

IN THE HIGH COURT

**KB-2024-001538, KB-2024-001772
and QB-2021-000171**

KING'S BENCH DIVISION
MEDIA AND COMMUNICATIONS LIST

BETWEEN:

PROFESSOR THEODORA KOSTAKOPOULOU

Claimant

-and-

- (1) UNIVERSITY OF WARWICK (Corporate Body incorporated by Royal Charter under Royal Charter Number: RC0006678)**
(2) PROFESSOR ANDREW SANDERS
(3) PROFESSOR CHRISTINE ENNEW OBE
(4) PROFESSOR ANDY LAVENDER
(5) MS DIANA OPIK

Defendants

CLAIMANT'S SKELETON ARGUMENT

BACKGROUND: The original fraud and deceit surrounding the libel and rights' abuse of the Claimant by the University of Warwick and the individual defendants

1. Professor Dora Kostakopoulou was subjected to protracted retaliation for defending equality laws and for whistleblowing via concocted allegations of misconduct by the head of the Law Department of Warwick Law School, Professor Andrew Sanders, in December 2019. On 6 January 2020, Professor Kostakopoulou raised a formal grievance to the Chair of the Council of the University of Warwick, Sir David Normington, for bullying, victimisation, breaches of the law and human rights and violations of the University's own procedures and policies. Within ten days, she was suspended from work with more serious allegations of gross misconduct, which had also been concocted. She raised another grievance against Professor Ennew for her suspension on 17 January 2020. On 16 January 2020, she received Professor Ennew's suspension letter containing the following allegations:

Allegation 1: ‘You have attempted to influence potential witnesses, specifically by questioning students in relation to complaints they may have made against you, in an effort to undermine the ongoing investigation into the fulfilment of your duties’

Allegation 2: ‘You have harassed and displayed threatening and intimidating behaviour towards students when questioning them in relation to complaints they may have made against you.’

2. Professor Kostakopoulou did not know when, how, or to whom she was supposed to have done what was alleged. She was barred from campus and her office, could not access her papers and books, was prevented from contacting her PhD students, undergraduate students and colleagues, and remained unaware of the facts and prima facie evidence supporting the allegations for several months. She was informing the University of Warwick that she was innocent and was submitting grievances containing evidence of the lies. But she was ignored.

3. The University of Warwick refused to set up grievance hearings, provide information, examine Professor Kostakopoulou’s documents and evidence and continue to inflict injuries to her health, career and reputation. The whole process was procedurally flawed and in breach of due process. In the process, Professor Kostakopoulou discovered that the University of Warwick routinely uses libellous allegations of harassment against innocent employees to force their exit and to procure their constructive dismissal. Professor Docherty, a famous academic, was suspended for nine months for the alleged display of negative body language, including touching his nose in 2014. He suffered depression (there is an account of his ordeal on the internet). He was totally innocent.

4. During her protracted suspension of six months (16 January – 20 July 2020), Professor Kostakopoulou had to apply to Professor Ennew for permission to travel to Vienna to attend the meetings of the Fundamental Rights Agency of the EU’s meetings as a member of the Scientific Committee of Fundamental Rights Agency of the European Union and to give lectures and conference papers in the UK and abroad. That was humiliating for her and damaging to her career and academic standing.

5. She was made ill by the University of Warwick and was medically certified unfit for duties between 1 and 21 July 2020. The University of Warwick had received the doctor’s certificate. While Professor Kostakopoulou was ill and under a medical certificate, the University of Warwick convened a disciplinary hearing on 20 July 2020, chaired by Professor Ennew’s deputy, Professor Meyer, and without considering her evidence or listening to her or her witnesses, and summarily dismissed her.

6. Professor Kostakopoulou was totally unaware of what was happening. 700+ students, colleagues and others signed a petition on change.org. She was notified about the outcome of this disciplinary hearing in absentia by email on 29 July 2020.

7. On 27 February 2023, following a very arduous process of seeking information and documents from the University of Warwick, the Defendants conceded that there was no redacted or unredacted student complaint against her and no signed witness statement by any student claiming that Professor Kostakopoulou had harassed, threatened and intimidated anybody (Claimant's Supplementary Evidence Bundle, file 1 submitted to the High Court alongside her rescission application first and then claim KB-2024-001518). The University of Warwick's executives had deliberately manufactured libellous allegations to bully Professor Kostakopoulou out of her job, thereby violating her dignity, good name, human and labour rights, the regulations and policies of the University and ethics.

8. The Defendants' actions were so deplorable that extraordinary and concerted efforts have been made to conceal them and to prevent any public merits hearing of her legal claims and, in particular, of her human rights abuse. The High Court litigation outcome of December 2021 was part of this cover-up and the continued denial of vindication, restoration of her reputation and professional career and compensation for a protracted ordeal which nearly killed her. The Court of Appeal documents included in the Supplementary Bundle 'Evidence' file 2 disclose how many complaints of her 2021 libel, malicious falsehood and breach of human rights and EU law claim were left undetermined by the High Court and the Court of Appeal. The latter included her appeal grounds about the unreasonable and disproportionate costs of £ 75000 on account ordered by Sir Nicol, which remained without a determination by Lady Asplin.

