Supreme Court Registry Demerara

Hate Filed: 2003 - 12 - 12 Time Filed: 14:16

Attorneys-at-Law: Mr. C.A. Nigel Hughes

Ms. Kiswana Jefford

Ms. Ashrey Batson

Firm's Name: Hughes, Fields and Stoby

Attorneys-at-law

62 Hadfield and Cross Streets, Werk-en-Rust, Georgetown.

Email: n.hughes@guyanalaw.net

k.jefford@guyanalaw.net A.batson@guyanalaw.net

Tel: 227-4629 Fax: 225 7996

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

(CIVIL JURISDICTION)

2023-HC-DEM-CIV-FDA- 18\7

BETWEEN: -

**DAVID PATTERSON** 

Applicant

-and-

THE ATTORNEY GENERAL

Respondent



	1. This proceeding is commenced as a:
	[] Statement of Claim
	[x] Fixed Date Application
	2. This proceeding falls under the High Court's:
	[] Appellate Jurisdiction
	[] Admiralty Jurisdiction
	[] Commercial Jurisdiction
	[] Criminal Jurisdiction
	[] Family Jurisdiction
	[x] Regular Jurisdiction
	(must check one of these boxes and, except where proceeding is under the regular
	jurisdiction of the Court, must specify the applicable jurisdiction in the General Heading
	(Form 4A))
	3. The proceeding is a(n):
	[] Admiralty Proceeding in personam
	[ ] Admiralty Proceeding in rem
	[ ] Probate Proceeding
	[ ] Proceeding for Judicial Review
	[ X] Proceeding for relief under the Constitution
	[ ] Proceeding for other Administrative Order
	[] Proceeding for Administration
	[ ] Proceeding commenced under (name of Act)
	[] Other Proceeding
	(must check <u>one</u> of these boxes and, except where the proceeding relates to the last option, specify so on the General Heading (Form $4A$ ))
S. S	A Tourist that the characteristic is a second of the formation is a second of the formation in the second of the formation is a second of the formation in the second of the formation is a second of the formation in the second of the formation is a second of the second
	4. I certify that the above information is correct, to the best of my knowledge.
300	Date: 12-12-23
1070	Signature of Attorney-at-Law

Ms. Kiswana Jefford

Ms. Ashrey Batson

Firm's Name: Hughes, Fields and Stoby

Attorneys-at-law

62 Hadfield and Cross Streets, Werk-en-Rust, Georgetown.

Email: n.hughes@guyanalaw.net

k.jefford@guyanalaw.net A.batson@guyanalaw.net

Tel: 227-4629 Fax: 225 7996

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

(CIVIL JURISDICTION)

2023-HC-DEM-CIV-FDA-

BETWEEN: -

### **DAVID PATTERSON**

**Applicant** 

-and-

THE ATTORNEY GENERAL

Respondent

INFORMATION FOR COURT USE

Ms. Kiswana Jefford

Ms. Ashrey Batson

Firm's Name: Hughes, Fields and Stoby

Attorneys-at-law

62 Hadfield and Cross Streets, Werk-en-Rust, Georgetown.

Email: n.hughes@guyanalaw.net

k.jefford@guyanalaw.net A.batson@guyanalaw.net

Tel: 227-4629 Fax: 225 7996

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

(CIVIL JURISDICTION)

2023-HC-DEM-CIV-FDA-

BETWEEN: -

**DAVID PATTERSON** 

**Applicant** 

-and-

THE ATTORNEY GENERAL

Respondent



**FIXED DATE APPLICATION** 

### TO THE RESPONDENTS:

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

THIS APPLICATION will come on for a hearing on the 1st day of February, 2028 at 10:00 am before the Hon CJR-George

IF YOU WISH TO OPPOSE THIS APPLICATION, to receive notice of any step in the application or to be served with any documents in the application, you or an Attorney-at-Law acting for you must forthwith prepare an Affidavit in Defence in Form 10C prescribed by the Civil Procedure Rules 2016, serve it on the Applicant's Attorney-at-Law or, where the Applicants do not have an Attorney-at-Law, serve it on the Applicants, and file it, with proof of service, at a Registry, AT LEAST FOUR, as applicable, DAYS before the date fixed for the hearing of the application, and you or your Attorney-at-Law must appear at the hearing.

