

Judgment 16 of 1972

16

IN THE PRIVY COUNCIL

No. 11 of 1970

O N A P P E A L

FROM THE COURT OF APPEAL OF THE SUPREME
COURT OF JUDICATURE OF GUYANA

B E T W E E N :

BOOKERS STORES LIMITED

Appellant
(Defendant)

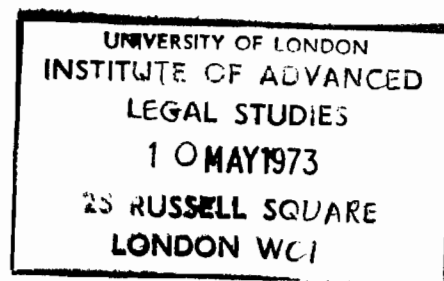
- and -

MUSTAPHA ALLY

Respondent
(Plaintiff)

RECORD OF PROCEEDINGS

VOLUME 2



SIMMONS & SIMMONS,
14, Dominion Street,
London, EC2M 2RJ.

Solicitors for the Appellant.

FROM THE COURT OF APPEAL OF THE SUPREME
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Appellant
(Defendant)

Respondent
(Plaintiff)

RECORD OF PROCEEDINGS

INDEX OF REFERENCE

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LIST OF DOCUMENTS TRANSMITTED TO PRIVY COUNCIL
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Description of Document	Date of Document
Defence	January 1965
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Exhibit "K20" Telegram	21st March 1963
" "K21" "	22nd March 1963
" "K23" "	22nd July 1963
" "K31" "	18th October 1963

EXHIBITS

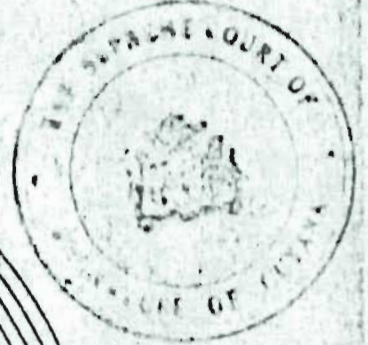
B - PAMPHLET ON GRANTEX RICE MILLS

B

Pamphlet on Grantex
Rice Mills

20th February 1965

S 20



RICE MILLS

Morris & Co. Ltd.

LEWIS C. GRANT LTD.

DUNDEE FOUNDRY
DYSSALMILLIE
SCOTLAND

B

Pamphlet on Grantex
Rice Mills20th February 1965
(continued)

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SPECIFICATION AND DESCRIPTION

"Grantex" Self Contained Rice Mills are supplied to the following specification which lists the machine incorporated in the mills in the order in which the rice passes through them.

IRONWORK for PADDY INTAKE HOPPER (1) comprising steel grating to prevent entry of large foreign matter and regulating slide with adjustment to control rate of flow of paddy from the intake hopper to the paddy intake elevator.

ONE PADDY CLEANING RIDDLE for removing stones dust and other extraneous matter from the paddy.

OR alternatively in the case where the paddy is more than slightly dirty.

ONE PADDY CLEANER (2) fitted with trays to remove stones, dust, and other extraneous matter from the paddy and with a fan arranged to aspirate the paddy at both the intake and discharge.

ONE MAGNETIC SEPARATOR (3) for removing nails, wire, and bits of iron from the paddy. This magnet is of the permanent type with no moving parts.

ONE OR TWO DISC SHELLERS (4) with discs covered with emery composition during passage between which the bulk of the paddy is shelled.

ONE OR TWO HUSK ASPIRATORS (5) for removing the husk from the rice and paddy mixture discharged from the sheller together with shaper(s) for removing bran and points of rice before entry to the body of the aspirator.

ONE OR TWO PADDY SEPARATORS (6) for recovering paddy from the rice for return to the sheller(s). This machine would be supplied with a countershaft and a pair of conical pulleys to permit of accurate speed adjustment.

TWO OR THREE PEARLING (WHITENING) CONES (7) with coner covered with emery composition between which and wirecloth or perforated steel casings the rice is whitened. These cones are arranged to work in series, whitening the rice in equal stages in each.

In series 60, 70 and 80 mills only :

ONE OR TWO POLISHING CONES with drums covered with sheepskin for polishing the rice after whitening. These machines would be identical to the whitening cones except for the replacement of the emery-covered cone by one covered with sheepskin.

ONE SUCTION FAN for aspirating the Pearling Cones and where applicable the Polishing Cones together with air suction piping connecting the cones to the suction fan.

ONE TWO-TRAY ROTARY SIEVE (8) for separating broken rice from whole grains and grading the brokens into two sizes (large and small). This sieve would be mounted in a strong steel frame.

OR alternatively

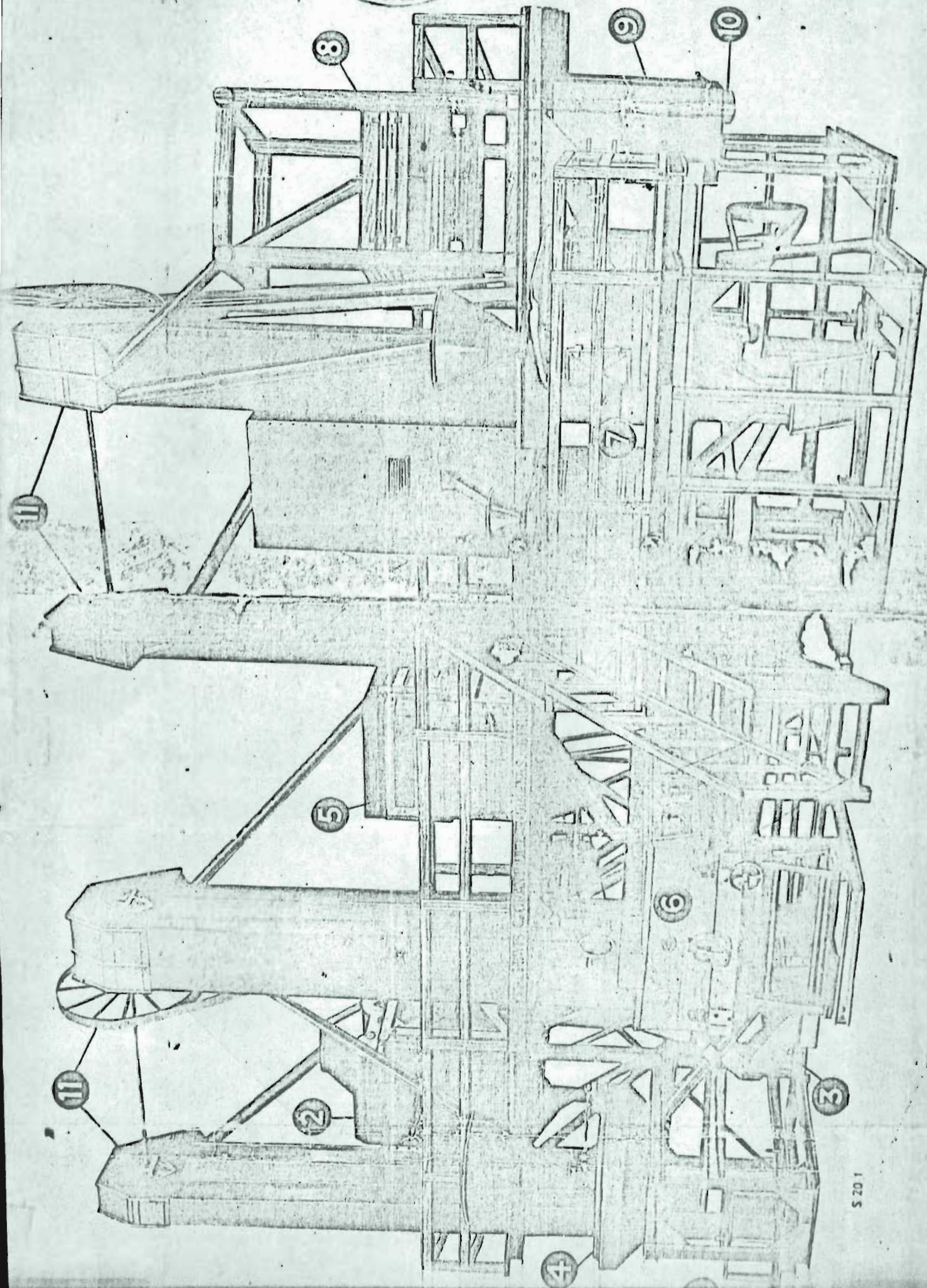
ONE COMPOUND TRIEUR CYLINDER with cylinder indented sheet for separating broken rice from whole grains in the first section and grading the brokens in the second section into two sizes (large and small). This Trieur would be fitted with standard tray regulator and tapping hammers and would be mounted in a strong steel framework.

OR alternatively both the above Rotary Sieve and Trieur Cylinder can be supplied the Rotary Sieve being used for separating the whole grains and the small brokens while the large brokens from the Rotary Sieve would be passed to the Trieur Cylinder for recovery of any whole grains. In this case a simple trieur would be supplied for sorting into two products only (whole rice and large brokens).

B

Pamphlet on Grantex Rice Mills

20th February 1965
(continued)



No. 44 SELF CONTAINED MILL (2 CONES) WITH PADDY CLEANER

S 20 1

B

Pamphlet on Grantex
Rice Mills20th February 1965
(continued)

(5)

Specification and Description—continued

BOX TYPE ASPIRATORS (9) for aspirating whole rice, large broken, and small broken together with air suction piping to connect the aspirators to the cone suction system.

BAGGING SPOUTS (10) with quick release straps for bagging off whole rice, large broken, small broken, and points discharged from the shaker of the husk aspirator.

All necessary ELEVATORS (11) for making the mill fully automatic. These elevators would be of the bucket type and would be supplied with steel trunking unless otherwise requested by customer.

All HOPPERS and SPOUTING between machines and elevators (made of steel).

SHAFTING for driving the above machines mounted in ball bearings and fitted with PULLEYS and BELTS for driving all machines and elevators.

NOTE: Fast and Loose pulleys would be supplied for receiving the drive from customer's engine or motor but the main driving belt between engine or motor and millshaft would not be supplied unless ordered as an extra.

STEEL FRAMEWORK of strong construction for carrying the above machines and shafting. The wooden flooring staircases and handrails would not be supplied as these could be supplied more economically by the customer locally.

FOUNDATION and HOLDING DOWN BOLTS; SPANNERS; STRICKLE GEARS for use in re-covering sheller discs and cone faces; SLIDE REST with tool holder and tools for truing up cone faces; LIFTING BAR for lifting sheller discs and cones.

Items marked * are supplied only at an extra price as the following can also be.

SCALPING BAND for removing excess straw from the paddy prior to the paddy entering the Paddy Riddle or Paddy Cleaner.

RETURN PADDY SHELLER for treating the paddy returned by the Paddy Separator.

CYCLONE for collecting meal in the air discharged from the cone suction fan.

CONE MOULD for use in recovering cones in lieu of the strickle gear. (The use of a cone mould is strongly recommended as re-covering of cones by this means is much facilitated particularly with the larger sizes of cones).

WOOD FLOORING, STAIRCASE and HANDRAILS for platform.

Each Self-Contained Mill manufactured is fully erected in our works, given a thorough trial (empty), and is marked for re-erection before being dismantled for packing.

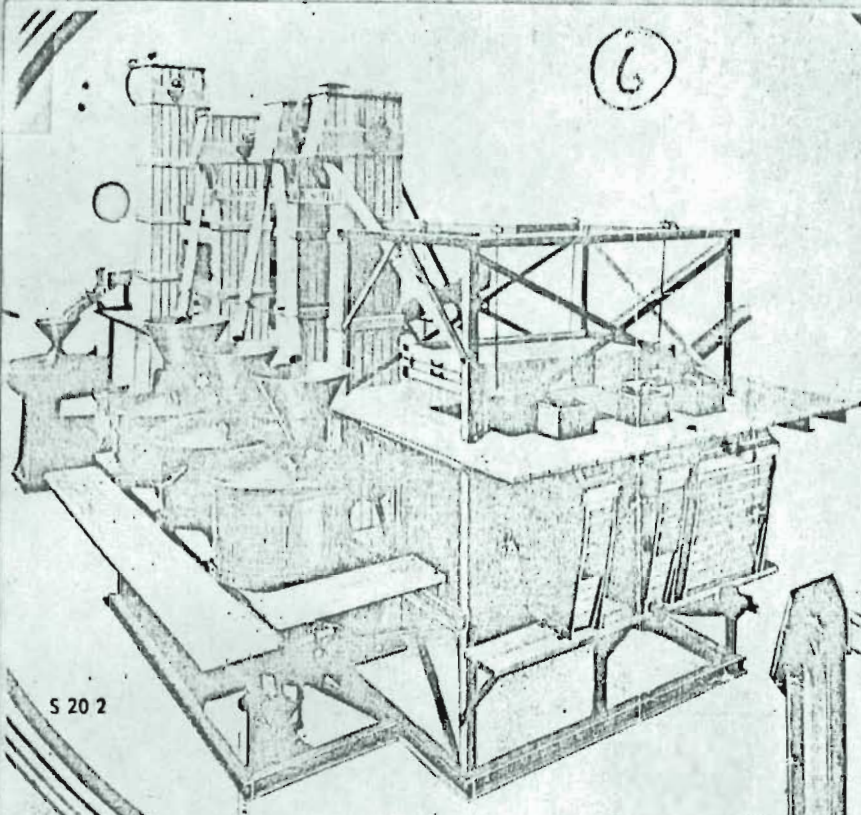


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Pamphlet on Grantex
Rice Mills

20th February 1965
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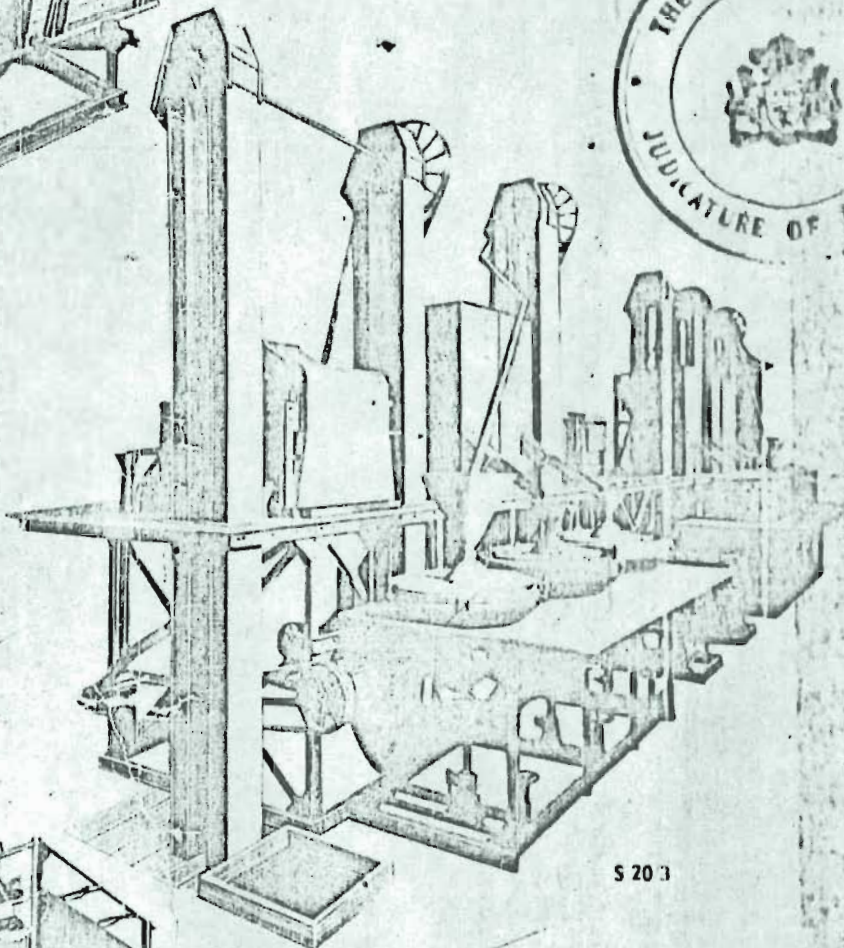


No. 53. Self Contained Mill (3 Cones) with
Rotary Sieve for Rice Grading.

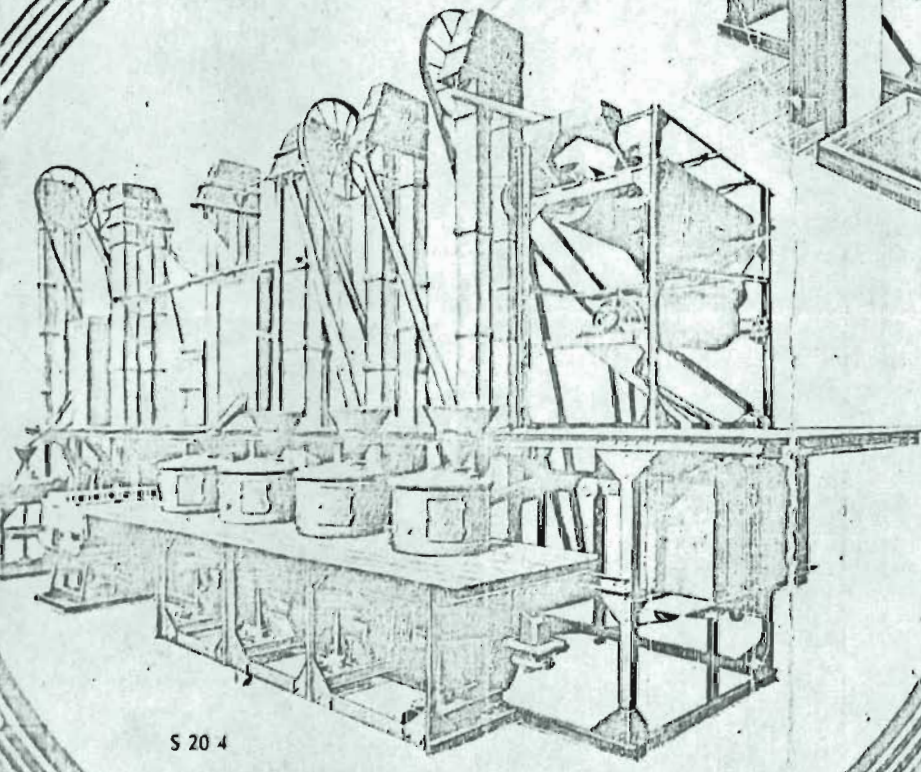
S 20 2



No. 75. Self Contained Mill (3 Cones,
1 Polisher) with Paddy Cleaner and
Return Paddy Sheller.



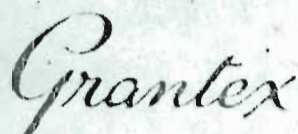
S 20 3



No. 77. Self Contained Mill (3 Cones,
1 Polisher) with Triquet Cylinders for
Rice Grading.

