**Advocate Attorney:AUGUSTUS THOMAS**

**Bar No.THA2006142**

**18-20 Duke Street**

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**Tel: 7525141**

**Filing attorney: CHRISTOPHER ROSS GIDLA**

**Bar NO. GIC2006148**

**GIDLA & ASSOCIATES**

**99 A Duke Street**

**Port of Spain**

**Tel:350-6259**

**THE REPUBLIC OF TRINIDAD AND TOBAGO**

IN THE HIGH COURT OF JUSTICE

Claim No: CV 2015-000067

BETWEEN

**JAIRAJ RAMSAWAK Claimant**

**AND**

**K & A HOLDINGS LIMITED Defendant**

\* \* \* \* \*

**DEFENCE**

1. The Defendant admits paragraph 1
2. The Defendant admits paragraph 2
3. The Defendant admits paragraph 3
4. The defendant admits paragraph 4
5. The defendant denies paragraph 5 in that the Defendant has made several payments to the Claimant, the payments so far paid amounted to $100,200.
6. The Defendant avers that the Claimant when approached by the Defendant , it was agreed that the defendant would pay him when he receives the payment from the state for the main contract.
7. The Defendant admits paragraph 7.
8. The Defendant denies paragraph 8 in that the contract has not been breached since the time for payment has not elapsed.

**I certify that all the facts set out in my defence are true to the best of my knowledge, information and belief. My address for service is**

**Christopher Ross Gidla**

**Attorney at law**

**Gidla and Associates**

**99 A Duke Street**

**Port of Spain**

………………………………………………..

Defendant

I am acting for the defendant, my address is for address for service is

**Christopher Ross Gidla**

**Attorney at law**

**Gidla and Associates**

**99 A Duke Street**

**Port of Spain**

**Tel: 350-6259**

Dated 10th of February, 2015

Christopher Ross Gidla

Attorney for the defendant

To: The Registrar

Hall of Justice

Harris Promendade

San Fernando

AND

TO: **Shalini Dhanipersad**

**Attorney at law**

**Corner keate & Harris Streets**

**San Fernando.**