

CAUSE NO. \_\_\_\_\_

TANWEER AHMED,

Plaintiff,

vs.

MOHAMMED TAHIR JAVED,  
KAMRAN JILANI, and  
JAGO TIMES  
Defendants.

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IN THE DISTRICT COURT OF

\_\_\_\_\_ COUNTY, TEXAS

\_\_\_\_\_ JUDICIAL DISTRICT

**PLAINTIFF’S ORIGINAL PETITION**

COMES NOW Tanweer Ahmed (“Ahmed” or “Plaintiff”), Plaintiff, filing this Original Petition against Mohammed Tahir Javed (“Javed”), Kamran Jilani (“Jilani”), and Jago Times (“Times,” and with Javed and Jilani, collectively, “Defendants”), Defendants, showing the Court the following:

**I.  
DISCOVERY LEVEL**

1. Plaintiff intends to conduct discovery under Level 3 of Texas Rule of Civil Procedure 190.4.

**II.  
JURISDICTION AND VENUE**

2. This Court has jurisdiction over the Defendants residing in Texas and committing tortious acts in Harris County, Texas.

3. Venue is proper in Harris County under Chapter 15 of the Texas Civil Practice & Remedies Code for events occurring in Harris County.

**III.**  
**CLAIM FOR RELIEF**

4. Damages sought are within the jurisdictional limits of the Court. Plaintiff seeks monetary relief over \$1,000,000.

**IV.**  
**PARTIES**

5. Ahmed is an individual residing in Harris County, Texas.

6. Javed is an individual residing in Jefferson County, Texas.

7. Jilani is an individual residing in Harris County, Texas.

8. Times is an entity located in Tarrant County, Texas.

**V.**  
**PRELIMINARY STATEMENT**

9. This lawsuit arises from defamation and civil conspiracy by Javed against Ahmed. Javed is destroying the reputation of Ahmed.

10. Javed accuses Ahmed of murder, providing illegal political gifts to politicians, and committing fraudulent activity. These accusations damage Ahmed's personal and professional reputation and severely harm his political endeavors. Ahmed is losing financial backing and public support.

11. Ahmed brings this action holding Javed accountable for defamatory conduct, civil conspiracy, breach of contract, and tortious interference with business relations. Ahmed is seeking compensatory and punitive damages, and injunctive relief preventing further harm and restoring Ahmed's integrity in the community.

12. Plaintiff brings this action to hold Jilani and Times accountable for conspiring to defame Ahmed.

13. Javed is seeking a deposition against Ahmed in Harris County, filing a 202 Petition on September 20, 2024. Javed is alleging defamation against Ahmed.

14. Ahmed is requesting that the 202 Petition be dismissed and consolidating all depositions within this lawsuit.

## VI.

### **FACTUAL BACKGROUND**

15. Ahmed is a respected businessman in the United States and in Pakistan. He is well connected to high levels of government in both countries. Javed maintains personal grievances against Ahmed for reasons unknown, orchestrating a campaign of defamation, spreading false and malicious lies, and destroying Ahmed's personal and professional reputation.

16. Javed claims Ahmed murdered a woman and engages in illegal activity providing a Senator a chartered plane.

17. Javed misrepresents Ahmed's actions claiming engagement in illegal activity, to sway public opinion damaging Ahmed's political influence. These false accusations significantly harm Ahmed's reputation, portraying him as conducting unlawful activity when Ahmed conducts business lawfully.

18. Javed engages in this behavior since 2016. Javed portrays himself to be a man of good character. He circulates many lies misrepresenting himself to the American-Pakistani community as a man of integrity.

#### **a. January 2016 – Fundraising event with former President Bill Clinton**

On January 22, 2016, Ahmed hosts a fundraising event in Las Vegas, Nevada. Coordinating with the Democratic National Convention ("DNC") attendees pay \$100.00 entering the event and \$5,500.00 for photographs with former President Bill Clinton. Javed photographs

himself with the former president without paying \$5,500.00, displaying this photograph on social media as though paying for the photograph.

