



**SUPREME COURT**

**Respondents' Notice**

Appeal No: **S:AP:IE:2015:000046**

Lower Court Record No. **2014 1100 COA**

<b>RUTH MORAM</b>	<b>V</b>	<b>WATCH TOWER BIBLE &amp; TRACT SOCIETY OF IRELAND and ANDREW BEESTON, PETER VAN BENTHEM and MARTYN BELL.</b>
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<b>Date of filing</b>	August 19 <sup>th</sup> , 2015
<b>Name of respondents</b>	WATCH TOWER BIBLE & TRACT SOCIETY OF IRELAND, ANDREW BEESTON, PETER VAN BENTHEM & MARTYN BELL
<b>Respondent's solicitors</b>	Ferrys, Inn Chambers, 15 Upper Ormond Quay, Dublin 7 (on behalf of all four Respondents)
<b>Name of appellant</b>	Ruth Moram
<b>Appellant's solicitors</b>	N/A (litigant in person)

**1. Respondent Details**

Where there are two or more respondents by or on whose behalf this notice is being filed please also provide relevant details for those respondent(s)

<b>Respondent's full name</b>	WATCH TOWER BIBLE & TRACT SOCIETY OF IRELAND, ANDREW BEESTON, PETER VAN BENTHEM & MARTYN BELL
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<b>The respondent was served with the application for leave to appeal and notice of appeal on date</b>
August 6 <sup>th</sup> , 2015

**The respondent intends :**

- to oppose the application for an extension of time to apply for leave to appeal
- not to oppose the application for an extension of time to apply for leave to appeal
- to oppose the application for leave to appeal**
- not to oppose the application for leave to appeal
- to ask the Supreme Court to dismiss the appeal
- to ask the Supreme Court to affirm the decision of the Court of Appeal or the High Court on grounds other than those set out in the decision of the Court of Appeal or the High Court
- Other (please specify)

If the details of the respondent's representation are correct and complete on the notice of appeal, tick the following box and leave the remainder of this section blank; otherwise complete the remainder of this section if the details are not included in, or are different from those included in, the notice of appeal.

**Details of respondent's representation are correct and complete on notice of appeal:**

## Respondent's Representation

<b>Solicitor</b>			
<b>Name of firm</b>	Ferrys		
<b>Email</b>	bodonoghue@ferrysolicitors.com		
<b>Address</b>	Inn Chambers, 15 Upper Ormond Quay, Dublin 7	<b>Telephone no.</b>	01-6779408
		<b>Document Exchange no.</b>	1017 Four Courts
<b>Postcode</b>		<b>Ref.</b>	WAT008/0002
<b>How would you prefer us to communicate with you?</b>			
<input checked="" type="checkbox"/>	<b>Document Exchange</b>	<input checked="" type="checkbox"/>	<b>E-mail</b>
<input type="checkbox"/>	<b>Post</b>	<input type="checkbox"/>	<b>Other (please specify)</b>

<b>Counsel</b>			
<b>Name</b>	Richard Daniel B.L.		
<b>Email</b>	C/O bodonoghue@ferrysolicitors.com		
<b>Address</b>	C/O Ferrys Solicitors	<b>Telephone no.</b>	
		<b>Document Exchange no.</b>	
<b>Postcode</b>			

<b>Counsel</b>			
<b>Name</b>			
<b>Email</b>			
<b>Address</b>		<b>Telephone no.</b>	
		<b>Document Exchange no.</b>	
<b>Postcode</b>			

## 2. Respondent's reasons for opposing extension of time

If applicable, set out concisely here the respondent's reasons why an extension of time to the applicant/appellant to apply for leave to appeal to the Supreme Court should be refused

N/A

### 3. Information about the decision that it is sought to appeal

**Set out concisely whether the respondent disputes anything set out in the information provided by the applicant/appellant about the decision that it is sought to appeal (Section 4 of the notice of appeal) and specify the matters in dispute:**

The Appellant has provided copies of the Ex tempore Judgment of the Court of Appeal and the Memorandum prepared by Mr Justice Barrett.

