Filing Attorneys-at-Law: **Mr. Roysdale A. Forde, S.C**

Forde, Amsterdam & Lewis

Lot 77 Hadfield Street

Werk-en-Rust, Georgetown

Guyana

Tel: 592-227-1656/592-227-7482

Email: [roysdaleforde@gmail.com](mailto:roysdaleforde@gmail.com)

**Form 4 C: INFORMATION FOR COURT USE**

IN THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE OF GUYANA

CIVIL JURISDICTION

2021-HC-DEM-CIV-SOC-

BETWEEN:

**DAVID ARTHUR GRANGER**

Claimant

- and -

1. CHRISTOPHER NASCIMENTO
2. SHAMAIN GRAINGER
3. GLENN LALL
4. NATIONAL MEDIA AND PUBLISHING COMPANY LIMITED
5. TUSIKA MARTIN
6. GUYANA TIMES INC
7. ANAND PERSAUD
8. GUYANA PUBLICATION INC

Defendants

Jointly and Severally

**INFORMATION FOR COURT USE**

1. This proceeding is commenced as a:

[ X ] Statement of Claim

[ ] Fixed Date Application

1. This proceeding falls under the High Court’s:

[ ] Appellate Jurisdiction

[ ] Admiralty Jurisdiction

[ ] Commercial Jurisdiction

[ ] Criminal Jurisdiction

[ ] Family Jurisdiction

[ X ] Regular Jurisdiction

3. The proceeding is:

[ ] Admiralty Proceeding in personam

[ ] Admiralty Proceeding in rem

[ ] Probate Proceeding

[ ] Proceeding for Judicial Review

[ ] Proceeding for relief under the Constitution

[ ] Proceeding for other Administrative Order

[ ] Proceeding for Administration

[ ] Proceeding commenced under (name of Act)

[ X ] Other Proceeding

4. I certify that the above information is correct, to the best of my knowledge.

Dated at Georgetown, Demerara. …………………………………………

This day of May, 2021. Signature of Attorney-at-Law

Filing Attorneys-at-Law: **Mr. Roysdale A. Forde, S.C**

Forde, Amsterdam & Lewis

Lot 77 Hadfield Street

Werk-en-Rust, Georgetown

Guyana

Tel: 592-227-1656/592-227-7482

Email: [roysdaleforde@gmail.com](mailto:roysdaleforde@gmail.com)

**Form 8A: STATEMENT OF CLAIM**

IN THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE OF GUYANA

CIVIL JURISDICTION

2021-HC-DEM-CIV-SOC-

BETWEEN:

**DAVID ARTHUR GRANGER**

Claimant

- and -

1. CHRISTOPHER NASCIMENTO
2. SHAMAIN GRAINGER
3. GLENN LALL
4. NATIONAL MEDIA AND PUBLISHING COMPANY LIMITED
5. TUSIKA MARTIN
6. GUYANA TIMES INC
7. ANAND PERSAUD
8. GUYANA PUBLICATION INC

Defendants

Jointly and Severally

**STATEMENT OF CLAIM**

TO THE DEFENDANTS

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the Claimant. The claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or an Attorney-at-Law acting for you must prepare a Defence in Form 10A prescribed by the Civil Procedure Rules 2016, serve it on the Claimant’s Attorney-at-Law or, where the Claimant does not have an Attorney-at-Law, serve it on the Claimant, and file it, with proof of service at a Registry, WITHIN TWENTY EIGHT DAYS after this Statement of Claim is served on you.

IF YOU FAIL TO DEFEND THIS PROCEEDING, JUDGMENT MAY BE GIVEN AGAINST YOU IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO DEFEND THIS PROCEEDING BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

THIS STATEMENT OF CLAIM has no validity if it is not served within six months of the date below unless it is accompanied by an Order extending that time.

Dated at Georgetown, Demerara. ……………………………………

This day of April, 2021. Signature of Registry

Issued by:

Address of Registry where issued:

TO: **CHRISTOPHER NASCIMENTO,**

Lot 168 Century Palm Gardens,

Durban Backlands,

**GEORGETOWN.**

TO: **SHAMAIN GRAINGER,**

Lot 24 Saffon Street,

Charlestown,

**GEORGETOWN.**

TO: **GLENN LALL,**

Lot 24 Saffon Street,

Charlestown,

**GEORGETOWN.**

TO: **NATIONAL MEDIA AND PUBLISHING**

**COMPANY LIMITED,**

Lot 24 Saffon Street,

Charlestown,

**GEORGETOWN.**

TO: **TUSIKA MARTIN,**

Editor-in-Chief,

**GUYANA TIMES INC.,**

Queens Atlantic Industrial Estate,

Ruimveldt,  
**GEORGETOWN.**

TO: **GUYANA TIMES INC.,**

Queens Atlantic Industrial Estate,

Ruimveldt,  
**GEORGETOWN.**

TO: **ANAND PERSAUD,**

Editor,

**STABROEK NEWS**,

Lot [46-47](https://www.google.com/search?q=46-47&stick=H4sIAAAAAAAAAONgVuLVT9c3NEw2KrMwszQyWsTKamKma2IOADPD9XUZAAAA&sa=X&ved=2ahUKEwiLkcag6_jvAhWuneAKHSB-A4oQmxMoATAgegQIMxAD) [Robb Street](https://www.google.com/search?q=Robb+Street&stick=H4sIAAAAAAAAAONgVuLWT9c3LEmpys0pKVvEyh2Un5SkEFxSlJpaAgAd9-2xHQAAAA&sa=X&ved=2ahUKEwiLkcag6_jvAhWuneAKHSB-A4oQmxMoAjAgegQIMxAE),

[Lacytown](https://www.google.com/search?q=Lacytown&stick=H4sIAAAAAAAAAONgVuLWT9c3LEkxLs6qNF3EyuGTmFxZkl-eBwB46dsWGgAAAA&sa=X&ved=2ahUKEwiLkcag6_jvAhWuneAKHSB-A4oQmxMoAzAgegQIMxAF),

**GEORGETOWN.**

TO: **GUYANA PUBLICATIONS INC**,

Lot [46-47](https://www.google.com/search?q=46-47&stick=H4sIAAAAAAAAAONgVuLVT9c3NEw2KrMwszQyWsTKamKma2IOADPD9XUZAAAA&sa=X&ved=2ahUKEwiLkcag6_jvAhWuneAKHSB-A4oQmxMoATAgegQIMxAD) [Robb Street](https://www.google.com/search?q=Robb+Street&stick=H4sIAAAAAAAAAONgVuLWT9c3LEmpys0pKVvEyh2Un5SkEFxSlJpaAgAd9-2xHQAAAA&sa=X&ved=2ahUKEwiLkcag6_jvAhWuneAKHSB-A4oQmxMoAjAgegQIMxAE),

[Lacytown](https://www.google.com/search?q=Lacytown&stick=H4sIAAAAAAAAAONgVuLWT9c3LEkxLs6qNF3EyuGTmFxZkl-eBwB46dsWGgAAAA&sa=X&ved=2ahUKEwiLkcag6_jvAhWuneAKHSB-A4oQmxMoAzAgegQIMxAF),