**b. Defendant Javed Lied Under Oath**

Javed applies to obtain a pharmacy license. The application states all responses are under oath. Javed lies stating he never had any felony, and notarizes the application on March 14<sup>th</sup>, 2016 by Tammy L. Sactano. That application is attached and incorporated to this Petition as Exhibit A.

**c. March 2016 – Wedding Event Center Investment Plan**

On or around March 28, 2016 Javed approaches Ahmed with a business proposal for a wedding event center project to partner with Ahmed, costing approximately \$2 Million. Javed seeks investment funds from Ahmed. Javed provides no funding and receives equity and project control to manipulate potential investors. The project structure gives Javed ownership of the real estate and management company. Javed depreciates investor investments by a quarter and obtains a quarter of equity in the project. Ahmed rejects this proposal. Javed asserts Ahmed owes Javed \$250,000.

**d. April 2016 – Political Event for Hillary Clinton**

On or around April 8, 2016, Javed hosts a political event for Hillary Clinton. Javed requests help from Ahmed to arrange with the DNC for funding. Ahmed brings the DNC to the table. Ahmed raises \$270,000 out of a total of \$413,000. Javed takes complete credit for the event pushing Ahmed, his family, and supporters to the side. Javed refuses decorum and honor at Ahmed's expense.

**e. Movie Production**

On or around September 5, 2016, Javed approaches Ahmed to collaborate on a movie production featuring actress Sharon Stone highlighting Pakistan in a positive light. The entity, Atlantcis LLC, is formed. Ahmed contributes approximately \$51,000. The movie is not released, despite a set date on or around June 2021. Javed fails to issue a K-1 and fails to return the investment.

**f. April 2017 – Wedding in The Woodlands**

On or around April 17, 2017, Amar Shahzad invites “Mr. and Mrs.” Javed to a wedding celebration. Javed brings 19 family members. Javed gifts a \$500.00 check payable to Ahmed instead of the new couple. A bank rejects the deposit for insufficient funds embarrassing Ahmed. Javed misrepresents to the community he is a man of incredible wealth but cannot cover \$500.00. Javed fails to remedy the dishonored check. The check is attached and incorporated to this Petitioner as Exhibit B.

**g. Defendant Javed – Congress Campaign**

On or around March 6, 2018, Javed runs for Congress. Javed requests Ahmed to contribute \$1 million. Ahmed refuses. Javed lashes out at Ahmed screaming with aggressive behavior. Additionally, and more problematic, Javed takes funds from his campaign that not equal to his contribution, embezzling funds from his campaign which was reported in a publication. Javed acts in bad faith.

**h. September 2019 – Senator Chris Von Hollen Pakistan Trip**

In September 2019, Javed takes Senator Chris Von Hollen on an unofficial tour to Pakistan. Javed asks Ahmed to arrange for a chartered plane. Ahmed arranges a chartered plane for Javed. Javed states to Senator Hollen that he owns the plane. Later at an event, Ahmed and Senator Hollen engage in a discussion in connection to the chartered plane and its

ownership. Senator Hollen and Ahmed discuss that the chartered plane is not owned by Javed but rather by Ahmed's friend. A few days after this discussion, Javed calls Senator Hollen's Chief of Staff acting like he is from ARY Digital (a news media company) making disparaging remarks about Ahmed. Acting as an ARY Digital representative, Javed inquires how the Senator could accept a gift and further blatantly lies that "Plaintiff created and circulated a video that Plaintiff is trying to make go viral". Then 15 minutes later, Javed calls the Chief of Staff from his personal phone, lies again, stating that ARY Digital called him regarding this illegal gift and how Javed can save the Senator.

