principal was demanded to the day the Plaintiff was filed ;
 3. Per diem of \$ Nil from the date the Plaintiff was filed to the date judgment is entered ;
 4. Post-judgment interest from the date judgment is given until the date the judgment debt is paid in full ;
 5. Filing Fee \$ 25.00 ;
 6. Fixed Cost \$ 150.00 ;
 7. Bailiff Fees \$ To be assessed if incurred. ;
- or, in the alternative,
8. Costs to be assessed ; and
 9. Such other relief as this Honorable Court sees fit.

Vamshi Kottur

IN THE SUMMARY COURT OF THE CAYMAN ISLANDS

CIVIL DIVISION

CAUSE No. S2026-0087

BETWEEN

VAMSHI KOTTUR

PLAINTIFF

AND

ALLAN WAYNE EBANKS t/a

DEFENDANT

A & D RECRUITMENT AGENCY & IMMIGRATION SERVICES

ACKNOWLEDGMENT OF SERVICE

1. State the Defendant's name and address,

Allan Wayne Ebanks t/a

A & D Recruitment Agency & Immigration Services

Block 27E, Parcel 168, 35 Brushwood Way

Bodden Town

Grand Cayman

Cayman Islands

Email: info@ad-immigrationservices.com

Tel: +1 (345) 922-8602

[Physical address presently unknown to the Plaintiff despite reasonable enquiries. The forgoing address was obtained from the Trade and Business Licences June 2026 list, available from the Department of Commerce & Investment, Cayman Islands, at <https://www.dci.gov.ky/licensing/trade-business-licensing/reports>]

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 defence overleaf.

Service of the **Plaint** is acknowledged accordingly

Defendant's Signature

Dated this

day of

2026

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, P.O. Box 495 GT, George Town, Grand Cayman within **14 days** of receipt otherwise a Default Judgment may be entered against you.