**GEORGETOWN.**

**CLAIM**

1. The Claimant claims:
2. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the First Named Defendant for libel published by the First Named Defendant on the 23rd day of May, 2020, in a Newspaper, Guyana Times, owned, printed and or published by the Fifth and Sixth Named Defendants in which the said First Named Defendant’s defamatory statements about and concerning the Claimant were published in a Letter to the Editor titled “Granger is not innocent of attempt to force rigged election on Guyana” under the name of the First Named Defendant.
3. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the First Named Defendant for libel published by the First Named Defendant on the 23rd day of May, 2020, on the Internet through the Website of Guyana Times, the said Website being owned, maintained and operated by the said Fifth and Sixth Named Defendants and on which articles are published, circulated, released and or disseminated to the public through the Internet and on the World Wide Web by the Fifth and Sixth Named Defendants, the said First Named Defendant’s defamatory statements about and concerning the Claimant were published in a Letter to the Editor titled “Granger is not innocent of attempt to force rigged election on Guyana”.
4. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the First Named Defendant for libel published by the First Named Defendant on the 5th day of June, 2020, on INEWS, an online news platform in which the said First Named Defendant’s defamatory statements about and concerning the Claimant were published in an Article titled “OPINION: Granger should concede defeat before he is ultimately forced to do so by Int’l condemnation”.
5. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the First Named Defendant for libel published by the First Named Defendant on the 5th day of June, 2020, in a Newspaper, Kaieteur News, owned, printed and or published by the Second, Third and Fourth Named Defendants in which the said First Named Defendant’s defamatory statements about and concerning the Claimant were published in a Letter to the Editor titled “David Granger should do the honourable thing and avoid international condemnation” under the name of the First Named Defendant.
6. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the First Named Defendant for libel published by the First Named Defendant on the 5th day of June, 2020, on the Internet through the Website of Kaieteur News, the said Website being owned, maintained and operated by the said Second, Third and Fourth Named Defendants and on which articles are published, circulated, released and or disseminated to the public through the Internet and on the World Wide Web by the Second, Third and Fourth Named Defendants, the said First Named Defendant’s defamatory statements about and concerning the Claimant were published in a Letter to the Editor titled “David Granger should do the honourable thing and avoid international condemnation”.
7. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the First Named Defendant for libel published by the First Named Defendant on the 20th day of June, 2020, in a Newspaper, Stabroek News, owned, printed and or published by the Seventh and Eighth Named Defendants in which the said First Named Defendant’s defamatory statements about and concerning the Claimant were published in a Letter to the Editor titled “David Granger is without shame in continuing to defy the will of the people” under the name of the First Named Defendant.
8. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the First Named Defendant for libel published by the First Named Defendant on the 20th day of June, 2020, on the Internet through the Website of Stabroek News, the said Website being owned, maintained and operated by the said Seventh and Eighth Named Defendants and on which articles are published, circulated, released and or disseminated to the public through the Internet and on the World Wide Web by the Seventh and Eighth Named Defendants, the said First Named Defendant’s defamatory statements about and concerning the Claimant were published in a Letter to the Editor titled “David Granger is without shame in continuing to defy the will of the people”.
9. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the First Named Defendant for libel published by the First Named Defendant on the 20th day of June, 2020, in a Newspaper, Kaieteur News, owned, printed and or published by the Second, Third and Fourth Named Defendants in which the said First Named Defendant’s defamatory statements about and concerning the Claimant were published in a Letter to the Editor titled “We must now hope that our Courts, at least, are ready to recognize the will of the people” under the name of the First Named Defendant.
10. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the First Named Defendant for libel published by the First Named Defendant on the 20th day of June, 2020, on the Internet through the Website of Kaieteur News, the said Website being owned, maintained and operated by the said Second, Third and Fourth Named Defendants and on which articles are published, circulated, released and or disseminated to the public through the Internet and on the World Wide Web by the Second, Third and Fourth Named Defendants, the said First Named Defendant’s defamatory statements about and concerning the Claimant were published in a Letter to the Editor titled “We must now hope that our Courts, at least, are ready to recognize the will of the people”.
11. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the First Named Defendant for libel published by the First Named Defendant on the 10th day of July, 2020, in a Newspaper, Kaieteur News, owned, printed and or published by the Second, Third and Fourth Named Defendants in which the said First Named Defendant’s defamatory statements about and concerning the Claimant were published in a Letter to the Editor titled “Has David Granger lost touch with reality?” under the name of the First Named Defendant.
12. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the First Named Defendant for libel published by the First Named Defendant on the 10th day of July, 2020, on the Internet through the Website of Kaieteur News, the said Website being owned, maintained and operated by the said Second, Third and Fourth Named Defendants and on which articles are published, circulated, released and or disseminated to the public through the Internet and on the World Wide Web by the Second, Third and Fourth Named Defendants on which the said First Named Defendant’s defamatory statements about and concerning the Claimant were published in a Letter to the Editor titled “Has David Granger lost touch with reality?”.
13. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the First Named Defendant for libel published by the First Named Defendant on the 10th day of July, 2020, in a Newspaper, Guyana Times, owned, printed and or published by the Fifth and Sixth Named Defendants in which the said First Named Defendant’s defamatory statements about and concerning the Claimant were published in a Letter to the Editor titled “Granger-led APNU/AFC coalition playing a dangerous game” under the name of the First Named Defendant.
14. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the First Named Defendant for libel published by the First Named Defendant on the 10th day of July, 2020, on the Internet through the Website of Guyana Times, the said Website being owned, maintained and operated by the said Fifth and Sixth Named Defendants and on which articles are published, circulated, released and or disseminated to the public through the Internet and on the World Wide Web by the Fifth and Sixth Named Defendants, the said First Named Defendant’s defamatory statements about and concerning the Claimant were published in a Letter to the Editor titled “Granger-led APNU/AFC coalition playing a dangerous game”.
15. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the First Named Defendant for libel published by the First Named Defendant on the 20th day of July, 2020, in a Newspaper, Stabroek News, owned, printed and or published by the Seventh and Eighth Named Defendants in which the said First Named Defendant’s defamatory statements about and concerning the Claimant were published in a Letter to the Editor titled “Granger seeking to overturn recount that he agreed to abide by” under the name of the First Named Defendant.
16. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the First Named Defendant for libel published by the First Named Defendant on the 20th day of July, 2020, on the Internet through the Website of Stabroek News, the said Website being owned, maintained and operated by the said Seventh and Eighth Named Defendants and on which articles are published, circulated, released and or disseminated to the public through the Internet and on the World Wide Web by the Seventh and Eighth Named Defendants, the said First Named Defendant’s defamatory statements about and concerning the Claimant were published in a Letter to the Editor titled “Granger seeking to overturn recount that he agreed to abide by”.
17. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the First Named Defendant for libel published by the First Named Defendant on the 20th day of July, 2020, in a Newspaper, Guyana Times, owned, printed and or published by the Fifth and Sixth Named Defendants in which the said First Named Defendant’s defamatory statements about and concerning the Claimant were published in a Letter to the Editor titled “Granger’s hypocrisy, duplicity, deceit and lying have now come full circle” under the name of the First Named Defendant.
18. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the First Named Defendant for libel published by the First Named Defendant on the 20th day of July, 2020, on the Internet through the Website of Guyana Times, the said Website being owned, maintained and operated by the said Fifth and Sixth Named Defendants and on which articles are published, circulated, released and or disseminated to the public through the Internet and on the World Wide Web by the Fifth and Sixth Named Defendants, the said First Named Defendant’s defamatory statements about and concerning the Claimant were published in a Letter to the Editor titled “Granger’s hypocrisy, duplicity, deceit and lying have now come full circle”.
19. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Fifth Named Defendant for libel published by the Fifth Named Defendant on the 23rd day of May, 2020, in a Newspaper, Guyana Times owned, printed and or published by the Fifth and Sixth Named Defendants in which the said Fifth and Sixth Named Defendants caused to be published a Letter to the Editor titled “Granger is not innocent of attempt to force rigged election on Guyana” under the name of the First Named Defendant.
20. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Second Named Defendant for libel committed by the Second Named Defendant on the 5th day of June, 2020, in a Newspaper, Kaieteur News, owned, printed and or published by the Second, Third and Fourth Named Defendants in which the said Second Named Defendant caused to be published a Letter to the Editor titled “David Granger should do the honourable thing and avoid international condemnation” under the hand of the First Named Defendant.
21. Damages in excess of $50,000,000.00 (Fifty Hundred Million Dollars) against the Third Named Defendant for libel committed by the Third Named Defendant on the 5th day of June, 2020, in a Newspaper, Kaieteur News, owned, printed and or published by the said Third and Fourth Named Defendants in which the said Third Named Defendant caused to be published a Letter to the Editor titled “David Granger should do the honourable thing and avoid international condemnation” under the hand of the First Named Defendant.
22. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Fourth Named Defendant for libel committed by the Fourth Named Defendant on the 5th day of June, 2020, in a Newspaper, Kaieteur News, owned, printed and or published by the said Second, Third and Fourth Named Defendants in which the said Third Named Defendant caused to be published a Letter to the Editor titled “David Granger should do the honourable thing and avoid international condemnation” under the hand of the First Named Defendant.
23. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Sixth Named Defendant for libel published by the Sixth Named Defendant on the 23rd day of May, 2020, in a Newspaper, Guyana Times owned, printed and or published by the Fifth and Sixth Named Defendants in which the said Sixth Named Defendant caused to be published a Letter to the Editor titled “Granger is not innocent of attempt to force rigged election on Guyana” Under the name of the First Named Defendant.
24. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Seventh Named Defendant for libel published by the Seventh Named Defendant on the 20th day of June, 2020, in a Newspaper, Stabroek News owned printed and or published by the Seventh and Eighth Named Defendants in which the said Seventh Named Defendant caused to be published a Letter to the Editor titled “David Granger is without shame in continuing to defy the will of the people” under the name of First Named Defendant.
25. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Eighth Named Defendant for libel published by the Eighth Named Defendant on the 20th day of June, 2020, in a Newspaper, Stabroek News owned, printed and or published by the Seventh and Eighth Named Defendants in which the said Eighth Named Defendant caused to be published a Letter to the Editor titled “David Granger is without shame in continuing to defy the will of the people” under the name of First Named Defendant.
26. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Seventh Named Defendant for libel published by the Seventh Named Defendant on the 20th day of July, 2020, in a Newspaper, Stabroek News owned printed and or published by the Seventh and Eight Named Defendants in which the said Seventh Named Defendant caused to be published a Letter to the Editor titled “Granger seeking to overturn recount that he agreed to abide by” under the name of First Named Defendant.
27. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Eighth Named Defendant for libel published by the Eighth Named Defendant on the 20th day of July, 2020, in a Newspaper, Stabroek News owned, printed and or published by the Seventh and Eighth Named Defendants in which the said Eighth Named Defendant caused to be published a Letter to the Editor titled “Granger seeking to overturn recount that he agreed to abide by” under the name of First Named Defendant.
28. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Second Named Defendant for libel committed by the Second Named Defendant on the 20th day of June, 2020, in a Newspaper, Kaieteur News, owned, printed and or published by the Second, Third and Fourth Named Defendants in which the said Second Named Defendant caused to be published a Letter to the Editor titled “We must now hope that our Courts, at least, are ready to recognize the will of the people” under the hand of the First Named Defendant.
29. Damages in excess of $50,000,000.00 (Fifty Hundred Million Dollars) against the Third Named Defendant for libel committed by the Third Named Defendant on the 20th day of June, 2020, in a Newspaper, Kaieteur News, owned, printed and or published by the said Third and Fourth Named Defendants in which the said Third Named Defendant caused to be published a Letter to the Editor titled “We must now hope that our Courts, at least, are ready to recognize the will of the people” under the hand of the First Named Defendant.
30. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Fourth Named Defendant for libel committed by the Fourth Named Defendant on the 20th day of June, 2020, in a Newspaper, Kaieteur News, owned, printed and or published by the said Second, Third and Fourth Named Defendants in which the said Third Named Defendant caused to be published a Letter to the Editor titled “We must now hope that our Courts, at least, are ready to recognize the will of the people” under the hand of the First Named Defendant.
31. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Second Named Defendant for libel committed by the Second Named Defendant on the 10th day of July, 2020, in a Newspaper, Kaieteur News, owned, printed and or published by the Second, Third and Fourth Named Defendants in which the said Second Named Defendant caused to be published a Letter to the Editor titled “Has David Granger lost touch with reality” under the hand of the First Named Defendant.
32. Damages in excess of $50,000,000.00 (Fifty Hundred Million Dollars) against the Third Named Defendant for libel committed by the Third Named Defendant on the 10th day of July, 2020, in a Newspaper, Kaieteur News, owned, printed and or published by the said Third and Fourth Named Defendants in which the said Third Named Defendant caused to be published a Letter to the Editor titled “Has David Granger lost touch with reality” under the hand of the First Named Defendant.
33. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Fourth Named Defendant for libel committed by the Fourth Named Defendant on the 10th day of July, 2020, in a Newspaper, Kaieteur News, owned, printed and or published by the said Second, Third and Fourth Named Defendants in which the said Third Named Defendant caused to be published a Letter to the Editor titled “Has David Granger lost touch with reality” under the hand of the First Named Defendant.
34. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Fifth Named Defendant for libel published by the Fifth Named Defendant on the 10th day of July, 2020, in a Newspaper, Guyana Times owned printed and or published by the Fifth and Sixth Named Defendants in which the said Fifth Named Defendant caused to be published a Letter to the Editor titled “Granger-led APNU/AFC coalition playing a dangerous game” under the name of First Named Defendant.
35. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Sixth Named Defendant for libel published by the Sixth Named Defendant on the 10th day of July, 2020, in a Newspaper, Guyana Times owned, printed and or published by the Fifth and Sixth Named Defendants in which the said Sixth Named Defendant caused to be published a Letter to the Editor titled “Granger-led APNU/AFC coalition playing a dangerous game” under the name of First Named Defendant.
36. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Fifth Named Defendant for libel published by the Fifth Named Defendant on the 20th day of July, 2020, in a Newspaper, Guyana Times owned, printed and or published by the Fifth and Sixth Named Defendants in which the said Fifth Named Defendant caused to be published a Letter to the Editor titled “Granger’s hypocrisy, duplicity, deceit and lying have now come full circle” under the name of First Named Defendant.
37. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Sixth Named Defendant for libel published by the Sixth Named Defendant on the 20th day of July, 2020, in a Newspaper, Guyana Times owned, printed and or published by the Fifth and Sixth Named Defendants in which the said Sixth Named Defendant caused to be published a Letter to the Editor titled “Granger’s hypocrisy, duplicity, deceit and lying have now come full circle” under the name of First Named Defendant.
38. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Second Named Defendant for libel committed by the Second Named Defendant on the 5th day of June, 2020, in the online edition of the Kaieteur News, a Newspaper, owned, printed and or published by the Second, Third and Fourth Named Defendants in which the said Second Named Defendant caused to be disseminated, circulated and published on the World Wide Web a Letter to the Editor titled “David Granger should do the honourable thing and avoid international condemnation”.
39. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Third Named Defendant for libel committed by the Third Named Defendant on the 5th day of June, 2020, in the online edition of the Kaieteur News, a newspaper, owned, printed and or published by the Second, Third and Fourth Named Defendants in which the said Third Named Defendant caused to be disseminated, circulated and published on the Internet and through the World Wide Web a Letter to the Editor titled “David Granger should do the honourable thing and avoid international condemnation”.
40. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Fourth Named Defendant for libel committed by the Fourth Named Defendant on the 5th day of June, 2020, in the online edition of the Kaieteur News, a Newspaper, owned, printed and or published by the Second, Third and Fourth Named Defendants in which the said Fourth Named Defendant caused to be disseminated, circulated and published on the Internet and through the World Wide Web a Letter to the Editor titled “David Granger should do the honourable thing and avoid international condemnation”.
41. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Seventh Named Defendant for libel committed by the Seventh Named Defendant on the 20th day of June, 2020, in the online edition of the Stabroek News, a Newspaper, owned, printed and or published by the Seventh and Eighth Named Defendants in which the said Seventh Named Defendant caused to be disseminated, circulated and published on the Internet and through the World Wide Web a Letter to the Editor titled “David Granger is without shame in continuing to defy the will of the people”.
42. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Eighth Named Defendant for libel committed by the Eighth Named Defendant on the 20th day of June, 2020, in the online edition of the Stabroek News, a Newspaper, owned, printed and or published by the Seventh and Eighth Named Defendants in which the said Eighth Named Defendant caused to be disseminated, circulated and published on the Internet and through the World Wide Web a Letter to the Editor titled “David Granger is without shame in continuing to defy the will of the people”.
43. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Seventh Named Defendant for libel committed by the Seventh Named Defendant on the 20th day of July, 2020, in the online edition of the Stabroek News, a Newspaper, owned, printed and or published by the Seventh and Eighth Named Defendants in which the said Seventh Named Defendant caused to be disseminated, circulated and published on the Internet and through the World Wide Web a Letter to the Editor titled “Granger seeking to overturn recount that he agreed to abide by”.
44. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Eighth Named Defendant for libel committed by the Eighth Named Defendant on the 20th day of July, 2020, in the online edition of the Stabroek News, a Newspaper, owned, printed and or published by the Seventh and Eighth Named Defendants in which the said Eighth Named Defendant caused to be disseminated, circulated and published on the Internet and through the World Wide Web a Letter to the Editor titled “Granger seeking to overturn recount that he agreed to abide by”.
45. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Second Named Defendant for libel committed by the Second Named Defendant on the 20th day of June, 2020, in the online edition of the Kaieteur News, a Newspaper, owned, printed and or published by the Second, Third and Fourth Named Defendants in which the said Second Named Defendant caused to be disseminated, circulated and published on the World Wide Web a Letter to the Editor titled “We must now hope that our Courts, at least, are ready to recognize the will of the people”.
46. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Third Named Defendant for libel committed by the Third Named Defendant on the 20th day of June, 2020, in the online edition of the Kaieteur News, a newspaper, owned, printed and or published by the Second, Third and Fourth Named Defendants in which the said Third Named Defendant caused to be disseminated, circulated and published on the Internet and through the World Wide Web a Letter to the Editor titled “We must now hope that our Courts, at least, are ready to recognize the will of the people”.
47. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Fourth Named Defendant for libel committed by the Fourth Named Defendant on the 20th day of June, 2020, in the online edition of the Kaieteur News, a Newspaper, owned, printed and or published by the Second, Third and Fourth Named Defendants in which the said Fourth Named Defendant caused to be disseminated, circulated and published on the Internet and through the World Wide Web a Letter to the Editor titled “We must now hope that our Courts, at least, are ready to recognize the will of the people”.
48. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Second Named Defendant for libel committed by the Second Named Defendant on the 10th day of July, 2020, in the online edition of the Kaieteur News, a Newspaper, owned, printed and or published by the Second, Third and Fourth Named Defendants in which the said Second Named Defendant caused to be disseminated, circulated and published on the World Wide Web a Letter to the Editor titled “Has David Granger lost touch with reality”.
49. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Third Named Defendant for libel committed by the Third Named Defendant on the 10th day of July, 2020, in the online edition of the Kaieteur News, a newspaper, owned, printed and or published by the Second, Third and Fourth Named Defendants in which the said Third Named Defendant caused to be disseminated, circulated and published on the Internet and through the World Wide Web a Letter to the Editor titled “Has David Granger lost touch with reality”.
50. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Fourth Named Defendant for libel committed by the Fourth Named Defendant on the 10th day of July, 2020, in the online edition of the Kaieteur News, a Newspaper, owned, printed and or published by the Second, Third and Fourth Named Defendants in which the said Fourth Named Defendant caused to be disseminated, circulated and published on the Internet and through the World Wide Web a Letter to the Editor titled “Has David Granger lost touch with reality”.
51. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Fifth Named Defendant for libel committed by the Fifth Named Defendant on the 10th day of July, 2020, in the online edition of the Guyana Times, a Newspaper, owned, printed and or published by the Fifth and Sixth Named Defendants in which the said Fifth Named Defendant caused to be disseminated, circulated and published on the Internet and through the World Wide Web a Letter to the Editor titled “Granger-led APNU/AFC coalition playing a dangerous game”
52. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Sixth Named Defendant for libel committed by the Sixth Named Defendant on the 10th day of July, 2020, in the online edition of the Guyana Times, a Newspaper, owned, printed and or published by the Fifth and Sixth Named Defendants in which the said Sixth Named Defendant caused to be disseminated, circulated and published on the Internet and through the World Wide Web a Letter to the Editor titled “Granger-led APNU/AFC coalition playing a dangerous game.”
53. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Fifth Named Defendant for libel committed by the Fifth Named Defendant on the 20th day of July, 2020, in the online edition of the Guyana Times, a Newspaper, owned, printed and or published by the Fifth and Sixth Named Defendants in which the said Fifth Named Defendant caused to be disseminated, circulated and published on the Internet and through the World Wide Web a Letter to the Editor titled “Granger’s hypocrisy, duplicity, deceit and lying have now come full circle”.
54. Damages in excess of $50,000,000.00 (Fifty Million Dollars) against the Sixth Named Defendant for libel committed by the Sixth Named Defendant on the 20th day of July, 2020, in the online edition of the Guyana Times, a Newspaper, owned, printed and or published by the Fifth and Sixth Named Defendants in which the said Sixth Named Defendant caused to be disseminated, circulated and published on the Internet and through the World Wide Web a Letter to the Editor titled “Granger’s hypocrisy, duplicity, deceit and lying have now come full circle”.
55. An Order that the First Named Defendant cause to be published on INEWS, an online news platform, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication “OPINION: Granger should concede defeat before he is ultimately forced to do so by Int’l condemnation”, published as aforesaid on the 5th day of June, 2020.
56. An Order that the First Named Defendant cause to be published in the Guyana Times, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “Granger is not innocent of attempt to force rigged election on Guyana” published as aforesaid on the 23rd day of May, 2020.
57. An Order that the Fifth and Sixth Named Defendants cause to be published in the Guyana Times, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “Granger is not innocent of attempt to force rigged election on Guyana” published as aforesaid on the 23rd day of May, 2020.
58. An Order that the First Named Defendant cause to be published in the Kaieteur News Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “David Granger should do the honourable thing and avoid international condemnation” published as aforesaid on the 5th day of June, 2020.
59. An Order that the Second, Third and Fourth Named Defendants cause to be published in the Kaieteur News Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “David Granger should do the honourable thing and avoid international condemnation” published as aforesaid on the 5th day of June, 2020.
60. An Order that the First Named Defendant cause to be published in the online edition of the Stabroek News Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “David Granger is without shame in continuing to defy the will of the people” published as aforesaid on the 20th day of June, 2020.
61. An Order that the Seventh and Eighth Named Defendants cause to be published in the online edition of the Stabroek News Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “David Granger is without shame in continuing to defy the will of the people” published as aforesaid on the 20th day of June, 2020.
62. An Order that the First Named Defendant cause to be published in the online edition of the Stabroek News Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “Granger seeking to overturn recount that he agreed to abide by” published as aforesaid on the 20th day of July, 2020.
63. An Order that the Seventh and Eight Named Defendants cause to be published in the online edition of the Stabroek News Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “Granger seeking to overturn recount that he agreed to abide by” published as aforesaid on the 20th day of July, 2020.
64. An Order that the First Named Defendant cause to be published in the online edition of the Kaieteur News Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “We must now hope that our Courts, at least, are ready to recognize the will of the people” published as aforesaid on the 20th day of June, 2020.
65. An Order that the Second, Third and Fourth Named Defendants cause to be published in the online edition of the Kaieteur News Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “We must now hope that our Courts, at least, are ready to recognize the will of the people” published as aforesaid on the 20th day of June, 2020.
66. An Order that the First Named Defendant cause to be published in the online edition of the Kaieteur News Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “Has David Granger lost touch with reality” published as aforesaid on the 10th day of July, 2020.
67. An Order that the Second, Third and Fourth Named Defendants cause to be published in the online edition of the Kaieteur News Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “Has David Granger lost touch with reality” published as aforesaid on the 10th day of July, 2020.
68. An Order that the First Named Defendant cause to be published in the online edition of the Guyana Times Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “Granger-led APNU/AFC coalition playing a dangerous game” published as aforesaid on the 10th day of July, 2020.
69. An Order that the Fifth and Sixth Named Defendants cause to be published in the online edition of the Guyana Times Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “Granger-led APNU/AFC coalition playing a dangerous game” published as aforesaid on the 10th day of July, 2020.
70. An Order that the First Named Defendant cause to be published in the online edition of the Guyana Times Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “Granger’s hypocrisy, duplicity, deceit and lying have now come full circle” published as aforesaid on the 20th day of July, 2020.
71. An Order that the Fifth and Sixth Named Defendants cause to be published in the online edition of the Guyana Times Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “Granger’s hypocrisy, duplicity, deceit and lying have now come full circle” published as aforesaid on the 20th day of July, 2020.
72. An Injunction restraining the First Named Defendant whether by himself or his servants and or agents from posting, printing, publishing, sharing, recording or otherwise recreating and disseminating the heading and Letter to the Editor titled “OPINION: Granger should concede defeat before he is ultimately forced to do so by int’l condemnation” and any offending words, sentences, phrases and statement or similar defamatory words defamatory of the Claimant contained therein as printed and circulated and published in INEWS edition dated the 5th day of June, 2020, and available at [https://www.inewsguyana.com/opinion-granger-should-concede-defeat-before-he-is-ultimately-forced-to-do-so-by-int’l-condemnation/](https://www.inewsguyana.com/opinion-granger-should-concede-defeat-before-he-is-ultimately-forced-to-do-so-by-int'l-condemnation/).
73. A Mandatory Injunction compelling the First Named Defendant whether by himself, his servants and or agents to forthwith permanently remove the Article in the online edition of INEWS dated the 5th day of June, 2020, and available at [https://www.inewsguyana.com/opinion-granger-should-concede-defeat-before-he-is-ultimately-forced-to-do-so-by-int’l-condemnation/](https://www.inewsguyana.com/opinion-granger-should-concede-defeat-before-he-is-ultimately-forced-to-do-so-by-int'l-condemnation).
74. An Injunction restraining the First Named Defendant whether by himself or his servants and or agents from posting, printing, publishing, sharing, recording or otherwise recreating and disseminating the heading and Letter to the Editor titled “Granger is not innocent to attempt to force rigged election on Guyana” under the hand of Kit Nascimento and any offending words, sentences, phrases and statement or similar defamatory words defamatory of the Claimant contained therein as printed and circulated and published in the Guyana Times edition dated the 23rd day of May, 2020, and available at <https://guyanatimesgy.com/granger-is-not-innocent-of-attempt-to-force-rigged-election-on-guyana/>.
75. An Injunction restraining the Fifth and Sixth Named Defendants whether by themselves or their servants and or agents from posting, printing, publishing, sharing, recording or otherwise recreating and disseminating the heading and Letter to the Editor titled “Granger is not innocent to attempt to force rigged election on Guyana” under the hand of Kit Nascimento and any offending words, sentences, phrases and statement or similar defamatory words defamatory of the Claimant contained therein as printed and circulated and published in the Guyana Times edition dated the 23rd day of May, 2020, and available at <https://guyanatimesgy.com/granger-is-not-innocent-of-attempt-to-force-rigged-election-on-guyana/>.
76. A Mandatory Injunction compelling the Fifth and Sixth Named Defendants whether by themselves, their servants and or agents to forthwith permanently remove the letter to the Editor in the online edition of the Guyana Times dated the 23rd day of May, 2020, and available at <https://guyanatimesgy.com/granger-is-not-innocent-of-attempt-to-force-rigged-election-on-guyana/>.
77. An Injunction restraining the First Named Defendant whether by himself or his servants and or agents from posting, printing, publishing, sharing, recording or otherwise recreating and disseminating the heading and Letter to the Editor titled “David Granger should do the honourable thing and avoid international condemnation” under the hand of Kit Nascimento and any offending words, sentences, phrases and statement or similar defamatory words defamatory of the Claimant contained therein as printed and circulated and published in the Kaieteur News edition dated the 5th day of June, 2020, and available at <https://www.kaieteurnewsonline.com/2020/06/05/david-granger-should-do-the-honourable-thing-and-avoid-international-condemnation/>.
78. An Injunction restraining the Second, Third and Fourth Named Defendants whether by themselves or their servants and or agents from posting, printing, publishing, sharing, recording or otherwise recreating and disseminating the heading and Letter to the Editor titled “David Granger should do the honourable thing and avoid international condemnation” under the hand of Kit Nascimento and any offending words, sentences, phrases and statement or similar defamatory words defamatory of the Claimant contained therein as printed and circulated and published in the Kaieteur News edition dated the 5th day of June, 2020, and available at <https://www.kaieteurnewsonline.com/2020/06/05/david-granger-should-do-the-honourable-thing-and-avoid-international-condemnation/>.
79. A Mandatory Injunction compelling the Second, Third and Fourth Named Defendants whether by themselves, their servants and or agents to forthwith permanently remove the letter to the Editor in the online edition of the Guyana Times dated the 5th day of June, 2020, and available at <https://www.kaieteurnewsonline.com/2020/06/05/david-granger-should-do-the-honourable-thing-and-avoid-international-condemnation/>.
80. An Injunction restraining the First Named Defendant whether by himself or his servants and or agents from posting, printing, publishing, sharing, recording or otherwise recreating and disseminating the heading and Letter to the Editor titled “David Granger is without shame in continuing to defy the will of the people” under the hand of Kit Nascimento and any offending words, sentences, phrases and statement or similar defamatory words defamatory of the Claimant contained therein as printed and circulated and published in the Stabroek News edition dated the 20th day of June, 2020, and available at <https://www.stabroeknews.com/2020/06/20/opinion/letters/david-granger-is-without-shame-in-continuing-to-defy-the-will-of-the-people/>.
81. An Injunction restraining the Seventh and Eighth Named Defendants whether by themselves or their servants and or agents from posting, printing, publishing, sharing, recording or otherwise recreating and disseminating the heading and Letter to the Editor titled “David Granger is without shame in continuing to defy the will of the people” under the hand of Kit Nascimento and any offending words, sentences, phrases and statement or similar defamatory words defamatory of the Claimant contained therein as printed and circulated and published in the Stabroek News edition dated the 20th day of June, 2020, and available at <https://www.stabroeknews.com/2020/06/20/opinion/letters/david-granger-is-without-shame-in-continuing-to-defy-the-will-of-the-people/>.
82. A Mandatory Injunction compelling the Seventh and Eighth Named Defendants whether by themselves, their servants and or agents to forthwith permanently remove the Letter to the Editor in the online edition of the Stabroek News edition dated the 20th day of June, 2020, and available at <https://www.stabroeknews.com/2020/06/20/opinion/letters/david-granger-is-without-shame-in-continuing-to-defy-the-will-of-the-people/>.
83. An Injunction restraining the First Named Defendant whether by himself or his servants and or agents from posting, printing, publishing, sharing, recording or otherwise recreating and disseminating the heading and Letter to the Editor titled “Granger seeking to overturn recount that he agreed to abide by” under the hand of Kit Nascimento and any offending words, sentences, phrases and statement or similar defamatory words defamatory of the Claimant contained therein as printed and circulated and published in the Stabroek News edition dated the 20th day of July, 2020, and available at <https://www.stabroeknews.com/2020/07/20/opinion/letters/granger-seeking-to-overturn-recount-that-he-agreed-to-abide-by/>.
84. An Injunction restraining the Seventh and Eighth Named Defendants whether by themselves or their servants and or agents from posting, printing, publishing, sharing, recording or otherwise recreating and disseminating the heading and Letter to the Editor titled “Granger seeking to overturn recount that he agreed to abide by” under the hand of Kit Nascimento and any offending words, sentences, phrases and statement or similar defamatory words defamatory of the Claimant contained therein as printed and circulated and published in the Stabroek News edition dated the 20th day of July, 2020, and available at <https://www.stabroeknews.com/2020/07/20/opinion/letters/granger-seeking-to-overturn-recount-that-he-agreed-to-abide-by/>.
85. A Mandatory Injunction compelling the Seventh and Eighth Named Defendants whether by themselves, their servants and or agents to forthwith permanently remove the Letter to the Editor in the online edition of the Stabroek News edition dated the 20th day of July, 2020, and available at <https://www.stabroeknews.com/2020/07/20/opinion/letters/granger-seeking-to-overturn-recount-that-he-agreed-to-abide-by/>.
86. An Injunction restraining the First Named Defendant whether by himself or his servants and or agents from posting, printing, publishing, sharing, recording or otherwise recreating and disseminating the heading and Letter to the Editor titled “We must now hope that our Courts, at least, are ready to recognize the will of the people” under the hand of Kit Nascimento and any offending words, sentences, phrases and statement or similar defamatory words defamatory of the Claimant contained therein as printed and circulated and published in the Kaieteur News edition dated the 20th day of June, 2020, and available at <https://www.kaieteurnewsonline.com/2020/06/20/we-must-now-hope-that-our-courts-at-least-are-ready-to-recognize-the-will-of-the-people/>.
87. An Injunction restraining the Second, Third and Fourth Named Defendants whether by themselves or their servants and or agents from posting, printing, publishing, sharing, recording or otherwise recreating and disseminating the heading and Letter to the Editor titled “We must now hope that our Courts, at least, are ready to recognize the will of the people” under the hand of Kit Nascimento and any offending words, sentences, phrases and statement or similar defamatory words defamatory of the Claimant contained therein as printed and circulated and published in the Kaieteur News edition dated the 20th day of June, 2020, and available at <https://www.kaieteurnewsonline.com/2020/06/20/we-must-now-hope-that-our-courts-at-least-are-ready-to-recognize-the-will-of-the-people/>.
88. A Mandatory Injunction compelling the Second, Third and Fourth Named Defendants whether by themselves, their servants and or agents to forthwith permanently remove the Letter to the Editor in the online edition of the Kaieteur News edition dated the 20th day of June, 2020, and available at <https://www.kaieteurnewsonline.com/2020/06/20/we-must-now-hope-that-our-courts-at-least-are-ready-to-recognize-the-will-of-the-people/>.
89. An Injunction restraining the First Named Defendant whether by himself or his servants and or agents from posting, printing, publishing, sharing, recording or otherwise recreating and disseminating the heading and Letter to the Editor titled “Has David Granger lost touch with reality?” under the hand of Kit Nascimento and any offending words, sentences, phrases and statement or similar defamatory words defamatory of the Claimant contained therein as printed and circulated and published in the Kaieteur News edition dated the 10th day of July, 2020, and available at <https://www.kaieteurnewsonline.com/2020/07/10/has-david-granger-lost-touch-with-reality/>.
90. An Injunction restraining the Second, Third and Fourth Named Defendants whether by themselves or their servants and or agents from posting, printing, publishing, sharing, recording or otherwise recreating and disseminating the heading and Letter to the Editor titled “Has David Granger lost touch with reality?” under the hand of Kit Nascimento and any offending words, sentences, phrases and statement or similar defamatory words defamatory of the Claimant contained therein as printed and circulated and published in the Kaieteur News edition dated the 10th day of July, 2020, and available at <https://www.kaieteurnewsonline.com/2020/07/10/has-david-granger-lost-touch-with-reality/.>
91. A Mandatory Injunction compelling the Second, Third and Fourth Named Defendants whether by themselves, their servants and or agents to forthwith permanently remove the Letter to the Editor in the online edition of the Kaieteur News edition dated the 10th day of July, 2020, and available at <https://www.kaieteurnewsonline.com/2020/07/10/has-david-granger-lost-touch-with-reality/>.
92. An Injunction restraining the First Named Defendant whether by himself or his servants and or agents from posting, printing, publishing, sharing, recording or otherwise recreating and disseminating the heading and Letter to the Editor titled “Granger’s hypocrisy, duplicity, deceit and lying have now come full circle” under the hand of Kit Nascimento and any offending words, sentences, phrases and statement or similar defamatory words defamatory of the Claimant contained therein as printed and circulated and published in the Guyana Times edition dated the 20th day of July, 2020, and available at <https://guyanatimesgy.com/grangers-hypocrisy-duplicity-deceit-and-lying-have-now-come-full-circle/>.
93. An Injunction restraining the Fifth and Sixth Named Defendants whether by themselves or their servants and or agents from posting, printing, publishing, sharing, recording or otherwise recreating and disseminating the heading and Letter to the Editor titled “Granger’s hypocrisy, duplicity, deceit and lying have now come full circle” under the hand of Kit Nascimento and any offending words, sentences, phrases and statement or similar defamatory words defamatory of the Claimant contained therein as printed and circulated and published in the Guyana Times edition dated the 20th day of July, 2020, and available at <https://guyanatimesgy.com/grangers-hypocrisy-duplicity-deceit-and-lying-have-now-come-full-circle/>.
94. A Mandatory Injunction compelling the Fifth and Sixth Named Defendants whether by themselves, their servants and or agents to forthwith permanently remove the letter to the Editor in the online edition of the Guyana Times dated the 20th day of July, 2020, and available at <https://guyanatimesgy.com/grangers-hypocrisy-duplicity-deceit-and-lying-have-now-come-full-circle/>.
95. An Injunction restraining the First Named Defendant whether by himself or his servants and or agents from posting, printing, publishing, sharing, recording or otherwise recreating and disseminating the heading and Letter to the Editor titled “Granger-led APNU/AFC coalition playing a dangerous game” under the hand of Kit Nascimento and any offending words, sentences, phrases and statement or similar defamatory words defamatory of the Claimant contained therein as printed and circulated and published in the Guyana Times edition dated the 10th day of July, 2020, and available at <https://guyanatimesgy.com/granger-led-apnu-afc-coalition-playing-a-dangerous-game/>.
96. An Injunction restraining the Fifth and Sixth Named Defendants whether by themselves or their servants and or agents from posting, printing, publishing, sharing, recording or otherwise recreating and disseminating the heading and Letter to the Editor titled “Granger-led APNU/AFC coalition playing a dangerous game” under the hand of Kit Nascimento and any offending words, sentences, phrases and statement or similar defamatory words defamatory of the Claimant contained therein as printed and circulated and published in the Guyana Times edition dated the 10th day of July, 2020, and available at <https://guyanatimesgy.com/granger-led-apnu-afc-coalition-playing-a-dangerous-game/>.
97. A Mandatory Injunction compelling the Fifth and Sixth Named Defendants whether by themselves, their servants and or agents to forthwith permanently remove the letter to the Editor in the online edition of the Guyana Times dated the 10th day of July, 2020, and available at <https://guyanatimesgy.com/granger-led-apnu-afc-coalition-playing-a-dangerous-game/>.
98. Exemplary Damages.
99. Aggravated Damages.
100. Interest at a rate of 6 % per annum from the date of filing to the date of Judgment and thereafter at a rate of 4% per annum from the date of Judgment until fully paid.
101. Such further and or other Order as to this Court seems just.
102. Costs.

