



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

CAUSE NO: G

OF 2026

BETWEEN:

KARI RACHEL LARKIN VASQUEZ

Plaintiff

AND:

(1) BALDWIN JASEMOUR GRAYTON

First Defendant

(2) BREANN PRISCILLA EBANKS

Second Defendant

WRIT OF SUMMONS

TO:

Baldwin Jasemour Grayton
31 Periwinkle Drive 3
Bodden Town, Grand Cayman

Breann Priscilla Ebanks
7 Sunset Retreat, John Greer Boulevard 10
George Town, Grand Cayman

AND NOTICE TO:

Cayman First Insurance Company Limited
Cayman First Centre
17 Vibert Bodden Drive
P.O. Box 2171
Grand Cayman KY1-1105
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,

This **Writ of Summons** and **Statement of Claim** is issued by the Plaintiff in person, whose address for service is 64 Whistling Way, 1 Casa Blanca, Bodden Town, PO Box 266, Grand Cayman KY1-1501, Cayman Islands.

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 3rd day of September 2026

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** and **Statement of Claim** is issued by the Plaintiff in person, whose address for service is 64 Whistling Way, 1 Casa Blanca, Bodden Town, PO Box 266, Grand Cayman KY1-1501, Cayman Islands.

STATEMENT OF CLAIM

(The Writ in this action was issued on the date shown on the face hereof.)

1. At all material times the Plaintiff, Kari Rachel Larkin Vasquez, was the driver and owner of a 2016 Lincoln MKC motor vehicle registration number 167670 (the **Lincoln**).
2. The First Defendant was at all material times the driver of a 2019 Kia Optima motor vehicle registration number 193735 (the **Kia**).
3. The Second Defendant was at all material times the registered owner of the said Kia.
4. At all material times, the said Kia was insured by Cayman First Insurance Company Limited, which had issued a policy of insurance numbered CPM0004987 in accordance with the Vehicle Insurance (Third Party Risks) Act (2012 Revision), and to whom notice of the bringing of these proceedings is being given pursuant to section 15(2)(b) of the said Act.
5. On 15 September 2023 at approximately 11:08 hours the Plaintiff was lawfully driving her Lincoln westbound along Crewe Road in George Town, Grand Cayman, on or in the immediate approach to King's roundabout in the inside lane, intending to leave the roundabout westbound onto Linford Pierson Highway.
6. At the same time, the First Defendant was driving the said Kia westbound along Crewe Road and entered King's roundabout in the outside lane.

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7. As the Plaintiff was about to leave the roundabout, the First Defendant drove the Kia across the path of the Lincoln, without warning, moving from his outside lane across the path of the Plaintiff's vehicle on the inside lane, colliding with it. The right front of the Kia struck the left side of the Lincoln (the **Accident**).
8. At the time, King's roundabout had a single lane exit continuing onto Crewe Road, which was served solely by the inside lane. A vehicle in the outside lane was able lawfully to proceed straight ahead onto Linford Pierson Highway or to take the exit onto Old Crewe Road, to its left, and was not entitled to cross the inside lane to reach the Crewe Road exit or any other exit to its right.
9. The police report records the First Defendant as having stated that his intention was to take "the third exit to exit west onto Crewe Road," so that the maneuvers described was one he was never entitled to make.
10. The said collision was caused solely by the negligence of the First Defendant and/or by his breach of statutory duty under sections 67 and 68 of the Traffic Act (2026 Revision) and/or by his breach of the common law duty of care owed by him to other road users.