9. The Claimant acted diligently within the confines of the law by activating CPR r 52.30 and seeking to re-open the permission to appeal issue. She argued that her grounds of appeal against Sir Nicol's judgment had not been grappled by Lady Justice Asplin to the extent that the process had been critically undermined and the Appellant had been denied access to justice, judicial protection and an effective remedy to the violations of her rights and reputation. The miscarriage of justice devastated Professor Kostakopoulou, who suffered from Sir Nicol.

KB-2024-001518: Rescission Claim of May 2024. Fraud and deceit unconcealed

10. Time started revealing the truth. In the summer of 2022, the University of Warwick sent nearly 4000 documents to her. She also continued placing disclosure requests and unless order applications to the Midlands West Employment Tribunal in 2022 and 2023. On 27 February 2023, during a preliminary hearing, the Defendants admitted inter alia that there was no redacted or unredacted student complaint about the innocent Claimant, who had been suspended for six months and dismissed in absentia on the pretence that students had complained about her conduct. Professor Kostakopoulou started compiling

the documentary evidence of a coordinated campaign against her masterminded by Professors Sanders, Ennew and Human Resources at the University of Warwick, and when digital forensic tools of large language models became available in the United Kingdom in March 2024, the Claimant had the critical new evidence that was not previously available for the Tahkar claim. The above is clearly stated on pages 41 of the Claimant's Bundle (para 23 et seq of the POC), 45 of the Claimant's Bundle (paras 32-35 of the POC) and page 61 of the Claimant's Bundle (paras 37 et seq).

11. Via a primary reliance on *Takhar v Gracefield Developments* [2019] UKSC 13 and the supporting case law framework laid out in para 4-6 of the POC (pages 34-26 of the Claimant's Bundle), the Claimant applied the *Takhar* principles to her factual situation. She identified three distinct grounds, namely, the Defendants' legal team's deliberate misrepresentation, material non-disclosure, and judicial impropriety. She showed how each ground fits within the established case law framework and how the alleged fraud affected the court's decision.

12. In section A, Mr Smith's student complaints deception received exposition. Mr Smith represented to the High Court that Ms Opik and Student X (Mr Sharma) had made complaints about the Claimant harassing, threatening and intimidating them while as shown at paragraph 24(1) of the POC and evidenced by File 1 of the Supplementary Bundle, 'there was NEVER a redacted or unredacted student complaint by either Ms Opik or Student X (Mr Sharma) submitted to the University of Warwick under its procedures'. Mr Smith had falsely stated in paragraph 66 of his witness statement that "Once the allegations had been made by the Fifth Defendant and Student X it is difficult to understand how their being repeated internally as part of the investigation could be dishonest and so malicious" while the Defendants admitted on 27 February 2023 that there were "no signed witness statements by either Mr Sharma or Ms Opik providing factual and evidential details". Mr Smith had represented the student complaints and allegations as being credible to the High Court and therefore had to be investigated while not only were there no student complaints, but Mr Sharma had actually described the Claimant as "a great personal tutor" who had been "professional and helpful" and that tutorial meetings had "gone smoothly for him". Mr Smith knew this and deceived the High Court by concealing the truth.

13. Mr Munden (5RB), on the other hand, concealed that Professor Ennew's allegations were "original" (first published on January 16, 2020) to make a case for applying the *Friend* precedent and to secure the strike out of the Claimant's case. In paragraph 38 of his skeleton argument, Munden claimed, "Once the allegations had been made by D5 and Student X it is difficult to understand how their being considered and repeated internally as part of the investigation could be dishonest and so malicious" while the evidence shows that "Professor Ennew had articulated, and published, those defamatory allegations on 16 January 2020 – she had neither 'summarised' nor 'repeated' allegations" and that Student X had only positive things to say about the Claimant's care of him. Mr Munden also

argued that Professor Ennew "did no more than summarise the allegations against C that she had directed to be investigated" while the extensive new evidence of previously concealed email communications (material non-disclosure) showed a well orchestrated and coordinated campaign against the Claimant, with Professor Ennew actively involved in creating rather than merely summarizing allegations. As regards the malice pleadings, Mr Munden argued there was "No case in malice set out against D2, beyond bare assertion" and similar claims about other defendants while in reality, the Claimant had made extensive pleadings about malice which were ignored, and the allegations themselves were fabricated – facts that Mr Munden knew and distorted in the High Court to harm the Claimant's case. These deceptions were material to the court's decision as they formed the basis for accepting the qualified privilege defence and rejecting the Claimant's case on malice as "hopeless."

