



Claim Form

In the High Court of Justice Queen's Bench Division Media and Communications List	
Fee Account no.	PBA 0087441
Help with Fees – Ref. no. (if applicable)	H W F - <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/>

You may be able to issue your claim online which may save time and money. Go to www.moneyclaim.gov.uk to find out more.

	For court use only
Claim no.	
Issue date	

Claimant(s) name(s) and address(es) including postcode

Sir Stelios Haji-Ioannou of 14 Quai Antoine 1er, Monaco, MC 98000



Defendant(s) name and address(es) including postcode

- (1) Telegraph Media Group Limited of 111 Buckingham Palace Road, London, SW1W 0DT
- (2) Mr Ben Marlow of 111 Buckingham Palace Road, London, SW1W 0DT

For further details of the courts www.gov.uk/find-court-tribunal.

When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

N1 Claim form (CPR Part 7) (06.16)

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Brief details of claim:

The Claimant's claim is for libel and breach of the Claimant's data protection rights under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA) in relation to an article published by the Defendants on the website www.telegraph.co.uk on 7 May 2020 and in the print edition of the Daily Telegraph newspaper on 8 May 2020.

The Claimant claims:

- (1) damages (including aggravated damages) for libel;
- (2) an injunction restraining the First Defendant, whether by its directors, officers, employees, agents or otherwise howsoever, and the Second Defendant, whether by himself, his agents or otherwise howsoever, from publishing or causing to be published the same or similar words defamatory of the Claimant;
- (3) compensation for damage and/or distress, pursuant to Article 82 of the GDPR and section 168 Data Protection Act 2018, for breach of statutory duty to process the Claimant's personal data in accordance with Article 5 of the GDPR;
- (4) an order under section 167 of the Data Protection Act 2018 that the First Defendant rectify and cease processing unlawful, unfair and/or inaccurate personal data pertaining to the Claimant pursuant to Articles 16 and 17 of the GDPR and notify this to third parties pursuant to Article 19 of the GDPR;
- (5) an order pursuant to section 12 of the Defamation Act 2013 that the First Defendant publish a summary of the judgment in these proceedings;
- (6) interest;
- (7) costs, including interest on costs;
- (8) such further relief as is just and appropriate.

The full details of the claim, including the words complained of, are set out in the Particulars of Claim, which are attached.

Value: The claimant expects to recover more than £100,000.

This claim is for libel and contravention of the GDPR/DPA and therefore must be issued in the Media and Communications List in the Queen's Bench Division of the High Court.

You must indicate your preferred County Court Hearing Centre for hearings here (*see notes for guidance*)

Defendant's name and address for service including postcode

(1) Telegraph Media Group Limited
(2) Mr Ben Marlow
Ince Solicitors
Aldgate Tower
2 Leman Street
London
E1 8QN
RobinShaw@incegd.com

	£
Amount claimed	£100,000 +
Court fee	£10,000 + £528
Legal representative's costs	To Be Assessed
Total amount	TBC

Claim No.	
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Does, or will, your claim include any issues under the Human Rights Act 1998? [] Yes [x] No

Particulars of Claim (attached)(~~to follow~~)


Statement of Truth

*~~(I believe)~~(The Claimant believes) that the facts stated in these particulars of claim are true.

* I am duly authorised by the claimant to sign this statement

Full name: Mr Rory Lynch

Name of claimant's legal representative's firm: Vardags Limited

signed  position or office held: Solicitor
*~~(Claimant)~~(Litigation friend) (if signing on behalf of firm or company)
(Claimant's legal representative)

**delete as appropriate*

Vardags Limited
10 Old Bailey
London EC4M 7NG
0207 404 9390
RLynch@vardags.com
REF: HAJ17/1/RL/RR

Claimant's or claimant's legal
representative's address to which
documents or payments should be
sent if different from overleaf including
(if appropriate) details of DX, fax or e-
mail.