

Further parts.

MCH 91-65-10-2

KEMP versus MINISTER OF JUSTICE and OTHERS

PLAINTIFF'S REQUEST FOR FURTHER PARTICULARS
TO DEFENDANTS' PLEA

1. Ad Paragraph 2.

Defendants are requested to plead specifically to the allegations contained in paragraph 4(b) of Plaintiff's Declaration, in particular to the allegations:

- (i) That Plaintiff was under detention at Caledon Square Police Station at the time as alleged;
- (ii) that Plaintiff was subjected to interrogation from 11 a.m. on 1st August, 1964, until the early hours of the next morning; and
- (iii) that Plaintiff was kept standing for long periods during interrogation.

2. Ad Paragraph 3.

- (a) Is it alleged that the blow struck by Second Defendant was lawfully inflicted? If the answer is in the affirmative, Defendants are requested to specify the grounds and circumstances ~~upon~~ ^{upon which} and the statutory provisions or common law principles (they rely in support of their contention that in striking Plaintiff Second Defendant acted lawfully.
- (b) The names of the persons who it is alleged conducted the said interrogation are requested.
- (c) Was the said interrogation conducted at the place and during the period as alleged in Plaintiff's

Declaration.... /

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Declaration? If not, precisely where and during precisely what period was the said interrogation conducted?

- (d) At precisely what time was the blow in the face delivered?
- (e) Precisely where in the face did Second Defendant strike Plaintiff?
- (f) Defendants are required to plead specifically to the allegation that Plaintiff fell to the ground as a result of Second Defendant's conduct.

3. Ad Paragraph 6.

Did Plaintiff receive any injury at all as a result of Second Defendant's conduct? If so, full particulars are required of all such injuries.

Chambers:
28th May, 1965.

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W. COOPER S.C.

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A.L. SACHS