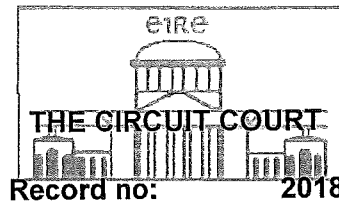
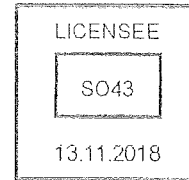


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DUBLIN CIRCUIT

COUNTY OF THE CITY OF DUBLIN

IN THE MATTER OF SECTION 28, 30 AND 33 OF THE DEFAMATION ACT, 2009

BETWEEN

RACHEL MORAN

Applicant

and

GAYE DALTON

Respondent



ORIGINATING MOTION

TAKE NOTICE that on the *10<sup>th</sup>* day of *December* *Court 22* 2018 at 10.00am in the forenoon or at the earliest opportunity thereafter, Counsel appearing on behalf of the Plaintiff herein will apply to this Honourable Court sitting at the Four Courts, Inns Quay, in the City of Dublin for:

- (a) An Order pursuant to **Section 28 of the Defamation Act, 2009**, as amended, declaring statements made by the Respondent on the various publications scheduled hereto of and concerning the Applicant to be false and defamatory of the Applicant;
- (b) An Order directing the Respondent to publish a correction of the defamatory statements of the Applicant pursuant to **Section 30 of the Defamation Act, 2009**, as amended;
- (c) An Order, if necessary, pursuant to **Section 33 of the Defamation Act, 2009**, as amended, prohibiting the further publication of the false and defamatory statements of and concerning the Applicant by the Respondent;
- (d) Such further or other Orders which this Honourable Court may deem meet;
- (e) The costs of this Application.

**WHICH SAID APPLICATION** will be grounded upon this Originating Notice of Motion, the Affidavit of the Applicant (sworn on the 13<sup>th</sup> day of November 2018), the exhibits therein, proof of service of the said Originating Notice of Motion and Affidavit, the nature of the case, the reasons to be offered and the evidence to be adduced.

Dated this *14* day of *November* 2018.

*Lavelle*

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**Lavelle  
Solicitors for the Applicant,  
St. James House,  
Adelaide Road,  
Dublin 2.**

**To:**

**The County Registrar,  
Four Courts,  
Dublin 7**

**And To:**

**Gaye Dalton**

## SCHEDULE

1. Email dated 9<sup>th</sup> April, 2018 [10:45] authored by the Respondent and sent to set@amnesty.org.uk; jo@samaritans.ie AND Charles.flanagan@oir.ie.
2. Statutory Declaration of the Respondent dated 26<sup>th</sup> February, 2014;
3. <http://www.niassembly.gov.uk/globalassets/documents/reports/justice/report-on-human-trafficking-bill.bdf>;
4. <https://maggiemcneil.wordpress.com/2014/03/11/played-out/>;
5. <https://mymythbuster.wordpress.com/fanny-by-gaslight>;
6. <https://mymythbuster.wordpress.com/myth-my-years-in-gibraltar>;
7. <https://mymythbuster.wordpress.com/the-origins-of-rachel-moran>;
8. <https://mymythbuster.wordpress.com/leter-to-irish-times-31-May-2015>;
9. <https://mymythbuster.wordpress.com/dialogue-with-new-statesman-regarding-rachel-moran>;
10. <https://mymythbuster.wordpress.com/dm-reality-bites>;
11. Numerous tweets made of the Applicant by the Respondent.
12. <https://www.youtube.com/watch?v=hDxH7dguCdQ&list=UUHMBX1JGhXCSDoynh1SD9lw&index=13>
13. <https://www.youtube.com/watch?v=5k6oORavhHI&list=UUHMBX1JGhXCSDoynh1SD9lw&index=23>
14. <https://www.youtube.com/watch?v=hDxH7dguCdQ&index=13&list=UUHMBX1JGhXCSDoynh1SD9lw>
15. <https://www.youtube.com/watch?v=ZywUgokrpBo&list=UUHMBX1JGhXCSDoynh1SD9lw&index=9>
16. <https://www.youtube.com/watch?v=LtBuNz2LR5w&list=UUHMBX1JGhXCSDoynh1SD9lw&index=7>
17. <https://www.youtube.com/watch?v=C6r3YMdwgS0&index=24&list=UUHMBX1JGhXCSDoynh1SD9lw>
18. <https://www.youtube.com/watch?v=Dn4YdmqRQg8&list=UUHMBX1JGhXCSDoynh1SD9lw&index=18>
19. <https://www.youtube.com/watch?v=uSrlUvBdQvU&index=16&list=UUHMBX1JGhXCSDoynh1SD9lw>

THE CIRCUIT COURT

Record no: 2018

DUBLIN CIRCUIT

COUNTY OF THE CITY OF DUBLIN

IN THE MATTER OF SECTION 28, 30 AND 33 OF THE DEFAMATION ACT, 2009

BETWEEN

RACHEL MORAN  
Applicant

and

GAYE DALTON  
Respondent

ORIGINATING MOTION

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Dublin 2.