S 20 4

B

Pamphlet on Grantex
Rice Mills20th February 1965
(continued)


Self Contained Rice Mills are made in standard sizes ranging from double cone mills to mills with three cones and two polishers and in capacities ranging from 1700 to 7500 lbs. of paddy per hour. These standard mills are listed below but we will be glad to offer Self Contained Mills of a greater capacity if so required.

LIST OF STANDARD SELF-CONTAINED RICE MILLS

Ref. No.	Capacity lbs. hour Paddy.	Driving Pulleys Fast and Loose			B.H.P.	Approximate Overall Dimensions in Feet.			Shipping Particulars.		Code Word.
		*Dia.	Width.	Revs.		Length.	Width.	Height.	Gross Weight Cwts.	Meast. Cubic Ft.	
DOUBLE CONE MILLS (Fig. 2)											
43	1700-2200	21"	7"	350	27	23	16	17	180	960	SMABZ
44	2650-3500	24"	9"	300	35	28	19	18	270	1350	SMADF
45	4000-5200	24"	11"	300	45	35	25	20	320	1600	SMAFL
46	5500-7000	30"	12"	250	55	39	27	21	400	1900	SMAGO
TRIPLE CONE MILLS (Fig. 3)											
52	1900-2500	21"	8"	350	30	28	17	18	240	1200	SMANK
53	2950-3800	24"	11"	300	40	33	18	19	330	1540	SMAON
54	4300-5600	30"	11"	300	55	42	25	21	380	1800	SMAPR
55	5800-7500	42"	11"	250	65	45	27	22	440	2200	SMARU
DOUBLE CONE MILLS WITH ONE POLISHER (Fig. 3)											
63	1700-2200	21"	8"	350	30	28	17	18	240	1200	SMAYP
64	2650-3500	24"	10"	300	38	33	18	19	330	1540	SMAZT
65	4000-5200	30"	11"	300	50	42	25	21	380	1800	SMEBD
66	5500-7000	42"	11"	250	60	45	27	22	440	2200	SMEDJ
TRIPLE CONE MILLS WITH ONE POLISHER											
72	1900-2500	21"	9"	350	35	33	17	18	290	1340	SMEKF
73	2950-3800	24"	12"	300	48	38	18	19	370	1700	SMELI
74	4300-5600	30"	12"	300	60	48	25	21	460	2000	SMENO
75	5800-7500	42"	12"	250	70	51	27	22	500	2400	SMEOS
TRIPLE CONE MILLS WITH TWO POLISHERS											
82	1900-2500	21"	9"	350	35	38	17	18	360	1600	SMEUH
83	2950-3800	30"	11"	300	50	43	18	19	420	1900	SMEVK
84	4300-5600	36"	11"	300	65	54	25	21	500	2200	SMEWN
85	5800-7500	42"	12"	250	75	57	27	22	560	2600	SMEYU

* Can be varied slightly to suit Customers' Driving Pulley.

Capacities given assume paddy of good quality, the lower figure referring to paddy difficult to mill and the higher figure to easily milled paddy.



B

Pamphlet on Grantex Rice Mills

20th February 1965 (continued)

X-A-11
A.C.
20/2/65

Self Contained Rice Mills are the outcome of many years of experience in the manufacture of Rice Milling Machinery, which has resulted in the design of these mills being the best of their type. They are of sturdy construction, easily erected by any competent mechanic without specialist knowledge, and arranged so that all adjustments are accessible to ensure ease in operation. Only the simplest foundation work is necessary for these Self Contained Rice Mills which are also self supporting so that the building in which they are erected can be of the simplest type.

In addition to these Self Contained Rice Mills we make a complete range of all machines required for:—

- Paddy Cleaning
- Paddy Parboiling
- Rice Milling
- Rice Glazing
- Paddy Grading
- Paddy Drying
- Rice Grading

together with ancillary machinery such as elevators and conveyers.

Enquiries are welcome and we will always be glad to have an opportunity of quoting against your requirements.



CERTIFIED
A TRUE COPY

W. Camp
Assistant Justice Clerk
8.6.70.

LEWIS C. GRANT LTD.

GRANTEX

POUNDRY, DYERS, FILE SCOTLAND

C - PAMPHLET ON GRANTEX GRAIN DRYER

C

Pamphlet on Grantex
Grain Dryer
20th February 1965



C

Pamphlet on Grantex Grain Dryer
20th February 1965
(continued)

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you use a **GRANTEX** grain dryer



If grain is stored with excessive moisture, deterioration will follow. Under given conditions the rate of deterioration depends mainly on the amount of moisture present, the lower moisture values making for longer safe storage. For example grain at or over 20% moisture content could be affected in only a few hours, at 15% it can normally be stored for 6 to 12 months, while at 12% storage up to two years becomes possible.

The weather seldom allows grain to be harvested at the low moisture content required for long term bulk storage. Artificial drying is, therefore, often essential if the grain is to be kept in good condition over a period of time until required for use, or sale when the market is favourable.

An efficient Grain Dryer should fulfil the following conditions:—

It should be capable of receiving and treating, without delay, the full intake from harvest operations even under the wettest conditions, thereby ensuring that the grain is safe at least for a short period.

Operating costs should be low both as regards fuel and power requirements.

The labour required to operate the Dryer should be kept to a minimum and manual handling of the grain avoided.

It should dry the grain evenly, eliminating the risk of small wet patches which can cause "hot spots" and ruin large quantities of grain in store.

The temperature of the drying air and flow of grain should be under simple and accurate control over a wide range to cover the different drying requirements. In the treatment of Seed and Malt grains drying air temperature is critical if germination is to remain unaffected.

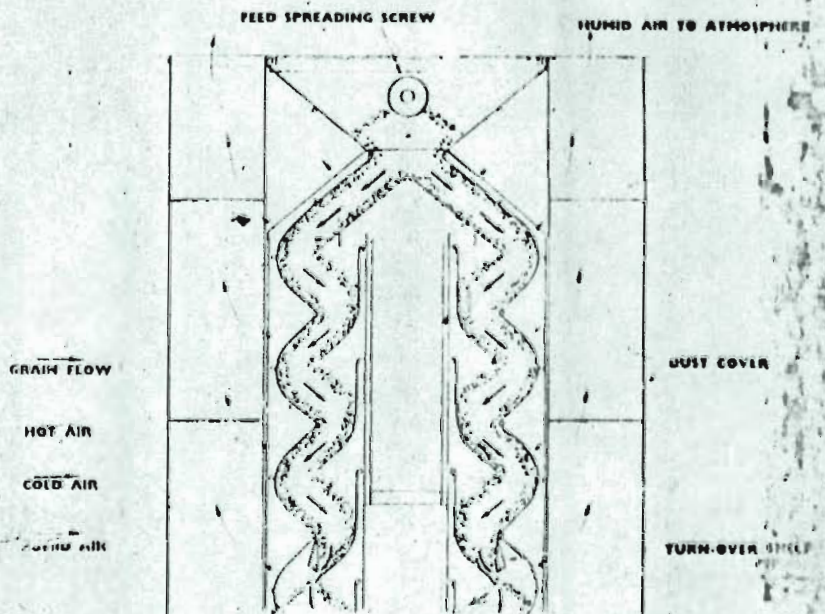
There should be an effective means of cooling the grain after drying. The warm grain may "sweat" in an enclosed space.

Hot moist air discharged by the Dryer should be ducted out of the building to prevent condensation and the re-entry of moisture into the Dryer.

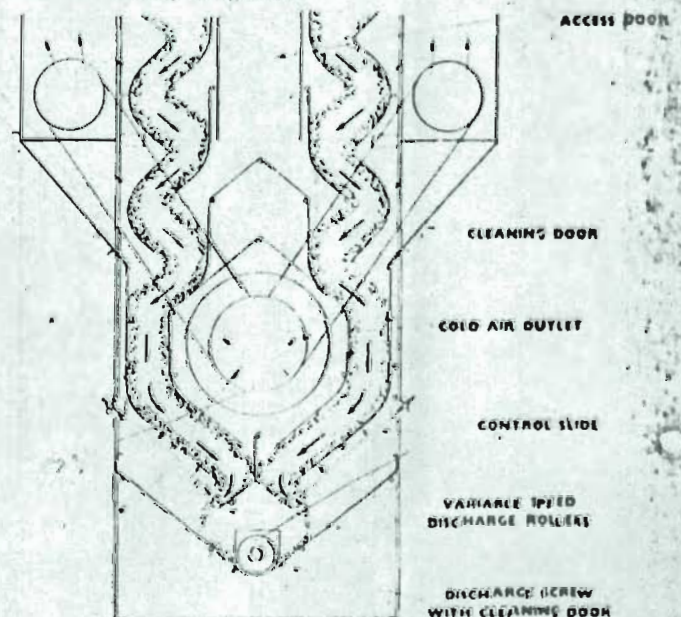
The Dryer should be dust-proof and access for inspection and cleaning should be easy.

The **GRANTEX UNIFLOW GRAIN DRYER** fulfils all these conditions. Its design is based on over thirty years experience of grain drying

The operation of this dryer is illustrated in the adjacent diagrams. The grain is elevated to an intake hopper at the top of the drying tower. From here it flows down in uniform smooth columns over a series of specially designed shelves.



The special design ensures that the fullest advantage is made of the dry heated air in the uniform drying of each grain in the descending columns, thereby giving maximum economy of operation.

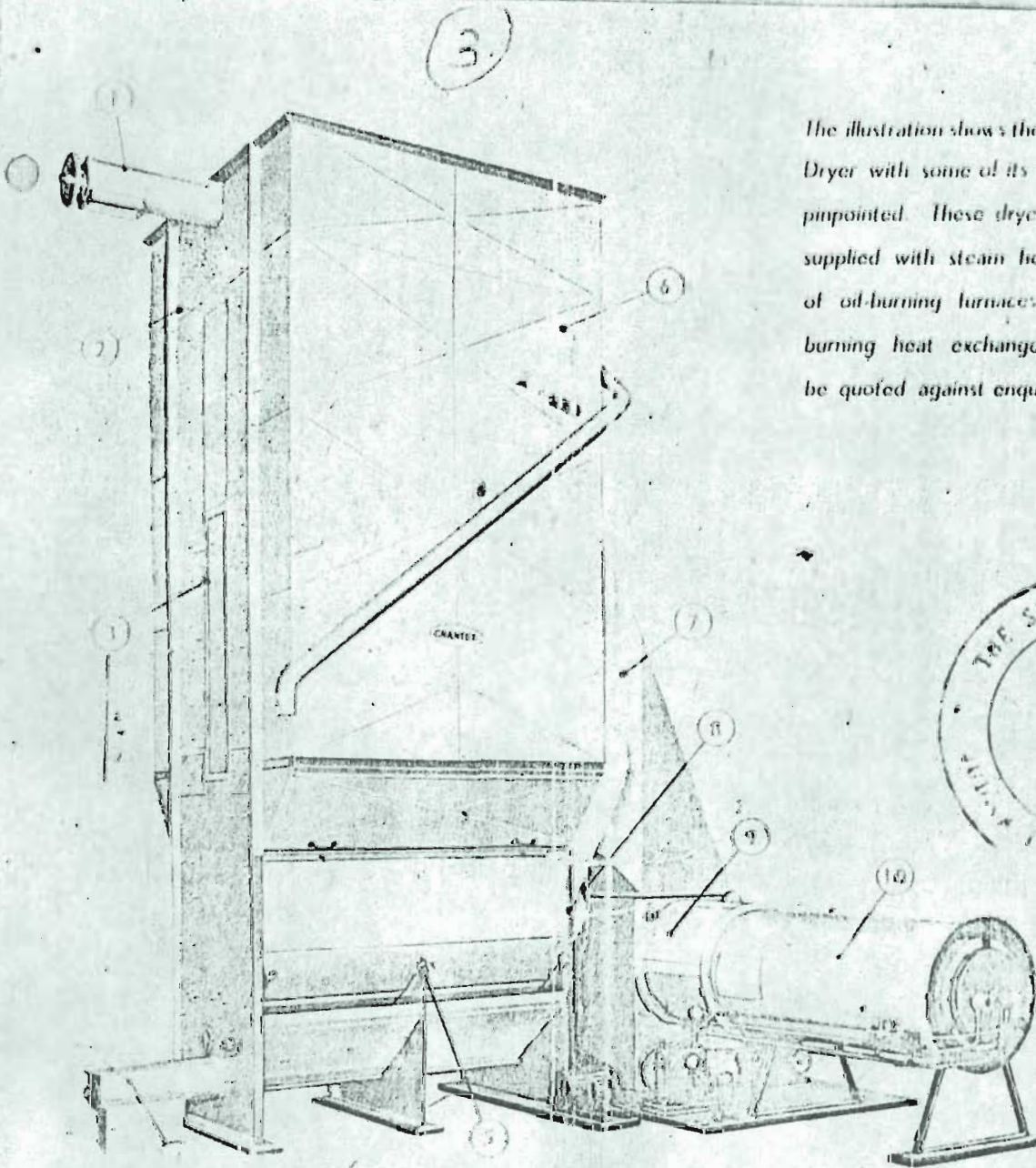


Discharge Rollers arranged across the whole width of each column ensure an even flow of grain through the Dryer. The rate of flow is controlled within wide limits by a variable speed gear incorporated in the drive.

C

Pamphlet on Grantex
Grain Dryer20th February 1965
(continued)

Page three



The illustration shows the Grantex Grain Dryer with some of its special features pinpointed. These dryers can also be supplied with steam heaters in place of oil-burning furnaces, or with oil-burning heat exchangers.* Price will be quoted against enquiries.



SPECIAL FEATURES

- 1 **DRYER FEED SCREW** spreads wet grain evenly across the Dryer width maintaining a constant head of grain.
- 2 **DRYER COLUMN** made from heavy gauge galvanized steel. The inner shelves are of galvanized steel and are open for access and cleaning from the plenum chamber. The outside shelves are part-perforated aluminium arranged so that the grain rests on the lower solid part giving smooth flow, while the exhaust drying air passes through the upper perforated part.
- 3 **ACCESS DOOR** allows easy access for periodical cleaning.
- 4 **DISCHARGE SCREW** collects and delivers dried grain from the Dryer to one outlet point.
- 5 **ADJUSTABLE SLIDES** enable even discharge from each section of the Dryer to be achieved. A variable speed gear on discharge rollers allows a wide variation of the rate of flow through the Dryer as a whole by simple single control.
- 6 **DUST COVERS** collect moist air and dust discharged from the Dryer; keep the building clean and ventilated. We strongly recommend that these dust covers be fitted to give good working conditions and to ensure a supply of fresh air to the Dryer intake and the Dryer cooling section.
- 7 **HOT AIR DUCT** conducts all the heated air from the main fan to the Dryer.
- 8 **COOLING FAN** high efficiency, axial flow type; maximum air movement for minimum power; cools the grain after drying to ensure safe storage.
- 9 **MAIN FAN** high efficiency, axial flow type normally fitted, of ample capacity to blow the hot air through the grain with minimum power requirements.
- 10 **FURNACE UNIT** easy and safe to operate with air controlled oil burners. Oil is cut off automatically if the flame goes out or the main fan fails. A further thermostat controls air temperature over a wide range, independent of ambient temperature.

All motors are totally enclosed type to give long trouble-free life.

C

Pamphlet on Grantex
Grain Dryer20th February 1965
(continued)

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GRANTEX GRAIN DRYER

components

DRYING TOWER — of galvanised steel and aluminium construction comprising:—

Columns and Division Sheets of heavy gauge galvanized steel sheet. Top Hopper with screw to spread feed over the width of the Dryer. Screw normally driven from elevator head—separate motor can be supplied. Inner Shelves of galvanized steel. Outer Shelves of part-perforated aluminium. Discharge Roller driven by variable speed device to regulate the flow of grain through the Dryer. Control Slides to give wider variation of feed rate. Screw to collect the grain from the Dryer and deliver to one outlet point. Electric Motor with starter and drive for discharge rollers and screw. Hot Air Ducting from a suitable point from the fan to the drying tower. Dust Covers at front and back of tower to collect air discharged from the Dryer. (Ducts should be built from these dust covers to the outside of the Dryer building to exhaust all moist air and to avoid any dust and chaff being deposited in the building.) Dial type Thermometer to register temperature of air in hot air duct.

COOLING SECTION is arranged in the lower part of the Dryer immediately above the discharge rollers. The Shelves are of perforated aluminium and the section has an insulation space between it and the drying section. It is fitted with an axial flow fan complete with motor and starter. (Note: This Cooling Section is omitted from many Rice Mill Installations where it is not required.)

FURNACE AND OIL BURNING UNIT: Furnace of heavy gauge steel construction having an inner combustion chamber and an outer air chamber. The outer cold air and the combustion gases are mixed before passing to the main fan. Fitted with adjustable slides for drawing in extra cold air when required. All available heat is passed to the Dryer resulting in maximum fuel economy. Oil Burner(s), thermostatically controlled and controllable over a wide range of temperatures. Air leak temperature control thermostat which controls oil feed to burner to give steady predetermined air temperature. Safety thermostat cuts off oil supply in event of a flame failure. Automatic Oil Cut Off Valves with oil metering valves and air control valves. Air Compressor complete with gauges. Fuel Pump. Oil Filter. All the necessary oil and air piping and fittings. *Customer would supply fuel storage tank and pipework to fuel pump to suit his own layout. We can quote extra for this.*

MAIN FAN: Large capacity hot air fan of the axial flow type with air cooled ball bearings; Electric motor; Starter and vee drives.

INDUCTIONS: All motors on the Dryer are of the totally enclosed type which prevents dust, etc. from entering the working part of the motor and ensure a long, trouble-free life.

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Pamphlet on Grantex
Grain Dryer20th February 1965
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CAPACITY TABLE and SHIPPING SPECIFICATION



Capacity Table

Size	Capacity in ton/hour when reducing moisture content by 5% using drying air shown				Total H.P. Required
	110 F	130 F	150 F	180 F	
02	.58	.82	1	1.4	5
04	1.16	1.64	2	2.8	7
04T	1.74	2.46	3	4.2	10
06	1.74	2.46	3	4.2	10
06T	2.61	3.69	4	6.3	15
08	2.32	3.28	4	5.6	15
08T	3.48	4.92	6	8.4	26

NOTE: Capacities are based on reducing moisture content from 22% to 16% under atmospheric conditions of 60 F and 70% relative humidity. Output at other extraction rates will vary approximately in inverse proportion.

Capacities under other climatic conditions, e.g. Tropical, Sub-tropical, will be given on receipt of details of average temperature, and humidity prevailing.

Approximate Shipping Specification

Standard Dryers size	02	04	06	08
Shipping Tons	6½	8½	11	13
Tall Dryers size		04T	06T	08T
Shipping Tons		11	13	16

MILLERS, SEED MERCHANTS
& MALTSTERS

Hovis Ltd.,
Albion Mills,
Lincoln.

John Croysdale & Sons Ltd.,
Whitley Bridge,
Goole,
Yorkshire.

North of England Malt Roasting Co. Ltd.,
Masham,
Near Ripon,
Yorkshire.

McGill & Smith, Ltd.,
Kyle Street,
Ayr.