14. The judge, Sir Nicol, failed to scrutinise the Defendants' deceptions despite having the Claimant's particulars of claim, which asserted her innocence and made extensive pleadings about malice. He accepted the Defendants' fraudulent representations, endorsed the legitimacy of the accusations by assuming they came from students and had a legitimate basis, and copied and paraphrased from the Defendants' documents with the digital forensic analysis revealing both significant similarities with the statistical probability of such similarities occurring by chance was calculated at 0.1% (practically impossible) as well as a concerning lack of independent analysis and impartial engagement with the Claimant's arguments and evidence. He largely ignored sections of her particulars of claim, especially regarding human rights breaches and EU law breaches, did not address her proportionality arguments or right to be heard and simply adopted the Defendants' legal arguments even when they led to absurd conclusions, such as that the Claimant had consented to her libel and malicious falsehood and to the abusive use of the disciplinary procedure by Warwick University. The violations of Professor Kostakopoulou's rights under Article 6(1) ECHR (right to fair trial), Article 47 EUCFR were significant, making a retrial compelling since justice was not done.

15. The statistical evidence of copying and reliance on the Defendants' submissions damages the credibility of the 2021 judgment, as it suggests Sir Nicol did not engage in the independent analysis required of a judge but instead acted as a conduit for the Defendants' arguments. The Defendants had also blocked her short disclosure application under Part 18 despite Professor Kostakopoulou responding to their disclosure request and 90 questions. Professor Kostakopoulou also faced significant obstacles in getting the information she needed before the High Court hearing: Mr Justice Nicklin had refused her application and had threatened her with a civil restraining order if she made more disclosure applications. This adds context to why specific evidence was unavailable during the original hearing.

16. The Defendants hid significant information and documents from the High Court. These are outlined under section B of the POC (material non-disclosure). There was the ICO connection and the emails about the University's actions after receiving an ICO (Information Commissioner's Office) request about deleting incorrect data from her employment file; extensive email evidence showing coordination between HR (particularly Ms Ashford) and Professor Sanders: HR was drafting emails for Sanders to send and helping construct the case against the professor; the investigation report was actually written by HR (Ms Ashford) having discussions with Professor Sanders but signed by Professor Lavender and was backdated from May 20 to May 13, 2020; evidence of a pre-planned dismissal since even before the investigation was complete, Professor Sanders was removing Professor Kostakopoulou from the teaching allocation, planning for her replacement, telling staff she would not return, seeking to access her email account, expressing impatience about her illness potentially "delaying the process" and other inappropriate actions described in the POC. The chronological evidence presented in the POC also more clearly demonstrates the connection between her data protection complaints to the ICO and the subsequent disciplinary actions against her, suggesting a retaliatory motive that was not disclosed to the court.

17. These additional details and the evidence in File 3 of the Supplementary Bundle strengthen the case that there was a coordinated campaign against Professor Kostakopoulou deliberately concealed from the High Court and that her ability to present evidence was actively impeded during the original proceedings. Her Notices to Admit Facts, which the Defendants' legal team refused in 2021, also show that Mr Smith and the Defendants' legal team were deliberately withholding essential information from the Court.

18. Based on the POC, evidence, and relevant legal principles, there is a strong case for a retrial (or, as Professor Kostakopoulou terms it, a "de novo hearing"). There has been systematic deception of the court regarding the very foundation of the case - the alleged student complaints and the Claimant's alleged gross misconduct that never existed. The Claimant was entirely innocent; she was framed and libelled. The combination of fraud and judicial conduct effectively denied the Claimant her right to have her case properly heard. The consequences for the Claimant have been severe (loss of career, reputation, and livelihood). There is also a strong public interest in ensuring the integrity of judicial proceedings, for, as Lord Kerr noted in *Takhar*, allowing fraudulent conduct to succeed would be "antithetical to any notion of justice." The POC makes a compelling case for justice to be done and seen to be done. According to paragraph 56 (p. 69 of the POC): "swift and decisive action for a de novo hearing is now necessary to prevent further suffering and to procure a fair and just outcome via a fair and unbiased process percolated by the truth, the whole truth and nothing but the truth." Given the cited case law and principles, particularly from *Takhar*, the presence of fraud alone would justify a retrial. When combined with the evidence of judicial impropriety, the case for a retrial appears particularly strong.

KB-2024-001772: Second Rescission Claim. Defendants' Dishonesty and Fraud in the 2021 Statements of Costs Causative of the Costs Paragraphs of Sir Nicol's Order and the payment of £ 75000 on account

19. The Claimant's POC on page 83 et seq of the Claimant's Bundle outlines how this fraud was discovered in the process of the Defendants' initiated charging orders. The Claimant received the interim charging order two days after submitting the first rescission application to Mr Wright, Legal Counsel of the University of Warwick, on 29 April 2024.

20. The legal authorities and the relevant legal test are stated in paragraphs 12-20 of the POC (pp. 86-90). At the same time, on page 93 of the Claimant's Bundle, the identification of all instances of overcharging, fraudulent misrepresentations, double counting, fabrication of time records, and breaches of the CPR commences in a detailed manner in relation to each of the five statements of costs submitted by Mr Smith to the High Court in October 2021.