IF YOU FAIL TO APPEAR AT THE HEARING, AN ORDER OR JUDGEMENT MAY BE GIVEN IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO OPPOSE THIS APPLICATION BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.



THIS FIXED DATE APPLICATION has no validity unless it is served on you at least seven or four, as applicable, days before the date fixed for the hearing of the application.

Date: 18 13 13 3

K.I.

Signature of Registry

CERTIFIED A TRUE
COPY OF THE ORIGINAL
must 12-12-2023
Supreme Court of Judicature

Issued by: Renay Dettering

Address of Registry where issued: Victoria Law Courts, Georgetown Demerara

TO:

 THE ATTORNEY GENERAL, Mr. Mohabir Anil Nandlall, S.C., M.P 95 Carmichael Street Georgetown Guyana

### **FIXED DATE APPLICATION**

- 1. The Applicant makes application for:
  - (a) An award of damages in excess of \$100,000.00 (one hundred thousand dollars) for breach of the Applicant's guaranteed fundamental right to freedom of movement as guaranteed by Article 148 of the Constitution of the Cooperative Republic of Guyana on or about the 28th day of September 2023.
  - (b) Exemplary damages.
  - (c) Costs.
  - (d) Such further or other order as to this Honourable Court may seem just.



### 2. THE GROUNDS FOR THE APPLICATION ARE:

- (a) The Applicant is a citizen of Guyana and the holder of a Guyana Passport.
- (b) The Applicant is and was at all material times a member of the National Assembly.
- (c) At all material times, it was matter of public record that the Applicant was traveling on official duties as a member of the Opposition for the purposes of making presentations in the United States on matters which touched and concerned the lives of the citizens of the Cooperative Republic of Guyana.
- (d) At all material times, it was a matter of public record that the Applicant was scheduled to make a presentation to the Black Congressional Caucus on Capitol Hill in the United States of America.
- (e) The Applicant had been previously charged with indecent exposure and appeared before Magistrate Leron Daly.
- (f) At the time of the Applicant's appearance, the Applicant was granted permission by the Learned Magistrate to travel in and out of Guyana during the currency of the charges.
- (g) The Applicant purchased a ticket from American Airlines for the purpose of travelling to the United States on the 26th day of September 2023.
- (h) On the 26<sup>th</sup> day of September 2023, the Applicant attended the Cheddie Jagan International Airport for the purpose of travelling to the United States of America for the aforementioned purpose.
- (i) The Applicant presented his passport to the Immigration officer who examined the same, stamped it and permitted the Applicant to proceed to the departure lounge.
- (j) While the Applicant was in the departure lounge, he was approached by Immigration officers who informed the Applicant that he was not permitted to depart from Guyana.
- (k) The Applicant contacted his Attorneys-at-Law who engaged the immigration officer and informed the Immigration officer that the Applicant was expressly permitted to leave Guyana both by the Magistrate



- and pursuant to the provisions of the Constitution of the Cooperative Republic of Guyana.
- (l) The Applicant's Attorneys-at-Law further informed the Immigration officer that if the Applicant was not permitted to depart from Guyana it would be a breach of the Applicant's fundamental rights as guaranteed aby Article 148 of the Constitution of the Cooperative Republic of Guyana.
- (m) In spite of the aforementioned notification the Immigration officer refused to permit the Applicant to depart from Guyana and cancelled the Immigration departure stamp.
- (n) The Applicant was unable to attend and deliver the presentation to Congressional caucus at Capitol Hill in his capacity as a member of the National Assembly on matters of concern to the citizens of Guyana.
- (o) The Applicant was forced to incur expense of returning to Georgetown, paying a penalty for lost travel and accommodation expenses.
- (p) The Chief Immigration Officer admitted that there was no lawful basis for preventing the Applicant from departing from Guyana.
- (q) The Applicant through his Attorneys-at-Law on the 10<sup>th</sup> day of October 2023, sent a demand for payment of compensation for the breach of his Rights to the Attorney General.
- (r) The Attorney General failed to acknowledge receipt of the request and offered no compensation.
- (s) The Applicant suffered loss, humiliation and embarrassment.