**i. October 2020 – Jago Times**

Sometime in October 2020, Ahmed learns of a publication by Jilani on Facebook at Javed's direction. Rehan Siddiqui calls Jilani asking him to remove the post, and Jilani refuses. Jilani states he cannot remove it until Javed instructs him to remove it. Ahmed calls Jilani the next day demanding removal of the defaming post. Jilani reluctantly obliges. Javed seeks revenge paying Times to publish the defaming statement. Times refuses to remove the story. Times states Javed pays for the post and Times refuses removal until Ahmed pays. Ahmed refuses to pay. Three years later another writer for Times publishes another defaming story about Ahmed.

**j. May 2021 – Governor of Punjab Arrival in Houston**

On or around May 27, 2021, Ahmed invites the Governor of Punjab, Pakistan to his daughter's wedding. Javed wants to bask in the spotlight, and hearing about the Governor of Punjab arriving to Houston, insists joining Ahmed for a luncheon at his residence. The Governor obliges, Javed attends, and Javed takes photographs and shares on social media misrepresenting to the community that he invited the Governor

**k. June 2021 – Presidential Lifetime Achievement Award**

On or around June 24, 2021, Javed sells Presidential Lifetime Achievement Awards for \$10,000. Javed demands \$10,000.00 from Ahmed. Ahmed refuses.

**l. July 2021 – Civil Award**

On or around July 23, 2021, Javed receives a Civil Award. 12 people contribute \$3,000.00 each. Ahmed makes an extra \$3,000.00 contribution to fulfill the obligation hosting the event. Javed pressures others to award himself. Javed fails to contribute payment apart from all the others. Javed represents himself as a man of wealth but not paying for hosting events or dues to organizations.

**m. June and July 2022 –Residential Tower**

- 1) On or around June 1, 2022, General Bajwa (Pakistan) assigns Javed to raise investment for construction of a residential tower. Javed creates a WhatsApp group to raise investment and did not invest himself.
- 2) On or around June 10, 2022, Javed creates another WhatsApp group and circulates project documents.
- 3) On or around June 13, 2022, Javed creates a third group on WhatsApp for the same purpose.
- 4) July 2022 – DHA JV Meeting  
On or around July 18, 2022, Javed displays bad character conducting a meeting at his office regarding financial matters of DHA JV project (i.e., Residence Tower). Javed shares financial plans with manipulated numbers. Ahmed notices the calculations incorrect and

informs Javed. Javed starts yelling and again does not take accountability for his misrepresentations.

**n. September 2022 – Pakistan Flood Support**

The late Congresswoman Sheila Jackson Lee, with the help of Dr. Asif Qadeer, Tahir Bhatti, and Ahmed, gives \$30 million to help flood victims in Pakistan. Javed joins this event even though not invited. The late Congresswoman requests Ahmed onstage to present and say a few words. Ahmed also donates 30 million Pakistani Rupees to the cause. Javed snatches the microphone and tries taking credit for the event and the funds. Javed is always seeking credit without putting forth money, time, or any other real efforts. Javed plans to travel with Congressman Al Green to Pakistan but jumps ship going with the late Congresswoman Sheila Jackson Lee who goes to Pakistan on an official trip for the press conference relating to the Pakistan Flood Victims Support Fund. Javed never purchases his own airfare. In the 202 Petition, Javed, falsely claims he contributes significant amounts of money to Pakistan government. Javed remits a \$50,000 check returned for insufficient funds.

**o. October 2023 – Special Assistant to Prime Minister**

On or around October 2, 2023, Javed becomes the Special Assistant to Prime Minister of Pakistan, and his past criminal charges and/or convictions comes to the attention of the Prime Minister. Two days prior to taking the oath for this prestigious position, Javed's position is withdrawn after investigation. Javed fabricates a letter written by Jefferson County clerk with no address, phone number, or contact information. The person who signs the letter has no name underneath the signature. That letter is incorporated to this Petition and attached as Exhibit C. There is no department of felony records search existing in

