



**GRAND COURT OF THE CAYMAN ISLANDS
DIVISION**

CAUSE NO: OF 2026

BETWEEN

VANESSA SANDRALEE BENNETT

PLAINTIFF

AND

ZUMA ISABEL CASTRO VILLAFRANCA

DEFENDANT

WRIT OF SUMMONS

TO: Zuma Isabel Castro Villafranca
241 Walkers Road, George Town, Grand Cayman

AND AS A NOTICED PARTY TO: Saxon MG Insurance Company Limited
14 Saturn Close
Grand Cayman
Cayman Islands

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, 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 day of August 2026

THIS WRIT OF SUMMONS was issued by **HARVEL GRANT** of 86 Cico Avenue, Unit B7, P.O. Box 23 Bodden Town, KY1-1601 Grand Cayman, Cayman Islands, Attorney-at-law for the Plaintiff whose address for service is that of her said Attorney-at-law.

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 Acknowledgment of Service are given with the accompanying form.

THIS WRIT OF SUMMONS was issued by **HARVEL GRANT** of 86 Cico Avenue, Unit B7, P.O. Box 23 Bodden Town, KY1-1601 Grand Cayman, Cayman Islands, Attorney-at-law for the Plaintiff whose address for service is that of her said Attorney-at-law.

STATEMENT OF CLAIM

1. At all material times the Plaintiff was driving a Honda Inspire with registration 197281 along Walkers Road, George Town.
2. The Defendant was at all material times the authorised driver of a motor vehicle with registration no. 160531.
3. On 7 September 2023, the Plaintiff was driving her motor vehicle when, upon approaching Keturah Street, she indicated and then made a full stop to turn into Keturah Street when your insured's vehicle collided in the rear of her vehicle, causing major damage and injury to her.
4. The accident was caused by the negligence of the Defendant.

PARTICULARS OF NEGLIGENCE

5. The Defendant was negligent in that he:
 - 5.1. Failed to keep any or any proper lookout;
 - 5.2. Failed to see the vehicle in which the Plaintiff was driving in time, or at all;
 - 5.3. Failed to apply his brakes whether in time or at all; and
 - 5.4. Failed to steer or control his vehicle to avoid the said collision.
6. The Plaintiff also relies on the doctrine of *res ipsa loquitur*.
7. By reason of these matters the Plaintiff sustained serious injuries and has suffered loss and damage.

THIS WRIT OF SUMMONS was issued by **HARVEL GRANT** of 86 Cico Avenue, Unit B7, P.O. Box 23 Bodden Town, KY1-1601 Grand Cayman, Cayman Islands, Attorney-at-law for the Plaintiff whose address for service is that of her said Attorney-at-law.

PARTICULARS OF INJURIES

8. The Plaintiff's date of birth is 3 September 1989, and at the date of the accident she was 34 years old.
9. The Plaintiff was transferred to George Town Hospital by ambulance and suffered injuries to her lower back.
10. The Plaintiff has been seen by a general practitioner following the accident as she has been diagnosed with chronic lower back pain.
11. The Plaintiff has been prescribed medication and has been attending physiotherapy and continues to see medical practitioners, both general practitioners and specialists.
12. The Plaintiff continues to do various tests and assessments to determine her prognosis and treatments

PARTICULARS OF SPECIAL DAMAGES

13. At the time of the Accident, the Plaintiff was employed.
14. The Plaintiff has suffered loss and incurred expenses as a result of the accident.
15. The Plaintiff's particulars of special damages will be supplied at a later date by way of a schedule of damages including but not limited to claims for loss of income, medical treatment, travel, equipment and gratuitous care.

THIS WRIT OF SUMMONS was issued by **HARVEL GRANT** of 86 Cico Avenue, Unit B7, P.O. Box 23 Bodden Town, KY1-1601 Grand Cayman, Cayman Islands, Attorney-at-law for the Plaintiff whose address for service is that of her said Attorney-at-law.

STATEMENT AS TO INTEREST

16. The Plaintiff will claim interest pursuant to s. 34 of the Judicature Act (2021 Revision) at half the rate prescribed under the Judgment Debts (Rates of Interest) Rules (as amended) from 7 September 2023 until trial.

