

6. The above article means and is understood to mean that the Plaintiff is of characters that resemble Ali Baba and Robin Hood and is also understood to mean that he is a bogus philanthropist.
7. The first and 2<sup>nd</sup> defendant's wilful and malicious publication brought in ridicule, contempt, dis-respect to the Plaintiff and greatly injured his character, credit and reputation in the society including his friends, members of his family.
8. The news article referred to in page 2 of the Plaintiff named Ramadoss specifically in paragraph 4 of the said news also cites by innuendo, the Plaintiff, through his professional degree namely doctor, of his donations and other philanthropic activities and by the posts he is holding at material times.
9. The publication and the printing of the article referred to in 5 supra, caused by the 1<sup>st</sup> and 2<sup>nd</sup> defendants have been aimed at defaming the Plaintiff so as to cause sabotage to his personal reputation and thus caused personal injury and defame to the Plaintiff.
10. The said news article cites the Plaintiff as "not so good doctor" "infamous doctor" in various places of the news article refer the Plaintiff, directly and impliedly as looting the money from the Republic of Seychelles
11. The publication and the printing of the said article brought in imputation in the midst of the potential local and overseas investors, business partners, employees and general public in the Republic of Seychelles while the article is misleading, false and misconceived and thus defamed the Plaintiff.
12. The Plaintiff's personal reputation is jeopardized as a result of the said news article referred above and caused shock, anxiety and mental stress to him that resulted in a trauma.
13. The Third Defendant in its capacity as a printer has printed the above article without having checked the veracity of the news article and thus the third defendant is also liable for the defamatory publication.
14. The Plaintiff avers that all the defendants are jointly and severally liable to compensate the Plaintiff for having published, printed and sold the misleading news article that resulted in defamatory allegation against the Plaintiff.
15. The Plaintiff estimates that the defendants are jointly and severally liable to compensate the Plaintiff in the sum of SR14,000,000.00 (Seychelles Rupees Fourteen Million only) for the above defamatory and innuendo against him.

**PARTICULARS OF CLAIM**

Claim for Moral Damages	- SR 10,000,000.00
Claim for Special Damages	- SR 4,000,000.00
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<b>Total</b>	<b>SR 14,000,000.00</b>
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