Jefferson County. The fabricated letter causes Javed's ministry position to be withdrawn, in connection with his felony records in Jefferson County including theft by receiving (buying and selling stolen goods- Case # D014328282A) and indictment on Feb. 16, 1996 (Beaumont Police record #90-88930 investigation regarding MICHEAL CHRISTOPHER MADIGAN AND/OR MUHAMMAD TAHIR JAVED) from County Clerk John Appleman in the 136<sup>th</sup> District court Jefferson County Texas. The judgment is recorded in the 136<sup>th</sup> Judicial District in Jefferson County in 1996, with a conviction of guilty and an order to pay \$30,000, cost of court, interest and attorney fees. Javed is also ordered to pay \$10,000 before March 18, 1996 to SUBURBAN CORPORATION before execution of the judgment. Javed blames Ahmed for running a smear campaign against him publishing articles in Pakistan about Javed's involvement in a murder and in the U.S. about Javed regarding a felony indictment and/or conviction during his run for Congress. Apparently, these news articles are circulated by the public coming to the attention of the Office of the Prime Minister. This incident directly relates to the pending 202 Petition filed in Harris County which Javed accuses Ahmed as an architect for a smear campaign conspiracy without proof.

**p. October 5, 2023 – Rubina Javed Harasses Plaintiff**

On or around October 5, 2023, Javed's wife, Rubina Javed harasses Ahmed and Ahmed's wife with a series of text messages accusing Ahmed of circulating false articles and/or paying for false articles about her husband [Javed]. Rubina Javed further harasses Ahmed's wife by calling her and leaving an accusatory message.

**q. Defendant Javed Lied about Plaintiff**

Javed publishes on social media a lie stating Ahmed is a non-Muslim.

**r. August 2024 – Death of Nepali Girl**

On or around August 24, 2024, a Nepali woman is murdered in Houston, Texas. The police share a photograph of the suspect. Javed calls the Harris County Sheriff Department and state the man in the photograph is Ahmed. The agent at the Harris County Sheriff Department informs Javed that is incorrect, and they have identified the suspect, and his name is not Tanweer Ahmed. After knowing the truth, Javed intentionally and maliciously circulates lies to the community in the U.S. and in Pakistan stating Ahmed murdered the Nepali woman.

**s. April 2025 – Congressional Delegation to Pakistan**

Ahmed forms a Pakistani Caucus. To make it official, the Ambassador signs off on it. Javed forces the Ambassador to include Javed. Javed conspires with the Ambassador to withhold information for the delegation resulting in Javed going on the delegation without Ahmed.

19. Defendants' defamatory actions are effective. The false statements, circulated widely through social media and other platforms, severely damage Ahmed's reputation. Ahmed is losing critical political supporters and financial backers due to these lies. Defendants' conduct is a coordinated and deliberate attempt ruining Ahmed's credibility, influence, and chances of success in his efforts. The financial harm these lies are causing cripples Ahmed's ability to effectuate his efforts and inflicts severe emotional distress from this smear campaign.

**VII.  
CONDITIONS PRECEDENT**

20. All conditions precedent to Plaintiff's recovery have been performed, are waived, or have otherwise been satisfied.

**CAUSES OF ACTION**  
**First Cause of Action – Defamation**

21. Plaintiff incorporates each of the foregoing paragraphs by reference as if fully set forth herein.

22. Defendants engage in a sustained and coordinated campaign of defamation against Plaintiff, making false statements severely damaging Ahmed's personal and professional reputation. Defendants falsely claim in videos, images, and posts disseminated through social media that Plaintiff commits murder, is involved in illegal political activities and/or bribes. These statements are blatantly false and made with actual malice, Defendants know the statements are false or act with reckless disregard for the truth.

23. These statements are defamation per se, accusing Ahmed of criminal activity and dishonesty, inherently damaging his reputation without the need for further proof of harm. Defendants' conduct is intended to harm Ahmed's reputation in the eyes of the public and significantly damage his political connections and personal standing in the community.

