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1999 No 421

IN THE HIGH COURT OF JUSTICE IN NORTHERN IRELAND
QUEEN'S BENCH DIVISION

BETWEEN

ROSEMARY NELSON

Plaintiff

-and-

CHIEF CONSTABLE OF THE ROYAL ULSTER CONSTABULARY

Defendant

STATEMENT OF CLAIM

Served this 24th day of March 1999
By Rosemary Nelson, of 8 William Street,
Lurgan, Co Armagh, Solicitor for the
Plaintiff.

The Writ of Summons in this Action was issued on 29th day of January 1999

1. The Plaintiff is forty years of age and is a Solicitor by occupation.
2. On or about the 6th day of July 1997 at approximately 6.00 am at or about Churchill Park, Portadown, in the County of Armagh, servants or agents of the Defendant without lawful authority, excuse or consent, subjected the Plaintiff to assaults, batteries and trespasses to her person. Further, on or about the 6th July 1997 at approximately 8.00 am at or about the Ballycran Estate servants or agents of the Defendant without lawful authority, excuse or consent, subjected the Plaintiff to further assaults, batteries and trespasses to her person.

**PARTICULARS OF ASSAULT, BATTERY AND TRESPASS
TO THE PERSON AT CHURCHILL PARK**

- (a) Putting the Plaintiff in fear.
- (b) Touching the Plaintiff against her will and without her consent.
- (c) Striking the Plaintiff.
- (d) Using unnecessary, unreasonable, excessive and arbitrary force.
- (e) Using force upon the Plaintiff.
- (f) Pushing/throwing the Plaintiff from one Police Officer to ar