FARMERS

J. Alston,
Sco-Ruston Farms Ltd.,
Tunstead,
Norwich.

A. W. Clark,
Skeddoway Farm,
Thornton,
Fife

W. Allison,
Almonchill,
Kirkliston,
West Lothian.

J. Stott,
Crichtie Farm,
Inverurie,
Aberdeenshire.

and RICE MILLERS

in

British East Africa
British Guiana

Ceylon
Colombia
Greece

Indonesia
Jamaica

Malaya

Panama

Portuguese East Africa

Salvador

Sierra Leone

South Africa

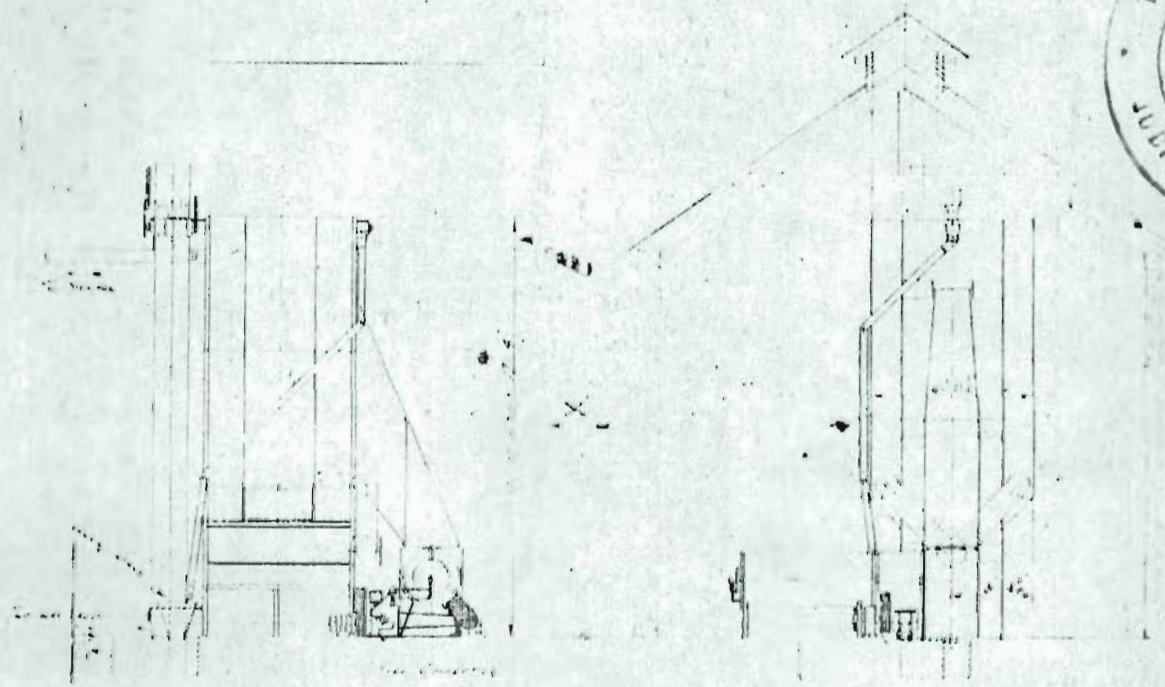
Venezuela

C

Pamphlet on Grantex Grain Dryer

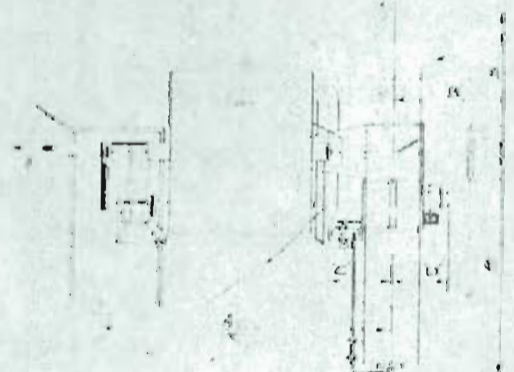
20th February 1965
(continued)

(6)
DIMENSIONS



FRONT ELEVATION

ELEVATION ON ARROW 'X'



PLAN

	SIZE OF DRYER			
	02	04	06	08
'A'	8'-2"	11'-4"	14'-6"	17'-2"
'B'	8'-0"	9'-0"	11'-6"	11'-6"
'C'	2'-11"	2'-7"	2'-10"	2'-6"
'D'	2'-3"	2'-5"	2'-1"	2'-9"

	SPECIAL DRYER 21' x 180LH		
	04T	06T	08T
'A'	12'-9"	14'-11"	18'-0"
'B'	11'-6"	13'-6"	15'-6"
'C'	2'-10"	2'-6"	2'-6"
'D'	2'-1"	2'-6"	2'-8"

NOTE: Illustrations are typical and we reserve the right to depart from them or from specification in detail without prior notice.

Enquiries are welcomed and we will be glad to put our customers in touch with our nearest agents without obligation.

CERTIFIED
A TRUE COPY

W. G. ...
Assistant Survey Clerk
8-6-70



LEWIS C. GRANT LTD.

Specialists in Process Machinery
DUNDEE FOUNDRY, DYSART FIFE, SCOTLAND

EXHIBIT G.
BOOK OF INSTRUCTIONS, AT PAGE 11.

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REF. 7D
LEWIS C. GRANT, LTD.
Dunnikier Foundry, Dysart, Fife, Scotland
August, 1961.

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 instructions
 at page 11.
 26th February
 1965

INSTRUCTIONS FOR OPERATING "GRANTEX" GRAIN DRYERS

10 It is recommended that, before starting to use the
 Dryer, the operator should make himself familiar with
 the various adjustments and controls available, which
 are as follows:-

1. Grain Dryer:

(a) Slide to regulate feed to Intake Elevator

Whether this is supplied by us depends on the
 individual plant but some such control will be
 incorporated, either on the Elevator or in the
 Intake Pit so that the flow to the Dryer can
 be regulated to conform to the speed of
 discharge of the grain from the Dryer.

20 (b) Feed Distributer in Top Hopper and Overflow

30 It is essential that the Top Hopper on the
 Dryer is kept full of grain while the Dryer
 is in operation. On standard Dryers a
 distributing Screw Conveyor is fitted in the
 Top Hopper to spread the feed evenly over the
 width of the Dryer. The grain is fed into
 the Hopper at one end of the screw, and then
 conveyed as the Dryer fills, to the opposite
 end. Excess grain is passed out through an
 overflow pipe and returned to the Intake
 Hopper, or to some point in the flow where it
 will again have to pass through the Feed
 Control Slide. The feed to the Dryer should
 always be slightly in excess of the Dryer
 discharge rate, with just a small amount
 returning over the overflow to ensure a full
 Hopper on the Dryer.

(c) Discharge Slides. (See fig. 1) (overleaf)

40 These are located, one at the bottom of each
 column just above the Discharge Rollers, and
 they should be adjusted by means of the
 wing-nuts "A" to give a gap of approximately 3/4".
 The purpose of these Slides is to regulate

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(continued)

-1A-

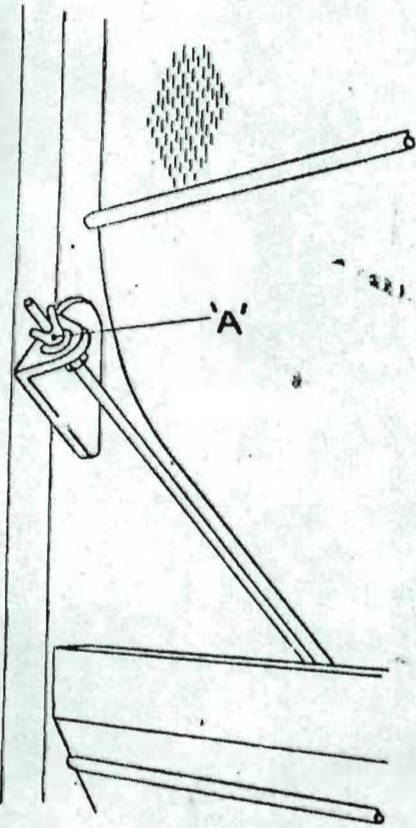


FIG. 1

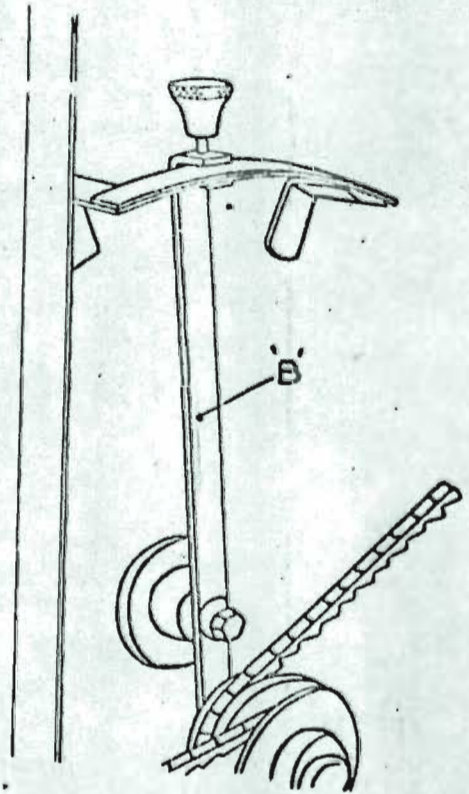


FIG. 2

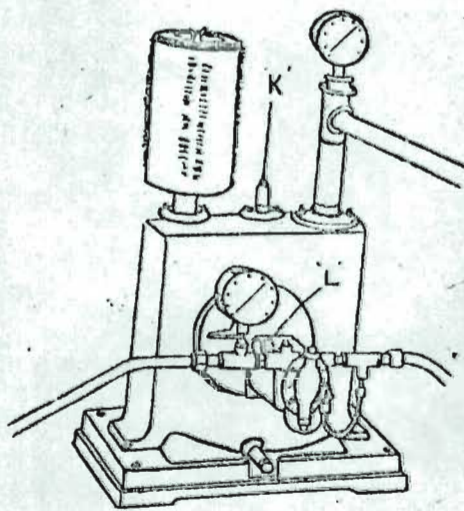


FIG. 3



the discharge so that it is even over the whole width of each drying column and even for each column to ensure equal drying.

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(d) Discharge Rollers. (See fig. 2) (Page 1A)

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10 These are located at the bottom of each column and are driven from a motor through a variable speed drive fitted at the side of the drying tower. Adjustment is by lever "B" allowing the speed of the rollers to be increased or decreased as required to speed up or slow down the flow of grain through the Dryer. This is the control which governs the amount of drying done at the particular drying air temperature being used.

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(continued)

2. Oil Furnace:

Air Compressor and Fuel Pump (See fig. 3)
(Page 1A)

20 Air pressure should be adjusted to approximately 5 lbs. per square inch by removing the brass dome shaped cover "K" and turning the screw which will be then exposed.

Oil pressure should be adjusted to between 4 and 5 lbs. per square inch. The oil pump is fitted to the air compressor at the opposite end to the drive, and adjustment is made by removing the brass plug "L" * nearest to the compressor when a brass screw will be seen in the hole so opened. Turning this screw will alter the pressure as required.

30 Note * This plug may be on top or under the oil pump according to the plant layout.

(b) Main Oil Valve is located in the oil fuel suction line to the fuel pump and is for shutting off the supply to the pump.

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(continued)

(c) Oil Cut-off Valves. (See figs. 4 and 5)
(Page 2A)

Cut-off Valve "H" is a diaphragm type Valve controlled by the temperature control thermostat "C" (fig. 7) which varies the air pressure under the diaphragm according to the drying air temperature, and so varies the flow of oil through the Main Control Valve "F" to the burner.

Cut-off Valve "J", also diaphragm type, and controlled by Flame Failure Thermostat "D" (fig.7) is fitted only on Dryers with Air-operated Flame failure protection, in which case flame failure causes the air pressure on the diaphragm to fall, thus cutting off the oil flow to the burner. The Air Cock "E" on Valve "J" is closed to isolate the Thermostat Control "D" when warming up, and opened to allow the control to operate when the furnace is warmed up.

On Dryers with Electrically-operated Flame Failure protection Cut-off Valve "J" is replaced by a Solenoid Valve "P" (fig.5) controlled by a light sensitive electric cell fitted on front of the furnace. If flame failure occurs, or if the flame becomes poor or smoky, this cell operates the Solenoid Valve and fuel to the burner is cut off immediately.

No adjustment is required to any of these cut-off Valves.

(d) Oil Control Vales. (See figs.4 and 5)(Page 2A)

These Valves "F" and "G" are located in the fuel oil line between the two cut-off valves "H" and "J" or "P" and marked "PILOT" and "MAIN".

On large Dryers with double burners, the valve arrangement differs (see fig.6) with one pilot and one main control valve to each burner. In addition, Air Shut-off Valves "Q" are fitted so that one burner can be shut off completely for single burner operation.

The setting of these Valves is explained under "Furnace Operation".

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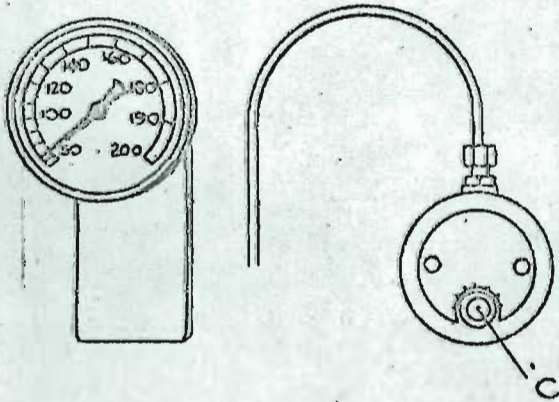


FIG. 8

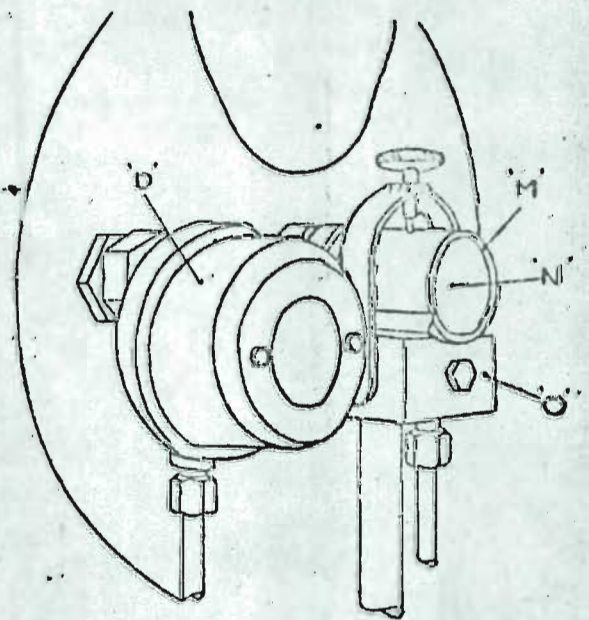


FIG. 9

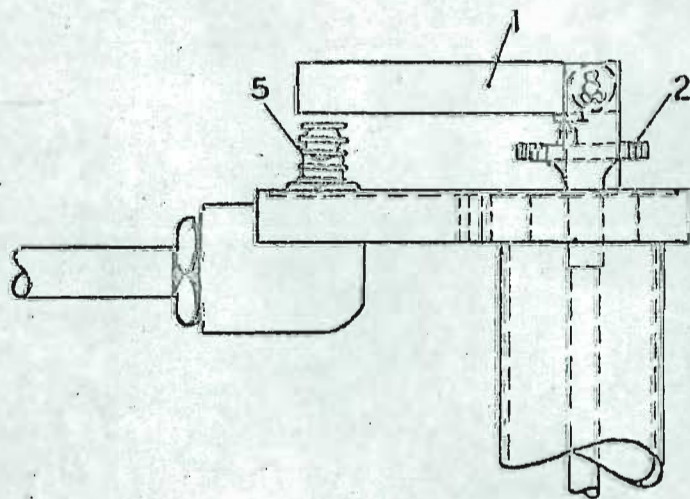


FIG. 10



(e) Temperature Control Thermostat (See fig.8)Plaintiff's
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This is located on one side of the hot air duct generally near the dial type thermometer, and allows any drying air temperature to be selected within a wide range, by turning the control knob "C" to a point to correspond with the required air temperature. When the Dryer is working, the drying air will be automatically brought to and maintained at that temperature. The temperature setting can be altered while the Dryer is working but a short time will be necessary to enable the air to be brought to the new temperature. When resetting from a high to a low temperature through a wide range, make a series of small settings, allowing the furnace flame to return to normal between settings. Flame failure is liable to occur if the knob setting is reduced too quickly.

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(continued)

(f) Flame Failure Protection

Two alternative types are available, one air operated and one electrically operated. Their purpose is to cut off the fuel supply to the burner should the furnace flame go out at any time, and so prevent flooding of the furnace with fuel oil or contamination of the grain in the Dryer with unburnt fuel.

Air operated type (See fig. 9 and 10).

A Flame Failure Thermostat "D" is fitted on the front of the furnace and controls the air pressure on Cut-off Valve "J" (fig. 4) (page 2A). When the thermostat is hot, cut-off valve is open to allow fuel to pass to the burner, but if the furnace flame goes out and the thermostat cools down; the cut-off valve is operated to close and shut off the fuel supply. 20-30 seconds delay is normal between flame failure and operation of cut-off valve. Air cock "E" (fig.4) in the air pipe between Thermostat "D" and cut-off Valve "J" is closed to put the thermostat out of action when starting up from cold and then opened up after 10-15 minutes run to allow thermostat to operate.

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(continued)

Should Thermostat "D" get out of adjustment it can be reset as follows. (See fig. 10) (Page 3A)

- (1) Remove cover.
- (2) Turn adjusting screw (2) in an anti-clockwise direction until operating bar (1) is approximately 1/8" clear of ball valve (5) with thermostat cold.
- (3) Start firing with Pilot flame only (See Furnace Operation page 7, para. h), and with Air Cock "E" closed. 10
- (4) As the furnace warms up, the operating bar (1) will gradually close down on ball valve (5). The ball valve is closed when no movement can be felt on the operating bar when pressed with the finger. Check the time at which the valve just closes, and if less than 10 minutes, ease off the operating bar by turning adjusting screw (2) anti-clockwise, and set so that closure occurs in approximately 10-12 minutes. 20
On the other hand, if the Valve fails to close in this time, turn adjusting screw (2) clock-wise, until valve is just closed. Air Cock "E" can now be opened.
- (5) Put full fire on and run plant for approximately 15 minutes.

Make sure that Air Cock "E" is in the open position. 30

Then extinguish the fire by closing control valves "F" and "G" (fig. 4) and within 20-30 seconds the ball valve (5) should be open enough to feel a slight movement on the operating bar (1) when pressed with the finger. The ball valve will continue to open still further as the furnace cools down, but the initial slight opening will be sufficient to operate cut-off valve "J" (fig. 4) and effect fuel cut-off in the event of flame failure. 40

If the ball valve (5) fails to open in the time stated, turn adjusting screw (2) say half a turn in an anti-clockwise direction and repeat the test.