The following documentary evidence will be used at the hearing of the Application



- (1) The Affidavit of David Patterson.
- (2) The Cancelled Immigration stamp in the Applicant's passport.
- (3) The Case Jacket in the matter of the police V David Patterson.

- (4) The Press Release issued by the Guyana Police Force dated the 27th September 2023.
- (5) Boarding Pass issued in favor of the Applicant for travel on the  $26^{th}$  September 2023.

Date of Issue:	day of December 2023.
	day of Deceritoet 2023.

The Registry is located at The Law Courts, Georgetown, Demerara. The office is open to the public between 8:30 a.m. and 3:30 p.m. Mondays to Thursdays and 8:30 a.m. and 2:30 p.m. on Fridays, except holidays.



Ms. Kiswana Jefford

Ms. Ashrey Batson

Firm's Name: Hughes, Fields and Stoby

Attorneys-at-law

62 Hadfield and Cross Streets, Werk-en-Rust, Georgetown.

Email: n.hughes@guyanalaw.net

k.jefford@guyanalaw.net A.batson@guyanalaw.net

Tel: 227-4629 Fax: 225 7996

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

(CIVIL JURISDICTION)

2023-HC-DEM-CIV-FDA-

BETWEEN: -

### **DAVID PATTERSON**

**Applicant** 

-and-

THE ATTORNEY GENERAL

Respondent

FIXED DATE APPLICATION

Ms. Kiswana Jefford

Ms. Ashrey Batson

Firm's Name: Hughes, Fields and Stoby

Attorneys-at-law

62 Hadfield and Cross Streets, Werk-en-Rust, Georgetown.

Email: n.hughes@guyanalaw.net

k.jefford@guyanalaw.net A.batson@guyanalaw.net

Tel: 227-4629 Fax: 225 7996

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

(CIVIL JURISDICTION)

2023-HC-DEM-CIV-FDA-

BETWEEN: -

### **DAVID PATTERSON**

Applicant

-and-

### THE ATTORNEY GENERAL

Respondent

# AFFIDAVIT OF DAVID PATTERSON IN SUPPORT OF FIXED DATE APPLICATION

- I, **DAVID PATTERSON**, of Lot 151 Durbana Square, Lamaha Gardens, Georgetown, Demerara, being duly sworn make oath and say as follows:
  - 1. I am the applicant herein.
  - 2. I am a citizen of Guyana and a member of the National Assembly.

- 3. I have been a member of the national assembly for in excess of fifteen years.
- 4. I was charged with the offence of indecent exposure for which offence I was admitted to bail.
- 5. At the time of my appearance before Magistrate Leron Daly, I was granted permission to travel in and out of Guyana. Hereto attached and Marked "DP1" is a copy of the case jacket.
- 6. At the time of the issuance of the Order the Police Legal Advisor Mondel Moore was in attendance at the Court.
- 7. During the month of September 2023, I was appointed as a member of the Alliance for Change and as a member of the National Assembly to travel to the United States of America for the purpose of delivering a presentation to the Black Caucus of the Congress of the United States of America. This fact was widely publicized in the print and electronical media.
- 8. I purchased a ticket from American Airlines for the travel to the United States of America on the 26th day of September 2023.
- 9. I made arrangements for my travel to the airport by taxi and my accommodation in Washington DC.
- 10. On the 26<sup>th</sup> day of September 2023, I traveled to the Cheddie Jagan International Airport, where I was issued with a Boarding Pass by American Airlines. Hereto attached and marked duly DP 2 is a copy of the Boarding Pass.
- 11. I thereafter presented my passport to the Immigration officer who examined it and stamped it with the immigration stamp.
- 12. I thereafter proceeded to the departure lounge to await the departure of the flight.
- 13. While I was in the departure lounge, I was approached by Immigration officers who informed me that I was not permitted to travel out of Guyana.
- 14. The Immigration officer informed me that my name was on a list.
- 15. I informed them that there was no obstacle to my leaving Guyana.
- 16. I then contacted my Attorney-at-Law Nigel Hughes who requested to speak with the Immigration officer.



