**CHRISTOPHER GIDLA**

**Attorney At Law**

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**123 Duke Street**

**Port of Spain**

**THE REPUBLIC OF TRINIDAD AND TOBAGO**

**IN THE HIGH COURT OF JUSTICE**

Claim #

**TYRONE GIBBS Claimant**

**AND**

**RBTT BANK LIMITED**

**Defendant**

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**Reply**

Reply filed this 28th day of June, 2011 by Christopher Ross Gidla of 123 Duke Street, Port of Spain, whose address for service is Gidla and Associates, 123 Duke Street, Port of Spain, Attorney at Law for the Claimant

1. The Claimant joins issue with the Defendant upon his Defence save in so far as the same consists of admission and save for any admissions contained herein
2. The Claimant denies as contended by the Defendant in the paragraph 6 that he ever became angry and agitated or ever spoke to the manager in loud and angry tones. He contends that he was merely speaking to himself whilst walking through the bank and at the ATM machine. He never created any disturbance within the Bank.
3. The Claimant denies as contended in the paragraph 7 of the defence that he continued to speak in loud angry tones and he never made any disparaging statements about the Bank and its staff in general. The Claimant was merely saying that he is only a small man and hence they refused his loan.
4. The Claimant denies as contended in the paragraph 8 of the defence that he was ever cautioned and was asked to lower his voice by the Constable Arthur or anybody.
5. The Claimant denies paragraph 9 of the defence that numerous attempts were made to calm down the Claimant. The Claimant maintains that the Constable Arthur grabbed the Claimant’s left hand elbow without any caution and dragged him out of the Bank. The Claimant denies that the Constable used reasonable force in the conduct of his duties but maintains that he used force which is not necessary at all.

Dated 28th day of June, 2011

Christopher Ross Gidla

Attorney at Law for Claimant

To: The Registrar of the High Court of Justice

Hall of Justice

Port of Spain

And To:Aisha Donawa

Attorney at Law

MG Daly and Partners

115A Abercromby Street

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Attorneys at Law for the Defendant