21. The layers of financial fraud are multiple and can be found in all five statements of costs: systematic overcharging; multiple solicitors charging for the same work; simple tasks like preparing cost statements with significantly reduced input artificially inflated; same hourly rate for all fee earners; the exact fee earner featuring twice having a different grade and charging twice; fabricated time records - claiming 21 hours and £ 3570 for tasks that take 30 minutes (para 33.14); same tasks billed under different descriptions; overlapping charges between statements of costs; review tasks duplicated across multiple items; bundle preparation charged multiple times; £56,105 charged for a strike out/summary judgment application; Mr Munden's stated hearing fee was £16,500 (more than £2,000/hour) when standard rate was £350-400/hour; in statement of costs No 2, items 6 (£ 85), 14 (£ 357) and 26 (£1394) contain triple counting (they involve the same or similar task): drafting a list of profiles of publishees (item 6), drafting a table of recipients of publications (item 14) and drafting table of list of publishees (item 26) (para 33.5); simple diary checking about dates of availability for the strike out/summary hearing carries a charge of £ 238 and double counting as items 22 (review re dates for application/hearing) and 25 (review re dates to avoid listing) concern the same task, are charged twice and appear to have required 1h and 24 minutes (para 33.12) and so on.

22. The pattern is consistent across all five cost statements: for example, in Statement of Costs 2 (para 33), £11,441 is charged just for attendances, excluding documents; in Statement of Costs 3 (para 34), £1,037 charged for bundles already charged in Statement 2 and £1,071 charged for 6.3 hours to input 12 numbers and to write 10 short descriptions of work while in Statement of Costs 4 (para 35) £221 charged for 1.3 hours to write 4 descriptions and to input a few numbers. In Statement of Costs 5 (para 36), £3,400 was charged for 30 hours of attendance by two solicitors at a 6.35-hour hearing and £ 136 for writing a description of 6 words and a handful of numbers. This shows a pattern of intentional

misconduct rather than a few isolated errors. The absence of dates for the work done, vague descriptions and the lack of proper accounting for very large bills for attendance also demonstrate concealment, that is, a decision to hide or obscure the fraud.

23. The scale of financial misrepresentation is significant. The severity is compounded by the coordinated nature of the fraud and its apparent aim not just to overcharge but to use costs as a weapon against the claimant by inducing Sir Nicol to order the Claimant to pay £ 75000 on account within 14 days without any hearing, any assessment and any reasonableness and proportionality concerns (paras 37-40 of the POC, pp. 103-104 of the Claimant's Bundle).

STRIKE OUT APPLICATIONS

24. The Claimant has repeatedly made extended submissions in the context, and support, of:

A) Application dated 12 August 2024 to strike out the Defendants' strike-out/summary judgment application and for an extended civil restraint (pp. 525-536 of the Claimant's Bundle) because they are manifestly ill-founded and inadmissible and for an expedited hearing of 2 hours.

B) Application dated 16 October 2024 to vary Ms J. Steyn's order (pp. 642-660 of the Claimant's Bundle) listing the urgent application of 12 August 2024 for December 2024 and for an expedited hearing in October 2024 to stop the abuse of the court's process owing to the Defendants' pretence strike out/summary judgment application and the Court's wilful blindness to it for months, the considerable delay in the administration of justice, the prejudice to the Claimant, continuing costs and resource implications and the waste of judicial time and resources.

C) Application dated 15 November 2024 for urgent directions (pp. 710-787 of the Claimant's Bundle) about the Defendants' expressed tactic of ambushing the Claimant with last-minute grounds for their defective applications of 24 July 2024 and voluminous material in violation of Article 6(1) ECHR and the HRA 1998 (s 6(3)(a) and 6(1)).

25. The Claimant seeks the striking out of the Defendants' manifestly ill-founded strike-out/summary judgment application dated 24 July 2024, which was served by email on 25 July 2024 to the Claimant in breach of Master Dagnall's order dated 19 July 2024, which:

(a) Lacks proper grounds, particularisation and factual information in support.

(b) Contains no evidence in support.

(c) Ticked under 10 of the N244 form the box on reliance on the statement of case. When the Claimant notified the Court that there was no statement of case accompanying the application, the Defendants stated that they meant the Claimant's statement of case, thereby actively misleading the Court since even the Governmental web guidelines on the completion of an N244 form state 'tick the second box if you intend to rely on your particulars of claim or defence in support of your application'. By making this admission before Master Dagnall at the August hearing, the Defendants undermined and essentially cancelled their strike-out/summary judgment application.

