

**Respondents:**

Iain Clifford Stamp of c/o [REDACTED]

\_\_\_\_\_ of \_\_\_\_\_,  
\_\_\_\_\_

And intervening agents.

## Affidavit of Iain Clifford Stamp

I, a man by the name of Iain Clifford, a member of Stamp family, living on the land, c/o [REDACTED]  
[REDACTED], hereby state upon oath in this private court of  
record:

1. Facts stated herein this Affidavit – [REDACTED] **F.01** – are from within my own knowledge or are from information provided to me by my postal agents, save as otherwise stated.

## INTRODUCTION

1. The Respondent has made and continues to make the most serious bare allegations against the Declarant.

**RESIGNATION**

2. Beginning from the 9<sup>th</sup> of August 2021 until the 5<sup>th</sup> of November 2021 the Respondent provided services for the Declarants group of companies.
3. On the 5<sup>th</sup> of November 2021 the Respondent issued her resignation notice to the Declarant. The Respondent held no ill-will:

*“As a last note, please know there is no ill-will or malice here; I think you/the team are brilliant, and are doing a stirring job with an abundance of opportunities ahead of you. It is a shame the role has not met with my expectations, but I do wish you and everyone at MF every success and will continue to refer/direct people to MF well into the future. “*

4. Communications regarding the resignation continued between the Parties until the 14<sup>th</sup> of November 2021.

**DEFAMATION**

5. Despite the Parties amicable split, on the 28<sup>th</sup> of February 2023 at 11:17 the Respondent made a series of the most serious bare allegations and opinions, numbered (1-27) (the “**Allegations**”).
6. Despite the Declarant invitation on the 1<sup>st</sup> of March 2023 for the Respondent to provide substantiated evidence proving the Allegations by 17:00 on Monday the 6<sup>th</sup> of March 2023, the Respondent failed to substantiate her Allegations at all.
7. Therefore, the Allegations are false libellous statements made by the Respondent.

**PROOF OF ALLEGATION(S)**

8. Whereas the Respondent fails to prove every Allegation with irrefutable evidence by Tuesday the 14<sup>th</sup> of March 2023 at 17:00, shall by implication form acceptance and

agreement between the Parties that the Respondent's Allegations amount to libellous statements causing the Declarant serious reputational harm.

## LOSS

9. The Respondent accepts and agrees that your libellous statements have caused the Declarant significant damage and loss of £25,000,000.

## NEGATIVE AVERMENT

10. I have seen no verified evidence that the facts as stated herein this Affidavit – ██████ F.01 are not as they are stated to be or as stated to appear to me to be, and it appears that no such evidence exists.

Further, I now make oath as follows.....

## OATH

I, a man by the name of Iain Clifford, a member of the Stamp family proceeding in good faith and being of age of majority and of sound mind and competence, do hereby make oath and verify on my full and unlimited commercial liability and under penalty of perjury that I have read this Affidavit ██████ F.01 - and do know to the best of my knowledge that the statements made herein are the truth and nothing but the truth. In witness whereof I hereunto set my hand and seal by my freewill act and deed on day eight of the month of March in the year two thousand and twenty-three:

Sworn by:   
I, Iain Clifford Stamp

On day eight of the month of March in the year two thousand and twenty-three, a man by the name of Iain Clifford, a member of the Stamp family, being made known to us and appearing before us, did make oath and set hand and seal to the above Affidavit - [REDACTED] F.01 - in our presence:

\_\_\_\_\_

I, \_\_\_\_\_ of \_\_\_\_\_

\_\_\_\_\_

I, [REDACTED] .....of [REDACTED]

**NOTICE TO RESPOND**

The above Affidavit – [REDACTED].01 (the “**Affidavit**”) is private and confidential and for the attention of the Respondents and Witnesses only.

**RESPONDENTS - SUFFICIENT ANSWER**

A sufficient answer to the Affidavit shall consist of an affidavit made by the Respondent attesting that the facts as stated in the above Affidavit are not true on a point-by-point basis and underwritten by the equivalent weight of oath as that of the Declarants (a “**Sufficient Answer**”).

The Declarant hereby grants the Respondent five (5) calendar days from the date of delivery of the above Affidavit, as recorded by mail service, in which to make a Sufficient Answer.

If the Respondent fails to provide a Sufficient Answer to the Declarant then they shall by tacit acquiescence convey to the Declarant their agreement that the facts, as they are stated to be or as stated to appear to the Declarant to be, in the Affidavit are true.

Further, the Respondent shall agree by failure to provide a Sufficient Answer that they are estopped from rebutting or disputing the Affidavit at a later time.