

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
MEDIA AND COMMUNICATIONS LIST
B E T W E E N:**

Claim No: KB-2023-000774

(1) RICHARD (RAZIEL) DAVIDOFF **Claimants**
(2) HANNAH (HANNI) DAVIDOFF
(3) TAMARA DAVIDOFF
(4) DEBBY DAVIDOFF

-and-

NICHOLAS HARGRAVE **Defendant**

**SUMMARY OF DEFENCE
PURSUANT TO CPR PD16 PARA 1.3**

1. This is a summary of the Defendant's Defence pursuant to paragraph 1.3 of Practice Direction 16.
2. The Claimants complain in libel of a tweet that was published by the Defendant on 7 May 2022 and bring a claim in libel ("**Tweet**"). The Tweet was set out above a quoted tweet from the @LKPleasehold account ("**Quoted Tweet**").
3. The Defendant denies that any of the Claimants are entitled to a remedy in respect of the publication.

The Parties

4. The Defendant takes issue with the description of the Claimants in their prefatory averments: see Defence, paras 1 to 3.12.

The publication complained of, meaning and reference

5. The Defendant admits publishing the Tweet but denies that the Tweet imported the words contained in an online article, accessible via a hyperlink embedded at the end of the Quoted Tweet. The Defendant also denies that the words complained of bear the meaning advanced by the Claimants either in their natural and ordinary meaning or by way of innuendo: see Defence, paras 4 to 6.
6. The Defendant further denies that the Claimants' substantial particulars of reference and true innuendo provide a factual basis for finding that the Second to Fourth Claimants would have been understood to be referred to by the Defendant's use of the phrase 'ABC Estates' in the Tweet: see Defence, paras 4 to 24.2.

Defamatory / Serious harm

7. The Defendant does not admit that the Tweet has caused or is likely to cause serious harm to the Claimants' reputations: see paras 25 to 26.9.

Defence of public interest under s. 4 Defamation Act 2013

8. The Defendant relies on the defence of publication on a matter of public interest under s. 4 of the Defamation Act 2013: see paras 27 to 54.

Defences of honest opinion and truth under ss. 2 and 3 Defamation Act 2013

9. The Defendant raises defences of honest opinion and truth and pleads extensive particulars: see paras 55 to 105.3.

Remedies

10. The Defendant denies that the Claimants or any of them are entitled to the remedies that they seek or any remedy at all: see paras 106 to 108.2.

**ADAM SPEKER KC
SAMUEL ROWE
5RB**