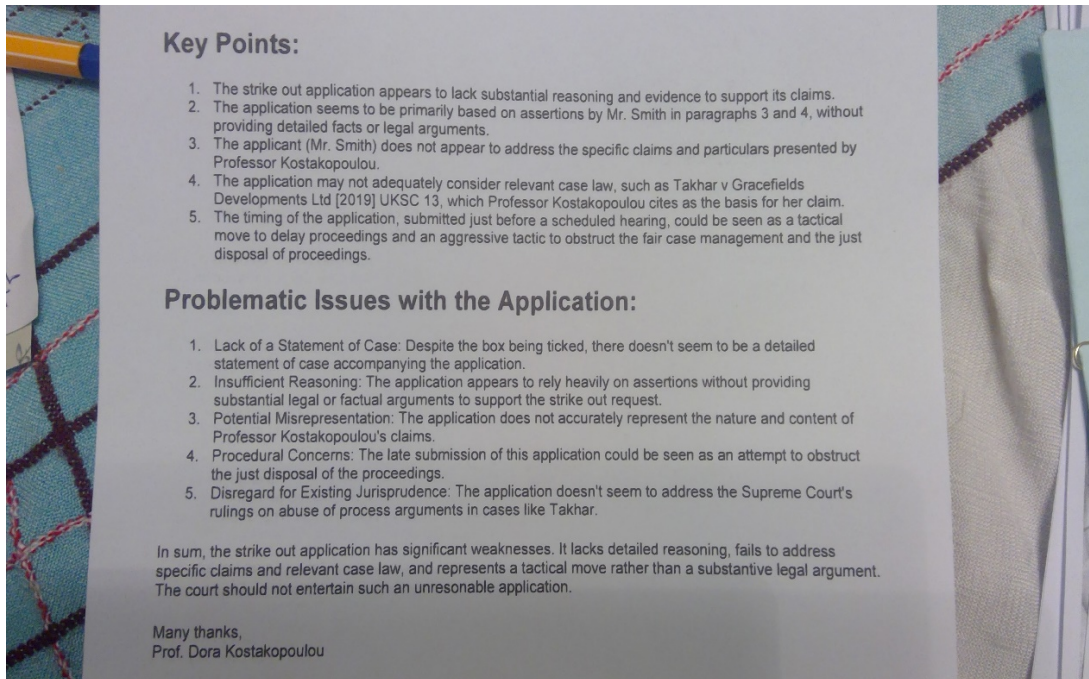
(d) Breaches multiple CPR provisions, as stated in the subsequent paragraphs.

(e) Inappropriately conflates different legal tests.

(f) Forms part of a pattern of procedural abuse and aggressive tactical litigation to delay and obstruct the fair disposal of proceedings.

26. The Claimant has taken a significant number of appropriate and diligent steps to address the procedural abuse and to alert the Court as follows:

26 July 2024: Upon the receipt of the Defendant's application on 25 July 2024, the Claimant notified the Court (Master Dagnall) and the Defendants' legal team about the weaknesses and abusive nature of their application promptly (pp. 495-497 of the Claimant's Bundle). The summary at the end of the email communication was:



2 August 2024: Claimant's similar oral submissions about a 'sham application' at the hearing conducted by Master Dagnall.

12 August 2024: Application for the dismissal of Ds' application as manifestly ill-founded and inadmissible.

20 August 2024: Submissions in the appeal against Master Dagnall (pp. 551-555 of the Claimant's Bundle).

30 September 2024: Letter to the Court complaining about the non-listed application of 12 August 2024 and the negative impact of the Court's failure to act.

16 October 2024: Application to vary Ms Justice-Steyn's order, which included the above mentioned letter to the Court dated 30 September 2024.

15 November 2024: Application which also sought the court's intervention to prevent procedural unfairness and tactical abuse as well as the waste of the court's resources.

Several letters to DWF:

- alerting them directly to their breaches of CPR Part 23 and PD 23A,

-providing them with the relevant QB Guide sections,

-creating a clear paper trail of objections to their irregular tactics

- reminding them of their obligations under the Overriding Objective and the SRA code of conduct to desist from breaching the Civil Procedure Rules and obstructing justice

- to desist from seeking to cure their deficient applications of 24 July via a skeleton argument, post-application correspondence and bundle materials (Please see, among other things, C's Letters dated 20 October [699-702 of the C's Bundle], 2 November [705 of C's Bundle] and 19 November 2024 [798-799 of C's Bundle]. The later letter requested them to withdraw their application and to desist from attempting actions against CPR and Article 6(1) ECHR).

CHRONOLOGY OF KEY EVENTS

27. The detailed chronology was provided to the Court in writing in the context of C's application dated 12 August 2024 (pp. 530-531 of the Claimant's Bundle). A laconic summary is provided below:

- 28 May & 11 June/1 July 2024: Claimant filed two rescission claims for QB-2021-000171.
- 14 June & 8 July 2024: Claimant submitted default judgment applications on KB-2024-001518 because of Ds' lack of acknowledgement of service.
- 24 June 2024: Defendants claimed at a hearing they needed time to file a defence.
- 1 July 2024: Claimant served the second rescission claim against Sir Nicol's 2021 order's costs paragraphs on the ground of pervasive fraud in the statements of costs submitted to the HC in 2021.
- 19 July 2024: Master Dagnall ordered the defences to be filed by 26 July 2024.
- 24 July 2024: Instead of defences, the Defendants filed incurably defective strike-out/summary judgment applications.
- 1 August 2024: Hearing before Master Dagnall – the Claimant made strong submissions about the Defendants' abusive of the Court's process tactics and the manifestly ill-founded application
- 9 August 2024: Master Dagnall's order.
- 12 August 2024: Claimant filed a cross-strike-out application.
- 20 August 2024: The claimant filed an appeal against Master Dagnall's orders.
- September 2024: The application of 12 August remained non-listed, and C's letter to the Court.
- 16 October 2024: Claimant applies to vary Steyn J's order.
- 16 November 2024: Claimant files an application for urgent directions.

