



Eligible



**WRIT OF SUMMONS**  
(Order 2 rule 3(1))

WRIT ISSUED FROM ACCRA 14/2/2024

GA/0426/2024  
SUIT No.....

**IN THE HIGH COURT**  
**ACCRA AD.2024**

**MARTHA ANKOMAH**

**PLAINTIFF**

No.24 Flint Road  
GA-255-3586  
Accra.

VS

**KWADWO NKANSAH a.k.a LIL WIN**

**DEFENDANT**

(Mile 7 Achimota)

*(Plaintiff will direct service)*

To

AN ACTION having been commenced against you by the issue of this writ by the above- named Plaintiff.

**MARTHA ANKOMAH**

YOU ARE HEREBY COMMANDED that within EIGHT DAYS after service of this writ on you inclusive of the day of service you do cause an appearance to be entered for you.

**KWADWO NKANSAH a.k.a LIL WIN**

AND TAKE NOTICE that in default of your so doing, judgment may be given in your absence without further notice to you.

Dated this **14<sup>th</sup>** day of **FEBRUARY** 2024

Chief Justice of Ghana

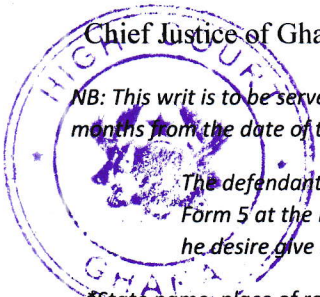
**G. SACKY TORKORNOU (JUDGE)**

*NB: This writ is to be served within twelve calendar months from the date of issue unless, it is renewed within six calendar months from the date of that renewal.*

*The defendant may appear hereto by filing a notice of appearance either personally or by a lawyer at Form 5 at the Registry of the Court of issue of the writ at ..... A defendant appearing personally may, if he desire, give notice of appearance by post.*

*\*State name, place of residence or business address of plaintiff if known (not P.O. Box number).*

*\*\*State name, place of residence or business address of defendant (not P.O. Box number).*



SEALED

14/2/24

## STATEMENT OF CLAIM

The Plaintiff's claim is for:

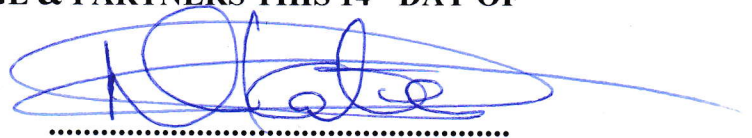
- a) A declaration that the words *“Who knows you? If not for GTP and senior government officials who signed you on at GTP, who would have signed you. What kind of star are you? Even your own daughter doesn't know you”*

*I don't even know why GTP bypassed the likes of McBrown, Mercy Asiedu and co and made Martha Ankomah their brand ambassador.*

*“If you had been a male actor, you would have suffered. When you become an actress and you become a star, men take care of you, men rent accommodation for you, men buy you houses, men buy cars for you. You would have suffered as a man but for the fact that you are female. It is men who look after you. You have become a star that is why men take care of your needs, you don't use your money on anything”* published of and concerning the Plaintiff and contained in paragraphs 8 and 9 of the Statement of Claim are defamatory of the Plaintiff.

- b) Damages in the sum of 5 million Ghana cedis for the defamatory statements made by Defendant.
- c) Compensatory damages for the damage done to the reputation of Plaintiff.
- d) Aggravated damages for the reckless and malicious publication of the defamatory words.
- e) An order directing the Defendant to publish an apology and a retraction of the said defamatory words with the same prominence.
- f) Injunction restraining the Defendant from further publishing and causing to be published the said or similar words defamatory of Plaintiff.
- g) Legal Costs

**DATED AT ANKOMMA-SEY, APATU-PLANGE & PARTNERS THIS 14<sup>th</sup> DAY OF  
FEBRUARY, 2024**



**NII APATU-PLANGE  
LAWYER FOR PLAINTIFF**

Nii Kwatei Apatu Plange  
ANKOMMA - SEY, APATU-PLANGE & PARTNERS  
1st Floor Teachers Hall Complex  
GNAT Drive, (off Barnes Road)  
Adabraka - Accra  
D. P. Pw. 8060, AS/14 NWHU, GHANA

**NII APATU-PLANGE**  
Licence No.eGAR01071/24/  
Lawyer for Plaintiff

*Nii Kwatei*  
**Nii Kwatei Apatu Plange**  
**ANKOMA-SEY, APATU-PLANGE & PARTNERS**  
1st Floor Teachers Hall Complex  
GNAT Drive, (off Barnes Road)  
Adabraka - Accra  
P. O. Box 8956, Accra North, Ghana

This writ was issued by **NII APATU-PLANGE**

whose address for service is **ANKOMA-SEY, APATU-PLANGE & PARTNERS**  
**1<sup>ST</sup> FLOOR TEACHERS HALL COMPLEX, ADABRAKA-ACCRA**

Agent for **PLAINTIFF**

Address Number and date of lawyer's current licence: **eGAR01071/24**

Lawyer for the Plaintiff **NII APATU-PLANGE** who resides at **ACCRA**

.....  
**Indorsement to be made within 3 days after service**

This writ was served by me at

on the defendant  
on the \_\_\_\_\_ day of

endorsed the \_\_\_\_\_ day of

Signed.....

Address.....