Note: /

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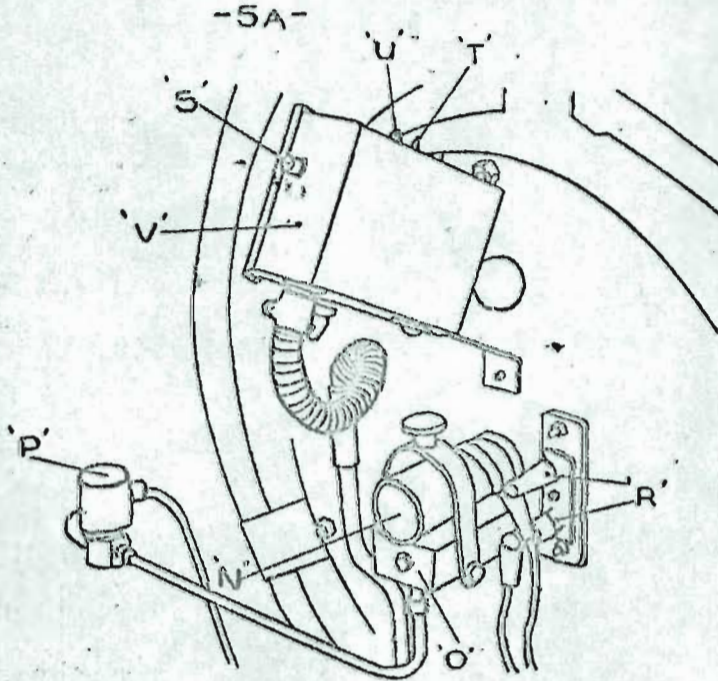


FIG. 11

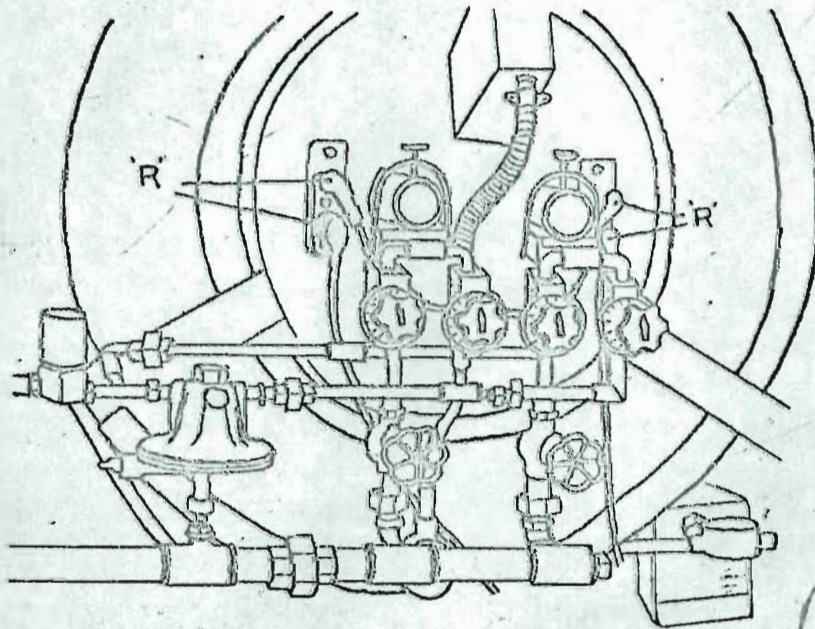


FIG. 12

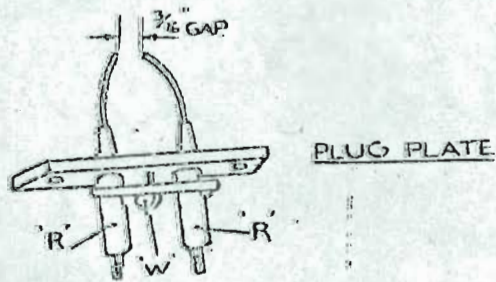


FIG. 13



Note: This re-adjustment will cause a slight increase in the "warming up" time (paragraph 4).

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Electrically operated Flame Failure protection (See figs. 11 and 12)

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(continued)

10 A light sensitive Electric Cell is fitted on the front of the furnace and controls the Solenoid Valve "P".
While the furnace remains lit, and this light falls on the electric cell, the Solenoid Valve is held open to allow fuel to pass to the burner. On flame failure, the Solenoid Valve closes immediately and the fuel supply is cut off. The control box "V" is fitted with a push button "S" for starting up, and two indicator lamps, one "Red" "T" to indicate that the current is switched on to the control box ready for starting up and one "Amber" "U" to indicate that the electric cell has operated and assumed control when the furnace lights up.
20 On pressing the starting button, the Solenoid Valve is automatically operated to allow fuel to pass to the burner and at the same time, current is switched on to the Ignition Plugs "R" (figs. 11 and 12).
If the furnace flame goes out, it will not re-ignite until starting button is again pressed. No adjustment is required to
30 this electrical equipment.

(g) Furnace Ignition

For furnaces with Air-Operated Controls, insert a lighted torch through the opening in the furnace front plate (or to the nozzle of the burner). See "Furnace Operation". This torch can be a piece of wire with waste or asbestos cord wrapped on one end and dipped in oil.

40 Furnaces with Electric Ignition are fitted with Spark Plugs "R" on the front plate which are fired when starting button is pressed. The gap between the points should be approximately 3/16" (See fig. 13). To adjust, slack off centre screw "W" on plug plate and swivel plugs to obtain correct setting. Do not bend the electrodes to adjust.

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(continued)

3. Furnace Operation:

THE FURNACE SHOULD NOT BE LIT UNTIL MAIN FAN
IS RUNNING.

In the "Grantex" Dryers, the drying air fan and air compressor are driven from the same motor (or countershaft) so that the furnace cannot be lit until the fan is started up.

The above conditions ensure that should the fan motor fail, the air compressor will also stop, thereby shutting down the furnace and preventing damage by overheating.

10

To start furnace with air-operated control.

(a) Open Air Cock "E" in air line to Flame Failure Thermostat (this prevents oil being fed to the burner until you are ready to ignite it and is the most convenient method of so doing).

(b) Check that the two Oil Control Valves (Pilot and Main) are shut, (four valves in the case of larger size Dryers).

(c) Open Main Oil Valve from oil supply.

20

(d) Start up main Fan and Compressor.

(e) Set Temperature Control Thermostat to required air temperature.

(f) Open "Pilot" Oil Control Valve about one turn.

(g) Insert lighted torch through opening in furnace plate (or to nozzle of the burner) and at the same time close Air Cock "E" in the air line to Flame Failure Thermostat when oil will be discharged from the burner nozzle and will ignite. Failure to ignite or burn steady at a Pilot Valve setting of 1 to $1\frac{1}{4}$ turns suggests the presence of dirt or air locks in the fuel line or burner. Check as described under "Maintenance" pages 14 and 15.

30

(h) Adjust Pilot Control Valve "G" to give a small steady flame. It is important that

the "pilot" flame should be too small to bring the drying air temperature up to the required figure, as this flame is hand controlled and not operated thermostatically. The extra oil needed to raise the temperature to the required figure is supplied automatically by the main control valve under thermostatic control.

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(continued)

- 10 (i) Adjust the Main Control Valve "F" so that the flame is sufficient to raise the drying air temperature a little higher than the required figure. Avoid over setting so that the flame passes round the baffle at the inner end of the furnace tube, as this may produce an irregular, pulsing flame, particularly at low drying air temperatures. The valve settings will readily be found once the Dryer is in operation. Note the valve settings as indicated on the setting dials for future starting.
- 20

- (j) After the furnace has been running for 10 to 15 minutes open the Air Cock "E" in the air line to Flame Failure Thermostat.

Note: In the case of Dryers with double burners Items (f) to (h) should be carried out first of all on one burner only, and then (f) and (h) on second burner.

30 Item (i) should be carried out on both burners together keeping them as equal as possible. The plant will now run until the temperature on the Control Thermostat setting is reached and this thermostat, which is fully modulating, will keep the drying air at this temperature. For low temperature operation on Dryer with two burners it is possible to operate with one burner only by closing the two oil control valves and the air valve "Q" (fig. 6) on the other burner.

40 To shut down

- (a) Turn off Main and Pilot Control Valves and allow fan to run for a short time - say 10/15 minutes to cool down the furnace and the grain in the Dryer.

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- (b) If the plant is to be stopped for a long period shut off the oil supply at the Main Oil Valve.

A trial start-up of the Furnace should be carried out before filling the Drying Tower with grain to check that the fuel is passing freely. In the early stages, burners may require frequent cleaning (see burner cleaning under heading "Maintenance") until pieces of grit and scale from new piping etc. have been eliminated. Final temperature setting should be carried out with grain in the Dryer.

10

To start furnace with electrically-operated Control and Ignition.

- (a) Check that the two Oil Control Valves (Pilot and Main) are shut. (Four valves in the case of larger size Dryers).

(b) Open Main Oil Valve from Oil Supply.

(c) Start up Main Fan and Air Compressor.

(d) Set Temperature Control Thermostat to required air temperature.

20

(e) Open Pilot Oil Control valve about one turn.

(f) Red indicator light should be "ON" on the control box. Press Starting Button on control box and hold until furnace lights up, a buzzing sound will be heard at the Spark Plugs if operating correctly. If furnace lights then go out, open up Pilot Valve a fraction (say one point on the indicator plate) and press button again. Repeat if necessary until Pilot Valve setting gives a small steady flame. Failure to ignite or burn steadily at a Pilot Valve setting of 1 to $1\frac{1}{4}$ turns suggests the presence of dirt or air locks in the fuel line or burner. Check as described under "Maintenance" pages 14 and 15.

30

It is important that the "pilot" flame should be too small to bring the drying air temperature up to the required figure as

40

this flame is hand controlled and not operated thermostatically. The extra oil needed to raise the temperature to the required figure is supplied automatically by the main control valve under thermostatic control.

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(continued)

10

- (g) If the Electric Cell has functioned correctly the Amber light on control box will be "ON". Check for flame failure operation by placing the hand between the cell and the furnace front, to prevent the light from the flame reaching the cell. The furnace should go out immediately. Press starting button to re-light the furnace.

20

- (h) Adjust the main Control Valve "F" so that the flame is sufficient to raise the drying air temperature a little higher than the required figure.
Avoid over-setting so that the flame passes round the baffle at the inner end of the furnace tube, as this may produce an irregular, pulsing flame, particularly at low drying air temperatures. The valve setting will readily be found once the Dryer is in operation. Note the valve settings as indicated on the setting dials, for future starting.

30

- (i) In the case of Dryers with double burners items (e) and (f) should be carried out first of all on one burner only, the Pilot Valve setting noted, and then repeated on second burner only. Then with both burners on, carry out item (h) keeping both as equal as possible. The plant will now run until the temperature on the Control Thermostat setting is reached and this Thermostat, which is fully modulating, will keep the drying air at this

40

To shut down

- (a) Either place hand between cell and furnace front as described in paragraph (g), or switch off electric supply to control box, when flame will go out.

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(continued)

Run Main Fan for a short time - say 10-15 minutes to cool down the furnace and the grain in the Dryer.

- (b) If the plant is to be stopped for a long period, shut off the oil supply at the main oil valve.

A trial start up of the furnace should be carried out before filling the Drying Tower with grain, to check that the fuel is passing freely. In the early stages, burners may require frequent cleaning (see burner cleaning under heading "Maintenance") until pieces of grit and scale from new piping etc., have been eliminated. Final temperature setting should be carried out with grain in the Dryer.

10

Dryer Operation:

Once the operator has familiarised himself with the adjustments and controls on the Dryer and with the furnace operation all as described he is ready to start using the Dryer as such and should proceed as follows:-

20

- (a) Fill the Dryer tower with the grain to be dried noting the moisture content of this grain. Frequent moisture readings should be taken as, particularly with grain coming in from the fields, there may be an appreciable variation in samples and it will be necessary to average these out.

If the Elevator supplied for feeding the Dryer is not arranged to drive the screw distributor in the top hopper of the Dryer (when fitted) then remember to start up the motor driving this screw before starting to fill.

30

Continue filling until the grain starts to come down the overflow pipe, then stop the feed Elevator.

- (b) Start up the main fan and air compressor and then start up the furnace all as described under Furnace Operation. The temperature control thermostat will, of course, be set according to the purpose

40

for which the grain is required as for example:-

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For seed and malting barley..	110°F to 120°F
Wheat, Oats or Barley for Milling.....	150°F
Raw rice for milling.....	125°F to 150°F
Parboiled Rice (three pass drying).....	First pass 135°F
	Second pass 130°F
	Third pass 125°F
Grain for feeding stuffs	170°F to 180°F

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(continued)

10

- (c) Check that the Discharge Slides are properly open and parallel.
- (d) After the drying air temperature has reached the required figure, as shown on the thermometer on the side of the Dryer tower start up the discharge elevator and feed elevator (those will probably be in the form of a double elevator). Then start up the motors driving the discharge rollers, discharge screw conveyors (if fitted) and the cooling fan (if fitted).

20

REMEMBER TO OPEN THE COCK IN THE AIR LINE TO THE FLAME FAILURE THERMOSTAT IF AIR OPERATED

- (f) Check Discharge Slide openings to see that even flow is being obtained - once set there should be no need to alter the positions of these.
- (g) Adjust the speed of the Discharge Rollers to give the rate of grain discharge required according to the moisture extraction to be done. This rate can easily be measured by weighing the discharge over a convenient period.

30

Continuous Drying:

The method of starting up the Dryer has been given but it is obvious that if the two columns are filled with grain at the start, the grain in the cooling section will not be dried at all when it is discharged. This grain should be fed back into the intake elevator and returned

40

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to the top of the Dryer.

Again the grain which was filled in on the lower shelves will only be slightly dried before being discharged. The grain which filled the top shelf and hopper will be the only grain to receive a full measure of drying at the start.

Put in another way if the moisture content of the grain is measured as it discharges from the Dryer it will be found that until the cooling section has been emptied there is no change from the original moisture content. Thereafter the grain discharged will show a progressive reduction in moisture content until the full extraction rate is reached. This will be when the grain which was in the top shelf at the start reaches the discharge. The time taken for this condition to be reached depends on the rate of discharge (which is of course infinitely variable).

10

On a long run when handling a big batch it may be best to arrange to feed back to the top of the Dryer the grain from the cooling section and from the lower shelves, then to run off into a silo or to bags the partially dried grain. This can be passed through the Dryer quickly at the end of the run to complete the drying. When the grain which was on the top shelf at the start reaches the discharge it can be run off to storage or to bags as fully treated. The timing of the various switch overs can be easily calculated once the capacity of the tower is known on different grains. For example if the column holds 20 cwts. and this is discharged at the rate of 1 cwt. every 3 minutes the starting top grain will be discharged after the dryer has been running 60 minutes. In this case probably the discharge from the first 12-15 minutes would be fed back to the intake elevator and returned to the Dryer and the discharge for 45 minutes bagged off for finishing at the end of a run.

20

30

40

Batch Drying:

The Grantex Dryer can be used as a batch Dryer thus:-

With the grain moving slowly down the columns, the Dryer is operated as for continuous drying but the grain discharged is returned to the intake elevator and this circulates. In this method it is necessary to time the rate of discharge and run the Dryer only long enough to make all the grain in the batch pass once through the drying columns. When one circuit has been timed complete the batch can be discharged. In some instances it may be desirable or necessary to give the grain two circuits. This can be done on timing. In using this method the batch must be large enough to keep the columns completely filled as the grain dries and loses volume.

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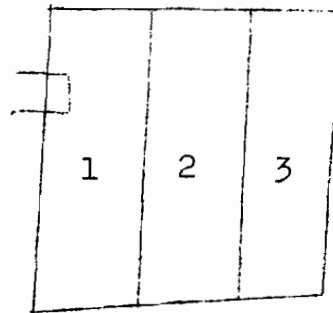
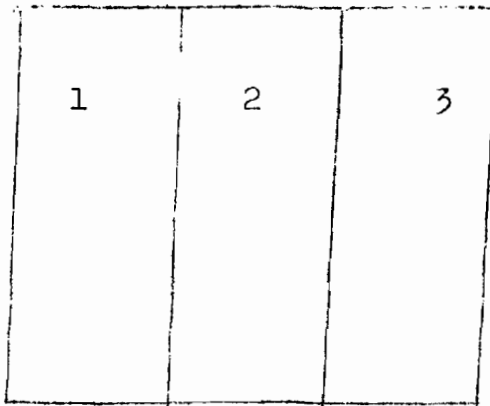
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(continued)

Columns as per illustration

Filled	Filled	Filled
First	2nd	3rd



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(continued)

4. Maintenance:

Regular:

- Air Compressor: (a) Maintain driving belts at tension such as to allow approximately 1" vertical movement of belt when stationary.
- (b) Maintain oil level in sump (using Shell Rotella 20 or equivalent) between marks on dipstick. Oil level should be checked after machine has been at least 10 minutes at rest. 10

- Main Fan: (a) Maintain driving belt at tension such as to allow approximately 1" vertical movement of belt when stationary.
- (b) Grease bearings weekly with a good general purpose grease through nipple brought to outside of furnace. 20

- Bearings of top and bottom Conveyors, Discharge Roller spindles and variable Speed Drive Chain Drives)
)
) Oil lightly twice weekly or thereabouts. 30

Photo-Electric Cell: The small glass window should be cleaned daily.

As required:

- Burner: Clean nozzle if flame shows any tendency to be dirty or unsteady, or if the presence of unburnt fuel oil is detected either in the furnace chamber or at the burner nozzle. 40
 The burner can be removed by

slacking off the locking screw on stirrup "M" (fig.9) (page 3A) swinging the stirrup back over the burner to a horizontal position, and lifting the burner "N" from its seating block "O". Care should be taken to avoid damaging the gasket jointing between burner and block. To clean burner, unscrew the front cap and remove any piece of grit etc. which may be lodging inside, particularly round the central opening. If necessary blow through the jet hole in the nozzle to clear it but avoid using pieces of wire etc. which may damage the small aperture.

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(continued)

Fuel Line:

The fuel supply system may become blocked with dirt or air locked particularly if the supply tank is allowed to drain empty. Uncouple the fuel line from the burner seating block "O". Open up Fuel Control Valves fully. Start up Fan and Compressor. Close Air Cock "E" (air operated system) or press Starting Button "S" (electrically operated system) and fuel should be discharged from the uncoupled end of the fuel line. Continue until say 1 pint is discharged or until the flow is free of air bubbles then recouple the fuel line and reset Fuel Control Valves to original working position.

Every 3 months or every season (whichever is less):

Burner: Clean nozzle before starting season's drying.

Oil Filter: Clean filter in fuel oil line between main oil valve and oil pump.

Air Compressor: Change element of air filter if required.

Electric motors and Cooling Fan: Lubricate at beginning and end of drying season or regularly if in regular use.

Drying Tower: Clean out shelves. This can be done with a small hand brush and the shelves are easily accessible from the inside of the Dryer via the inspection door.