1. The Claimant is and was at all material times the President of the Co-operative Republic of Guyana from the 16th day of May, 2015, to the 2nd day of August, 2020.
2. The Claimant was a Commander and Brigadier of the Guyana Defence Force, National Security Advisor to the President and the recipient of the Military Service Medal, Military Service Star and the Military Commendation Medal amongst the Awards, more fully set out in Schedule 1 of the Claim.
3. The Claimant is and was also at all material times the Leader and a Member of the People’s National Congress Reform and an Author and Editor of Books, Academic Papers, Monographs and other Works and Publications which are more fully set out in Schedule 1 of this Claim.
4. The Claimant is and was also invited to deliver numerous addresses to distinguished and august bodies and assemblies in and out of Guyana which are more fully set out in the Schedule 1 to the Claim.
5. The Claimant is and was also a member of numerous Commissions, Boards and Committees which are more fully set out in the Schedule 1 to the Claim.
6. The Claimant is and was also an Adjunct Professor, Lecturer and Teacher at Universities in Guyana and internationally, as well as at other Institutions of Learning which are more fully set out in the Schedule 1 to the Claim.
7. The Claimant was also the recipient of numerous distinguished Academic Awards such as and are more fully set out in the Schedule 1 to the Claim:
8. University of Guyana Award for outstanding performance.
9. Department of History Prize for the best first-year student majoring in History.
10. Mary Noel Menezes Award for the best student in the Organisation of History and Research Methodology course.
11. Most Outstanding Debater in the University of Guyana’s XXV Anniversary Debating Series.
12. Winner of the University of Guyana’s XXV Anniversary Debating Series.
13. University of Guyana Award for outstanding performance.
14. Dennis Irvine Prize for the student who has made the greatest contribution to all cultural life of the University.
15. J.S. Bissoondial Prize for the best undergraduate essay or study on the History and Culture of any Guyanese ethnic group.
16. Guyana Teachers’ Union Award for the best second-year student in the field of History.
17. The President’s Medal for the best graduating student in a Bachelor’s Degree Programme in the University.
18. The Earl Attlee History Prize for the most outstanding student majoring in History.
19. From May, 2015 to August, 2020, the A Partnership for National Unity and the Alliance for Change constituted the Government of the Co-operative Republic of Guyana hereinafter referred to as APNU+AFC Government.
20. The Claimant was named and designated as the Presidential Candidate of the A Partnership for National Unity/Alliance for Change (APNU+AFC) List of Candidates to contest the 2nd day of March, 2020, General and Regional Elections.
21. The Second Named Defendant is the Editor-in-Chief of “KAIETEUR NEWS”, a daily newspaper which has a wide circulation throughout the Co-operative Republic of Guyana and internationally online. Kaieteur News is also available online at <https://www.kaieteurnewsonline.com> and at <https://epaper.kaieteurnewsonline.com> where individual articles are available electronically through its own webpage and link and through an ePaper (electronic paper) service which publishes the entire daily editions in a scrollable and searchable PDF/online format.
22. The Third Named Defendant is the founder and Publisher of “KAIETEUR NEWS”, a daily newspaper which has a wide circulation throughout the Co-operative Republic of Guyana and internationally online. Kaieteur News is also available online at <https://www.kaieteurnewsonline.com> and at <https://epaper.kaieteurnewsonline.com> where individual articles are available electronically through its own webpage and link and through an ePaper (electronic paper) service which publishes the entire daily editions in a scrollable and searchable PDF/online format.
23. The Fourth Named Defendant is a Company incorporated under the Companies Act of Guyana and the owner and or Publisher of “KAIETEUR NEWS”, a daily newspaper which has a wide circulation throughout the Co-operative Republic of Guyana and internationally online. Kaieteur News is also available online at <https://www.kaieteurnewsonline.com> and at <https://epaper.kaieteurnewsonline.com> where individual articles are available electronically through its own webpage and link and through an ePaper (electronic paper) service which publishes the entire daily editions in a scrollable and searchable PDF/online format.
24. The Fifth Named Defendant is the Editor-in-Chief of the “GUYANA TIMES INC”, a daily newspaper which has a wide circulation throughout the Co-operative Republic of Guyana and internationally online. Guyana Times Inc., is also available online at https://www.guyanatimesgy.com, news@guyanatimesgy.comand on Facebook at <https://www.facebook.com/gytimes/> where individual articles are available electronically through its own webpage and link and through an ePaper (electronic paper) service which publishes the entire daily editions in a scrollable and searchable PDF/online format.
25. The Seventh Named Defendant is the Editor-in-Chief of the “STABROEK NEWS”, a daily newspaper which has a wide circulation throughout the Co-operative Republic of Guyana and internationally online. Stabroek News is also available online at <https://www.stabroeknews.com> and on Facebook at <https://www.facebook.com/stabroeknews> where individual articles are available electronically through its own webpage and link and through an ePaper (electronic paper) service which publishes the entire daily editions in a scrollable and searchable PDF/online format.
26. The Eighth Named Defendant is a Company incorporated under the Companies Act of Guyana and the owner and or Publisher of the Stabroek News.
27. The First Named Defendant between the months March, 2020 to August, 2020 commenced and sustained a series of defamatory attacks on the Claimant which were relentless and displayed a complete disregard for the truth.
28. The First Named Defendant wrote an Opinion titled “Granger should concede defeat before he is ultimately forced to do so by international condemnation” which was published on the 5th day of June, 2020, on INEWS, an online news platform in which the First Named Defendant made the following statements of an concerning the Claimant:

“OPINION: Granger should concede defeat before he is ultimately forced to do so by int’l condemnation

The following is an opinion piece by Kit Nascimento.

On May 17, 2020, at a press conference across the road from the Convention Centre, where the Election Recount is coming to a conclusion, David Granger was asked, “To what extent would your Coalition accept the result coming from the Recount?”

He evaded the question. His answer was, “Whatever declaration is made by the Chairman of the Elections Commission would be regarded as legitimate by the Coalition Government”.

When David Granger was pressed further on an earlier declaration by Basil Williams and Roysdale Forde — that the Recount is illegal – again he stated, this time emphatically, “As President of Guyana and Leader of the Government, it is my policy that any declaration coming from the Chairman of GECOM will be accepted by the Government of Guyana”.

But David Granger’s party, on June 3, in an e-mail, declared that APNU+AFC would not accept the result of the ballot recount, a statement which we must presume has the approval of David Granger, even before the Chairman of the Elections Commission can deliver her Commission’s verdict on the ballot recount.

If, as she should, the GECOM Chairman declares the result of the ballot recount to be that which the world can already see, the PPP/C has won the Elections, David Granger’s party have now told her in advance that they will not accept any such decision.

In fact, the APNU+AFC have gone further in stating that “any results emanating from this process cannot be considered credible because of the high incidence of fraud”, thereby rejecting the entire recount process. It therefore immediately becomes incumbent on Granger to either reject the APNU+AFC statement, or be seen to have lied to the nation.

**But David Granger has other problems. Not once but twice, prior even to the Recount beginning, and based entirely on the fraudulent Lowenfield Report from the Mingo tabulation, David Granger told his party followers that APNU+AFC had won the Elections. The ballot recount has proved already that he lied to his followers.**

It is already patently clear that none of the so-called anomalies listed by APNU+AFC has any credibility, and remain not only unsubstantiated, but proved to be false. For instance, the ridiculous claim that absentee persons from Guyana were impersonated and voted. These persons were in fact in Guyana.

The claim by Aubrey Norton that the members of the Defence Force have been disenfranchised has also been proved to be entirely false.