**GROUNDS FOR STRIKING OUT DEFENDANTS' APPLICATION OF 24 JULY
 2024**

28. The Defendants' application dated 24 July 2024 (pp. 448, Claimant's Bundle) was structured as follows: Paras 1-2: Background; Paras 3-4: Strike out application; Paras 5-6: Summary judgement; Paras 7-11: Extended Civil Restraint Order.

29. Mr Smith's misstatement of the *Tahkar* requirements: Mr Tim Smith's application misstated the law, thereby misleading the Court and the Claimant by writing in para 2:

'The Claimant relies on the jurisdiction explained in *Tahkar v Gracefields Developments Ltd* [2019] UKSC 13, by which the Court may rescind judgments obtained by fraud by one party, where that fraud has deceived the Court and their opponent and has only been discovered after the conclusion of proceedings'.

30. The underlined three words above (i.e., deceived and their opponent) represent the misstatement of the *Tahkar* precedent. *Tahkar* included no requirement for the opponent's deception; the focus was on the deception of the court itself. This was also my focus on the POC regarding the statements made by the Defendants' legal team and the concealment of the truth. In paragraph 4 of the Claimant's POC (p. 34 of the Claimant's Bundle), the Claimant quoted para 56 of *Tahkar* citing Aikens LJ's principle from Royal Bank of Scotland (which was endorsed in *Tahkar*): the requirement is for "*conscious and deliberate dishonesty in relation to the relevant evidence given, or action taken, statement made or matter concealed, which is relevant to the judgment now sought to be impugned.*"

32. In addition, Lord Briggs' emphasis, quoted at paragraph 55 stated "*fraud of this kind is all the more serious because it is aimed at deceiving the court itself.*" The materiality test cited is whether the dishonesty "was an operative cause of the court's decision" and, therefore, what matters is the deception's impact on the court's decision-making, not on whether the opposing party was also deceived. The *Tahkar* principles do not require proof of direct deception of the opposing party (i.e., the Claimant).

33. The Claimant's particulars of claim served on 28 May 2024 noted that in 2021, the Defendants deceived the court through a) False representations Mr Smith and Mr Munden made to the court, b) Their material non-disclosure to the court, c) Improper influence on the judgment. Given that the *Tahkar* precedent focuses on the deception of the court as the key element for setting aside a judgment for fraud, deceiving the court alone through fraudulent conduct that affects the judgment is sufficient ground for seeking to set that judgment aside. This makes logical sense, given that the principle at stake is protecting the integrity of the judicial process itself, as Lord Kerr highlighted that "fraud unravels all" because it undermines the administration of justice. The core rationale discussed throughout the judgment is protecting the integrity of the judicial process and, thus, the rule of law. This rationale prevents fraudsters from benefiting from judgments obtained through deception of the court.

Defendants' Strike Out Application: Paragraphs 2-4

34. The strike-out application is unfounded and flawed for several reasons:

- I. **Lack of particularisation:** The Defendants make broad assertions about the Claimant's statements of case failing to plead fraud adequately but provide no specific details about the alleged pleading deficiencies. They do not identify which specific parts of the statements of case are defective or explain why they fail to meet the requirements for pleading fraud. The Claimant's evidence of fraud in all statements of costs submitted by Ds to the High Court in 2021 is not addressed. It lacks the specificity required for strike-out applications, where the burden is on the applicant to demonstrate why the pleading discloses no reasonable grounds for bringing the claim.
- II. **Falsehoods and need for missing evidence:** Mr Smith argues that the Claimant is trying to re-litigate matters from the 2021 proceedings and to re-argue the 2021 claim in para 4. But in so doing, he failed to engage with paras 9-22 of the Claimant's POC (pp. 37-41 of the Claimant's Bundle) and the Evidence that became available in 2022-2023 stated in paras 23 et seq of her POC (on pages 41-44 of the Claimant's Bundle) showing that there was no factual or evidential basis of the gross misconduct allegations against the Claimant and no redacted or unredacted student complaints by Mr Sharma and Ms Opik of harassment, threatening and intimidating conduct. It also did not engage with the plethora of the Defendants' non-disclosed facts and email communications, which show the framing of the innocent Claimant as stated in para 33 of the POC (pp. 45 et seq. of the Claimant's Bundle), which were made available in 2022 and 2023. These have been included in the Evidence Bundle submitted by the Claimant to the High Court.