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(Sgd.)
Assistant Sworn Clerk
8.6.70

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EXHIBIT K.1
LETTER, DEFENDANTS TO PLAINTIFF

K. 1

Letter from
Defendant to
Plaintiff
25th April
1961

T. A. M.
Exhibit "K1"
4. 3. 65

BOOKERS STORES LIMITED
49-53 WATER STREET GEORGETOWN BRITISH GULANA
PLEASE QUOTE: Cable Address: "BOOST"
DEMERARA

OUR REF: L/3/769 Telephone: Dial 62171

10

25th April, 1961

Mr. Mustapha Alli
Albion Estate,
Corentyne,
Berbice.

Dear Sir,

As requested, we have pleasure in quoting for
the following equipment for use in conjunction with
the Rice Mill as per quotation handed to you by
our Mr. Chung:-

20

1 - JAMES LEFFEL 30 H.P. BOILER No. 495
125 lbs/50 INCH WORKING PRESSURE,
FURNISHED WITH 24" HERRINGBONE GRATES FOR
HAND FIRING. NO SMOKE STACK OR GUY
WIRE \$ 8,900.00

1 - SIZE O8 GRANTEX UNIFLOW GRAIN DRYER
ARRANGED FOR BELT DRIVE, OIL FIRED
FURNACE, WITH DOUBLE ELEVATOR.
\$19,000.00

SINGLE ELEVATORS AS REQUIRED 28'3"
PRICE APPROX. \$ 1,240.00 Each.

30

ESTIMATED COST PER SQ. FOOT FOR FOUNDATIONS

\$ 2.50 per
sq.ft.

We trust you will find our quotations acceptable and look forward to receiving your valued order in due course.

Plaintiff's
Exhibits

K. 1

Yours faithfully,

Letter from
Defendants to
Plaintiff

BOOKERS STORES LIMITED

25th April
1961

Agricultural & Machinery Dept.

(continued)

W. A. Y. Blair
.....

W. A. Y. Blair

General Manager.

10 WAYB: Group Parent: Booker Bros., McConnell
& Co. Ltd., London Confirming House: Campbell
Booker Carter Limited, Bucklersbury House,
Walbrook, London, E.C. 4

Attach.

Plaintiff's
Exhibits

EXHIBIT K.2

LETTER, DEFENDANTS TO B.G.CREDIT CORPORATION

K. 2

Letter,
Defendants to
B.G. Credit
Corporation
19th June,
1961

Exhibit "K2"

4. 3. 65

BOOKER STORES LIMITED
49-53 WATER STREET GEORGETOWN BRITISH GUIANA
CAMPCULT

PLEASE QUOTE: Cable Address: DEMERARA 10

OUR REF: L/21-B/2095 Telephone: Dial 62171

19th June, 1961.

B. G. Credit Corporation,
39, Brickdam,
Stabroek,
GEORGETOWN.

Dear Sirs,

MUSTAPHA ALLY - ALBION.

In accordance with your request, we have
pleasure in detailing the equipment required by the
above customer. 20

1 ONLY 30/60E GRANTEX RICE MILL, 2-ton CAPACITY, SUITABLE FOR OPERATION ON 220/440V. 50 CYCLES 3 PHASE SUPPLY	\$50,000.00
1 ONLY CUMMINS OR EQUIVALENT GENERATOR 100/125KW CONTINUOUS RATING	25,000.00
1 ONLY #8 DRYER	26,000.00
1 ONLY LEFFEL 30 H.P. BOILER	9,000.00
	<u>\$110,000.00</u>

The above prices are estimates given to the
customer but should prove reasonably in line with
actual cost. 30

Yours faithfully,

British Guiana Credit Corporation 19 JUNE 1961 RECEIVED	BOOKERS STORES LIMITED Agricultural & Machinery Dept.? p.p. W.A.Y. Blair General Manager.
--	---

WAYB:gl

Group Parent: Bookers Bros., McConnell & Co.
Ltd., London Confirming House: Campbell Booker
Carter Limited, Bucklersbury House,
Walbrook, London, E.C. 4 40

EXHIBIT K. 3
LETTER, DEFENDANTS TO PLAINTIFF.

Plaintiff's
Exhibits

T. A. M.
Exhibit "K3"

K. 3

Letter,
Defendants to
Plaintiff

4. 3. 65

29th September
1961

BOOKER STORES LIMITED
49-53 WATER STREET GEORGETOWN BRITISH GUIANA
CAMPCULT

10 PLEASE QUOTE: CABLE ADDRESS: DEMERARA

OUR REF: L/3/6012 Telephone: Dial 62171

Mr. Mustapha Ally,
Albion Estate,
Corentyne,
BERBICE.

29th September 1961

Dear Sir,

20 Further to our recent conversation concerning a
2-ton Electrically driven Grantex Multi-Stage Rice
Mill, we confirm that we are prepared to place this
on order for you providing the following terms are
fulfilled.

- 1) \$10,000.00 to place order.
- 2) Balance to 1/3rd of value on arrival.
- 3) Remaining balance paid monthly over a two year period.
- 4) Co-lateral security given for remaining balance after initial down payment of 1/3rd.

We can undertake delivery of the mill in March 1962, if the order is placed during October.

30 Yours faithfully,
BOOKER STORES LIMITED
Agricultural & Machinery Dept.
W. A. Y. Blair
.....
General Manager.

WAYB:gl

c.c. Mr. M.A.Chung - N/A Branch.

Group Parent: Booker Bros., McConnell & Co.Ltd.
London Confirming House: Campbell Booker Carter Limited,
Bucklersbury House, Walbrook, London, E.C.4

371.

Plaintiff's
Exhibits

EXHIBIT K. 4

RECEIPT

K. 4

Receipt

11th October,
1961

T. A. M.
Exhibit "K4"

4. 3. 65

BOOKERS STORES LIMITED

SPECIAL ORDER

E - 24651

Pln. Albion, Corentyne B/ce

£10.000.00

Received from Mr. Mustapha Ally the sum of Ten
thousand $\frac{xx}{100}$ dollars payment
of S/order on Grantex Rice Mill & Dryer.

BOOKERS STORES LIMITED

per ?

11.10.1961

4 Stamps
Cancelled

Plaintiff's
Exhibits

K. 5

Letter,
Defendants
to Plaintiff

17th November
1961

(continued)

We have requested Mr. Chung to get in touch with you, concerning the length of the Shaker Conveyor required for the Dryer, and until this information is to hand, we are unable to let you have a firm quotation. Lewis C. Grant Limited have also informed us, that the total collective load of the Motors for the Rice Mill and Dryer is 120 H.P.

We trust this information will be of assistance to you, in selecting a suitable Generating Set, which we feel should have an output of approximately 95K.W. 10

We would appreciate if you will get in touch with Mr. Chung as early as possible, concerning the length of the Shaker Conveyor.

Yours faithfully,

BOOKERS STORES LIMITED

Agricultural & Machinery Dept.

W. A. Y. Blair
.....

W. A. Y. Blair

General Manager.

20

WAYB:mm.

c.c.: To Mr. M. A. Chung.

Group Parent; Booker Bros., McConnell & Co. Ltd. London Confirming House: Campbell Carter Limited, Bucklersbury House, Walbrook, London, E.C.4.



EXHIBIT K. 6
RECEIPT

Plaintiff's
Exhibits

K. 6

Receipt

13th January
1962

T. A. M.
Exhibit "K6"
?
4. 3. 65

BOOKERS STORES LIMITED

Albion Estate ~~£~~
Corentyne B/ce 10,000.00

10 SPECIAL ORDER

E 24674

Received from Mustapha Ally

the sum of Ten thousand XX Dollars
 100

payment of S/order on Rice Mill & Dryer

BOOKERS STORES LIMITED

per ?

13/1/1962

20

4~~¢~~ Stamps
Cancelled



EXHIBIT K.8
LETTER, DEFENDANTS TO PLAINTIFF

Plaintiff's
Exhibits

K. 8

T. A. M.
Exhibit "K8"
?
4. 3. 65

Letter,
Defendants
to Plaintiff

1st February
1962

BOOKERS STORES LIMITED

49-53 WATER STREET GEORGETOWN BRITISH GUIANA
CAMPCULT

PLEASE QUOTE: Cable Address: DEMERARA

10 OUR REF: L/3/269 Telephone: DIAL 62171

1st February, 1962

Mr. Mustapha Ally,
Albion Estate,
Corentyne,
BERBICE.

Dear Sir,

We refer to our letter dated 17th November,
1961, in which we quoted a price of \$55,300.00 for
the 2-ton 30/60E Multi-Stage Rice Mill.

20 In order to quote for the dryer, we asked Lewis
C. Grant Ltd. to prepare a suggested layout for the
mill and dryer, and their proposals allow for a 28'
shaker conveyor.

The dryer duty-paid, ex wharf Georgetown will
cost \$27,500.00 this makes the total for mill and
dryer \$82,800.00.

Mr. Chung has the suggested layout in his
possession and will contact you to work out whether
or not a 28' shaker conveyor is suitable.

30 We are also pleased to advise that a fitter from
Lewis C. Grant Ltd. will be in the Colony during
erection of your mill.

Yours faithfully,

BOOKERS STORES LIMITED
Agricultural & Machinery Dept.

(Sgd.) W. A. Y. Blair
.....

W. A. Y. Blair
General Manager.

40 WAYB:gl
c.c.Mr. M.A.Chung - N/A

Group Parent: Booker Bros., McConnell & Co.Ltd.
London Confirming House: Campbell Booker Carter Limited,
Bucklersbury House, Walbrook, London, E.C. 4

377.

Plaintiff's
Exhibits

EXHIBIT K.9

B I L L

K. 9

Bill

7th February,
1962

T. A. M.
Exhibit "K.9"
4. 3. 65

CASH

HOUSTON, E. B. DEMERARA 7. 2. 1962

MUSTAPHA ALLY, ALBION B/ce.

BRITISH GUIANA TIMBERS, LIMITED.

SUPPLIERS OF
TIMBER AND LUMBER

10

P. O. Box 421 Dial 2681.

B. G. L. - T. 14,370

Pieces	Lin Feet	Size	Description	B.M.	Unit Price	Price
4	80	1 $\frac{1}{4}$ x 12	Dr.GH 20'	100	28	28 00
2	41	2 x 12	" GH 20/21	82	28	22 96
16	224	2 x 5	" GH 14'	187	27	50 49

T. A. M.
K. 9
4. 3. 65

Plaintiff's
Exhibits

K. 9

CASH
HOUSTON, E. B. DEMERARA

7. 2. 1962.

Bill

MUSTAPHA ALLY, ALBION, B/ce.

7th February,
1962

BRITISH GUIANA TIMBERS, LIMITED.

(continued)

P.O. BOX 421
Dial 2681
B.G.L.-T.14,370

SUPPLIERS OF
TIMBER AND LUMBER.

10

Pieces	Lin Feet	Size	Description	B.M.	Unit Price	Price
15	322	1 x 10	Dr. GH	268	26	69 68
5	75	2 x 8	" PH 12/18'	100	28	28 00
12	150	1 x 8	" PH	100	27	27 00
204	2672	1 x 4	" SINGH	791	27	240 57

(~~\$~~466.70)

\$466.70

20

Delivered at....Private Lorry
Despatched by....Gilbns.
Lorry No. L.H.502

Checked by.....
Incharge of.....
Your Order No.....
Our Order No.....

No. 295 - 8
DELIVERED

AGAINST DEPOSIT
7, Feb., 1962.

DELIVERED

INVOICE

Plaintiff's
Exhibits

K.10
Bill
9th May 1962

EXHIBIT K.10B I L L

Exhibit "K.10"
4. 3. 65

CASH
HOUSTON, E. B: DEMERARA 9.5.62
MUSTAPHA ALLY, ALBION, CORENTYNE.

BRITISH GUIANA TIMBERS LIMITED.

SUPPLIERS OF
TIMBER AND LUMBER.

P.O. Box 421 Dial 2681
B. G. L. - T. 19,542

10

Pieces	Lin Feet	Size	Description	B.M.	Unit Price
3	68	6 x 11	Dr. GH 22/23'		
10	115	6 x 6	" GH 10/13'		
3	31	4 x 4	" GH 10/11'		
6	78	2 x 5	" GH 13'		20
14	199	2 x 10	" GH 14/15'		
28	384	1½ x 12	" GH 13/14'		

Delivered at Private Lorry Checked by 20
Despatched by R.HODGE In charge of Lawrence
Lorry No. LL 354 Your Order No.
Our Order No.

No. 313 - 9

30

DELIVERY NOTE (INVOICE TO FOLLOW)

EXHIBIT K.11
LETTER, DEFENDANTS TO PLAINTIFF

Plaintiff's
Exhibits

T. A. M.
Exhibit "K11"

K.11

Letter,
Defendants
to Plaintiff

4. 3. 65

6th March,
1962

BOOKERS STORES LIMITED

49 - 53 WATER STREET GEORGETOWN BRITISH GULANA

PLEASE QUOTE: Cable Address: CAMPCULT

DEMERARA

10

OUR REF: L/3/511 Telephone: Dial 62171

6th March, 1962.

Mr. Mustapha Ally,
Albion Estate,
Corentyne,
BERBICE.

Dear Sir,

20

We are arranging to ship your 30/60E Grantex
Electric Multi-stage Rice Mill to Stanleytown and will
notify you by telegram when it is loaded on the car-
rying vessel.

Mr. Chung has been asked to draw up the contract,
using the \$20,000.00 which you have deposited, and
he will be contacting you in this respect.

The replacement electric dryer is due to be
shipped in April.

Yours faithfully,

BOOKERS STORES LIMITED

Agricultural & Machinery Dept.

30

W.A.Y. Blair
.....

General Manager.

WAYB:gl
c.c. Mr. Chung - N/A Branch.

Group Parent: Booker Bros., McConnel & Co. Ltd.
London Confirming House: Campbell Booker Carter
Limited, Bucklersbury,
House, Walbrook, London
E.C.4

Plaintiff's
Exhibits

EXHIBIT K.13
LETTER, DEFENDANTS TO PLAINTIFF

K.13
Letter,
Defendants
to Plaintiff
18th April,
1962

T. A. M.
Exhibit "K13"

4. 3. 65

BOOKERS STORES LIMITED

49 - 53 WATER STREET GEORGETOWN BRITISH GUIANA

PLEASE QUOTE:

Cable Address: CAMPCULT DEMERARA

OUR REF: L/3/779

Telephone: Dial 62171

10

18th April, 1962

Mr. Mustapha Ally,
Albion Estate,
Corentyne,
BERBICE.

Dear Sir,

DALE ELECTRIC GENERATING SET.

In accordance with your request we invited a
quotation for 112 KVA Generating Set from Messrs.
Dale Electric, Ltd.

20

We are sorry to inform you that delivery is 35
weeks ex works, and in the circumstances suggest you
proceed with the purchase of a Caterpillar set as you
originally planned.

Yours faithfully,

BOOKERS STORES LIMITED

Agricultural & Machinery Dept.

W. A. Y. Blair
.....

W. A. Y. Blair

WAYB:j.c.

General Manager.

30

c.c. Mr. Chung - New Amsterdam.

Group Parent: Bookers Bros., McConnell & Co., Ltd.

London Confirming House: Campbell Booker Carter
Limited, Bucklersbury
House, Walbrook, London
E.C.4.

EXHIBIT K.15
RECEIPT

Plaintiff's
Exhibits

T. A. M.
Exhibit "K15"

K.15
Receipt
30th May 1962

4. 3. 65

BOOKERS STORES LIMITED

₪
7,600.00

10 HIRE PURCHASE
R 156273

Received from Mr. Mustapha Ally, Albion Estate
Corentyne B/ce the sum of Seven thousand and six
hundred dollars in payment of Part Option on
Electric Paddy Dryer.

BOOKERS STORES LIMITED

per P. Browne.

30/5/1962.

₪1.00 stamps

20

Cancelled.

Plaintiff's
Exhibits

EXHIBIT K.16

LETTER, PLAINTIFF TO DEFENDANTS

K.16

Letter,
Plaintiff to
Defendants

26th January
1963

T. A. M.
Exhibit "K16"

5/3/65

Albion Estate,

January, 26th, 1963.

Mr. Boon,
Director - Bookers Stores Ltd.,
Georgetown.

10

Dear Sir,

This is to let you know on many occasions I spoke to you about the Mill and Dryer sold to me and erected at my place, and nothing have been done so far to have same dismantled.

Of course you know that I have bought this Dryer for the purpose of drying paddy, I was told and advised by Mr. Blair and Mr. Chung in ordering same, that, it is efficient and good enough to handle 48 bags of paddy per hour white rice and 30 to 32 bags of paddy Parboil paddy per hour, this I find is not so.

20

You must have been aware of the fact that I have started to operate this mill since December during which time there was a wet weather for around 11 days and during that time I could not operate because of the fact that the weather was bad, and paddy steamed could not have been dried although I have a dryer.

On the 14th January, 1963 I steam an amount of 150 bags of paddy, the weather again turns out bad, today is the 26th day of January, 1963 and the weather still hold out to be bad, what am I going to do I don't know. I dried and passed the 150 bags of paddy in the dryer which took me 8 days and after finishing milling same, I had was to agree to compensate the person whose paddy. He agree to settle same at \$1,680.00 for roughly 80 bags clean rice at \$21.00 per bag because it has actually 75% broken and you can imagine the expense it cost

30

40

running a 165 H.P. generating set for 8 days to dry 150 bags of paddy. I want to draw to your attention that twice I have been affected by the weather though I have a dryer, In view of this I ask that you take this dryer off immediately. I want to draw your attention that I have paid an amount of approximately \$10,000.00 down payment for the dryer.

Plaintiff's Exhibits

K.16

Letter, Plaintiff to Defendants

26th January 1963

(continued)

10

I have erected a storage bin costing \$5,000.00 I have built concrete foundation reinforced with mild steel rods and electrical installations costing roughly \$7,000.00. I have bought a generating set 165 H.P. on advice of Bookers Stores Ltd., to drive the dryer and mill which after removing the dryer will left me with a lot of extra load and it cannot pay me to run this set for this mill.

20

There again I will lose on a 5 years run roughly around \$10,000.00 using excess fuel, I also have balance of about \$22,000.00 hire purchase balance on the dryer. Erection of dryer Building approximately cost \$10,000.00. This in all totalling a sum of around \$62,000.00 Spending \$62,000.00 in making dryer floor with stone cement and sand will give me drying space roughly 10,000 bags of paddy per day. Again I say, Sir, in view of this all, I beg that you remove this dryer as early as possible, and deduct the sum of \$40,000.00 from my account for down payment and excessive spending on advice of Bookers for a dryer sold to me which cannot pay for itself, instead I have to pay farmers for using same by compensating them for damages done by the dryer to their paddy.

30

Please do give this matter your earliest attention.

Thanking you.

I remain,

Yours very truly,

Mustapha Ally.

.....