As for these so-called anomalies every day being claimed at the recount stations by APNU+AFC party agents, these amount to minor infractions that have no bearing on the overwhelming result of an election process which all of the international observers found credible, and to which Granger himself originally gave his blessings.

It is time, as I have said before, for David Granger to do the honourable thing: accept that he has lost the elections and concede before he is ultimately forced to do so by the international condemnation which will come his way and to our country if he doesn’t.”

1. The words in bold in Paragraph 18 (Eighteen) above are complained of.
2. In the Guyana Times edition of the 23rd day of May, 2020, the Fifth and Sixth Named Defendant caused to be published and circulated in the said print and online edition of the said Guyana Times of the said Guyana Times a Letter to the Editor from the First named Defendant headed “Granger is not innocent of attempt to force rigged election on Guyana”.
3. In the aforesaid Letter to the Editor, and as printed, published and circulated First Named Defendant stated:

“Dear Editor,

On Sunday last, David Granger emerged from his home complete with massive security (akin to an Idi Amin) surrounded by a phalanx of former APNU/AFC Ministers and imposed his ‘Presidential’ presence on the GECOM recount proceedings. Granger arrived at GECOM for no good reason other than to reassure his party faithful that he is still in charge, rather than to reassure the country that he recognises and supports the legitimacy of the recount or that he will accept the results.

What, in fact, did he do and say at GECOM? He deliberately confuses his status as to whether he has come as our ‘de facto’ President or as that of the APNU/AFC Presidential Candidate. Having held meetings with the GECOM Chairman and senior staff and the Caricom scrutineers, he then crosses the road to hold a press conference, whether as ‘de facto’ President or party leader, it never becomes clear, obliging the Chairman of GECOM to join him at his side.  
He then speaks both as APNU/AFC leader and as leader of the Government, completely compromising the presence of the GECOM Chair, who should have immediately excused herself.  
The press conference was carefully orchestrated and managed by none other than Cathy Hughes, who has no governmental information role and is clearly acting in her party capacity.

At the press conference, Granger persistently refused to answer straight forward questions as to whether he would recognise and accept the result of the recount, claiming only that “whatever declaration is made by the Chairman of the Elections Commission would be recognised as legitimate by the coalition Government”.

Pressed further by reporters, in spite of the effort by Hughes to manage them, on the fact that his Attorney General, the day before had challenged the legitimacy of the recount, Granger repeated this time, “as President of Guyana and leader of the Government, it is my policy that any declaration coming from the Chairman of GECOM will be accepted by the Government of Guyana”.

But to what exactly had Granger committed himself? To learn that, you had to hear what he said the next day at a Mark Benschop radio interview, where he declared that he is “confident” that his party has won the elections.  
So, what, then, if the GECOM Chairman, faced with the overwhelming evidence of the recount, announces that it is the PPP/C that has won the elections, **would Granger say to the APNU/AFC voters to whom he has persistently lied?**  
He also used the Benschop interview to perpetuate the lie that “the Opposition stormed” the GECOM centre to invade the office of the GECOM Chair. I was there. So were the international observers. There was no invasion. It was when Mingo first attempted to declare a fraudulent result of the unfinished District Four tabulation that he was shouted down to prevent him from doing so. The Chairman of GECOM remained perfectly secure in her office, inexplicably choosing to ignore Mingo’s performance.

But Granger did not only refuse to acknowledge acceptance of the result of the recount at his press conference, he also refused to reject the Mingo/Lowenfield declaration which remains in “abeyance”. Granger left that for Ms Singh to consider when using her casting vote in the Commission. We know how Granger’s Commissioners will vote.

Granger also refused at his press conference to recognise and accept the credibility of the election process on Elections Day. According to him, it was “premature”, leaving yet another decision wide open for Ms Singh to decide upon by using her casting vote in the Commission.

All those decisions carefully placed upon the shoulders of Ms Singh by David Granger could, of course, lead to Ms Singh swearing-in David Granger as President of another APNU/AFC Government, regardless of the results of the number of ballots counted in favour of the PPP/C.

To sum it up:

\* Granger has refused to recognise the fraud committed by Mingo as the immediate beneficiary of that fraud.  
\* Granger has refused to recognise that the recount of the ballots currently taking place must deliver the results of the elections.  
\* Granger has refused to recognise the credibility of the election process on elections day which was recognised by all of the observers and signed onto by all of the APNU/AFC party agents.

\* Granger has refused to recognise that the declaration by Lowenfield, based on the tabulation of Mingo, is fraudulent and must be rejected without exception.

\* Granger has refused to recognise the evidence of the Statements of Poll in his party’s possession which were publicly displayed on Elections Day for the world to see as irrefutable evidence that the PPP/C has won the election by a substantial majority.

**David Granger still has the gall to say to the world that it is not me, that this has nothing to do with me, that I am innocent of all of this, that it is all the responsibility of the Chairman of GECOM**.

**Not really! Granger hangs on to power from a fraud committed and embraced in GECOM by the very people that he appointed to the Commission**. A fraud that his candidate went to the court to keep alive and defended by the lawyers hired and paid for by his Government. David Granger has stopped The Carter Center from observing the recount.

**David Granger is not innocent of this attempt to force a rigged election on our country**. David Granger has the power and authority in his hands, to, tomorrow, release our country from the agony and growing disaster in which he and his party has placed us, by simply accepting the actual result of the elections and conceding that he has lost the elections.

Yours sincerely,

Kit Nascimento”

1. The words in bold in Paragraph 21 (Twenty-One) above are complained of.
2. In the Kaieteur News edition of the 5th day of June, 2020, the Second, Third and Fourth Named Defendants caused to be published and circulated in the said print and online edition of the said Kaieteur News a Letter to the Editor from the First Named Defendant headed “David Granger should do the honourable thing and avoid international condemnation”.
3. In the aforesaid Letter to the Editor, and as printed, published and circulated the First Named Defendant stated:

David Granger should do the honourable thing and avoid international condemnation

Dear Editor,

David Granger, on 17th May, 2020, at a Press Conference across the road from the Conference Centre, where the election Recount is coming to a conclusion, told the nation when asked “to what extent would your Coalition accept the result coming from the Recount” evaded the question. His answer was “whatever declaration is made by the Chairman of the Elections Commission would be regarded as legitimate by the Coalition government”.

When David Granger was pressed further on an earlier declaration by Basil Williams and Roysdale Forde that the Recount is illegal, again, stated, this time emphatically, “as President of Guyana and Leader of the Government, it is my policy that any declaration coming from the Chairman of GECOM will be accepted by the Government of Guyana”.

But David Granger’s party, last night (3rd June), in an e-mail, declared that APNU+AFC would not accept the result of the ballot Recount, a statement which we must presume has the approval of David Granger, even before the Chairman of the Elections Commission can deliver her Commission’s verdict on the ballot Recount.

If, as she should, the GECOM Chairman declares the result of the ballot Recount to be that, which the world can already see, the PPP/C has won the Elections, David Granger’s party have now told her in advance that they will not accept any such decision. In fact, the APNU+AFC have gone further in stating that “any results emanating from this process cannot be considered credible because of the high incidence of fraud”, thereby rejecting the entire Recount process. It, therefore, immediately becomes incumbent on Granger to either reject the APNU+AFC statement, or be seen to have lied to the nation.

But David Granger has other problems. Not once, but twice, prior even to the Recount beginning and based entirely on the fraudulent Lowenfield Report from the Mingo tabulation, **David Granger told his party followers that APNU+AFC had won the Elections. The ballot Recount has proved already that he lied to his followers.**

It is already patently clear that none of the so-called anomalies listed by APNU+AFC have any credibility and remain, not only unsubstantiated, but proved to be false. For instance, the ridiculous claim that absentee persons from Guyana were impersonated and voted. These persons were, in fact, in Guyana. As I write, fourteen (14) of these persons have given the lie to the information sent to the GECOM Chairman by the Commissioner of Police. Many more will be revealed.

The claim by Aubrey Norton that the members of the Defence Force have been disenfranchised has, also, been proved to be entirely false.

As for these so-called anomalies, everyday being claimed at the Recount stations by APNU+AFC Party Agents, these amount to minor infractions having no bearing on the overwhelming result of an election process, which all of the International Observers found credible and which Granger himself originally gave his blessings.

It is time, as I have said before, for David Granger to do the honourable thing. Accept that he has lost the Elections and concede before he is ultimately forced to do so by the international condemnation which will come his way and to our country if he doesn’t.

Yours sincerely,

Kit Nascimento”

1. The words in bold in Paragraph 24 (Twenty-Four) above are complained of.
2. In the Stabroek News edition of the 20th day of June, 2020, the Seventh and Eighth Named Defendants caused to be published and circulated in the said print and online edition of the said Stabroek News a Letter to the Editor from the First Named Defendant headed “David Granger is without shame in continuing to defy the will of the people”.
3. In the aforesaid Letter to the Editor, and as printed, published and circulated First Named Defendant stated:

“Dear Editor,

It is clear as daylight on a bright sunny day, **that David Granger, in power as a de facto President, with the full support of the police and army under his command, if not in absolute control, is most certainly complicit in an obvious and determined decision of APNU+AFC to remain in government regardless of the expressed will of our people in the 2nd March Elections.**

It is equally clear that the GECOM Secretariat, in the persons of Keith Lowenfield and Clairmont Mingo and others in command, have conspired to serve the determination of Granger and the APNU+AFC to remain in power.

I first witnessed this when Mingo set out to rig the tabulation of District 4. I said then that “in all my life, considerable life and career, in and out of politics in this country, I have never seen such a barefaced, ugly and deliberate attempt to rig an election. Yes, I have seen and I am aware of attempts where elections were rigged but not in this kind of manner. It was utterly disgusting”.

It is also, now, perfectly clear that Keith Lowenfield, as the Chief Election Officer of GECOM, aided and abetted by three (3) GECOM Commissioners serving the interest of the APNU+AFC leadership, is prepared even to defy the explicit directions of Chairman Claudette Singh when all else has failed to keep Granger in power.

It was as long ago as 17th March that I wrote that “it must be either that Mr. Granger has lost control of the party of which he is the Presidential candidate or that he has acted in a manner that brings into question his personal credibility and honesty”. That was when Granger had invited the first CARICOM delegation to our country to “supervise” a recount of the electoral result and his party candidate, Ulita Moore, sabotaged the CARICOM visit. I was castigated by APNU+AFC supporters for having dared to question Granger’s honesty.

Again, **on 22nd March, I wrote that “it has become increasingly clear that Mr. Granger is a hypocrite in all that he says and does”.**

In April, I wrote expressing my “deep apprehension of what is yet to follow from the ugly and unveiled determination of the APNU+AFC leadership to prevent the conclusion of an election which they know they have lost” and their invention of “a narrative which reads as a tissue of lies”. It is that narrative of alleged, unproved “anomalies” that they pursued throughout the Recount and which has been adopted wholesale by Lowenfield in his Report submitted to the Chairman of GECOM in violation of the law. It is that narrative that is now before the Court in a final desperate attempt to escape Chair-man Singh’s decision to recognize the fact that the Recount has confirmed the PPP/C as the choice of the electorate.

Not once, but on a number of occasions, Granger had promised all of Guyana that “whatever declaration is made by the Chairman of the Elections Commission would be recognized as legitimate by the Coalition government”. He added that “as President of Guyana and leader of the government, it is my policy that any declaration coming from the Chairman of GECOM would be accepted by the Government of Guyana”.

But, Granger, faced with the Chairman leaving no option to Lowenfield but to report on the result of the balloted Recount and her announcing a declaration of the PPP/C as winning the Elections, has broken even that promise when **he summoned the clan at State House on Wednesday to move to the Appeal Court and to denude the Chairman of her authority to pronounce on the elections result.**

**David Granger is without shame, is without care, is without concern in his grasp to rule regardless of the consequences to our country**. We must now hope that our Courts, at least, are ready to recognize the will of the people.

Yours faithfully,

Kit Nascimento”

1. The words in bold in Paragraph 27 (Twenty-Seven) above are complained of.
2. In the Kaieteur News edition of the 20th day of June, 2020, the Second, Third and Fourth Named Defendant caused to be published and circulated in the said print and online edition of the said Kaieteur News a Letter to the Editor from the First Named Defendant headed “We must now hope that our Courts, at least, are ready to recognize the will of the people”.
3. In the aforesaid Letter to the Editor, and as printed, published and circulated First Named Defendant stated:

“Dear Editor,

It is clear as daylight on a bright sunny day, that David Granger, in power as a de facto President, with the full support of the police and army under his command, if not in absolute control, is most certainly complicit in an obvious and determined decision of APNU+AFC to remain in government regardless of the expressed will of our people in the 2nd March Elections.

It is equally clear that the GECOM Secretariat, in the persons of Keith Lowenfield and Clairmont Mingo and others in command, have conspired to serve the determination of Granger and the APNU+AFC to remain in power.

I first witnessed this when Mingo set out to rig the tabulation of District 4. I said then that “in all my life, considerable life and career, in and out of politics in this country, I have never seen such a barefaced, ugly and deliberate attempt to rig an election. Yes, I have seen and I am aware of attempts where elections were rigged but not in this kind of manner. It was utterly disgusting”.

It is also, now, perfectly clear that Keith Lowenfield, as the Chief Elections Officer of GECOM, aided and abetted by three (3) GECOM Commissioners serving the interest of the APNU+AFC leadership, is prepared even to defy the explicit directions of Chairman Claudette Singh when all else has failed to keep Granger in power.