PARTICULARS OF NEGLIGENCE / BREACH OF DUTY

11. The First Defendant was negligent and/or in breach of the aforesaid statutory and/or common law duty of care in that he:
 - (a) caused or permitted his vehicle to come into collision with the Plaintiff's vehicle;
 - (b) failed to keep any or any proper lookout;

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- (c) failed to see the Plaintiff's vehicle when he ought to have done;
- (d) drove across the path of the Plaintiff's vehicle and into her carriageway, when it was neither safe nor reasonable to do so;
- (e) failed to give way to the Plaintiff's vehicle;
- (f) failed to slow down, steer or control his vehicle so as to avoid the Accident;
- (g) failed to apply his brakes whether on time or at all;
- (h) failed to observe or to heed the prevailing traffic conditions;
- (i) changed lanes when it was not safe to do so, and without first using his mirrors or checking his blind spot to ensure that he would not force another road user to change course or speed, contrary to paragraph 3.3.1 of the Road Code of the Cayman Islands, 2012;
- (j) failed to keep between the lane dividers and failed at all times to use one lane, contrary to paragraphs 3.3.1 and 3.3.3 of the said Road Code;
- (k) failed to exercise due care and attention when using the road and failed to have due regard for the safety of other road users, contrary to section 67 of the Traffic Act (2026 Revision);
- (l) failed to drive in such a manner as to have full control of his vehicle at all times, contrary to section 68(a) of the Traffic Act (2026 Revision);

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- (m) failed to drive at a speed and in a manner and at a distance from other vehicles so as to be able to stop in an emergency without being involved in a collision, contrary to section 68(f) of the Traffic Act (2026 Revision);
 - (n) failed to keep a watch on the road in front of and behind the vehicle he was driving, contrary to section 68(g) of the Traffic Act (2026 Revision);
 - (o) failed to give prior warning of his intended manoeuvre by means of the prescribed hand or traffic indicator signals, contrary to section 68(h) of the Traffic Act (2026 Revision);
 - (p) failed to take reasonable care in all the circumstances.
12. The Plaintiff will refer at the trial of this action to Royal Cayman Islands Police Service Motor Vehicle Accident Report 2023-027861, which records a contributing factor against the First Defendant and no contributing factor against the Plaintiff.
13. The Plaintiff's claim against the Second Defendant is that at all material times the First Defendant was driving the said Kia with her permission and/or as her servant or agent, so that she is vicariously liable for his negligence. Further or alternatively, if the First Defendant was not a person insured to drive the said vehicle under the said policy, the Second Defendant permitted him to drive it when she knew or ought to have known that he was not insured to do so. The Plaintiff reserves the right to provide further and better particulars of her claim against the Second Defendant following discovery.

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14. The Plaintiff also relies on the doctrine of *res ipsa loquitur*.
15. By reason of the matters aforesaid, the Plaintiff, (who was born on 23 March 1981 and was aged 42 years on the date of the Accident), has sustained personal injury and has suffered loss and damage.

PARTICULARS OF PERSONAL INJURY

16. Immediately following the collision, the Plaintiff sought medical attention, reporting pain in the neck, back, jaw, shoulder, pelvis, head, knee and thumb.
17. On 18 September 2023, the Plaintiff attended for medical assessment, underwent cervical and thoracic x-rays, was prescribed anti-inflammatory and pain medication, and was referred for physiotherapy. She was diagnosed with a whiplash-associated injury to the cervical spine and injury to the lumbar spine.
18. The Plaintiff underwent chiropractic treatment from 19 September 2023, attending on 41 occasions through to March 2026, and physiotherapy on 11 occasions between 6 October 2023 and 5 December 2023. She undertook self-funded strength and conditioning work from October 2024.
19. The Plaintiff's symptoms did not resolve with conservative management. She was referred for magnetic resonance imaging of the cervical spine, lumbar spine and brain in August 2024, for orthopaedic review in December 2024, for neurosurgical review in February 2025, and for lumbosacral radiography in April 2026.

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20. On 1 May 2026, the Plaintiff underwent a bilateral lumbosacral facet joint block as part of investigation and treatment of her ongoing lumbar pain. She underwent a further spinal procedure in July 2026.
21. The Plaintiff continues to suffer pain in the cervical and lumbar spine. She experiences episodes in which she is unable to walk unaided or rise from bed, and remains restricted in her ability to sit, stand, walk and lift.
22. Prior to the Accident, the Plaintiff was physically active. Since the Accident, she has been unable to resume those activities and has suffered a substantial impact on her daily life.
23. The Plaintiff remains under medical review, and her prognosis is not yet settled.
24. The Plaintiff reserves the right to provide further and better particulars of her injuries, treatment, prognosis and any sequelae prior to the date of trial, and will rely upon medical evidence to be served.