24. Defendants' false statements are widely published across various platforms, reaching countless people in both countries. As a result of Defendants' actions, Plaintiff suffers substantial reputational harm, emotional distress, and financial losses, including the withdrawal of crucial political and financial support for his endeavors.

**Second Cause of Action– Civil Conspiracy**

25. Plaintiff incorporates each of the foregoing paragraphs by reference as if fully set forth herein.

26. Defendants act in concert to orchestrate a coordinated campaign of defamation against Ahmed. Rather than acting independently, Defendants conspire together with a common goal: sabotaging Ahmed's current political efforts and any political future for the benefit of Javed.

Defendants use social media platforms, connections within the community, and their own influence spreading false and defamatory statements about Ahmed, intending harm to him.

27. The concerted actions of Defendants demonstrate their unified goal of undermining Ahmed's reputation. Their defamatory statements are not random or isolated incidents but part of a deliberate, strategic effort destroying Ahmed's standing in political circles. Each Defendant plays a role in this conspiracy, publishing defamatory content, spreading false rumors, and actively encouraging others to believe and share these lies.

28. As a direct result of this civil conspiracy, Ahmed's reputation is irreparably damaged, and his political efforts are seriously compromised. The coordinated nature of Defendants' actions amplifies the harm to Ahmed, as the false statements reach a broad audience across multiple platforms.

**Third Cause of Action— Intentional Infliction of Emotional Distress**

29. Plaintiff incorporates each of the foregoing paragraphs by reference as if fully set forth herein

30. The conduct of Defendants goes beyond mere defamation—it is extreme, outrageous, and calculated inflicting severe emotional distress on Plaintiff. Defendants make knowingly false and harmful statements accusing Ahmed of serious crimes and unethical behavior. These accusations are not only false but inherently damaging to Ahmed's reputation.

31. Defendants' conduct is intentional and malicious, designed to cause Ahmed emotional harm and distress. Defendants know that by spreading such egregious lies, they cause Ahmed to experience severe mental anguish, including anxiety, humiliation, and emotional suffering. The false accusations directly attack Ahmed's character, integrity, and reputation, which are all essential to his political and professional life.

32. As a result of Defendants' actions, Plaintiff suffers significant emotional distress, including feelings of helplessness, stress, and anxiety over the harm caused to his personal and professional reputation.

**Fourth Cause of Action– Tortious Interference with Prospective Relations**

33. Plaintiff incorporates each of the foregoing paragraphs by reference as if fully set forth herein.

34. Defendants' false and defamatory statements not only harm Ahmed's reputation but also interfere with his business relationships, specifically his relationships with politicians, supporters of his political endeavors, financial backers, and prospective political allies. Defendants' actions are specifically designed to disrupt Plaintiff's relationships with these crucial supporters, causing them to withdraw their financial and political backing.

35. By spreading false claims that Ahmed is engaged in illegal activity, Defendants intentionally sabotage Ahmed's political and financial relationships, causing lasting damage to his name. Defendants are fully aware their actions lead to such disruption and pursue their defamatory campaign with the express purpose of harming Ahmed's credibility and his ability to secure support and funding.

36. The loss of these relationships inflicts financial loss and professional damage to Ahmed. Defendants' actions are not only reckless but intended to harm Ahmed by preventing him from maintaining and cultivating these crucial business and political relationships.

**Fifth Cause of Action – Breach of Contract**

37. Plaintiff incorporates each of the foregoing paragraphs by reference as if fully set forth herein.

38. Javed and Ahmed have a valid and enforceable written contract. The contract provides that Javed would produce a movie funded by a certain sum by Ahmed.

39. Ahmed meets all the contractual obligations.

40. Javed does not meet the contractual obligations, and breached it. The breach by Javed causes damage to Ahmed, including the amount paid by Ahmed and all other damages including loss profits. Ahmed seeks attorney fees for this claim.