- III. **The Claimant's pleadings are assumed to be correct: In strike-out applications, the court must take the Claimant's adequately pleaded allegations at their highest and as true, and thus,** the Defendants did not submit any grounds or pleadings on 24 July 2024 in the context of their application disputing the Claimant's detailed POC submissions. On the contrary, the Defendants stated that their ticking of the box on reliance on a statement of case referred to the Claimant's statement of case(s) and, thus, by admitting those facts as true, have no grounds for their strike-out application.
- IV. **The Takhar Principles were not adequately engaged:** While the Defendants cite Takhar, they have not demonstrated why its principles preclude this claim as a matter of law. On the contrary, the claim's primary reliance on *Takhar v Gracefield Developments* [2019] UKSC 13 is well-argued. The Claimant correctly cited the main principles established in Takhar regarding the setting aside judgments obtained by fraud. She accurately noted that the Supreme Court held that a claimant doesn't need to prove the fraud could not have been discovered earlier through reasonable diligence, cited Lord Kerr's statements that "fraud unravels all" and "fraud is a thing apart" and several supporting authorities (*Jonesco v Beard* [1930] AC 298 (on how fraud infects the whole judgment); *Royal Bank of Scotland v Highland Financial Partners* [2013] EWCA Civ 328 (on materiality requirement); *Sharland v Sharland* [2015] UKSC 60 (on materiality of deception); More recent cases like *Broomhead v National Westminster Bank* [2020] EWHC 1005 and *Tinkler v Esken Limited* [2023] EWCA Civ 655 to show continuing application of principles).
- V. **Res judicata or estoppel by judgment does not apply when a judgment may have been procured by fraud or collusion** (*Girdlestone v Brighton Aquarium Co* [1879] 4 Ex D. 104 CA). The fact that some matters may have been raised before does not automatically mean new fraud allegations cannot be pursued. *Takhar* has confirmed this; if fraud allegations were involved in obtaining the previous judgment, this would indeed prevent the application of Henderson's abuse of process principles (res judicata).
- VI. **Conflation of legal tests:** In addition, the Claimant's stated instances of fraud required individual consideration, and the Defendants conflated the test for strike out (no reasonable grounds) with arguments about abuse of process. These are distinct bases for challenges requiring different approaches and evidence, and the grounds, as stated, do not engage either test properly.
- VII. **Strike out is to be avoided in a claim based on fraud on an interim application** (*Alpha Rocks Solicitors v Alade* [2015] 1 WLR 4535).
- VIII. **Abusive Tactics:** it is clear that the strike-out option was deployed as a tactical manoeuvre to obstruct the issue of default judgments, evade the filing of defences and delay the litigation process and justice for several months so that the Ds' legal team could profit from C's suffering. Unsubstantiated assertions of Mr Smith were used to abuse the Court's process and to victimise

the Claimant with a view to several months down the line to pervert the course of justice and the airing and condemnation of the libel, rights' abuse, deceit and fraud forced upon her by the Defendants.

- IX. **Breaches of the overriding objective and Article 6(1) ECHR:** such breaches cannot be tolerated by a court having the constitutional function of a court of justice. The Claimant's claims are well grounded in law and factually well drafted and evidenced. Unlike the Claimant's claims, the Defendants' application is not particularised and arguable for the draconian remedy of strike out under CPR Part 3.4. It is procedurally ill-founded and inappropriate.

Defendants' application for a summary judgment: paragraphs 5 and 6

Fundamental Procedural Defects

35. The Defendants' 24 July application (paras 5 and 6) for a summary judgment is fatally flawed because:

a) it merely replicated the wording of CPR r 24.2 and 24.5 without providing any specific grounds, factual information and legal reasoning explaining why the claims have no real prospect of succeeding. Explaining why the Defendants believe the claim is unlikely to succeed requires engaging with the Claimant's statements of case and the particulars of deception and fraud. Therefore, the Ds have to go into the background in some detail. Merely stating a conclusion ("the claims have no real prospect of succeeding") without providing the specific reasons why and specifically demonstrating why claims are bound to fail constitutes a manifestly ill-grounded application and thus inadmissible owing to the absence of particularisation required by both the CPR and the case law.

AND

No evidence

b) it breached CPR's mandatory requirements contained in r 25.3(2) ('An application for an interim remedy must be supported by evidence'), 25.3(3) (If the applicant makes an application without giving notice, the evidence in support of the application must state the reasons why notice has not been given).

AND

c) It breached CPR Part 24 and leading cases like *Three Rivers District Council v Bank of England* [2001] UKHL 16, which require evidence to support summary judgment applications since the court cannot make summary determinations of fact without evidence.

AND

d) It breached the mandatory requirements of r 23.6 (b) and 23.7(3)(a), requiring that an application must be particularised appropriately and supported by written evidence when it is filed. No written evidence was filed on 24 July 2024, and no written evidence was served to the Claimant when the application was served several days afterwards.

AND

e) it breached PD 23 A para 7.1, stating ‘where it is intended to rely on evidence not contained in the application itself, the evidence should be served with the application unless it had already been served’. The Defendants did not serve any evidence with the application and are thus precluded from introducing (unverified) piecemeal evidence afterwards.

AND

f) it breached PD 32 para 9.3, stating ‘where it is intended to rely on evidence which is not contained in the application itself, the evidence should be served with the application’.

AND

g) it misrepresented the "statement of case" box-ticking section of the N244 and misled the High Court. The Defendants’ Counsel, Mr Munden, claimed they referred to the Claimant’s statement when this box refers to the applicant’s particulars.

Substantive Inadequacy

36. The application is substantively defective because it lacks:

- I. **Evidence required by CPR Part 24.** Summary judgment applications are dealt with based on written evidence which was missing on 24 July 2024.