PARTICULARS OF LOSS

25. The Plaintiff has suffered loss and incurred expenses as a result of the Accident, including medical, chiropractic, physiotherapy, imaging and pain management expenses, the cost of rehabilitation and the cost of future treatment. Full particulars of the her loss and damage will be provided at a later date by way of a Schedule of Loss.
26. The Plaintiff claims simple interest on items of special damage from the date on which each item of loss was incurred, pursuant to section 34 of the Judicature Act (2021 Revision) and rule 4 of the Judgment Debts (Rates of Interest) Rules (2021 Revision).

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27. The Plaintiff claims simple interest on general damages from the date of notice of the claim, pursuant to section 34 of the Judicature Act (2021 Revision) and rule 4 of the Judgment Debts (Rates of Interest) Rules (2021 Revision).
28. The Plaintiff further claims interest on the judgment debt and on any order for costs from the date of service of the judgment or order, pursuant to rule 5 of the Judgment Debts (Rates of Interest) Rules (2021 Revision).

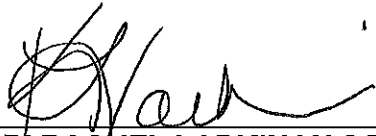
AND THE PLAINTIFF CLAIMS:

- (1) General damages for pain, suffering and loss of amenity;
- (2) Special damages;
- (3) Simple interest on special damages from the date of each item of loss, pursuant to section 34 of the Judicature Act (2021 Revision) and rule 4 of the Judgment Debts (Rates of Interest) Rules (2021 Revision), at such rate as this Honourable Court thinks fit;
- (4) Simple interest on general damages from the date of notice of the claim, pursuant to section 34 of the Judicature Act (2021 Revision) and rule 4 of the Judgment Debts (Rates of Interest) Rules (2021 Revision), at such rate as this Honourable Court thinks fit;
- (5) Interest on the judgment debt and on any order for costs, from the date of service of the judgment or order, pursuant to rule 5 of the Judgment Debts (Rates of Interest) Rules (2021 Revision);
- (6) Costs; and

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(7) Such further or other relief as this Honourable Court deems just.

Dated this 3rd day of September 2026



KARI RACHEL LARKIN VASQUEZ
Plaintiff in person

This **Writ of Summons** and **Statement of Claim** is issued by the Plaintiff in person, whose address for service is 64 Whistling Way, 1 Casa Blanca, Bodden Town, PO Box 266, Grand Cayman KY1-1501, Cayman Islands.

INDORSEMENT AS TO INSURER OF MOTOR VEHICLE

(Order 6, rule 4 of the Grand Court Rules (2023 Revision))

The Plaintiff's claim includes a claim for damages arising out of the use of a motor vehicle on a road. The insurer of the vehicle of the First Defendant named herein is Cayman First Insurance Company Limited of Cayman First Centre, 17 Vibert Bodden Drive, P.O. Box 2171, George Town, Grand Cayman KY1-1105, Cayman Islands, under policy number CPM0004987 issued to the Second Defendant.

INDORSEMENT AS TO INTEREST

(Order 6, rule 2(f) of the Grand Court Rules (2023 Revision))

The Plaintiff claims interest pursuant to section 34 of the Judicature Act (2021 Revision). The particulars required by Order 6, rule 2(f) are as follows.