Plaintiff's
Exhibits

EXHIBIT K.17
LETTER, DEFENDANTS TO PLAINTIFF

K.17
Letter,
Defendants
to Plaintiff
31st January
1963

T. A. M.
Exhibit "K17"
5. 3. 65

DIRECTORS: H.E. BOON (CHAIRMAN). G.R. BANE.
N. ESS LEMONT. H.C. RELHAN M.C. J. HUDSON F.C.A.
D.A. BLACKMAN:

BOOKERS STORES LIMITED
20-23 CHURCH STREET - GEORGETOWN - BRITISH GUIANA

10

PLEASE QUOTE: Cables: Boost Georgetown B.G.
OUR REF: Telephone: 62171 (20 lines)

31st January, 1963.

Mustapha Ally, Esq.,
Albion
CORENTYNE
Berbice

Dear Mr. Ally,

Your very kind invitation extended to Sir Jock
Campbell asking him to assist in the opening of your
rice mill has been verbally passed to me by the
Manager of our Agricultural and Machinery Department,
Mr. W.A.Y. Blair.

20

As you are no doubt aware, Sir Jock suffered a
severe illness some while ago and since he has
already committed himself to a fairly heavy programme
in Berbice, he will be remaining only for a short
while visiting all our sugar estates there, I am
afraid that it is most unlikely that he will be able
to accept any further engagements. However, we
shall most certainly advise him of your invitation
when he arrives.

30

We thank you again for sending this kind
invitation.

Yours faithfully,
BOOKERS STORES LIMITED

H. E. Boon
.....

H. E. Boon
Chairman

40

CONFIRMING HOUSE: CAMPBELL BOOKER CARTER LTD:
BUCKLESBURY HOUSE: WALBROOK LONDON E.C.4.

EXHIBIT K.18
COPY OF LETTER, PLAINTIFF TO DEFENDANTS.

Plaintiff's
 Exhibits

T. A. M.
 Exhibit "K18"

K.18

Copy of letter
 Plaintiff to
 Defendants

5. 3. 65

15th February
 1963

Albion Estate,
 Corentyne, Berbice.

February 15, 1963.

10 Mr. Boon,
 Director Bookers Store Ltd.,
 Universal Building, Church Street,
 Georgetown.

Sir,

20 I do hope you received my letter dated 26th
 inst. and I hope you have given some consideration.
 I must let you know that Mr. Chung says that you have
 spoken to Mr. Blair and Mr. Blair asked him to carry
 out a test. I shall be grateful if you can advise
 Mr. Blair that when this test is carried that it be
 recorded and a copy of the test findings be given to
 me signed by both parties.

30 As I have said in my letter before that as far as
 I can see the Mill and Dryer is a complete failure.
 Upon what I was told by Messrs. Blair and Chung that
 it would do. I am quite confident that some screw is
 slack either by Bookers or the Manufacture. When I
 say some screw slack I mean no one is too big to make
 a mistake and Bookers should go into the matter to
 find the mistake, but this I find difficult in
 convincing Mr. Blair and Mr. Chung because every time
 I tell them of the Mill they got annoyed over me and
 use all sorts of remarks.

Once I told Mr. Smith in New Amsterdam and he
 threatened to have all works which I am having from
 Bookers Sugar Estates to be cut off if I don't keep
 my blinking mouth shut, (this was his exact words).
 This I have seen is a fact as I Mr. Smith's words are
 coming to pass. In all departments of Bookers I find

Plaintiff's
Exhibits

K.18

Copy of letter
Plaintiff to
Defendants

15th February
1963

(continued)

myself to be severely criticised and victimised in so many different ways and all this can put you to kill, especially whenever I speak to them about the Mill. Nevertheless once there is a God one must find a way to live even though I have put all my savings of \$250,000.00 in Bookers who gave me so many flourishing promises.

I must let you know that I was to purchase an Italian Mill from Sandbach Parker, but Bookers told me if I don't buy the Mill from them (Bookers) they would not sell the land. This discussion took place at the Y.M.C.A. Hall in New Amsterdam between myself and the then Director Mr. Esslemont and was promised by both Mr. Esslemont and Mr. Baxter (both director now on retirement leave) a dozen bed of roses. Why because it was finalised that I will have to buy a Booker Mill I was to buy a belt driven Mill and not electrically driven Mill then comes Messrs. Blair and Chung in the picture. They persuaded me in buying an electrical Mill that I will have no trouble with belts and all such likes and that by having an electrically driven Mill you can have on the Dryer and Mill roughly one and a half times its performances and that you will be able to have a better profit by having a more efficient Mill which guarantees roughly one and half times its capacity. 10 20

I asked Mr. Chung whats the capacity of the Dryer and he said that the normal belt drier gives 54 bags of paddy per hour (white rice) and 25 bags of paddy per hour (par boil) I asked him what capacity per hour from the mill and he replied that normally about 4800 lbs. per hour, but by having an electrically driven mill and drier I can get at least one and a half times as to what was recommended. He also says he is only wishing when the day can come when he can put down an electrically driven Mill for some one. I must tell you that on several occasions I spoke to Messrs. Blair and Chung all I find is that at every time I spoke they got more and more annoyed Bookers have made several white rice test and failed but on the 1st February, Mr. Chung said he is going to make a test of his own and in doing so he said that he required a hundred bags of paddy to steam and so on the 1st February 1963, I steamed an amount of 100 bags of paddy for Mr. Esar. I finished steamed same around 5 a.m. from them to 10 a.m. the said paddy was on the concrete, and at about 10 am. Mr. Chung and his fellow workers 30 40

arrived and began to dry same. It took exactly 9.00 p.m. in passing its once taking out a certain amount of moisture. On the 2nd they again started around 9 a.m. finishing around 6.00 p.m. passing 50 bags only for the second time. Then again on the 4th they came around 8 a.m. passing 50 bags which took 7 hours to complete the entire lot for the second time. On the 6th they came again passing the said paddy which took ten hours for 50 bags and 9 hours on the 7th, this complete the 3rd passing, which then as arranged after the 3rd passing the paddy is scheduled to be milled. On the 8th Inshan came and started milling the paddy and after completing 5 bags he found that the paddy was not dried sufficiently and ordered same to be dried on the concrete. Now when dried on the concrete it gives less breakage. He advised the person whose paddy it was to dry all back on the concrete and this I did not allow. On the 9th I approached Mr. Chung and he told me he would be coming on the following morning at 9.00 a.m. and got ready to mill same. He arrived and in checking found that the paddy was not fit for milling and needed more drying, he there and then started to dry same finishing about 7.30 p.m. and said that he will come back the following day. He did not come so I went to see him and on the 12th he came around 1.30 p.m. and started to mill same. He stopped around 6.00 p.m. and hoped to return the next day. On that day he finished milling the paddy and the amount of clean rice got was 27 bags whole grain and 19 bags broken. The owner of the said paddy refused to take same. I therefore had to pay him \$20.00 per bag and take over. I was fortunate to sell a part to Albion Estate at \$9.00 per bag.

I am appealing to you Sir, that this dryer is a failure, Later Mr. Chung said he discovered the fault as to what caused the breakage and so did the adjustments, but from then on to now no one is taking chances to pass their paddy through the Dryer, so I cannot say exactly whether it is so or not. But whether this is adjusted or not the Dryer and also the Mill is not producing what was recommended. I am appealing to you to do something. I am quite confident that I am wrongly advised of the capacity of this mill and dryer, Since so, I am asking Bookers Stores Ltd. to do something. I personally feel that both Mr. Chung and Mr. Blair wanted to introduce an electrically driven mill in the colony and knowing that I am the fittest person because of

Plaintiff's
Exhibits

K.18

Copy of letter
Plaintiff to
Defendants

15th February
1963

(continued)

Plaintiff's Exhibits

K.18

Copy of letter Plaintiff to Defendants

15th February 1963

(continued)

the land squeezed me and did not care, but promised all sorts of guarantee just to have test experience on expensive rice milling Machinery into the market and hoping that it would have been successful.

At the moment the Dryer has not dried 1000 bags paddy and has broken two shafts. The Mill has not processed 2000 bags of rice and a Motor was burnt, all this has been caused by what I believe wrong way of fitting the machinery and bad calculation in ordering Motors. You said you would appreciate Sir Jock Campbell and the Premier Dr. Hon. C.B.Jagan to be patrons in opening the Mill. Well I have given Mr. Blair a list of all the invitees and I hope all was invited and the opening be a success to your future sales of GRANTEX MILLS & DRYER in British Guiana.

10

I don't know if the repairs would be finished in time for the opening if not Mr. Blair can get in touch with me and we can postpone the opening to a further date at least when we are quite confident that both the Mill and Dryer are working fine. In as much as it has dried the par boil and got it spoilt it has several lots of White Rice for which I had to compensate every single individual and this total up to several thousands of dollars.

20

I would like to know if I am to be a successful Miller I must not have to compensate people for damages, they the farmers by having a good grade should feel so please and pay an extra instead of compensating. I must tell you that those who were dissatisfied have shown resentment and they have declared their intent of not returning to the mill where they suffered loss. If this happens and I am seeing it is so as the night follows the day the farmers would not patronise this mill and where would I find this amount of money to pay for the instalments, and would like to further inquire who would pay me for compensating the people.

30

I would like to be in Georgetown during the week and I shall call to see you where we would be able to discuss matters in more detail form with reference to the mill and Dryer and any other aspect pertaining to the above.

40

Thank you.

I remain, Sir,
Yours faithfully,
.....
Mustapha Ally.

EXHIBIT K.19
DUPLICATE COPY OF LETTER, PLAINTIFF TO
DEFENDANTS

Plaintiff's
 Exhibits

K.19

T. A. M.
 EXHIBIT "K19"
 ?
 8. 3. 65.

Duplicate
 copy of letter
 Plaintiff to
 Defendants
 March 1963

March, 1963

10 P/R Boon,
 Director Bookers Stores Ltd.,

Dear Sir,

I am very sorry that I have to leave without seeing you. You have been very helpful to me in the way which you have tackled matters pertaining to my last two letters.

20 In our discussions yourself and Mr. Blair have shown considerable co-operating in assuring me that Bookers will do their utmost best to see that the mill works as should and that both the mill and Dryer will be checked thoroughly by L. C. Grant so as to give maximum production and less breakage. I left you last week with good spirit and was as discussed satisfied that Bookers would not let me down, you have suggested that if I should speak on the opening I must not reveal the ups and down of my trouble with the machinery this I guarantee you because as I have said if I do so it would be a slap on my own face and will take effect on my future as a Rice Miller. Mr. Blair asked me for a list of the invitees and I did
 30 so, we even had a quarrel (joke) about the drinks because he said that the Directors have voted \$400.00 and the drinks will be purchased at D'Aguiar Bros. this I criticize because I personally do not use D'Aguiar drinks never the less since it is Bookers who sponsering the opening I had no alternative but to agree with Mr. Blair. But the reason for me writing you this letter is that Mr. Blair went up day before yesterday to Berbice he went up to me but I

Plaintiff's
Exhibits

K.19

Duplicate
copy of letter
Plaintiff to
Defendants

March 1963

(continued)

was not in. He told my father that invitations have already gone out and that the Directors have decided to call off the opening he was questioned why and said that he is affraid that I might go out my way on my speech at the opening and criticise the machinery and not only that (2) pieces of machinery is broken (1) a motor for the sheller burnt by us while operating and (2) a shaft for the dryer broken while Bookers was making a test and so he instructed my father that I see him at Mr. Chung home the said night or at Bookers Stores before 4 p.m. I arrived home late and the message was delivered to me by my father. At around 8.30 p.m. I went along with a friend to see Mr. Blair we discussed the matter over thoroughly and I told him that I bluntly refused to agree with him to call off the opening. I left in a haste and the next day he went up at me and offered to take me down to G/town where he will meet again the Directors and give me a genuine answer. I am sorry that I cannot wait any longer I have been here since 9.15 this morning and its roughly now 10.50 your Secretary told me that you might not be back in office until after lunch I now left this matter entirely to you Sir, and as I promised you I would not bring to the attention of the invitees the trouble of the machinery. I told Mr. Blair that if he write back to the invitees and call off the opening I will go all out to have the opening go through as arrange for the 9th. I told him even if I have to put it over the air put it in the newspapers or take a public address system and go from street to street announcing the opening I will do it because its my mill and not Bookers. Bookers only assisting because they wanted to then to boost the mill for more sales, now that they find both the Mill and Dryer giving trouble they wanted to call off the opening again. I say Sir, Bookers or no Bookers I am going through I as you can seen bent for hell.

I bought (16) sheep and planned to give you all a good feed up I do hope you influence Sir Jock to stay back in Berbice for the opening its a Booker Mill and I shall be very much grateful to have him there with the Premier Dr. the Honourable C.B.Jagan as patrons and you can assure as a man there will be no criticism I guarantee you that personally once and I guarantee you again Sir You can have my word for it.

Hoping to hear from you all very early I close with best of thanks and all good wishes.

Thanking you, I remain, Yours very truly,
Mustapha Ally

.....

EXHIBIT K.22
LETTER, DEFENDANTS TO PLAINTIFF

Plaintiff's
Exhibits

K.22

T. A. M.
Exhibit "K22"
?
8. 3. 65.

Letter,
Defendants
to Plaintiff
5th July 1963

DIRECTORS: H. E. BOON (CHAIRMAN). G.R. BANE, N.
ESSLEMONT H.C. RELHAN M.C. J. HUDSON F.C.A. D.A.
BLACKMAN

10

BOOKERS STORES LIMITED

20-23 CHURCH STREET - GEORGETOWN - BRITISH GUIANA

PLEASE QUOTE: L/I/816. Cables: Boost Georgetown,
OUR REF: B.G.
Telephone: 62171 (20 lines)

5th July, 1963

Mr. Mustaph Ally
Sandreef,
Albion Estate,
Corentyne,
20 BERBICE.

Dear Sir,

We confirm our conversation with you during which we arranged for a test to be carried out with your Dryer commencing Monday 14th July, 1963.

Our Staff in Berbice will arrange to have the Dryer thoroughly inspected before the test is carried out and should it prove necessary to carry out repairs or replace any parts, this would of course, be for your account.

30

For the purpose of conducting this test, our Mr. Chung will prepare a test sheet on which will be recorded the results. This test sheet will be signed by you as the various stages of the tests are

Plaintiff's
Exhibits

K.22

Letter,
Defendants
to Plaintiff
5th July 1963
(continued)

recorded. The entire test will be controlled by Mr. Chung who will make arrangements concerning the paddy to be used.

We now refer to our letter dated 25th March, 1963 on the subject of testing the mill.

The paddy used on the dryer test, we propose using in testing the Mill and we hope you will be able to let us conduct this test immediately we have finished with the Dryer.

As we have already milled a considerable quantity of paddy, it is once again going to be necessary to thoroughly check each component of the Mill before the test can be carried out. This will entail a certain amount of work and replacing worn parts, the total cost of which you will be required to pay.

10

We look forward to receiving your full co-operation throughout these tests.

Yours faithfully,

BOOKERS STORES LIMITED
Agricultural & Machinery Dept.

20

(Sgd.) W. A. Y. Blair

W. A. Y. Blair
(General Manager)

W.A.Y.B. jc
c.c. Messrs. M. A. Chung
 D. J. Smith

CONFIRMING HOUSE: BOOKER CARTER LTD: BUCKLERSBURY
HOUSE: WALBROOK LONDON E.C.4.

EXHIBIT K.24
LETTER, DEFENDANTS TO PLAINTIFF

Plaintiff's
Exhibits

K.24

T. A. M.
Exhibit "K24"
?
9. 3. 65.

Letter,
Defendants
to Plaintiff

13th August,
1963

DIRECTORS: H.E. BOON (CHAIRMAN) G.R. BANE H.C. RELHAN
M.C. J. HUDSON F.C.A. D.A. BLACKMAN

BOOKERS STORES LIMITED

10 20-23 CHURCH STREET GEORGETOWN BRITISH GUIANA
PLEASE QUOTE: L/1/1003
OUR REF: Cables: Boost Georgetown
B.G.
Telephone: 62171 (20 lines)

13th August, 1963

Mr. Mustapha Ally,
Sandreef,
Albion,
BERBICE.

Dear Mr. Ally,

20 The writer confirms having advanced to you the
sum of \$435.00 (four hundred and thirty-five dollars)
to cover cost of legal fees etc., in connection with
your mortgage to the B. G. Credit Corporation.

As the writer is personally responsible for this
money, he looks forward to receiving a refund no
later than Monday 19th August, 1963.

Please also keep in close touch with the Deeds
Registry, New Amsterdam, and expedite return of your
papers to the Georgetown Office.

30 Yours faithfully,
BOOKERS STORES LIMITED
Agricultural & Machinery Dept.

W.A.Y. Blair,
W.A.Y. Blair

W.A.Y.B:jc

General Manager.

B CONFIRMING HOUSE: CAMPBELL BOOKER CARTER LTD.
BUCKLESBURY HOUSE WALBROOK LONDON E.C.4

Plaintiff's
Exhibits

K.25

Duplicate
copy of letter
Plaintiff to
Defendants

23rd August
1963

EXHIBIT K.25

DUPLICATE COPY OF LETTER, PLAINTIFF TO
DEFENDANTS

T. A. M.
Exhibit "K25"
?
9. 3. 65

Albion Estate,
Corentyne,
Berbice,

10

August 23rd, 1963.

Mr. Anthony Tasker,
Bookers Public Relation Officer,
22 Church Street,
Georgetown.

Dear Sir,

Confirming the discussions I had with you some-
time in June 1963, I enclose copies of letter sent
to P.M.A. and to Mr. Boon concerning my dealing with
those companies and their representatives in Berbice. 20

I have seen and I am convinced by having
discussions politically and businesslike that
because I am a frank supporter of the Government,
the Departments of Bookers have done their best to
lower my character and strangle me in my effort to
improve my social and economic position.

As an example, actions taken by Mr. Wilkins,
Mr. Findlay, Mr. Blackman, Mr. Palmer, Bookers
Agricultural and Machinery Department, in dealing
with me on the following subjects are some of the
best of evidence. 30

(1) Price agreed at purchasing the P.M. Manager's
house was \$25,000.00, but later Mr. Wilkins
squeezed us to \$27,000.00.

Also the P.P.P. Fair held in the yard has caused
Mr. Wilkins to order Mr. Findlay to take off all
lights and water immediately. What value do you
think the house has now?

(2) Lights and water promised to me at my Albion House. This is entirely false, as all promises were failed by Mr. Wilkins psychological manoeuvres.

Plaintiff's
Exhibits

K.25

(3) Actually all jobs promised to me at an agreement between Mr. Esslemont and Mr. Baxter retired Directors were turned down by Mr. Wilkins and Mr. Findlay.

Duplicate
copy of letter
Plaintiff to
Defendants

10 (4) Bookers also felt that I had no right to give Dr. Jagan a piece of land after I have paid an advance to about the average price for $1\frac{1}{2}$ acre.

23rd August
1963

(continued)

20 Also knowing that the Chairman for Bookers, Sir Jock Campbell, said he is all for the Government or any democratically elected Government that you all would have transferred this land to Dr. Jagan, but instead from the very instance I uttered such suggestion, long before I gave Dr. Jagan the letter to uplift same, I was severely attacked and criticised, not only by one Department but by several Departments of the Bookers circle.