- 17. In my presence and hearing, I heard my Attorney-at-Law inform the immigration officer that here was a court order from the Magistrate permitting me to travel out of Guyana and that I had a constitutional right to leave the country.
- 18. The immigration officer informed my Attorney-at-Law that she had instructions that I was not permitted to leave the country.
- 19. The Immigration officer requested my passport and cancelled the Immigration stamp. Hereto attached and marked DP 3 is a copy of the cancelled Immigration stamp.
- 20. I was unable to travel to Washington DC to deliver my presentation on behalf of the citizens of Guyana to the Black Caucus of the United States Congress.
- 21. I was forced to return to Georgetown at the cost of \$15000.00 (fifteen thousand dollar)
- 22. I was forced to cancel my accommodation.
- 23. On the 27<sup>th</sup> day of September 2023, the Guyana Police Force issued a Press Release stating that there was no legal basis for the Immigration officer to deny my right to depart from Guyana. **Hereto attached and marked GP 3** is a copy of the Press Release
- 24. In the said Press Release, the Guyana Police Force confirmed that my name was on a list of persons who were not permitted to depart from Guyana.
- 25. I suffered great humiliation and embarrassment.
- 26. On my subsequent travel, I was forced to retain the services of my Attorney-at-Law to accompany me to the Cheddie Jagan International Airport.
- 27. By an email dated the 10<sup>th</sup> October 2023, my Attorney-at-Law wrote to the Attorney General requesting compensation for denial of my right to travel. The Attorney General did not respond to the request. **Hereto attached and marked DP 4** is a copy of the email.
- 28. I am advised by my Attorney-at-Law and verily believe that the Chief Immigration officer breached my fundamental right to depart from



- 29. I am advised by my Attorney-at-Law and verily believe that there was no basis for the denial of my right to leave Guyana, particularly where the Magistrate had expressly granted me permission.
- 30. I am advised by my Attorney-at-Law and verily believe that the Immigration officer after being informed by my attorney at law that there was express permission for me to leave Guyana ought to have checked with the Police Legal Advisor about the issue.
- 31. The denial of my right to depart Guyana was political in nature and intended to prevent me from addressing the Congressmen.
- 32. I am advised by my Attorney- at-Law and verily believe that I am entitled to exemplary damages for reason *inter alia* that the refusal to permit me to leave Guyana when the Immigration officer was informed that there was an express Order of a Magistrate to permit me to travel was particularly egregious, exceptional and without any legal basis.
- 33. I am advised by my Attorney-at-Law and verily believe that there was no excuse lawful or otherwise for my denial to travel out of Guyana on the 26th September 2023.
- 34. I am advised by my Attorney-at-Law and verily believe that there are several decisions and Orders of the High Court which have pronounced on the illegality of the maintenance of a No travel List for citizens of Guyana.
- 35. I am advised by my Attorney-at-Law and verily believe that the persistent refusal to comply with the declarations of court on the constitutional right of citizens to depart Guyana is an act of defiance by the Chief Immigration Officer.
- 36. I have been severely humiliated and embarrassed by the actions of the Immigration officers.
- 37. I am respectfully seeking damages for the denial of my constitution right to depart Guyana.



38. This affidavit was drawn on my instructions by Mr. C.A.Nigel Hughes Attorney-at-Law of Messrs. Hughes, Fields, & Stoby of Lot 62 Hadfield and Cross Street, Werk-en-Rust, Georgetown, Guyana.