### 4. Respondent's reasons for opposing leave to appeal

**If leave to appeal is being contested, set out concisely here the respondent's reasons why:**

- 1. The decision in respect of which leave to appeal is sought does not involve a matter of general public importance;*
- 2. It is not in the wider interests of justice that there be an appeal to the Supreme Court as there is no point of law or other issue of general public importance that falls to be determined;*
- 3. The matter was very fairly and fully investigated at the hearing before Mr Justice Barrett who reached the conclusion that it was proper and lawful to strike out the proceedings as statute barred. His careful memorandum of the proceedings confirms the care with which he approached his task. There is no evidence that he failed to consider any relevant matter nor is there any evidence that he incorrectly took any matter into account. There is no evidence of any judicial error;*
- 4. Similarly, as the transcript of the judgment shows, the Appellant had a full and fair hearing before the Court of Appeal that unanimously found no reason to interfere with the decision of Mr Justice Barrett.;*
- 5. The Respondents respectfully submit that the Appellant is of the manifestly wrong view that the function of the Court system is to provide a platform to enable her to continually air her personal grievances against the First Named Respondent in particular, which grievances are without any foundation in law or in fact. The Respondents' position is that the matter must be determined according to the relevant legal principles, which Mr Justice Barrett and the Court of Appeal have manifestly done;*
- 6. Accordingly the Respondents invite the Supreme Court to refuse leave to appeal and to make the appropriate order against the Appellant requiring her to make a contribution towards the costs incurred by the Respondents in relation to this application.*

**5. Respondent's reasons for opposing appeal if leave to appeal is granted**

**Please list (as 1, 2, 3 etc in sequence) concisely the Respondent's grounds of opposition to the ground(s) of appeal set out in the Appellant's notice of appeal (Section 6 of the notice of appeal):**

*1. The Court of Appeal made no error in law or otherwise in dismissing the Appellant's appeal. In answer to the grounds raised by the Appellant in her Notice of Application insofar as they are relevant to the within appeal on whether the proceedings are statute barred, the Respondents will rely on the Judgment of the Court of Appeal and the reasons set out therein in full.*

*2. The Respondents will rely solely on the arguments advanced before the Court of Appeal as if set out herein and traversed seriatim, such grounds being substantially the same as the grounds advanced before the Learned Trial Judge in the High Court, and will only expand on those arguments:*

*- If the submissions of the Appellant vary from those made in the Court of Appeal, and in such a case only insofar as is necessary to meet such new issues;*

*- If new developments in law arise between the drafting of the herein Respondent's Notice and the hearing of any such appeal;*

*- As this Honourable Court directs.*

**Name of counsel or solicitor who settled the grounds of opposition (if the respondent is legally represented), or name of respondent in person:**

Richard Daniel B.L.

**6. Additional grounds on which decision should be affirmed**

**Set out here any grounds other than those set out in the decision of the Court of Appeal or the High Court on which the Respondent claims the Supreme Court should affirm the decision of the Court of Appeal or the High Court:**

N/A

Are you asking the Supreme Court to:

Depart from (or distinguish) one of its own decisions?

Yes

No

If Yes, please give details below:

Make a reference to the Court of Justice of the European Union?

Yes

No

If Yes, please give details below:

Will you request a priority hearing?

Yes

No

If Yes, please give reasons below:

Signed: \_\_\_\_\_

Ferrys,  
Solicitors for the Respondents.  
Inn Chambers,  
15 Upper Ormond Quay,  
Dublin 7.

Please submit your completed form to:

The Office of the Registrar to the Supreme Court  
The Four Courts  
Inns Quay  
Dublin

This notice is to be lodged and served on the appellant and each other respondent within 14 days after service of the notice of appeal.