AND THE PLAINTIFF claims:

1. General Damages;
2. Special Damages;
3. Interest in accordance with the Judicature Act (2021 Revision);
4. Costs; and
5. Such further or other relief that this Honourable Court deems just.



HARVEL GRANT
ATTORNEY-AT-LAW FOR THE PLAINTIFF

THIS WRIT OF SUMMONS was issued by **HARVEL GRANT** of 86 Cico Avenue, Unit B7, P.O. Box 23 Bodden Town, KY1-1601 Grand Cayman, Cayman Islands, Attorney-at-law for the Plaintiff whose address for service is that of her said Attorney-at-law.

INDORSEMENT AS TO INSURER OF MOTOR VEHICLE

The Plaintiff's claims arise out of the use of a motor vehicle on a public road. The insurer of the vehicle of the Defendant named herein is Saxon MG Insurance Company Limited of 14 Saturn Close, Grand Cayman, Cayman Islands.

THIS WRIT OF SUMMONS was issued by **HARVEL GRANT** of 86 Cico Avenue, Unit B7, P.O. Box 23 Bodden Town, KY1-1601 Grand Cayman, Cayman Islands, Attorney-at-law for the Plaintiff whose address for service is that of her said Attorney-at-law.

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 the Defendant's Acknowledgment of Service that the Defendant 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 that Defendant's defence within the appropriate time, the Plaintiff may enter judgment against the Defendant 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 the Defendant intends to apply for a stay, execution will be stayed for 14 days after that Defendant's Acknowledgment, but the Defendant must, within that time, issue a Summons for a stay of execution, supported by an affidavit of the Defendant's 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 OF SUMMONS was issued by **HARVEL GRANT** of 86 Cico Avenue, Unit B7, P.O. Box 23 Bodden Town, KY1-1601 Grand Cayman, Cayman Islands, Attorney-at-law for the Plaintiff whose address for service is that of her said Attorney-at-law.

Notes for Guidance

1. Each Defendant (if there is more than one) is required to complete an Acknowledgment of Service and return it to the Court's 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 the Defendant.
3. Where the Defendant is sued in a name different from the Defendant's own, the form must be completed by the Defendant 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 that Partner's name.
5. Where the Defendant is sued as an individual TRADING IN A NAME OTHER THAN THAT PERSON'S OWN, the form must be completed by the Defendant with the addition in paragraph 1 of the description "trading as (.....)" after that Defendant's 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 Court's Office.

THIS WRIT OF SUMMONS was issued by **HARVEL GRANT** of 86 Cico Avenue, Unit B7, P.O. Box 23 Bodden Town, KY1-1601 Grand Cayman, Cayman Islands, Attorney-at-law for the Plaintiff whose address for service is that of her said Attorney-at-law.

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

CAUSE NO: OF 2026

BETWEEN	VANESSA SANDRALEE BENNETT	PLAINTIFF
AND	ZULEMA ISABEL CASTRO VILLAFRANCA	DEFENDANT

**ACKNOWLEDGMENT OF SERVICE OF
WRIT OF SUMMONS**

If you intend to instruct an Attorney to act for you, give that Attorney 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 the Defendant may have to pay the costs 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 the Defendant 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

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Service of the Writ is acknowledged accordingly

(Signed).....

Attorney for

Please complete overleaf

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, the Defendant must give the Defendant's post office box number and the physical address of the Defendant's residence or, if the Defendant does not reside in the Cayman Islands, the Defendant must give an address in Grand Cayman where communications for the Defendant 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 that Plaintiff's name, address and reference, if any, in the box below.

Harvel Grant
Attorney-at-law
86 Cico Avenue, Unit B7
Grand Cayman
Cayman Islands
Email: harvelgrant@grantsservices.ky

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

THIS WRIT OF SUMMONS was issued by **HARVEL GRANT** of 86 Cico Avenue, Unit B7, P.O. Box 23 Bodden Town, KY1-1601 Grand Cayman, Cayman Islands, Attorney-at-law for the Plaintiff whose address for service is that of her said Attorney-at-law.