DAVID PATTERSON

Sworn to at Georgetown, Demerara

Dated this ...... day of December, 2023

A COMMISSIONER OF OATHS TO AFFIDAVITS



SECTION OF A SECTION AS A SECTION AS tue to i results labit of the second second second second Markey recognition A CONTRACTOR OF THE PARTY OF TH 

CLERK TO MAGISTRATE

COURT

MAGISTERIAL DISTRICT

This is the Document

referred

, 202

to in the foregoing

before me this

Affidavit of

DATED

No. Georgebourn Mugistrate

COURT.

2938/23 CRIMINAL JURISDICTION.

Georgetoun MAGISTERIAL DISTRICT Trimain Theme leterbive Lonce Corporal COMPLAINANT

Pavid Patterson DEFENDANT

OFFENCE Provohe Breuch of the Rover

FILED 28 - 7 - 2023

FOR 28 - 7-2023

Deg Pres. Vc colos

Bail \$19,000

Charge Read

Def is permitted to have the jurisdiction Plea: not quily Truestigation complete Transferred to gmc 6

to attend personal and professional

Adj to 11th Sept 2023.

MAGISTERIAL · NO. 156 enagements . However costs

COMPLAINANT DEFENDANT he is required to ottend all golfich appearan

Defendant present. JUDGEMENT Adj to 2003/9/27

RECEIPTS MUST BE OBTAINED WHEN EXHIBITS ARE UPLIFTED







Form No. 1 Sum. Jur. (Procedure) Act. Chapter 10:02

# COMPLAINT WITHOUT OATH

**GUYANA** 

IN THE

Georgetown

MAGISTERIAL DISTRICT MAGISTRATE'S COURT

Trimain Thomas Detective Lance Corporal 20411

Complainant

David Patterson

Defendant

Trimain Thomas Detective Lance Corporal Kitty Police Station comes before me

the undersigned Magistrate of the

Georgetown

Magisterial District

and complains against

David Patterson of Lot 151 Lamaha Gardens

for that the said (1)

Defendant did commit the following offence

## Statement Of Offence

Provoke Breach of the Peace- Contrary to section 141 (a) of the Summary Jurisdiction (Offences) Act chapter 8:02.

## Particular Of Offence

Defendant on Sunday 16th July 2023 at Lot 87 Seaforth Street Section A Campbelville, Georgetown, in the Georgetown Magisterial District exposed his genitals to Ramroop Oudit whereby a Breach of the Peace may be occasioned.

And the said

Trimain Thomas Detective Lance Corporal 20411 David Patterson

prays that the said

may be made to answer

said complaint.

Exhibited before me this }

Day of July

, 2023

Georgetown

Magisterial District

(1) State concisely the substance of the complaint.

Georgetown Magistrate.

MAGISTERIAL - No. 29

AMERICAN AIRLINES

SSSS

PATTERSON/DAVID GEORGETOWN GY NEW YORK JFK

6SEP23

GEORGETOWN GY

AA 269

ELHRZU / AA

BOARDING PASS

BOARDING ENDS 15 MINUTES

BEFORE DEPARTURE

GY 000

\*\*\*\*\*\*\*\*\*\*

to in the Affidavit

1 001 8056790854 0

EM1 / GEO

.1

SSSS

**American** AMERICAN AIRLINE

26SEP23

EM1 /GEO

AA 4538 S 27SEP824A

GEORGETOWN GY

AMERICAN AIRLINES BOARDING PASS

AMERICAN AIRLINES

GEORGETOWN GY NEW YORK JFK AMEDICAN AIDI THES

AA 2694 S 26SEP1154P

BOARDING PASS

PATTERSON/DAVID

PATTERSON/DAVID

NEW YORK JFK WASHINGTON REAGAN AMEDICAN FACIE

ELHRZU / AA

SEAT 19F

AA 4538 S 27SEP824A

ROARDING ENDS 15 MINUTES

**米米米米米米米米** 

NEW YORK JFK WASHINGTON REAGAN

PATTERSON/DAVID

BOARDING PASS

REFORE DEPARTURE

SOUND OF THE STATE OF THE STATE

VISAS

This is the Document referred to in the foregoing Affidavit of sworn day of N





This passport contains 32 pages

### Press Release.

David Patterson M.P. blocked from leaving the country to attend Congressional meeting despite order of court permitting him to leave the country.