It was as long ago as 17th March that I wrote that “it must be either that Mr. Granger has lost control of the party of which he is the Presidential candidate or that he has acted in a manner that brings into question his personal credibility and honesty”. That was when Granger had invited the first CARICOM delegation to our country to “supervise” a recount of the electoral result and his party candidate, Ulita Moore, sabotaged the CARICOM visit. I was castigated by APNU+AFC supporters for having dared to question Granger’s honesty.

Again, on 22nd March, I wrote that “it has become increasingly clear that Mr. Granger is a hypocrite in all that he says and does”.

In April, I wrote expressing my “deep apprehension of what is yet to follow from the ugly and unveiled determination of the APNU+AFC leadership to prevent the conclusion of an election which they know they have lost” and their invention of “a narrative which reads as a tissue of lies”. It is that narrative of alleged, unproved “anomalies” that they pursued throughout the Recount and which has been adopted wholesale by Lowenfield in his Report submitted to the Chairman of GECOM in violation of the law. It is that narrative that is now before the Court in a final desperate attempt to escape Chairman Singh’s decision to recognize the fact that the Recount has confirmed the PPP/C as the choice of the electorate.

Not once, but on a number of occasions, Granger had promised all of Guyana that “whatever declaration is made by the Chairman of the Elections Commission would be recognized as legitimate by the Coalition government”. He added that “as President of Guyana and leader of the government, it is my policy that any declaration coming from the Chairman of GECOM would be accepted by the Government of Guyana”.

But, Granger, faced with the Chairman leaving no option to Lowenfield but to report on the result of the balloted Recount and her announcing a declaration of the PPP/C as winning the Elections, has broken even that promise when **he summoned the clan at State House on Wednesday to move to the Appeal Court and to denude the Chairman of her authority to pronounce on the elections result.**

**David Granger is without shame, is without morose, is without care, is without concern in his grasp to rule regardless of the consequences to our country**. We must now hope that our Courts, at least, are ready to recognize the will of the people.

Yours sincerely,

Kit Nascimento”

1. The words in bold in Paragraph 30 (Thirty) above are complained of.
2. In Kaieteur News edition of the 10th day of July, 2020, the Second, Third and Fourth Named Defendants caused to be published and circulated in the said print and online edition of the said Kaieteur News a Letter to the Editor from the First Named Defendant headed “Has David Granger lost touch with reality”.
3. In the aforesaid Letter to the Editor, and as printed, published and circulated First Named Defendant stated:

Dear Editor,

I watched, with absolute dismay, David Granger come out of State House one Wednesday to address a crowd of APNU+AFC supporters who, under the COVID-19 regulations, should have been immediately dispersed by the police. Granger wore no face covering in coming close to address them, setting an appallingly bad example.

The APNU+AFC supporters were, not surprisingly, calling for Granger to be immediately sworn in as President. **For weeks now, Granger and Joe Harmon have used the Lowenfield Report, based on invented irregularities arbitrarily and in violation of his authority, submitted to the Chairman of GECOM on 23rd June to claim an APNU+AFC victory at the polls.**

Watching Granger’s pitiful but, unfortunately, dangerous attempt to cast aside the legal significance of the ruling of the Caribbean Court of Justice (CCJ), begs the question, has David Granger lost touch with reality? Is he, in fact delusional?

The CCJ had just ruled invalidating the Lowenfield 23rd June Report and ruled that the so-called “irregularities” claimed by Harmon and Granger could only be addressed in an Election Petition and that GECOM had no authority to address these claims in the final tabulation of the Recount.

Granger, however, refused to acknowledge the ruling of the Court, yet, in the same breath, told his supporters that “our Coalition is committed to the rule of law”. He told his supporters that the CCJ “made no coercive orders… they have not given any instructions to what GECOM is empowered under the laws of Guyana to do”, deliberately leading them to believe that the CCJ ruling was of no consequence.

Granger then went on to repeat the entirely false claim that there has been “massive” fraud and irregularities during the elections and that his party will continue to fight for only “valid votes to be counted”.

Again, Granger chose to ignore the very specific rejection by the CCJ of the Court of Appeal’s unnecessary insertion of the word “valid” which, the Court pointed out, “invited the CEO to engage unilaterally in an unlawful validation exercise”.

**David Granger had known from the very day after the 2nd March, that a majority of just under 16,000 Guyanese voted to elect the PPP/C** in an open, freely contested, internationally monitored and closely observed election. **Granger knew this from the published Statements of Poll in his party’s possession, but he has consistently and dishonestly refused to accept the result.**

**Granger, instead, first from behind the scenes, but now openly, has led his party to believe that they could cheat the counting process**, cheat the Recount result, and, when that failed, depend upon a biased judiciary to keep him in power.

He did not, however, calculate for the fact that this bias did not extend to Guyana’s Apex Court, the Caribbean Court of Justice. I repeat. Guyana’s Apex Court now being vilified by APNU+AFC’s leading spokespersons, James Bond, Aubrey Norton and Sherod Duncan, in a disgraceful display of lying about the CCJ judgment on the APNU+AFC Facebook page.

Nor did Granger and his highly financially compromised hierarchy in APNU+AFC count upon the inherent commitment to democracy of his fellow political leaders across the Caribbean.

Granger must know now that the GECOM Chairman is left with no alternative but to recognize the result of the Recount and proceed under the Constitution, as guided by the CCJ, to declare a decision in favour of swearing in Dr. Ali. He has consistently said that he will respect GECOM’s decision, but nothing that he has said or done since suggests that he will keep his word.

**David Granger has continued to insist that, regardless of the elections result, regardless of the Recount, regardless of the CARICOM Report, regardless of the universal position of every International and Local Observer, regardless of the ruling of the CCJ and regardless of the ultimate consequences to his country, his people, himself and those around him, he and his party will remain in office.**

There is nothing that has made me change my mind since my Commentary on 30th June that “these are men and women who are conniving, ruthless, ignorant and criminal in their intent” and that they “feel secure that they can do this supported by our military and our police”.

It is fast becoming essential that the newly appointed Chief-of-Staff of the Guyana Defence Force, Brigadier Godfrey Bess, and the Commissioner of Police, Leslie James, decide and state publicly whether or not they will uphold their oath of office, to which they are sworn, to the Constitution.

Yours truly,

Kit Nascimento”

1. The words in bold in Paragraph 33 (Thirty-Three) above are complained of.
2. In the Guyana Times edition of the 10th day of July, 2020, the Fifth and Sixth Named Defendant caused to be published and circulated in the said print and online edition of the said Guyana Times a Letter to the Editor from the First Named Defendant headed “Granger-led APNU/AFC coalition playing a dangerous game”.
3. In the aforesaid Letter to the Editor, and as printed, published and circulated First Named Defendant stated:

Dear Editor,

I watched, with absolute dismay, David Granger come out of State House on Wednesday to address a crowd of APNU+AFC supporters who, under the COVID-19 regulations, should have been immediately dispersed by the police.  
Granger wore no face covering in coming close to address them, setting an appallingly bad example.  
The APNU+AFC supporters were, not surprisingly, calling for Granger to be immediately sworn in as President. **For weeks now, Granger and Joe Harmon have used the Lowenfield Report, based on invented irregularities arbitrarily and in violation of his authority, submitted to the Chairman of GECOM on 23rd June to claim an APNU+AFC victory at the polls.**  
Watching Granger’s pitiful but, unfortunately, dangerous attempt to cast aside the legal significance of the ruling of the Caribbean Court of Justice (CCJ), begs the question, has David Granger lost touch with reality? Is he, in fact delusional?  
The CCJ had just ruled invalidating the Lowenfield 23rd June Report and ruled that the so-called “irregularities” claimed by Harmon and Granger could only be addressed in an Election Petition and that GECOM had no authority to address these claims in the final tabulation of the Recount.  
Granger, however, refused to acknowledge the ruling of the Court, yet, in the same breath, told his supporters that “our Coalition is committed to the rule of law”. He told his supporters that the CCJ “made no coercive orders… they have not given any instructions to what GECOM is empowered under the laws of Guyana to do”, deliberately leading them to believe that the CCJ ruling was of no consequence.  
Granger then went on to repeat the entirely false claim that there has been “massive” fraud and irregularities during the elections and that his party will continue to fight for only “valid votes to be counted”.

Again, Granger chose to ignore the very specific rejection by the CCJ of the Court of Appeal’s unnecessary insertion of the word “valid” which, the Court pointed out, “invited the CEO to engage unilaterally in an unlawful validation exercise”.  
**David Granger had known from the very day after the 2nd March, that a majority of just under 16,000 Guyanese voted to elect the PPP/C in an open, freely contested, internationally monitored and closely observed election. Granger knew this from the published Statements of Poll in his party’s possession, but he has consistently and dishonestly refused to accept the result.**

**Granger, instead, first from behind the scenes, but now openly, has led his party to believe that they could cheat the counting process, cheat the Recount result, and, when that failed, depend upon a biased judiciary to keep him in power.**

He did not, however, calculate for the fact that this bias did not extend to Guyana’s Apex Court, the Caribbean Court of Justice. I repeat. Guyana’s Apex Court now being vilified by APNU+AFC’s leading spokespersons, James Bond, Aubrey Norton and Sherod Duncan, in a disgraceful display of lying about the CCJ judgement on the APNU+AFC Facebook page.  
Nor did Granger and his highly financially compromised hierarchy in APNU+AFC count upon the inherent commitment to democracy of his fellow political leaders across the Caribbean.

Granger must know now that the GECOM Chairman is left with no alternative but to recognize the result of the Recount and proceed under the Constitution, as guided by the CCJ, to declare a decision in favour of swearing in Dr. Ali. He has consistently said that he will respect GECOM’s decision, but nothing that he has said or done since suggests that he will keep his word.

**David Granger has continued to insist that, regardless of the elections result, regardless of the Recount, regardless of the CARICOM Report, regardless of the universal position of every International and Local Observer, regardless of the ruling of the CCJ and regardless of the ultimate consequences to his country, his people, himself and those around him, he and his party will remain in office.**  
There is nothing that has made me change my mind since my Commentary on 30th June that “these are men and women who are conniving, ruthless, ignorant and criminal in their intent” and that they “feel secure that they can do this supported by our military and our police”.

It is fast becoming essential that the newly appointed Chief-of-Staff of the Guyana Defence Force, Godfrey Bess, and the Commissioner of Police, Leslie James, decide and state publicly whether or not they will uphold their oath of office, to which they are sworn, to the Constitution.

Yours sincerely,

Kit Nascimento”

1. The words in bold in Paragraph 36 (Thirty-Six) above are complained of.
2. In the Stabroek News edition of the 20th day of July, 2020, the Seventh and Eighth Named Defendants caused to be published and circulated in the said print and online edition of the said Stabroek News a Letter to the Editor from the First Named Defendant headed “Granger seeking to overturn recount that he agreed to abide by”.
3. In the aforesaid Letter to the Editor, and as printed, published and circulated First Named Defendant stated:

“Dear Editor,

**When I first called David Granger a hypocrite, a month ago on 17th of March, and then questioned  “his personal credibility and honestly”,** on the 22nd March, I was severely criticized by former senior colleagues in the PNC and subject to insults and abuse on Facebook by prominent persons who all conveniently live in the USA and England, and who must not escape the sanction list.

**David Granger’s hypocrisy, but much worse, his manifest duplicity and deceit and just plain lying has now come full circle.**

**This is a man, desperately holding onto  power in the face of his party’s defeat at the election**, who persistently claims, that his party and his government is innocent of wrongdoing and has never intervened or interfered in the decisions of GECOM.

This is the man who has publicly sworn, more than once, that no matter what, he, his government and his party, would abide by the decisions of the Chairman of GECOM.

Granger’s exact words were: “as President of Guyana and Leader of the Government, it is my policy that any declaration coming from the Chairman of the Elections Commission would be recognized as legitimate by the Coalition Government”.

The Chairman of GECOM has, in fact, just declared through her lawyer, Kim Kyte-Thomas, before the Chief Justice (ag) that she expects the Chief Election Officer, Lowenfield, to submit the elections results from the Recount and that the case before her brought by Granger’s party representative, Misenga Jones, be thrown out.

**It is, however, much worse than Granger failing to deliver on his promise to respect the position of the GECOM Chairman. Granger now has his Attorney General, supported by high-**priced Trinidad lawyers at Court, before the Chief Justice (ag) arguing that the Recount Order (Order 60) is itself illegal and that the results of the entire 33 days recount cannot be used by GECOM.

**Adding insult to injury, Granger now has his AG arguing before the court, that the Chairman of GECOM is obligated to accept the declaration made by Lowenfield** based on the fraudulent Mingo tabulation of District 4, to declare Granger President.

This is the same Granger, that, on 15th March, signed an Aide Memoire, together with Bharrat Jagdeo, “facilitated by Prime Minister Mia Mottley of Barbados” witnessed by Secretary General of Caricom, Ambassador Irwin LaRocque and also witnessed by Joe Harmon and Raphael Trotman, to “supervise the recount of ballots…from all electoral districts in Regions 1-10 …in accordance with the judgment of the Court issued by Roxane George, Chief Justice (ag), on 11th March 2020” and to “abide by the outcome of a fair and transparent process for the recount”.

**Today, as you read this, once more, Granger and his lawyers, have the nation before the Courts, this time actually attempting to throw out the recount to which he agreed to abide by**, and return us to a Lowenfield declaration of the count which the entire world, including this writer, witnessed and has condemned as fraudulent.