**Sixth Cause of Action- Misrepresentation**

41. Plaintiff incorporates each of the foregoing paragraphs by reference as if fully set forth herein.

42. Javed represents to Ahmed that a movie will be produced. Javed makes this representation in the course of Javed's business dealings, and Javed has an interest in the transaction. Javed makes this representation for the guidance of others. Javed's representation is a misstatement of fact. Javed fails to use reasonable care when this statement was made. Ahmed justifiably relies on this statement when it was made.

43. Javed's misrepresentation causes proximate damages to Ahmed, including the amount paid by Ahmed, exemplary damages, and all other available damages.

**Seventh Cause of Action - Fraud**

44. Plaintiff incorporates each of the foregoing paragraphs by reference as if fully set forth herein.

45. Javed represents to Ahmed that a movie will be produced. Javed's representation is material to Ahmed as a request for money necessary to fund a movie production. Javed's representation to Ahmed is a false promise of future performance as no movie was intended to be produced and no movie was produced. Javed knows that the statement is false at the time it was made to Ahmed. Javed intends that Ahmed would rely on the representation at the time it was

made. Ahmed justifiably relies on the Javed's statement at the time it was made without having a reason not to trust Ahmed.

46. Javed's representation causes proximate damages to Ahmed, including the amount paid by Ahmed, exemplary damages, and all other available damages.

**VIII.**  
**APPLICATION FOR EX PARTE TEMPORARY RESTRAINING ORDER,**  
**TEMPORARY INJUNCTION AND PERMANENT INJUNCTION**

47. Plaintiff's Application for Temporary Injunction is brought pursuant to Texas Civil Practice and Remedies Code Section 65.011(2) and (3). Plaintiff is likely to suffer permanent and irreparable harm if the requested injunction is not granted. There is no other adequate remedy at law, and thus Plaintiff seeks the equitable intervention of this Court to prevent further damage. As detailed in this Petition, Plaintiff respectfully requests that the Court issue a Temporary Restraining Order and a Temporary Injunction, enjoining Defendant from continuing the unlawful conduct outlined in the preceding paragraphs.

48. Conduct to be Restrained. In order to preserve the status quo pending a final trial on the merits of this case, Plaintiff respectfully requests that this Court issue a Temporary Restraining Order and a Temporary Injunction to immediately restrain and enjoin Defendants, their employees, agents, attorneys, servants, representatives, and all persons or entities acting under their control, direction, or in active concert with them, from engaging in any of the following conduct:

- A. Publishing, disseminating, or sharing any false, defamatory, or misleading statements regarding Plaintiff, including but not limited to statements about Plaintiff's business practices, personal conduct, or involvement in any criminal or unethical activity;

B. Creating, distributing, or reposting any videos, images, posts, or other forms of communication that falsely accuse Plaintiff of illegal activity;

C. Contacting or attempting to influence Plaintiff's political supporters, financial backers, or the general public with the intent to spread defamatory statements or destroy Plaintiff's credibility;

D. Engaging in any further acts of defamation, slander, or libel against Plaintiff through any medium, including but not limited to social media platforms, websites, or public forums.

49. Plaintiff seeks this Ex Parte Temporary Restraining Order to stop the Defendants from continuing their defamatory conduct, which threatens further irreparable harm to Plaintiff. The false statements currently being circulated by Defendant are damaging Plaintiff's political connections and efforts in ways that cannot be remedied by monetary damages alone. Without immediate relief, the harm to Plaintiff's reputation, relationships with supporters, and his ability to campaign will continue and escalate, causing permanent damage to his political prospects.

50. Under Texas law, a temporary restraining order is appropriate where the applicant demonstrates (1) a likelihood of success on the merits of the underlying claims, (2) a substantial threat of irreparable harm, (3) that the threatened injury outweighs any potential harm to the defendant, and (4) that the public interest supports issuing the injunction.