On the evening of Tuesday 26<sup>th</sup> September 2023 David Patterson MP went to the Cheddie Jagan International Airport for the purposes of travelling to the United States to deliver a presentation on Guyana to the Black Congressional Caucus on Capitol Hill.

After Mr. Patterson had cleared customs and immigration he was approached by Immigration officers who informed him that he was not permitted to travel.

Mr. Patterson contacted his Attorneys, Hughes Fields and Stoby, who informed him that the magistrate had expressly permitted him to travel for business and professional reasons when he was recently charged, provided he attended the court hearing either virtually or in person.

The Attorneys at law then engaged the Immigration officers and ingitired whether they were in possession of any order of Court restraining Mr. Patterson from travelling

They responded indicating that there did not have any such order of any such order but there was "something in the system" which not travel.

to in the foregoing harder were they aware which said Mr. Patterson could before me this

The attorneys invited the Officers to engage the Head of immigration immediately as Mr.

Patterson's constitution right to travel would be violated if he was prevented from travelling.

The officers asked that the Attorneys call back in five minutes.

On the return call the Attorneys were informed that they were unable to contact the Head or Deputy Head of immigration and in the light of the fact that there was "something in the system" Mr. Patterson would not be permitted to leave the country.

Mr. Patterson was scheduled to deliver presentations today and tomorrow to the Congressional Black Caucus on Capitol Hill.

Mr. Patterson has instructed that constitutional proceedings for damages be commenced against the State.

Dated the 27<sup>th</sup> September 2023

Hughes Fields and Stoby. Attorneys at law for David Patterson. M.P

## Monday, December 11, 2023 at 03:35:56 Guyana Time

**Subject:** FW: Request for damages for breach of David Patterson's

fundamental guaranteed right of freedom of movement.

Date: Thursday, 26 October 2023 at 3:51:02 PM Guyana Time

From: n.hughes@guyanalaw.net

**To:** patransfer@gmail.com

**BCC:** n.hughes@guyanalaw.net

Attachments: image001.jpg

Hi David

Please see below.

Yours sincerely, C. A. Nigel Hughes.

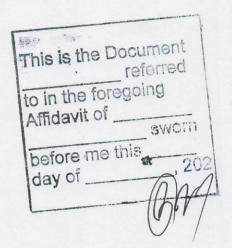
Partner.

Hughes, Fields & Stoby. 62 Hadfield & Cross streets.

Werke n Rust. Georgetown. Demerara.

Guyana. South America.

Tel/ voicemail. +592 662 6400.
Email. N.Hughes@guyanalaw.net
Website: www.quyanalaw.net.



This email along with the attachments may contain information which is confidential and legally privileged or restricted.

The information is intended solely for the use of the addressee(s).

If you are not the intended recipient, you are hereby notified that any reading, dissemination, copying, distribution, retention, or use of this message or its attachments is strictly prohibited..

If you have received this message in error, please notify the sender immediately by replying to this email or calling +592 662 6400 and delete all copies, versions and backups of this message.

From: Nigel Hughes <n.hughes@guyanalaw.net>

Date: Tuesday, 10 October 2023 at 3:55 PM

To: 'Anil Nandlall' <anilnandlall@hotmail.com>, 'Nigel Hawke' < llbllm@yahoo.com>

Subject: Request for damages for breach of David Patterson's fundamental guaranteed right of freedom of movement.

The Attorney General.

Attorney General's Chambers Carmichael Street Cummingsburg Georgetown Demerara

Dear Attorney General,

We have been consulted by Mr David Patterson M.P.