If I had already paid for the land it would have been my property and according to the British Democracy, I would be entitled to do whatever I care to do with it even though Bookers for their own reasons may have preferred me to sell same to someone else and not the P.P.P. Leader.

For this, Bookers would have complimented me instead of taking away all my jobs.

30 (5) I was severely attacked by Mr. Wilkins in what he termed a "classical thing" I have done in allowing the G.A.W.U. to keep a meeting on my premises in calling for a strike.

I am not a fool, I have sufficient knowledge to see how I am victimized by the Estate on this subject.

40 (6) Actions taken by Mr. Palmer and his representatives in Berbice in dealing with me the Petroleum Contract, the Cuban Oil and the Jotank is also a good evidence to show I have been treated not only by one particular person but by many staff members in various Bookers Department.

I have heard of the Klu Klux Clan - What a secret

Plaintiff's
Exhibits

K.25

Duplicate
copy of letter
Plaintiff to
Defendants

23rd August
1963

(continued)

society they are, but to tell you the truth, for the moment one Department of Bookers knows something about you, the entire Bookers Group gets you victimized or pushed around.

Bookers may feel that I have expanded my business without having enough cash. This is entirely false. The majority of people today deal in credit. I am not the only one, I paid a large amount down on the Rice Mill and Dryer recommended by Bookers and guaranteed for certain performances but which failed completely to do half of that which was guaranteed. 10

If this mill cannot run as it should when I have spent my future savings into it, leaving me penniless, and I cannot have the returns recommended Bookers should not blame me for being short of funds. If I ever do, they should have blamed themselves for giving me such an expensive machinery which cannot pay for itself.

You are aware that when Sir Jock Campbell was here he instructed me to put my case to you and that you would be able to settle my grievances. You have now asked me to wait on your results which I am anxiously awaiting before taking any further step. 20

I must tell you that Mr. Blair has made a test lasting to some six days during the past month. This test proved that the Dryer is only doing $\frac{1}{3}$ its capacity and the mill is only doing $\frac{1}{2}$ its capacity. I have been told by Mr. Blair that he is going to send one, Mr. Ottman to check the motors and that he also wrote Lewis Grant to send someone down to see what can be done. I must also tell you that through some circle a loan have been recommended by the Credit Corporation to pay off for the Mill and Dryer and also land bought from Bookers. 30

With all of this, and knowing what a hard working gentleman Mr. Blair is I am sure that in due course I will hear from Bookers if Lewis Grant is sending someone or what Mr. Ottman has to say.

I will also ask you to note that when I pay off Bookers for the Mill and Dryer, that I will not be forgotten and will be left working for nothing, so I ask you to pay special attention to this. 40

Again I say the main reason for writing this

letter to you is to inform you in due course not about the taking away of the jobs or anything, but to let you know fully that I am completely dissatisfied with this Mill and Dryer and have promised by Bookers that they will do all in their power to have same function as recommended. I have seen two letters which Mr. Blair sent out to Mr. Ottman and to Lewis C. Grant and from this I can see that Mr. Blair is trying.

Plaintiff's
Exhibits

K.25

Duplicate
copy of letter
Plaintiff to
Defendants

10

Nevertheless, if when I pay off nothing is done then I beg you Sir, I shall have no alternative but to go through the entire affair to see what can be done.

23rd August
1963

(continued)

Hoping to have your co-operation. I close with best regards.

Thanking you,

I am,

Yours truly,

Mustapha Ally

Mustapha Ally

20

Plaintiff's
Exhibits

EXHIBIT K.26

LETTER, PLAINTIFF'S SOLICITOR TO DEFENDANTS

K.26

Letter,
Plaintiff's
Solicitor to
Defendants

10th
September
1963

T. A. M.

Exhibit "K26"

?

9. 3. 65

L.L. DOOBAY
SOLICITOR
OF THE SUPREME COURT
Telephone: 61122

OFFICE:-

15 & 16 Croal Street,
Georgetown,
Demerara,
British Guiana,

10

10th September, 1963.

The Manager,
Bookers Stores Limited,
Church Street,
Georgetown, Demerara.

Dear Sir,

I write you on behalf of Mustapha Ally, of
Albion Front, Corentyne Berbice.

20

Enclosed is an order for the sum of \$70,000.00
(seventy thousand dollars) payable to you in
respect of all the balance of his indebtedness due
to you up to this date.

My client wishes to inform you that despite
all the genuine attempts on your part to have the
Dryer and Mill function as was guaranteed and
recommended on the purchase thereof both the Dryer
and Mill failed to function properly.

The Dryer damages the padi causing broken rice
and can only function to one third ($\frac{1}{3}$) of its
normal capacity.

30

The Mill can only produce one half ($\frac{1}{2}$) of its
capacity as recommended.

You will appreciate that my client is very much disappointed at the failure of the mill to function satisfactorily.

Your Mr. Ottman, Senior Electrical Engineer inspected the said Mill about two weeks ago and he found nothing wrong with the electrical installation.

10 My client still hopes that you will have all the defects on the Mill and Dryer remedied as early as possible for the Autumn Crop. He understands that an engineer from the Manufacturers of the Mill and Dryer is expected early to affect all necessary repairs.

You will, no doubt, realise that my client has lost considerably for the failure of the Mill and Dryer to function normally. He had to compensate several farmers for damages done to their paddy by the drier and in addition he has lost heavily on profits, he should have made on his investment.

Yours faithfully,

20 L. L. Doobay.

Plaintiff's Exhibits

K.26

Letter, Plaintiff's Solicitor to Defendants

10th September 1963

(continued)

Plaintiff's
Exhibits

EXHIBIT K.27

LETTER, DEFENDANTS TO PLAINTIFF'S SOLICITOR

K.27
Letter,
Defendants to
Plaintiff's
Solicitor
13th
September
1963

T. A. M.
Exhibit "K27"
?
9. 3. 65

DIRECTORS: H.E. BOON (CHAIRMAN) G.R. BANE H.C. RELHAN
M.C. J. HUDSON F.C.A. D.A. BLACKMAN

BOOKERS STORES LTD.
20 - 23 CHURCH STREET GEORGETOWN BRITISH GUIANA 10

PLEASE QUOTE: L/11/1185 Cables: Boost Georgetown B.G.
Telephone: 62171 (20 lines)

September 13th 1963.

Mr. L. L. Doobay,
Solicitor,
Supreme Court,
GEORGETOWN.

Dear Sir,

Thank you for your letter dated 10th September,
written on behalf of Mr. Mustapha Ally. 20

The facts given to you by Mr. Ally on the
performance of the milling equipment, are not
strictly correct and you will appreciate that the
quality of the paddy fed into the mill is of
paramount importance in gauging performance.

We assure you however that every assistance is
being given to Mustapha Ally. On the question of
a visit from the Factory Engineer, we have suggested
this to our Principals in view of the fact that we
have further two mills and a dryer to erect this 30
year, but so far, have not received confirmation.

Yours faithfully,
BOOKERS STORES LIMITED
Agricultural & Machinery Dept.
W. A. Y. Blair,
General Manager.

WAYB: jk

B CONFIRMING HOUSE: CAMPBELL BOOKER CARTER LTD.
BUCKLESBURY HOUSE. WALBROOK LONDON E.C.4

EXHIBIT K.28
LETTER, DEFENDANTS TO PLAINTIFF

Plaintiff's
Exhibits

T. A. M.
Exhibit "K28"
?
9. 3. 65

K.28

Letter,
Defendants
to Plaintiff
9th October,
1963

DIRECTORS: H.E.BOON (CHAIRMAN) G.R.BANE H.C.RELHAN
M.C. J.HUDSON F.C.A. D.A.BLACKMAN

BOOKERS STORES LTD.

20 20-23 CHURCH STREET GEORGETOWN BRITISH GUIANA

PLEASE QUOTE: L/1/1345 Cables: Boost Georgetown, B.G.
Telephone: 62171 (20 lines)

9th October, 1963

Mr. Mustapha Ally,
Sandreef,
Albion Estate,
Canje, BERBICE.

Dear Mr. Ally,

30 It is sometime now since I requested you let me
know when you were milling in order that I could
travel with Mr. Ottman and test your electrical equip-
ment under load.

40 I also refer to my visit to Berbice when I spoke
with you in the Mill building on the 28th September,
1963. Mr. Chung and myself called on the Sunday
morning as arranged to assist in starting off the
mill for milling par-boiled paddy and were most
disappointed to find that you were not there, nor, was
there an operator we could have handed over to on
starting up.

I would also urge you to send your cone stone
to our branch in New Amsterdam forrepair as this has
been lying in your mill for some time now.

Yours faithfully,

BOOKERS STORES LIMITED
Agricultural & Machinery Dept.

W. A. Y. Blair
W. A. Y. Blair

50 WAYB: jk General Manager.

c.c. Mr.M.A.Chung - New Amsterdam.

B CONFIRMING HOUSE: CAMPBELL BOOKER CARTER LTD.
BUCKLESBURY HOUSE. WALBROOK LONDON E.C.4

Plaintiff's
Exhibits

EXHIBIT K.29
LETTER, PLAINTIFF'S SOLICITOR TO DEFENDANTS

K.29

Letter,
Plaintiff's
Solicitor to
Defendants

10th October
1963

T. A. M.

Exhibit "K29"

?

9. 3. 65

L. L. DOOBAY
SOLICITOR
OF THE SUPREME COURT.
TEL: 61122

OFFICE:-

15 & 16, Croal Street,
Georgetown, Demerara,
British Guiana.

10

10th October, 1963.

11 OCT 63

The Manager,
Bookers Stores Ltd.,
Water Street, Georgetown.

Dear Sir,

Re: Mustapha Ally

Since your letter to me of the 13th September, 1963, nothing has been done by your Company to put the Dryer in order neither has the Mill been adjusted to its full capacity.

20

The rice crop is now on and in order to mitigate his heavy loss, my client has erected a concrete drying floor, whilst the Dryer a "white elephant" lies asleep.

I am instructed that this is the only type of Mill and Drying Unit in the colony and my client had at the very beginning relied entirely on your skill and judgment especially since the Mill and Drying Unit were so highly recommended by your Company.

30

As to the second paragraph of your letter of the 13th September, 1963, my client states that

your Company made several tests which proved that the Dryer was no good and the mill was not functioning as was guaranteed and he has been complaining bitterly all along to your Company.

My client is now being forced to seek other remedies for breach of warranty and/or guarantee and/or contract in this transaction with your Company.

10 You will appreciate my client's loss is continuous and severe. If it is your desire to discuss a settlement with a view to avoid legal proceedings instituted against your Company, I shall be happy to do so.

Yours faithfully,

L. L. Doobay.

Plaintiff's
Exhibits

K.29

Letter,
Plaintiff's
Solicitor to
Defendants

10th October
1963

(continued)

Plaintiff's
Evidence

EXHIBIT K.30

LETTER, DEFENDANTS TO PLAINTIFF'S SOLICITOR

K.30

Letter,
Defendants
to Plaintiff's
Solicitor

T. A. M.
Exhibit "K30"
?
9. 3. 65

16th October
1963

DIRECTORS: H.E. BOON (CHAIRMAN) G.R. BANE H.C. RELHAN
M.C. J. HUDSON F.C.A. D.A. BLACKMAN

BOOKERS STORES LIMITED

20 - 23 CHURCH STREET GEORGETOWN BRITISH GUIANA 10

PLEASE QUOTE: L/11/1374 Cables: Boost Georgetown B.G.
OUR REF: Telephone: 62171 (20 lines)

October 16th 1963.

L.L. Doobay, Esq.
Solicitor,
Supreme Court,
Georgetown.

Dear Sir,

Thank you for your letter dated 10th October, 1963. 20

We had arranged with Mr. Mustapha Ally to inform us when he was ready to commence milling to enable the writer and Mr. Ottman to travel to Berbice to test the electrical equipment under load. Not having heard from Mr. Ally the writer, accompanied by the Manager of our New Amsterdam Branch, Mr. Chung called to see Mr. Ally on the 28th September. We were informed that he would commence milling par-boiled rice on the following morning and we arranged to return to assist in adjusting the mill. We returned to the mill on the morning of the 29th September to find that Mr. Mustapha Ally was not there, nor did any arrangements appear to have been made to commence milling. 30

You mention in your letter that the mill is the only one of its type in the Colony. For your information we erected three (3) identical mills in

Berbice in the same year. The only difference is the source of power driving the mill I.e. electricity as against a diesel prime mover. This was requested by Mustapha Ally on placing the order as he was considering the possible development of rural electrification.

The reference in your letter to our recommendation of "GRANTEX" equipment to Mustapha Ally is incorrect.

10 Your client approached this department requesting we order the equipment on his behalf and it was only when he offered a deposit of \$10,000.00 to place the order that we accepted the business.

We have already given considerable assistance to your client but you will appreciate that we can only be of service if the mill is under the supervision of an experienced miller who can benefit from our help and guidance.

20 Please be assured that given the necessary co-operation, we shall continue to render every assistance to your client.

Yours faithfully,

BOOKERS STORES LIMITED

Agricultural & Machinery Dept.

W. A. Y. Blair,

General Manager.

WAYB: jk

Plaintiff's
Exhibits

K.30

Letter,
Defendants to
Plaintiff's
Solicitor

16th October,
1963

(continued)

Plaintiff's
Exhibits

EXHIBIT K.32

LETTER, PLAINTIFF TO DEFENDANTS

K.32

T. A. M.
Exhibit "K32"

Letter,
Plaintiff to
Defendants

?

9. 3. 65

23rd December
1963

Albion Front,
Corentyne,
Berbice.

23rd December, 1963

10

Mr. Anthony Tasker,
Bookers Head Office,
Church Street, Georgetown.

Dear Sir,

It is with a deep sense of disappointment that I write you over correspondence which was directed to you some time ago in connection with my business transaction with Bookers Stores Limited and repeated complaints. I wish to place on record the action in writing to you was the result of a direct request from Sir Jock Campbell to me, as I gathered from him, he had passed certain information to you to investigate my complains and arrange to have them resolved amicably.

20

I feel that I have been treated most discourteously by you who have failed to observe the common ethics by acknowledging receipt of my letter; because of this and my immediate plans to visit the United Kingdom with my legal adviser where I intend to personally Sir Jock Campbell. I request that you forthwith return to me the correspondence I sent you.

30

Yours faithfully,

Mustapha Ally

Mustapha Ally

c.c. sent Sir Jock Campbell
Bookers Group of Companies,
London, E.C.4.
England.

EXHIBIT K.33
LETTER, DEFENDANTS TO PLAINTIFF

Plaintiff's
 Exhibits

K.33

Letter,
 Defendants
 to Plaintiff
 11th January
 1964

T. A. M.
 EXHIBIT "K33"
 ?
 9. 3. 65

RESIDENT BOARD

Representing

10

THE BOOKER GROUP IN BRITISH GUIANA

22 CHURCH STREET

GEORGETOWN

BRITISH GUIANA

Telephone:62171

Cables: BOOKGROOP, GEORGETOWN
 BG

11th January, 1964

Mr. Mustapha Ally,
 Albion Front,
 Corentyne,
 Berbice.

Dear Mr. Ally,

20

In Mr. Tasker's absence - he is out of the country at the moment - I am writing to acknowledge your letter of the 23rd December, 1963, requesting the return of previous correspondence sent to him in connection with your commercial activities with some of our companies.

The correspondence referred to is presumably the carbon copy enclosures sent under cover of your letter of the 23rd August, 1963 (received here on the 11th September, 1963), and these are accordingly returned with this letter.

30

At this state, I am not prepared to go into any of the malicious accusations contained in your letter of the 23rd August, 1963, but in view of your letter of the 23rd December, 1963, I must make a few points absolutely clear to you. The first is that I utterly reject any suggestion that the mere absence of a formal acknowledgment of your earlier correspondence with Mr. Tasker was meant as a discourtesy to you. Indeed, the lengthy interview which Mr. Tasker granted you in June 1963 (as a result of which you wrote your letter of the 23rd August, 1963); the

40

Plaintiff's
Exhibits

K.33

Letter,
Defendants
to Plaintiff

11th January
1964

(continued)

readiness of the management of P.M.A. to see you at all times, and to discuss the problems which had arisen, with a view to reaching an amicable settlement with you; and the continued efforts of our Stores Company - you will remember Mr. Blair and Mr. Ottman visiting your rice mill and carrying out checks on it as late as less than a week before you institute legal proceedings against the Stores Company on the 29th October, 1963 - to provide you with satisfactory service, and to help you remedy the cause of your complaint, would all suggest that we have always endeavoured to treat you with respect and courtesy and with a sympathetic appreciation of your problems. This has always been and will continue to be our attitude in our relationships with our customers and others. 10

The second point is that while we are always willing and anxious to avoid litigation, and to investigate and remedy our customers' genuine complaint we would not be persuaded to compromise our reasonable stand on any commercial issue by threats of one sort or another, or by litigation. So long, therefore, as your Supreme Court action against Bookers Stores remains sub judice, no one in the Booker Group can be of any further assistance to you in that particular matter. I understand that you have already been advised that we would be willing to help in training yourself and your brother to operate the rice mill, but that this would not be possible while the suit for breach of warranty of the mill remains pending in the Supreme Court. 20 30

You have not specifically referred in your letter of the 23rd December, 1963, to your complaints against P.M.A., but I am aware that the matter is still under discussion between your self and the General Manager of P.M.A.

Yours sincerely,

H. Singh, Secretary

Resident Board

encl:

EXHIBIT K.34
LETTER, DEFENDANTS TO PLAINTIFF

Plaintiff's
Exhibits

K.34

T. A. M.
Exhibit "K34"
?
11. 3. 65

Letter,
Defendants
to Plaintiff

16th December
1963

L/1/1750

December 16, 1963.

10 Mr. Mustapha Ally,
Sandreef,
Albion,
Corentyne,
BERBICE.

Dear Sir:

We refer to our recent conversation during which you requested our assistance in making our Berbice Workshop foreman, Mr. Inshan, available to you for a period of two weeks to train yourself and brother in operating your Grantex Multi-Stage Rice Mill.

20 We fully appreciate your difficulties, having found it necessary to dismiss your mill operator on the grounds of incompetency, but we regret that we cannot be of assistance to you so long as your action is pending against us.

Yours faithfully,

BOOKERS STORES LIMITED
Agricultural & Machinery Dept.

W. A. Y. Blair

General Manager.

WAYB:jk.

Plaintiff's Exhibits

EXHIBIT K.35

O R D E R

K.35

Order

11th October 1961

T. A. M.
EXHIBIT "K35"

?
15. 3. 65

BOOKERS STORES LIMITED

DEPARTMENT.....AGRICULTURAL & MACHINERY.....

CUSTOMER'S SPECIAL ORDER FOR GOODS:

1. I, hereby, request....BOOKERS STORES LIMITED..... 10
Department to order expressly on my behalf:

....1- 30/60E Electric Powered Grantex Multi-....
.... Stage Rice Mill complete with the following.