The words of an ancient proverb come to mind “those whom the gods wish to destroy they first make mad”.

David Granger has earned himself a place at the head of the list of the sanctions by the Americans once he continues with this madness.

Yours faithfully,

Kit Nascimento”

1. The words in bold in Paragraph 39 (Thirty-Nine) above are complained of.
2. In the Guyana Times edition of the 20th day of July, 2020, the Fifth and Sixth Named Defendant caused to be published and circulated in the said print and online edition of the said Guyana Times a Letter to the Editor from the First Named Defendant headed “Granger’s hypocrisy, duplicity, deceit and lying have now come full circle”.
3. In the aforesaid Letter to the Editor, and as printed, published and circulated First Named Defendant stated:

Dear Editor,

**When I first called David Granger a hypocrite, a month ago on 17th of March, and then questioned “his personal credibility and honestly”,** on the 22nd March, I was severely criticised by former senior colleagues in the PNC and subject to insults and abuse on Facebook by the likes of Mark Benchop, Rickforde Burke and Mark Devonish, who all conveniently live in the USA and England, and who must not escape the sanction list.

**David Granger’s hypocrisy, but much worse, his manifest duplicity and deceit and just plain lying have now come full circle.**

**This is a man, desperately holding onto power in the face of his party’s defeat at the election**, who persistently claims that his party and his Government is innocent of wrongdoing and has never intervened or interfered in the decisions of GECOM.

This is the man who has publicly sworn, more than once, that no matter what, he, his Government and his party, would abide by the decisions of the Chairman of GECOM.  
Granger’s exact words were: “as President of Guyana and Leader of the Government, it is my policy that any declaration coming from the Chairman of the Elections Commission would be recognised as legitimate by the coalition Government”.

The Chairman of GECOM has, in fact, just declared through her lawyer, Kyte-Thomas, before the Chief Justice (ag) that she expects the Chief Elections Officer, Lowenfield, to submit the elections results from the recount and that the case before her brought by Granger’s party representative, Misenga Jones, be thrown out.

It is, however, much worse than **Granger failing to deliver on his promise to respect the position of the GECOM Chairman. Granger now has his Attorney General, supported by high-priced Trinidad lawyers at court**, before the Chief Justice (ag) arguing that the Recount Order (Order 60) is itself illegal and that the results of the entire 33-day recount cannot be used by GECOM.

**Adding insult to injury, Granger now has his AG arguing before the court**, that the Chairman of GECOM is obligated to accept the declaration made by Lowenfield based on the fraudulent Mingo tabulation of District Four, to declare Granger President.

This is the same Granger, that, on 15th March, signed an Aide Memoir, together with Bharrat Jagdeo, “facilitated by Prime Minister Mia Mottley of Barbados” witnessed by Secretary General of Caricom, Ambassador Irvin LaRoque and also witnessed by Joe Harman and Raphael Trotman, to “supervise the recount of ballots…from all electoral districts in Regions 1-10…in accordance with the judgment of the court issued by Roxane George, Chief Justice (ag), on 11th March 2020” and to “abide by the outcome of a fair and transparent process for the recount”.

**Today, as you read this, once more, Granger and his lawyers, have the nation before the courts, this time actually attempting to throw out the recount to which he agreed to abide**, and return us to a Lowenfield declaration of the count which the entire world, including this writer, witnessed and has condemned as fraudulent.

The words of an ancient proverb come to mind “those whom the gods wish to destroy they first make mad”.  
David Granger and his immediate family, with the marked exception of Dominic Gaskin and his wife, have earned themselves the place at the head of the list of the sanctions by the Americans, once they continue with this madness.

Sincerely,  
Kit Nascimento”

1. The words in bold in Paragraph 42 (Forty-Two) above are complained of.
2. The Claimant denies that he was ever:
3. Involved in criminal and illegal activities and practices;
4. Dishonest and deceitful;
5. Habitually hypocritical;
6. A liar;
7. Duplicitous, of dubious credibility and honesty.
8. Not be trusted;
9. Deceitful;
10. Unfit to be the President of Guyana;
11. A dishonest Politician;
12. Without shame;
13. Unfit to be a member of a Political Party;
14. Unfit to be a Leader in the community and Country;
15. Whilst the holder of a public office, that is to say, the President of Guyana, had engaged in dishonourable and criminal conduct;
16. Whilst the holder of a public office, that is to say, the President of Guyana had engaged in corrupt transactions;
17. Demonstrated a conniving, ruthless, and criminal intent;
18. Was of unsound mind;
19. Appointed to the Commission committed and embraced fraud;
20. Not innocent of any attempt to force a fraud on the country;
21. Lied to the people of the country and the APNU/AFC;
22. Complicit in an obvious and determined decision of the APNU/AFC to remain in Government regardless of the expressed will of the people in the 2nd day of March, 2020, General and Regional Elections;
23. Encouraged and or support efforts to move to the Courts inclusive of the Court of Appeal to deny the Chairman of her authority to produce the elections results;
24. Wanted to remain in office as President to rule without any regard or care regardless of the consequences to the country;
25. Used invented irregularities to claim a victory for himself as President and the APNU/AFC at the 2nd day of March, 2020, General and Regional Elections;
26. Known after the 2nd day of March, 2020, General and Regional Elections that a majority of just under 16,000 Guyanese voted to elect the PPP/C;
27. Knew after the 2nd day of March, 2020, General and Regional Elections that a majority of just under 16,000 Guyanese voted to elect the PPP/C from published Statements of Poll in the presence of his party;
28. Consistently and dishonestly refused to accept the results;
29. The Claimant initially from behind the scenes and later openly led his party to believe that they could cheat;
30. Insisted regardless of the elections results, regardless of the recount, regardless of the Caricom Report, regardless of the universal position of International and local observers, regardless of the ruling of the Caribbean Court of Justice and regardless of the ultimate consequences to his country, people and himself that he would remain in office;
31. Led his party to believe that they could depend on a biased Judiciary to keep him in power;
32. Desperately holding on to power in face of the defeat of his party at the Election;
33. Permitted his Attorney General to argue that Recount Order (Order 60) it itself illegal;
34. Permitted his Attorney General to argue that the Chairman of the Guyana Elections Commission is obligated to accept the declaration made by Lowenfield;
35. Along with his lawyers were attempting to throw out the recount which the Claimant has agreed to abide by;
36. Failed to deliver on his promise to respect the decision of the Chairman of the Guyana Elections Commission;
37. The Claimant stated as reproduced in the Guyana Chronicle Newspaper of the 5th day of March, 2020, that:

“Remain calm, we are awaiting a Declaration by the Elections Commission and as soon as we get word, we will make a public announcement. It is not possible right now…I crave your indulgence…patiently wait until the results come from the Commission and as soon as that comes we will be in touch with you…I cannot give you an announcement, we are all watching and waiting…right now, as I speak, verification is still taking place, so the numbers have not been verified and we cannot make an announcement until the Elections Commission make a declaration.”

1. The Claimant made several public broadcasts to the nation in which he communicated to the nation, the Diplomatic community and Civil Society that:

“As President of Guyana and Leader of the Government it is my policy that any declaration coming from the Chairman of GECOM will be accepted by the Government of Guyana.”

1. The Chairman of the Guyana Elections Commission on the 2nd day of August, 2020, declared another candidate duly elected, and the Claimant accepted the said Declaration as he always stated that he would accept any Declaration coming from the Chairman of the Guyana Elections Commission.
2. That on and from the 22nd day of March, 2020, to present, the Claimant, his wife and family were inundated with phone calls, text messages, Facebook messages, emails and whatsapp messages concerning or related to the articles and the truthfulness and/or veracity of the claims made by the Defendants.
3. That from the 22nd day of March, 2020, up to the present time, scores of persons including the friends, family, colleagues, prominent members of the business, Government Ministers and officials brought to the Claimant and his wife’s attention the claims made by the Defendants and which were posted online and published by the Defendants and have sought information regarding same.
4. The Claimant’s personal and professional reputation and standing has been irreparably and severely damaged.
5. That the effect of the aforesaid publications were intended to and calculated to affect the Claimant as Politician and a leader in the community and country with a view of lowering him in the estimation of right thinking persons in News by the Defendants.
6. That the effect of the aforesaid publications were intended to and calculated to damage the reputation of the Claimant and expose him to unwarranted hatred, ridicule, vilification and contempt.
7. That the effect of the aforesaid publications were intended to and calculated to also disparage the record of the Claimant as the President of Guyana and as a honest person.
8. That the natural and ordinary meaning and or by way of innuendo would mean and cause the reasonable reader of the Defendants’ publications, would conclude that:
9. The Claimant was involved in criminal and illegal activities and practices;
10. The Claimant is dishonest and deceitful;
11. The Claimant was habitually hypocritical;
12. The Claimant was a liar;
13. The Claimant was a duplicitous, of dubious credibility and honesty.
14. The Claimant could not be trusted;
15. The Claimant was deceitful;
16. The Claimant was unfit to be the President of Guyana;
17. The Claimant was a dishonest Politician;
18. The Claimant is without shame;
19. The Claimant was unfit to be a member of a Political Party;
20. The Claimant was unfit to be a Leader in the community and Country;
21. The Claimant whilst the holder of a public office, that is to say, the President of Guyana, had engaged in dishonourable and criminal conduct;
22. The Claimant whilst the holder of a public office, that is to say, the President of Guyana had engaged in corrupt transactions;
23. The Claimant has or demonstrated a conniving, ruthless, and criminal intent;
24. The Claimant was of unsound mind;
25. The Claimant is not innocent of any attempt to force a fraud on the country;
26. The Claimant lied to the people of the country and the APNU/AFC;
27. The Claimant is complicit in an obvious and determined decision of the APNU/AFC to remain in Government regardless of the expressed will of the people in the 2nd day of March, 2020, General and Regional Elections;
28. The Claimant encouraged and or support efforts to move to the Courts inclusive of the Court of Appeal to deny the Chairman of her authority to produce the elections results;
29. The Claimant wanted to remain in office as President to rule without any regard or care regardless of the consequences to the country;
30. The Claimant used invented irregularities to claim a victory for himself as President and the APNU/AFC at the 2nd day of March, 2020, General and Regional Elections;
31. The Claimant had known after the 2nd day of March, 2020, General and Regional Elections that a majority of just under 16,000 Guyanese voted to elect the PPP/C;
32. The Claimant knew after the 2nd day of March, 2020, General and Regional Elections that a majority of just under 16,000 Guyanese voted to elect the PPP/C from published Statements of Poll in the presence of his party;
33. The Claimant consistently and dishonestly refused to accept the results;
34. The Claimant initially from behind the scenes and later openly led his party to believe that they could cheat;
35. The Claimant insisted regardless of the elections results, regardless of the recount, regardless of the Caricom Report, regardless of the universal position of International and local observers, regardless of the ruling of the Caribbean Court of Justice and regardless of the ultimate consequences to his country, people and himself that he would remain in office;
36. The Claimant led his party to believe that they could depend on a biased Judiciary to keep him in power;
37. The Claimant was desperately holding on to power in face of the defeat of his party at the Election;
38. The Claimant permitted his Attorney General to argue that Recount Order (Order 60) it itself illegal;
39. The Claimant permitted his Attorney General to argue that the Chairman of the Guyana Elections Commission is obligated to accept the declaration made by Lowenfield;
40. The Claimant and his lawyers were attempting to throw out the recount which the Claimant has agreed to abide by;
41. The Claimant failed to deliver on his promise to respect the decision of the Chairman of the Guyana Elections Commission;
42. The Claimant and his family have suffered and continue to suffer financial injury, constant grave distress, humiliation, embarrassment, indignity, pain and suffering.
43. The aforesaid statements have no basis in fact, are malicious, grossly in accurate and intended to deceive the public.
44. The Claimant’s reputation and character has been impugned and brought into disrepute by the Defendants.
45. The said publication was calculated to lower the Claimant’s reputation in the mind of the right thinking members of society.
46. The Claimant’s reputation is crucial to his career.
47. The Claimant has in consequence been seriously injured in his character, credit, reputation and profession and has been brought into public scandal, odium and contempt.
48. As a result of the said headlines and articles and it dissemination, online and offline, by the Defendants, the Claimant’s personal and professional reputation and standing has been irreparably and severely damaged, lowered in the estimation of right-thinking members of society and the Claimant has suffered and continues to suffer financial injury, constant distress, humiliation, embarrassment, indignity, pain and suffering.
49. In the circumstances, the Orders as prayed should be granted to the Claimant with substantial costs.

………………………………………………

**Mr. Roysdale A. Forde, S.C**

Attorney-at-Law for the Claimant

Dated at Georgetown, Demerara,

This day of May, 2021.

Filing Attorneys-at-Law: **Mr. Roysdale A. Forde, S.C**

**Ms. Olayne D. T. Joseph**

Forde, Amsterdam & Lewis

Lot 77 Hadfield Street

Werk-en-Rust, Georgetown

Guyana

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Email: [roysdaleforde@gmail.com](mailto:roysdaleforde@gmail.com)

**Form 63A: NOTICE OF APPOINTMENT OF ATTORNEY-AT-LAW**

IN THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE OF GUYANA

CIVIL JURISDICTION

2021-HC-DEM-CIV-SOC-

BETWEEN:

**DAVID ARTHUR GRANGER**

Claimant

- and -

1. CHRISTOPHER NASCIMENTO
2. SHAMAIN GRAINGER
3. GLENN LALL
4. NATIONAL MEDIA AND PUBLISHING COMPANY LIMITED
5. TUSIKA MARTIN
6. GUYANA TIMES INC
7. ANAND PERSAUD
8. GUYANA PUBLICATION INC

Defendants

Jointly and Severally

**NOTICE OF APPOINTMENT OF ATTORNEYS-AT-LAW**

The Claimant **DAVID ARTHUR GRANGER,** has appointed **Mr. ROYSDALE A. FORDE, S.C.,** Attorney-at-Law of record.