- (a) Prescribed rates. The rates prescribed by the Twelfth Schedule to the Judgment Debts (Rates of Interest) Rules (2021 Revision), effective 1 February 2013, are 2³/₈ per centum per annum for judgments given in Cayman Islands dollars and 2³/₈ per centum per annum for judgments given in United States dollars.
- (b) Pre-judgment interest. Pursuant to rule 4(a) of the said Rules, the Plaintiff claims simple interest upon damages at such rate as this Honourable Court thinks fit in the exercise of its discretion under section 34(1) of the Judicature Act (2021 Revision), not exceeding 2³/₈ per centum per annum.
- (c) Dates from which interest is calculated. On special damages, from the date on which each item of loss was incurred. On general damages, from 15 November 2023, being the date of

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notice of the claim. On the judgment debt and on any order for costs, from the date of service of the judgment or order, pursuant to rule 5 of the said Rules.

- (d) Total amount of interest claimed as at the date of issue of this Writ. None is stated. The Plaintiff's claim is for unliquidated damages for personal injury, and no sum can be calculated until the damages have been assessed.
- (e) Amount accruing due each day thereafter. Not calculable, for the reason given at (d) above.

INDORSEMENT AS TO SERVICE ON INSURER

(Section 15(2)(b), Vehicle Insurance (Third Party Risks) Act (2012 Revision))

Notice of the bringing of these proceedings is given to Cayman First Insurance Company Limited by the posting, on the date of issue hereof, of a registered prepaid envelope containing the notice to the address of the insurer given in the certificate of insurance, pursuant to section 15(2)(b) of the Vehicle Insurance (Third Party Risks) Act (2012 Revision).

INDORSEMENT AS TO ADDRESS FOR SERVICE

(Order 6, rule 5 of the Grand Court Rules (2023 Revision))

The Plaintiff sues in person. The address of the Plaintiff's place of residence, which is also the Plaintiff's address for service, is 64 Whistling Way, 1 Casa Blanca, Bodden Town, P.O. Box 266, Grand Cayman KY1-1501, Cayman Islands.

This **Writ of Summons** and **Statement of Claim** is issued by the Plaintiff in person, whose address for service is 64 Whistling Way, 1 Casa Blanca, Bodden Town, PO Box 266, Grand Cayman KY1-1501, Cayman Islands.

THIS WRIT was issued by Kari Rachel Larkin Vasquez, the Plaintiff in person, whose address for service is 64 Whistling Way, 1 Casa Blanca, Bodden Town, P.O. Box 266, Grand Cayman KY1-1501, Cayman Islands.

This **Writ of Summons** and **Statement of Claim** is issued by the Plaintiff in person, whose address for service is 64 Whistling Way, 1 Casa Blanca, Bodden Town, PO Box 266, Grand Cayman KY1-1501, Cayman Islands.

**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

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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.

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NOTES FOR GUIDANCE

1. Each Defendant (if there are more than one) is required to complete an Acknowledgment of Service and return it to the Courts 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 his own, the form must be completed by him 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 his name.
5. Where the Defendant is sued as an individual TRADING IN A NAME OTHER THAN HIS OWN, the form must be completed by him with the addition in paragraph 1 of the description "trading as (.....)" after his 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.

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8. A Defendant acting in person may obtain help in completing the form at the Courts Office.

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IN THE GRAND COURT OF THE CAYMAN ISLANDS
CIVIL DIVISION

CAUSE NO: G OF 2026

BETWEEN:

KARI RACHEL LARKIN VASQUEZ
Plaintiff

AND:

(1) BALDWIN JASEMOUR GRAYTON First Defendant
(2) BREANN PRISCILLA EBANKS Second 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 of applying to set it aside.
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1. State the full name of the Defendant by whom or on whose behalf the service of the Writ is being acknowledged.

This Writ of Summons and Statement of Claim is issued by the Plaintiff in person, whose address for service is 64 Whistling Way, 1 Casa Blanca, Bodden Town, PO Box 266, Grand Cayman KY1-1501, Cayman Islands.

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 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. In the case of a limited company, "residence" means its registered or principal office.

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

KARI RACHEL LARKIN VASQUEZ Plaintiff in Person 64 Whistling Way, 1 Casa Blanca Bodden Town, P.O. Box 266 Grand Cayman KY1-1501 Cayman Islands

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

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