We are instructed that on the 26<sup>th</sup> day of September 2023 our client's fundamental right to travel out of Guyana was breached by the Chief Immigration officer when he refused to permit him to depart from Guyana.

We are instructed that despite the reminders from his counsel that there was an expressed order from Magistrate Dally granting permission to Mr Patterson to travel, the Chief Immigration Officer persisted in the refusal to permit our client to travel out of Guyana.

We are instructed that it was a matter of public record that our client was travelling on official business in his capacity as a member of the National Assembly to meet with and address members of the congress of the United States.

The actions of the Chief Immigration officer were intended to and did frustrate the official visit and presentations of our client.

We are instructed that given the gravity of the intentional violation of our client's protected right, the occasion which he missed as a result of the actions of the Chief Immigration Officer and the clear flouting of the order of Magistrate Daly our client is entitled to substantial damages.

We are further instructed that in the light of the expressed admission of the Chief Immigration Officer that the immigration officers had breached our client's protected and guaranteed constitutional right to travel out of Guyana as provided in Article 148 of the Constitution of the Co-operative Republic of Guyana our client is entitled to vindicatory damages.

We are instructed to request, as we hereby do, the sum of \$25,000,000.00 (twenty five million dollars) as damages for the breach of our client's constitutional rights, loss and damage.

We are instructed to give you notice, as we hereby do, that in the event of your failure to respond within five days hereof our instructions are to proceed to have a judicial determination of the breaches of our client's rights.

Yours Sincerely
C.A. Nigel Hughes.
Partner.
Hughes, Fields & Stoby.
62 Hadfield & Cross Streets.
Georgetown.

Ms. Kiswana Jefford

Ms. Ashrey Batson

Firm's Name: Hughes, Fields and Stoby

Attorneys-at-law

62 Hadfield and Cross Streets, Werk-en-Rust, Georgetown.

Email: n.hughes@guyanalaw.net

k.jefford@guyanalaw.net A.batson@guyanalaw.net

Tel: 227-4629 Fax: 225 7996

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

(CIVIL JURISDICTION)

2023-HC-DEM-CIV-FDA-

BETWEEN: -

#### **DAVID PATTERSON**

**Applicant** 

-and-

THE ATTORNEY GENERAL

Respondent

## NOTICE OF APPOINTMENT OF ATTORNEY-AT-LAW

I, DAVID PATTERSON, of Lot 151 Durbana Square, Lamaha Gardens, Georgetown, Demerara has appointed Mr. C.A. Nigel Hughes and/or Mr. Andrew M. F Pollard and/or Ms. Konyo Sandiford and/or Mr. Jed Vasconcellos and/or Mr. Ronald Daniels and/or Ms. Narissa Leander and/or Ms. Sophia Findlay, and/or Ms. Kiswana Jefford and/or Ms. Iyanna Butts and/or Ms. Edrianna Stephen and/or Ms. Nadia Gomes

and/or Michael Jagnanan and/or Mr. Shawn Shewram and/or Ms. Simone Singh and/or Ms. Ashrey Batson and/or Ms. Cassandra Jaikaran as her Attorneys-at-Law for the record. The address for service and place of business of my said Attorneys-at-Law, Messrs. Hughes, Fields & Stoby of Lot 62 Hadfield Streets, Werk-en-Rust, Georgetown, Demerara.

DATE

DAVID PATTERSON



Ms. Kiswana Jefford

Ms. Ashrey Batson

Firm's Name: Hughes, Fields and Stoby

Attorneys-at-law

62 Hadfield and Cross Streets, Werk-en-Rust, Georgetown.

Email: n.hughes@guyanalaw.net

k.jefford@guyanalaw.net A.batson@guyanalaw.net

Tel: 227-4629 Fax: 225 7996

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

(CIVIL JURISDICTION)

2023-HC-DEM-CIV-FDA-

BETWEEN: -

### **DAVID PATTERSON**

Applicant

-and-

### THE ATTORNEY GENERAL

Respondent

NOTICE OF APPOINTMENT OF ATTORNEY-AT-LAW