Dated at Georgetown, Demerara, ………………………………………………

this day of May, 2021. **DAVID ARTHUR GRANGER**

Filing Attorney-at-Law: **Mr. Roysdale A. Forde, S.C**

Forde, Amsterdam & Lewis

Lot 77 Hadfield Street

Werk-en-Rust, Georgetown

Guyana

Tel: 592-227-1656/592-227-7482

Email: [roysdaleforde@gmail.com](mailto:roysdaleforde@gmail.com)

**ORDER OF COURT**

IN THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE OF GUYANA

CIVIL JURISDICTION

2021-HC-DEM-CIV-SOC-

BETWEEN:

**DAVID ARTHUR GRANGER**

Claimant

- and -

1. CHRISTOPHER NASCIMENTO
2. SHAMAIN GRAINGER
3. GLENN LALL
4. NATIONAL MEDIA AND PUBLISHING COMPANY LIMITED
5. TUSIKA MARTIN
6. GUYANA TIMES INC
7. ANAND PERSAUD
8. GUYANA PUBLICATION INC

Defendants

Jointly and Severally

**BEFORE THE HONOURABLE MR. JUSTICE .**

**DATED THE DAY OF MAY, 2021.**

**ENTERED ON THE DAY OF , 2021.**

**ROYSDALE A. FORDE, S.C,** for the Claimant

**ORDER**

**THIS APPLICATION**, made by **DAVID ARTHUR GRANGER,** was heard this  day of May, 2021, in Chambers.

**ON  READING,**  the Application  dated  the  day of May, 2021, and  filed  on  the  day of  May, 2021, **AND UPON HEARING**  the Submissions of the Attorneys-at-Law for the Claimant and the Defendants.

1. **THIS COURT ORDERS** that the First Named Defendant cause to be published on INEWS, an online news platform, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication “OPINION: Granger should concede defeat before he is ultimately forced to do so by Int’l condemnation”, published as aforesaid on the 5th day of June, 2020.
2. **THIS COURT ORDERS** that the First Named Defendant cause to be published in the Guyana Times, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “Granger is not innocent of attempt to force rigged election on Guyana” published as aforesaid on the 23rd day of May, 2020.
3. **THIS COURT ORDERS** that the Fifth and Sixth Named Defendants cause to be published in the Guyana Times, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “Granger is not innocent of attempt to force rigged election on Guyana” published as aforesaid on the 23rd day of May, 2020.
4. **THIS COURT ORDERS** that the First Named Defendant cause to be published in the Kaieteur News Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “David Granger should do the honourable thing and avoid international condemnation” published as aforesaid on the 5th day of June, 2020.
5. **THIS COURT ORDERS** that the Second, Third and Fourth Named Defendants cause to be published in the Kaieteur News Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “David Granger should do the honourable thing and avoid international condemnation” published as aforesaid on the 5th day of June, 2020.
6. **THIS COURT ORDERS** that the First Named Defendant cause to be published in the online edition of the Stabroek News Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “David Granger is without shame in continuing to defy the will of the people” published as aforesaid on the 20th day of June, 2020.
7. **THIS COURT ORDERS** that the Seventh and Eighth Named Defendants cause to be published in the online edition of the Stabroek News Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “David Granger is without shame in continuing to defy the will of the people” published as aforesaid on the 20th day of June, 2020.
8. **THIS COURT ORDERS** that the First Named Defendant cause to be published in the online edition of the Stabroek News Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “Granger seeking to overturn recount that he agreed to abide by” published as aforesaid on the 20th day of July, 2020.
9. **THIS COURT ORDERS** that the Seventh and Eight Named Defendants cause to be published in the online edition of the Stabroek News Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “Granger seeking to overturn recount that he agreed to abide by” published as aforesaid on the 20th day of July, 2020.
10. **THIS COURT ORDERS** that the First Named Defendant cause to be published in the online edition of the Kaieteur News Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “We must now hope that our Courts, at least, are ready to recognize the will of the people” published as aforesaid on the 20th day of June, 2020.
11. **THIS COURT ORDERS** that the Second, Third and Fourth Named Defendants cause to be published in the online edition of the Kaieteur News Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “We must now hope that our Courts, at least, are ready to recognize the will of the people” published as aforesaid on the 20th day of June, 2020.
12. **THIS COURT ORDERS** that the First Named Defendant cause to be published in the online edition of the Kaieteur News Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “Has David Granger lost touch with reality” published as aforesaid on the 10th day of July, 2020.
13. **THIS COURT ORDERS** that the Second, Third and Fourth Named Defendants cause to be published in the online edition of the Kaieteur News Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “Has David Granger lost touch with reality” published as aforesaid on the 10th day of July, 2020.
14. **THIS COURT ORDERS** that the First Named Defendant cause to be published in the online edition of the Guyana Times Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “Granger-led APNU/AFC coalition playing a dangerous game” published as aforesaid on the 10th day of July, 2020.
15. **THIS COURT ORDERS** that the Fifth and Sixth Named Defendants cause to be published in the online edition of the Guyana Times Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “Granger-led APNU/AFC coalition playing a dangerous game” published as aforesaid on the 10th day of July, 2020.
16. **THIS COURT ORDERS** that the First Named Defendant cause to be published in the online edition of the Guyana Times Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “Granger’s hypocrisy, duplicity, deceit and lying have now come full circle” published as aforesaid on the 20th day of July, 2020.
17. **THIS COURT ORDERS** that the Fifth and Sixth Named Defendants cause to be published in the online edition of the Guyana Times Newspaper, a retraction and apology to the Claimant for the false, malicious and defamatory statements impugning the character and representation of the Claimant in the publication of a Letter to the Editor titled “Granger’s hypocrisy, duplicity, deceit and lying have now come full circle” published as aforesaid on the 20th day of July, 2020.
18. **THIS COURT ORDERS** that an Injunction be and is hereby granted restraining the First Named Defendant whether by himself or his servants and or agents from posting, printing, publishing, sharing, recording or otherwise recreating and disseminating the heading and Letter to the Editor titled “OPINION: Granger should concede defeat before he is ultimately forced to do so by int’l condemnation” and any offending words, sentences, phrases and statement or similar defamatory words defamatory of the Claimant contained therein as printed and circulated and published in INEWS edition dated the 5th day of June, 2020, and available at [https://www.inewsguyana.com/opinion-granger-should-concede-defeat-before-he-is-ultimately-forced-to-do-so-by-int’l-condemnation/](https://www.inewsguyana.com/opinion-granger-should-concede-defeat-before-he-is-ultimately-forced-to-do-so-by-int'l-condemnation/).
19. **THIS COURT ORDERS** that a Mandatory Injunction be and is hereby granted A Mandatory Injunction compelling the First Named Defendant whether by himself, his servants and or agents to forthwith permanently remove the Article in the online edition of INEWS dated the 5th day of June, 2020, and available at [https://www.inewsguyana.com/opinion-granger-should-concede-defeat-before-he-is-ultimately-forced-to-do-so-by-int’l-condemnation/](https://www.inewsguyana.com/opinion-granger-should-concede-defeat-before-he-is-ultimately-forced-to-do-so-by-int'l-condemnation).
20. **THIS COURT ORDERS** that an Injunction be and is hereby granted restraining the First Named Defendant whether by himself or his servants and or agents from posting, printing, publishing, sharing, recording or otherwise recreating and disseminating the heading and Letter to the Editor titled “Granger is not innocent to attempt to force rigged election on Guyana” under the hand of Kit Nascimento and any offending words, sentences, phrases and statement or similar defamatory words defamatory of the Claimant contained therein as printed and circulated and published in the Guyana Times edition dated the 23rd day of May, 2020, and available at <https://guyanatimesgy.com/granger-is-not-innocent-of-attempt-to-force-rigged-election-on-guyana/>.
21. **THIS COURT ORDERS** that an Injunction be and is hereby granted restraining the Fifth and Sixth Named Defendants whether by themselves or their servants and or agents from posting, printing, publishing, sharing, recording or otherwise recreating and disseminating the heading and Letter to the Editor titled “Granger is not innocent to attempt to force rigged election on Guyana” under the hand of Kit Nascimento and any offending words, sentences, phrases and statement or similar defamatory words defamatory of the Claimant contained therein as printed and circulated and published in the Guyana Times edition dated the 23rd day of May, 2020, and available at <https://guyanatimesgy.com/granger-is-not-innocent-of-attempt-to-force-rigged-election-on-guyana/>.
22. **THIS COURT ORDERS** that a Mandatory Injunction be and is hereby granted compelling the Fifth and Sixth Named Defendants whether by themselves, their servants and or agents to forthwith permanently remove the letter to the Editor in the online edition of the Guyana Times dated the 23rd day of May, 2020, and available at <https://guyanatimesgy.com/granger-is-not-innocent-of-attempt-to-force-rigged-election-on-guyana/>.
23. **THIS COURT ORDERS** that an Injunction be and is hereby granted restraining the First Named Defendant whether by himself or his servants and or agents from posting, printing, publishing, sharing, recording or otherwise recreating and disseminating the heading and Letter to the Editor titled “David Granger should do the honourable thing and avoid international condemnation” under the hand of Kit Nascimento and any offending words, sentences, phrases and statement or similar defamatory words defamatory of the Claimant contained therein as printed and circulated and published in the Kaieteur News edition dated the 5th day of June, 2020, and available at <https://www.kaieteurnewsonline.com/2020/06/05/david-granger-should-do-the-honourable-thing-and-avoid-international-condemnation/>.
24. **THIS COURT ORDERS** that an Injunction be and is hereby granted restraining the Second, Third and Fourth Named Defendants whether by themselves or their servants and or agents from posting, printing, publishing, sharing, recording or otherwise recreating and disseminating the heading and Letter to the Editor titled “David Granger should do the honourable thing and avoid international condemnation” under the hand of Kit Nascimento and any offending words, sentences, phrases and statement or similar defamatory words defamatory of the Claimant contained therein as printed and circulated and published in the Kaieteur News edition dated the 5th day of June, 2020, and available at <https://www.kaieteurnewsonline.com/2020/06/05/david-granger-should-do-the-honourable-thing-and-avoid-international-condemnation/>.
25. **THIS COURT ORDERS** that a Mandatory Injunction be and is hereby granted compelling the Second, Third and Fourth Named Defendants whether by themselves, their servants and or agents to forthwith permanently remove the letter to the Editor in the online edition of the Guyana Times dated the 5th day of June, 2020, and available at <https://www.kaieteurnewsonline.com/2020/06/05/david-granger-should-do-the-honourable-thing-and-avoid-international-condemnation/>.
26. **THIS COURT ORDERS** that an Injunction be and is hereby granted restraining the First Named Defendant whether by himself or his servants and or agents from posting, printing, publishing, sharing, recording or otherwise recreating and disseminating the heading and Letter to the Editor titled “David Granger is without shame in continuing to defy the will of the people” under the hand of Kit Nascimento and any offending words, sentences, phrases and statement or similar defamatory words defamatory of the Claimant contained therein as printed and circulated and published in the Stabroek News edition dated the 20th day of June, 2020, and available at <https://www.stabroeknews.com/2020/06/20/opinion/letters/david-granger-is-without-shame-in-continuing-to-defy-the-will-of-the-people/>.
27. **THIS COURT ORDERS** that an Injunction be and is hereby granted restraining the Seventh and Eighth Named Defendants whether by themselves or their servants and or agents from posting, printing, publishing, sharing, recording or otherwise recreating and disseminating the heading and Letter to the Editor titled “David Granger is without shame in continuing to defy the will of the people” under the hand of Kit Nascimento and any offending words, sentences, phrases and statement or similar defamatory words defamatory of the Claimant contained therein as printed and circulated and published in the Stabroek News edition dated the 20th day of June, 2020, and available at <https://www.stabroeknews.com/2020/06/20/opinion/letters/david-granger-is-without-shame-in-continuing-to-defy-the-will-of-the-people/>.
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FOR REGISTRAR

If the within named Defendants fail to comply with the terms of this Order, you will be in Contempt of Court and may be liable imprisonment or to have your assets confiscated.

Filing Attorneys-at-Law: **Mr. Roysdale A. Forde, S.C**

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**BACKUP**

IN THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE OF GUYANA

CIVIL JURISDICTION

2021-HC-DEM-CIV-SOC-

BETWEEN:

**DAVID ARTHUR GRANGER**

Claimant

- and -

1. CHRISTOPHER NASCIMENTO
2. SHAMAIN GRAINGER
3. GLENN LALL
4. NATIONAL MEDIA AND PUBLISHING COMPANY LIMITED
5. TUSIKA MARTIN
6. GUYANA TIMES INC
7. ANAND PERSAUD
8. GUYANA PUBLICATION INC

Defendants

Jointly and Severally

**INFORMATION FOR COURT USE**

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Jointly and Severally

**STATEMENT OF CLAIM**

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Defendants

Jointly and Severally

**NOTICE OF APPOINTMENT OF ATTORNEY-AT-LAW**

**Mr. Roysdale A. Forde, S.C**

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Jointly and Severally

**ORDER OF COURT**

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