51. **Likelihood of Success on the Merits:** Plaintiff is likely to succeed on the merits of his claims for defamation, civil conspiracy, tortious interference with prospective business relations, and business disparagement. Defendants have published multiple false statements about Plaintiff's business practices and personal conduct, including accusations of criminal activity.

These statements are not only blatantly false but were made with actual malice, as Defendants either knew their statements were false or acted with reckless disregard for the truth.

52. The widespread nature of these defamatory statements, including their publication on Facebook, Instagram, and Twitter, shows that Defendant intended these lies to reach a broad audience, damaging Plaintiff's reputation on a wide scale.

53. **Imminent and Irreparable Harm:** Plaintiff has suffered and continues to suffer irreparable harm from the defamatory conduct of Defendant. The loss of reputation, particularly in the context of forming political connections that took decades to build, is damage that cannot be adequately compensated for by monetary damages.

54. Further, the emotional toll on Plaintiff has been profound, as the false statements attack his character and integrity. Given the nature of these false accusations, the reputational harm will persist and spread as long as the defamatory content remains accessible online and is further disseminated by Defendant.

55. **No Adequate Remedy at Law.:** In the absence of injunctive relief, Plaintiff has no adequate remedy at law. It is essential that the Court immediately restrain Defendants from continuing the conduct described herein. Plaintiff is willing to post a bond in accordance with Tex. R. Civ. P. 684.

56. **Hearing** In compliance with the Texas Rules of Civil Procedure, Plaintiff is entitled to a hearing providing the relief requested above to give it an opportunity to be heard by the Court. Plaintiff requests that the Court set a hearing to consider whether temporary injunctive relief should be granted pending a trial on the merits.

57. **Permanent Injunctive Relief.** Plaintiff further plead for a permanent injunction, enjoining Defendants from engaging in the above acts, following a trial of this cause.

**IX.**  
**EXEMPLARY DAMAGES**

58. Plaintiff is entitled to exemplary damages for Defendant's intentional conduct, because such acts were committed with that level of mental culpability for which Texas law allows a jury to impose punitive damages. Plaintiff seeks an award of exemplary damages.

**X. NOTICE OF INTENT TO USE DISCOVERY AT TRIAL**

59. Pursuant to Texas Rule of Civil Procedure 193.7, Plaintiff hereby gives notice that he intends to use all discovery instruments produced in this case at trial. Such discovery instruments include, but are not limited to, all documents Defendants will produce, or has produced, in response to Plaintiff's written discovery requests.

**XI.**  
**JURY DEMAND**

60. Plaintiff requests a jury trial and tenders the appropriate fee with this Petition.

**PRAYER**

WHEREFORE, PREMISES CONSIDERED, Plaintiff Tanweer Ahmed respectfully prays that upon final trial and hearing of this matter, the Court grant judgment in favor of Plaintiff and against Defendants, Mohammed Tahir Javed, Kamran Jilani, and Jago Times, awarding Plaintiff the following relief:

1. Compensatory Damages in an amount to be determined at trial, including damages for loss of reputation, emotional distress, loss of political and financial support, and harm to Plaintiff's business;
2. Economic Damages for financial losses sustained as a result of Defendants' defamatory and tortious conduct, including lost business revenue and lost political contributions;
3. Exemplary (Punitive) Damages sufficient to punish Defendants for their willful, malicious, and reckless behavior, and to deter such conduct in the future;
4. Pre-judgment and Post-judgment Interest as allowed by law;

5. Court Costs and Expenses, including any fees incurred in bringing this action;
6. Injunctive Relief, including but not limited to a Temporary Restraining Order, Temporary Injunction, and Permanent Injunction prohibiting Defendant from publishing or disseminating any further false or defamatory statements about Plaintiff;
7. Such other and further relief, both at law and in equity, to which Plaintiff may show himself justly entitled.

Respectfully submitted,

**Mian & Associates Law Firm PLLC**

By: /s/ Jason R. Pelak

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