

51. The Plaintiffs claim punitive damages, the facts on which the Plaintiffs rely in support of this claim are *inter alia* as follows:
- (a) The conduct of the Defendants is malicious, oppressive, high-handed, and outrageous and offends the public's sense of decency.
  - (b) The Defendants' conduct is deserving of punishment, because of its harsh, vindictive and reprehensible nature;
  - (c) The Defendants' conduct is deserving of condemnation and punishment; and
  - (d) The defamatory publications are vicious, spiteful, wide-ranging in substance and worldwide in scope.