

LUCKHOO & LUCKHOO
LEGAL PRACTITIONERS

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WITH

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CHAMBERS:

"WHITEHALL"

N^o 1 LOT 1 CROAL STREET
(P.O. BOX 163),

GEORGETOWN,

GUYANA,

SOUTH AMERICA.

19th September 1977

Dear Paula,

Re Summons - Jovider - Setting aside Orders

I have just had a Conference with my brother Lloyd (a Senior Counsel), Junior Counsel + McDoom Co. (Solicitors).

We have settled the Affidavit. The Summons is now being prepared.

The other lawyers discussed with me fees. Up to now the only fees incurred are those for Solicitor's preliminary work, investigation and disbursements.

My services up to the present stage are freely given indeed happily given. When all is finished at the end of the line, I may send in some small charge.

I told the lawyers to fix a fee inclusive of all disbursements, and including the Solicitor's charges which are incurred A fee of \$8,500.^(G) has been fixed, and if you are agreeable and pay in this amount to Luckhoo & Luckhoo then we would have the firm issue their cheques

Normally we just send in accounts — but I couldn't do that to you, hence I have sought to spell it out.

Yours faithfully,
Lionel NW-1-HH,

Notes to Joyce Touchette

Case called in Chambers before Bishop J (he had granted the Orders) + so he would have to eat humble pie to reverse his Own Orders.
But this is procedurally correct

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If we fail + this is possible before the same judge, but our case is so overwhelming I feel it ought to succeed even before the same judge.

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Then our next step is to appeal to the Full Court of Appeal. I have every reason to believe that the judges there will agree with us + set aside the Orders

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If we fail (+ this is most unlikely) we will go before the final Court of Appeal presided over by the Chancellor. (D.F. Haynes)

My firm conviction is that we MUST Succeed !!
And there will be no need to go to the final Court, although if Grace Stein fails she may well do so.
The case before Bishop reached the skirmishing stage. Bishop was contending that Touchette's Affidavit might be treated as a Return of Service for Jones. I stated that Jones has NOT been served, he has entered no appearance — I am NOT appearing for him. Touchette is on her own seeking to get aside Nullity Orders because they affect her.

The case may well take the entire week !!! ^{more} It will be long drawn out + will be argued by Lloyd Luckton (S.C.) + myself N.N.-13/12/92 Luckton

2.

The Registrar tells me he is sending up
none to serve any further papers.
What I seek to establish is that the
slate should be wiped clean i.e.

No Orders must remain
appt. Jim Jones
so the contempt proceedings will remain "stet".
If Grace Stoen does come down (a
possibility but unlikely) she cannot give
evidence or be heard as —

The case in its present status must
be held good or bad without
supplementaries.

Nothing is impossible but for us
to fail to get the orders "stricken"
is as near as possible to an
impossibility

All of our lawyers are working on Sunday
in the Law Library to make assurance
doubly sure. At the end of the line I can
see no order outstanding. They are a NULLITY
LH