.....
.... Please find attached List of Equipment

.....
(here state description of articles to be imported)

2. I have today deposited the sum of \$10,000.00.... 20
on 11th October, 1961 Receipt No. E. 24651.....
(in words)

against this order and agree that within one month of the goods arriving in the Colony, I will

(a)

(b) pay the balance necessary for a hire purchase deposit and take delivery of the goods within the stipulated month after arrival.

3. Should I fail to complete the transaction promptly, I agree that my entire deposit be forfeited 30
and the goods sold elsewhere without any notification to me.

Signed.....Jumat Ally.....
for Mustapha Ally

Date.....

11/10/61

Witnesses:

- 1. M. A. Chung
- 2. M. Munro

24¢ Stamps
Cancelled.

1. All Elevators
2. Paddy Cleaner
3. Husk Aspirator
4. Compartment Seperator
5. Disc Sheller
6. Rubber Sheller
7. 2 - No. 1. Hullers
8. 3 Whitening Cones
9. 1 Polishing Cone
- 10 10. 1 Fan for Bran Extraction
11. Rotary Seive Grader
12. Cylinder Grader
13. Extra Fan to required distance all necessary motor and belts.
- 1 - 08 Dryer complete with the following:-
 1. All necessary Elevators.
 2. Drying Pile
 3. Vibratory conveyer to handle par-boiled paddy
 4. All motor & Belts.
- 20 3 Phase, 50 Cycles 220/440 Volts.

Delivery Approx: 31st March 1962.

All necessary Wood work and Extension ducting to be supplied by Customer.

Plaintiff's
Exhibits

K.35

Order

11th October
1961

(continued)

Plaintiff's
Exhibits

EXHIBIT K.36
LETTER, DEFENDANTS TO PLAINTIFF

K.36

Letter,
Defendants
to Plaintiff

Exhibit "K36"
for identification

25th March,
1963

15. 3. 65

L/1/522

25th March, 1963

Mr. Mustapha Ally,
Albion,
Corentyne,
BERBICE.

10

Dear Sir,

We refer to the recent conversation you had with the writer and Mr. H. C. Roach when you expressed the opinion that your mill was not working satisfactorily.

This is a subject which has been discussed with you on a number of occasions and it has been pointed out repeatedly that the quality of paddy you are milling is poor, and as such, you cannot expect to obtain the best results from your milling operations. We have also pointed out the necessity for employing someone with good milling experience to supervise the running of the mill.

20

The demonstration held at the opening of your rice mill received very favourable comments from the rice millers who were present and this supports the opinion we have expressed that there is nothing at all wrong with the mill.

You have requested that we run a test with your mill under the supervision of our Mr. Chung and this we are prepared to do under the following conditions -

30

1. We make arrangements to obtain paddy from another "Grantex" Mill in order that the result from both mills can be compared.
2. That our Mr. Chung will be in complete charge of the test and receives the fullest co-operation.
3. That the period of the test will be at Mr. Chung's discretion.
4. That the milled rice will be the property of the miller who supplied the paddy.

10

Should you be in agreement, would you please contact Mr. Chung and finalise arrangements.

Yours faithfully,

BOOKERS STORES LIMITED
Agricultural & Machinery Dept.

W.A.Y. Blair,
General Manager.

WAYB:jc

20 c.c. Mr. M. A. Chung - Berbice
Mr. H.C.W. Roach - Credit Controller.

Plaintiff's
Exhibits

K.36

Letter,
Defendants
to Plaintiff
25th March,
1963

(continued)

Plaintiff's
Exhibits

EXHIBIT K.37
LETTER, DEFENDANTS TO PLAINTIFF

K.37

Letter,
Defendants
to Plaintiff
5th March,
1964

T. A. M.
Exhibit "K37"
?
16.3.65

L/1/317

March 5th, 1964

Mr. Mustapha Ally,
Sandreef,
Albion Estate,
BERBICE.

10

Dear Mr. Ally:

We refer to our letter dated January 9, 1964 also correspondence dated 19th December 1963 and 7th January, 1964.

The rice milling components ordered on your behalf have now arrived in Georgetown and arrangements are being made to forward same to our New Amsterdam branch.

20

We are pleased to state that we can offer a reduction on the original prices quoted and details are given hereunder to enable you to finalise this transaction with our Branch in New Amsterdam.

	<u>Quoted</u>	<u>Actual</u>
1 Only 2-ton Capacity Grader with 220/440 Volt Motor	2,035.00	1,950.00
1 Only 12'0" Single Elevator with 220/440 Volt Motor	1,030.00	980.00

30

1 Only 18'0" Single Elevator with 220/440 Volt motor	1,250.00	1,100.00
2 Only No. 1 Planters Mills on High Stands c/w 220/440 Volt Motors and Set spare Belts		2,500.00
		<u>6,530.00</u>
Less Deposits		<u>1,500.00</u>
Balance to be paid in cash		5,030.00

Plaintiff's Exhibits

K.37
Letter, Defendants to Plaintiff
5th March, 1964
(continued)

10

We would appreciate your early attention to finalising this transaction.

Yours faithfully,

BOOKERS STORES LIMITED

Agricultural & Machinery Dept.

W. A. Y. Blair

General Manager.

WAYB:jk

c.c. Mr. M. A. Chung - New Amsterdam, Berbice.

Defendants'
Exhibits

EXHIBIT N.
TEST SHEET

N.
Test Sheet
19th July 1963

T. A. M.
Exhibit "N"
1965/1963
?
29.6.65

TEST RESULTS OF DRIER

JUMAT ALLY

Quantity of Paddy Weight	Time to fill Drier	Moisture content of Paddy	Actual Drying time	Moisture content after drying	Fuel used	10
60 BAGS 9,007	1 Hr. 3 Mins.	19%	1 Hr.	14½%	Not calcu- lated 45 GALS CONTAINER Measuring stick showed ½" used.	20

Returns from above Paddy Milled in 3 hrs.

28 bags whole Grain Rice

10 bags 52 lbs. Broken

5½ bags Bran.

Certified by:- M.A. Chung
19. 7. 63

Witnesses

Mr. Mustapha Ally refused to sign.

EXHIBIT 06

B I L L.

Defendants'
Exhibits

06

Bill

26th April
1965

T. A. M.

Exhibit "06"

1965/1963

?

23. 6. 65

This form is to remain in
the book.

10

FORM 7

RICE MARKETING ORDINANCE, 1946

NOTIFICATION BY MANUFACTURER

THAT RICE HAS BEEN FORWARDED FOR DELIVERY TO THE
BOARD

Tularam Bambola.....c/o Mustapha Ally.....

Owner's name

Owner's address

A/N ESTATE

NO.OF BAGS	MARKS ON BAGS	GRADE CLAIMED	PURCHASE TICKET NO.
------------	---------------	---------------	---------------------------

20

94 TL 54 White 1

54 TL 54 Broken

10 TL 54 Chips

158

.....26.4.65.....?.....	A/N Estate
-------------------	-------------	------------

Date

Manufacturer's Signa-
ture Waey

Manufactu-
rer's

30

I hereby authorise the B. G. Rice Marketing
Board to deduct from the proceeds of the above-
mentioned consignment (s) of rice, the sum of....
.....dollars andcents

Defendants' Exhibits

06

Bill

26th April 1965

(continued)

and to pay same to.....
of.....

Witnesses: (1)Owner's Signature...
(2)

THIS SPACE RESERVED FOR BOARD'S USE

..... Clerk-in-Charge Warehouse Ref.No.	Duplicate Copy of Total Amount of Rice to R.M.B.	10
..... Warehouse Voucher No.	From 303 bags of Paddy 45948 lbs. Dried on Dryer and Milled by me.	

Ranjit Bhoopsingh

FORM No. 7

Mill 54

20

No. 69

EXHIBIT P.1
LETTER, PLAINTIFF TO RICE DEVELOPMENT COMPANY

Defendants'
Exhibits

P. 1

T. A. M.
 Exhibit "P1"
 ?
 29. 3. 65

Letter,
 Plaintiff to
 Rice Develop-
 ment Company

4th September
 1964

Mustapha Ally,
 Albion Estate,
 Corentyne,
 Berbice.

10

September 4, 1964

The General Manager,
 Rice Development Company,
 Georgetown.

Dear Sir,

20

This is to let you know that some two years ago I have for the Rice Development Company an outstanding balance of roughly \$4,000.00 for which I have instructed the Rice Marketing Board to deduct from the proceeds of all Rice shipped to the Board 50¢ per bag of rice shipped to the Board by me for which in due course, I will instruct the Rice Marketing Board.

30

I feel proud in mentioning that it is well-known that I have one of the most modern and up-to-date Electrically driven Rice Milling Unit in the country, a two ton Grantex Electrical Mill with a .08 grantex electrical dryer with 165 H.P. generating set burning 8 to 9 gallons of fuel per hour while the mill is producing 5-6 to 7 bags of rice per hour. These machinery were sold by Bookers to me and were guaranteed under warrant to do a certain amount of work which have proven a failure by less than half its capacity, hence I had no alternative but to have this matter in suit.

40

I also wish to inform you Sir, that you as an expert will definitely agree with me that 100% of all the Rice Milling Machinery sold in British Guiana have proven a failure concerning its capacity and performance. Each and every individual including Government R.D.C. and the Co-op. Society have faced

Defendants'
Exhibits

P. 1

Letter,
Plaintiff to
Rice Develop-
ment Company

4th September
1964

with loss to their investment on Rice Milling Machinery calculated as per warranty. Many of us have taken it and sit down because we are afraid of the Big Firm and most likely the glib way an European discuss business with us or because our indebtedness with certain firms and in some cases we are afraid to face the court etc. I was one of these persons who had no alternative but to put my matter in suit.

I wish to inform you that a loan was granted to me by the Credit Corporation, and on the 28th October, 1963 I wrote the chairman of the Credit Corporation of which letter is enclosed for a committee to set up and carry on tests so as to submit a report to the Credit Corporation which in turn I was asked by my Council Mr. S.D.S.Hardyal, Mr. C.L.Luckhoo and Mr. B.O. Adams that they have a winning case and they are in sympathy but in carrying through they will need expert report, that is why I wrote the Credit Corporation for a test to be carried.

10

So in view of my pending auction against Bookers and knowing that this is the only opportunity in having expert advice, I rendered to you Sir my humbly Mill and Drier with one of your technicians from either Burma or Anna Regina to operate my Mill and Dryer to process all the paddy you will be having at Black Bush Polder for the crop. If this is done it means that I will be having an expert report on the Mill and Dryer and at the same time it will enable me to liquidate my indebtedness with your Company.

20

I will charge you 36¢ per bag transportation of the paddy from the Polder to the Mill, 36¢ per bag for transporting the rice from the Mill to the Rice Marketing Board and \$2.25¢ for Drying and Milling.

30

Copies of this letter are sent to

- (1) Mr.Gavin Kennard of the Industrial Corporation
- (2) The President of Rice Producers' Association
- (3) The General Manager - B.G.Credit Corporation
- (4) The President of the Rice Millers' Association
- (5) The Premier Dr. the Hon. C. B. Jagan.

I will be in Georgetown on Wednesday, September 16th, and shall call to see you when I will be able to discuss this matter more properly.

40

I thank you for your kind co-operation.

Thanking you,

Mustapha Ally
Mustapha Ally.

EXHIBIT P.2
LETTER, PLAINTIFF TO B.G.CREDIT CORPORATION

Defendants'
Exhibits

T. A. M.
Exhibit "P2"
?
29. 3. 65

P. 2

Letter,
Plaintiff to
B.G. Credit
Corporation

28th October
1963

Pln. Albion,
Corentyne,
Berbice.

28th October, 1963

10 The Chairman of B.G.Credit Corporation,
Boyle Place,
41 Brickdam,
Georgetown, B.G.

14th September 1964

Dear Sir,

PURCHASE OF TWO TON GRANTEX ELECTRICALLY
OPERATED RICE MILL AND DRYER

20 During the last year I purchased from Bookers
Stores Ltd. the above mill which has been installed
on my premises at Pln. Albion Estate. This mill
was commissioned in December last year and continues
to operate.

30 As you are aware, this mill is now mortgaged to
you and it is my duty to ensure that it is kept
occupied to the maximum capacity so that I could
maintain my payments to you. I am now in a position
to advise you that after many checks by Bookers
Stores Ltd., they have not been able to arrange
mechanism of this mill and dryer to operate to its
capacity as stated in the specifications governing
the mill. I must point out that the mill was
purchased with the specific understanding that the
capacity stated by the suppliers would be maintained.

Unfortunately, I have been unable to get any
further with Bookers with regard to getting the mill
to operate properly and therefore I have filed a Writ

Defendants'
Exhibits

P. 2

Letter,
Plaintiff to
B.G. Credit
Corporation

28th October
1963

(continued)

for damages against Bookers Stores Ltd.

As an industrialist without any technical knowledge of rice milling machinery, I feel obliged to ask you to appoint a Committee comprising the following personnel who should visit the site where the mill is installed and carry out tests and submit a report to you on the operation and output of this mill:

2 members from the Industrial Corporation

The Chairman of the Rice Marketing Board

10

The President of the Rice Producers'
Association

The Manager of the Rice Development Company

The President of the Rice Millers Association

The General Manager of the Credit Corporation

Mr. Compton Pooran, Adviser at the Government
Technical Institute.

Such an investigation would be of invaluable assistance in this matter as indeed it would certainly open the way for either Bookers or the Manufacturers of the mill to look more thoroughly into the specifications and correct the defects as found necessary.

20

Yours faithfully,

Mustapha Ally

Mustapha Ally.

EXHIBIT T.10

LETTER

T. A. M.
Exhibit "T10"
?
24. 6. 65

Defendants'
Exhibits

T.10
Letter
24th June 1965

TELEPHONES: C1484 & 1485

TELEGRAMS: "RICEBOARD"

BRITISH GUIANA
RICE MARKETING BOARD

P.O. Box 123

1 & 2 WATER STREET

G E O R G E T O W N

24th June, 1965

TO WHOM IT MAY CONCERN

Mr. Mustapha Ally, Miller of Mill No. 54
Albion Estate, Corentyne, Berbice, has delivered to
the Rice Marketing Board, 7,880 bags of rice from
1st January, 1965 to June, 1965, 84 bags of which
is unpaid to date.

NOOR M. KHAN

Secretary.

MCH/jr.

Defendants'
Exhibits

EXHIBIT V.1

DOCUMENT WITH SPECIFICATION

V. 1

Document
with
Specification

- 1 - Only No.30/60 Grantex Detached Type Rice Mill consisting of:-
- Ironwork for Intake Hopper comprising steel grating to prevent entry of large impurities & slide with control handwheel to regulate the feed to the intake elevator.
- One Paddy Cleaner comprising Vibrotary Sieve and all metal double leg aspirator fitted with feed roller & built in screw to deliver lifting at side of expansion chamber. 10
- One No.10 Magnetic Separator, chute type to remove wire, nails etc.
- One 54" dia. Disc Sheller mounted on cast Iron Stools and with discs covered with emery composition. Fitted with plain bearing bearing necbush and ball bearing footstep.
- One return Paddy Sheller consisting of a Grantex Minor Roller Sheller (with 3 spare covers) mounted on cast iron stools. 20
- One Husk Aspirator, Model B48, Vibrotary Sieve and all metal aspirator fitted with built in screw to delivery husk at side of expansion chamber. Venturi for fan discharge of husk aspirator.
- One 45 Paddy Seperator fitted with sheet iron side doors and with underdrive. Required with Grantex type of variable speed drive (enclosed type) mounted on channel section under frame.
- One No. 2 Huller mounted on C.I. "A" Frames and fitted with fast and loose pulleys and spouting. 30
- Three 30" dia. Whitening Cones mounted on cast Iron stools and with cones covered with emery composition. Fitted with plain bearing neckbush & ball bearing footstep.
- One 30" dia. Polishing Cone mounted on cast iron stools and with drum covered with sheepskin fitted with plain ball bearing neckbush and ball bearing footstep.
- Cone Suction Fan with suction ducting between chokes and fan and with branch, to aspirate rice at entry to final elevator. 40
- One 6" dia Cyclone for collecting meal from the cone suction. fan discharge.

Screw Conveyor with steel trough for collecting meal from the cones fitted with bagging spout and supported by brackets from the cone stools.

Defendants'
Exhibits

One Vibrotary Sieve Model V36 for grading rice into whole grains, large brokens and small brokens.

V. 1

One Kapak Cylinder Size No.1, for retreatment of the large brokens from the Vibrotary Sieve in order to cover any whole rice.

Document with
Specification
(continued)

10 Elevators with steel trunking, pressed steel buckets and rubber belting fitted with ball bearing on top and bottom shaft, the bottom shaft being adjustable to take up belt stretch.

Bagging Board with spouts for bagging off whole rice, large brokens and small brokens.

20 Transmission comprising shafting mounted in ball bearing plummer blocks, pulleys and rubberised belts for driving the above machines including a pair of fast and loose pulleys to receive drive from customers engine but excluding main drive belt from engine.

Spouting consisting of straight lengths of Steel spouting and rubber bends and connecting pieces to allow of the spouting being fitted up during erection on site.

Accessories comprising Strickle for Sheller Discs.

30 Cone Mould, Slide Rest for turning Cones with tool holder and tools (2 dozen sets star cutters and 4 pairs finishing cutters,) Mill pick, Hydrometer, Lifting Bar sheller Discs and cones, set of spanners Grease Gun, foundation holding down bolts and foundation drawings.

Certified a
true copy

(Sgd.)

Assistant Sworn Clerk.
8.6.70

(L.S.)

Defendants'
Exhibits

EXHIBIT V.2
DOCUMENT WITH SPECIFICATION

V. 2

Document with
Specification
19th April
1961

19th April, 1961

Dear Sir,

In answer to your request on quotation on Grantex Multi stage Rice Mill Model 30/60, capable of a capacity of 3,500 - 5000 lb of paddy per hour, consisting of Machinery as per Mill at East Lothian seen by your goodself, with rotary grader for treatment of large broken rice from the vibratory sieve less huller - cost \$42,000.00.

10

One 80 H.P. National Diesel engine complete with tropical radiator and Pryce Berger hydraulic starter - \$8,500.

Estimated cost of materials and labour for the foundation of the mill and engine - \$2,000.00.

Yours faithfully,
BOOKERS AGRIC. & MACHINERY DEPARTMENT
Berbice Depot.

.....
Sales Manager.

20

(L.S.)

Certified a
True Copy
(Sgd.)
Assistant Sworn Clerk
8.6.70.

IN THE PRIVY COUNCIL

No. 11 of 1970

O N A P P E A L

FROM THE COURT OF APPEAL OF THE SUPREME
COURT OF JUDICATURE OF GUYANA

B E T W E E N :

BOOKERS STORES LIMITED

Appellant
(Defendant)

- and -

MUSTAPHA ALLY

Respondent
(Plaintiff)

RECORD O F P R O C E E D I N G S

VOLUME 2

SIMMONS & SIMMONS,
14, Dominion Street,
London, EC2M 2RJ.

Solicitors for the Appellant.