**NOTE:**

If the plaintiff's claim is for a liquidated demand only, further proceedings will be stayed if within the time limited for appearance the defendant pays the amount claimed to the plaintiff, his lawyer or his agent or into court as provided for in Order 2 rule 3(2)

IN THE SUPERIOR COURT OF JUDICATURE  
IN THE HIGH COURT OF JUSTICE  
ACCRA - A.D. 2024

SUIT NO.

**MARTHA ANKOMAH**

No.24 Flint Road  
GA-255-3586  
Accra.

VS

**KWADWO NKANSAH a.k.a LIL WIN**

(Mile 7 Achimota)

**PLAINTIFF**

filed on 14/2/24  
at 2:00 PM  
Registrar  
**HIGH COURT  
ACCRA**

**DEFENDANT**

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**STATEMENT OF CLAIM**

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1. The Plaintiff is a distinguished actress who has featured in a number of movie productions both in Ghana and Nigeria for more than 20 years.
2. The Plaintiff has by dint of hard work as an actress, gained respectability amongst members of the movie and creative industry, movie lovers, friends and well-wishers.
3. The Plaintiff used to be a brand ambassador for GTP promoting their products but currently holds ambassadorial deals with Yaba Ghana, Vibrant Skin Care and Style In Vogue.
4. The Defendant is an actor, musician and comedian. The Defendant is also the founder and director of a school known as Great Minds School.
5. The Plaintiff says that on or about the 8<sup>th</sup> of February 2024, the Defendant without any provocation from Plaintiff went on a tirade on social media, raining insults and invectives on the Plaintiff for allegedly consistently turning down offers from movie directors to feature in two local movie productions popularly referred to as "Kumawood"

6. The Plaintiff says that the Defendant according to the video circulating all over social media was enraged by the fact that, a director by name Frank Fiifi Gharbin had informed him that, Plaintiff had turned down an offer to feature in a Kumawood movie on the basis that most Kumawood movies' story line do not make sense.
7. The Plaintiff vehemently denies this claim and says that she has never had any such conversation with the said director or said anything to that effect to warrant the verbal attack on her.
8. The Plaintiff says that the Defendant in the said video boldly, falsely and maliciously uttered the following words of and concerning the Plaintiff in Twi and herein transcribed in English as follows:

***“ Who knows you? If not for GTP and senior government officials who signed you on at GTP, who would have signed you. What kind of star are you? Even your own daughter doesn't know you”***

***I don't even know why GTP bypassed the likes of McBrown, Mercy Asiedu and co and made Martha Ankomah their brand ambassador.***

9. The Plaintiff says further that the Defendant further uttered the following words also in twi and herein transcribed in English.

***“If you had been a male actor, you would have suffered. When you become an actress and you become a star, men take care of you, men rent accommodation for you, men buy you houses, men buy cars for you. You would have suffered as a man but for the fact that you are female. It is men who look after you. You have become a star that is why men take care of your needs, you don't use your money on anything”***

10. The Plaintiff will say that taking into consideration the context in which the words were uttered, the manner and occasion of the publication and the persons to whom the words were published, the Plaintiff will plead innuendo and say that the words mean the following:
  - a) The Plaintiff is not a fit and proper actress capable of being made an ambassador of a brand like GTP
  - b) The Plaintiff is incompetent as an actress and has only made it because of her femininity.

- c) The Plaintiff lives off men for survival.
  - d) The Plaintiff as a woman can only acquire property through the help/assistance of men.
11. The Plaintiff says that the statements uttered by Defendant concerning Plaintiff are brazen lies published with malicious intent.
  12. The Plaintiff says that the offending statements were published by the Defendant with the sole intent of injuring Plaintiff's reputation and to expose Plaintiff to ridicule, hate and disesteem.
  13. The Plaintiff would rely on the fact that the Defendant published the words complained of maliciously and recklessly without any basis, lawful excuse or justification.
  14. The Plaintiff says that the false publication by Defendant which has gone viral on social media and other online news portals caused embarrassment, ridicule and reproach to Plaintiff, prompting calls from family and friends all over the world.
  15. The Plaintiff also says that the false publication has courted serious disaffection for her from actors, actresses, directors and lovers of Kumawood movies.
  16. The Plaintiff says that the Defendant knew or ought to have known that once the publication was made by a personality like him, it would be culled and reproduced on social media which is accessible to countless number of persons worldwide.
  17. The Plaintiff says that the false publication by Defendant has not only tarnished the image of Plaintiff, but has lowered her reputation in the eyes of well-meaning people in society.
  18. The Plaintiff says that the publication by Defendant has made her appear contemptible before her peers and other right thinking persons.
  19. Wherefore the Plaintiff claims against the Defendant as follows:

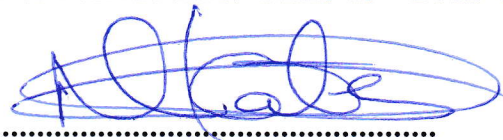
***A declaration that the words ““Who knows you? If not for GTP and senior government officials who signed you on at GTP, who would have signed you. What kind of star are you? Even your own daughter doesn't know you”***

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- f. Legal Costs

**DATED AT ANKOMA-SEY, APATU-PLANGE & PARTNERS THIS 13<sup>th</sup> DAY OF FEBRUARY, 2024**



**NII APATU-PLANGE  
LAWYER FOR PLAINTIFF**

Nii Kwesi  
Plange  
1st Floor Teachers Hall Complex  
GNAT Drive, (off Barnes Road)  
Adabraka - Accra  
M. 0. 944 000, 9444 0004, 94444

The Registrar  
High Court  
Accra