- II. **Demonstration with factual information and engagement** with the Claimant's particulars of claim of no real prospect of success, thereby failing to meet the burden of proving the assertion of 'no real prospects of success' (ED and F Man Liquid Products Ltd v Patel [2003] CPLR 384)
- III. **Proper grounds given fraud allegations.**
- IV. **Adherence to the case law on the unsuitability of such an application in claim alleging fraud** (*Allied Dunbar Assurance plc v Ireland* (2001) LTL 12/6/01; *Three Rivers District Council v Bank of England*).
- V. **Adherence to the case law dictating that cases involving disputed facts, mixed questions of law and facts where the law is complex cannot be decided on a summary basis** because the evidence would have to be tested (*Three Rivers District Council v Bank of England* (No 3) [2003] 2 AC 1). In *Easy Air Ltd v Opal Telecom Ltd* [2009] EWHC 339 (Ch), the High Court set out the principles to be applied in summary judgment applications.
- VI. **Adherence to the case law directing that allegations of deceitful, dishonest or unlawful conduct cannot be disposed of by a summary judgment** (*Espirit Telecoms UK Ltd v Fashion Group Ltd* (2000) LTL 27/07/00).
- VII. **Reversal of Burden:** summary judgment applications must demonstrate why the claim has no prospect of success (*Swain v Hilman* [2001] 1 All ER 91). The wording "the Defendants believe" wrongly suggests the burden is on the Claimant to prove prospects of success. This misunderstands the test under CPR Part 24.2.
- VIII. **No explanation** is given of why the Claimant's cases are suitable for summary determination.
- IX. **Alternative Remedy:** the application seeks strike out and "alternatively" summary judgment. This suggests a lack of clarity about the distinct tests and evidence required for each remedy and conflates different legal tests.
- X. **Defendants' admission to the Court that they rely on the Claimant's statement of case in support of their application.** By stating to the Court that the box they ticked on reliance on a statement of case meant the Claimant's statements of case, the Defendants have admitted that the facts stated in the Claimants' particulars of claim are true and thus have destroyed the basis of their summary judgment application. It also means they have no real prospect of success in any filed defence.

37. Therefore, paragraphs 5 and 6 of the Defendants' 24 July application fail to meet the requirements for a properly constituted summary judgment application under CPR Part 24 and relevant case law. The application is procedurally defective and lacks the necessary evidential foundation for summary determination.

Abuse of Process

38. In the light of paragraphs 28-37 above, the crucial question is why the Defendants' legal team breached the law, given that they are well-established legal practitioners familiar with the SRA and BSB's code of conduct and principles. They know the SRA Code requirements for honesty and the prohibition of making misleading statements to the Court, the BSB handbook obligations, the duties of candour to the court and the full and frank disclosure obligations in without notice applications. If one examines the sequence of events since May 2024, the answer to the question becomes apparent. The July 2024 application forms part of a systematic abuse of process with tactical delays and a concerted effort to prevent default judgments or a public hearing on merits. First, the Defendants failed to file an acknowledgement of service in June 2024 but also failed to seek an extension of time and to apply for relief from sanctions. Then, they promised to file defences by 26 July 2024 despite having received the Claimant's case on 29 April 2024. Two days before the expiry of the deadline for the submission of defences, they filed a manifestly ill-grounded strike-out/summary judgment application with the intention to introduce grounds and evidence 4.5 months later and to ambush the Claimant a few days before the hearing by including them in a skeleton argument which is not verified by a statement of truth and by denying the Claimant proper time to respond and to prepare submissions. They also sought to intimidate the Claimant by adding a request for an extended civil restraint order, thereby using a DARVO (Deny, Attack, Reverse Victim and Offender) tactic, which, combined with their pursuit of charging orders, would paralyse and silence the Claimant. When the Claimant challenged their 24 July application with a cross-application on 12 August 2024 and pinpointed its defects, including those of the civil restraint order, Ms Justice Collins-Rice, Ms Justice Steyn and Mr Justice Spencer came to assist them by circumventing proper procedural rules, using false premises for their restrictive orders, nullifying Civil Procedure Rules and breaching both the equality of arms principle and the rights contained in Article 6(1) ECHR which they had a statutory duty to observe.

39. This pattern of abuse was profitable for them both in monetary terms and for their strategy of deflection from the real issues of the cases, the deceit and fraud in the 2021 litigation and their intended perversion of the course of justice for the second time. The Claimant brought these matters to the Court's attention on a consistent basis: as soon as she received their application of 24 July, during the August hearing conducted by Master Dagnall, in her application of 12 July and her appeal against Master Dagnall's order dated 20 July which has not been determined yet and during the subsequent months.

40. In her application dated 16 October authorised by CPR and expressly invited by Ms Justice Steyn's order of 9 October, the Claimant stated (pp. 646 et seq, Claimant's Bundle):

‘1. That the Defendants and their legal team (Mr Munden, Mr Tim Smith and Ms Elsbury) hold the Claimant and the High Court prisoners in abuse of process tactics, unreasonable conduct and tactical delays for profiteering for more than four months since the filing of the Claimant’s two rescission claims on the basis of deception and fraud (28 May and 11 June/1 July 2024) and her default judgement applications (14 June and 8 July 2024) is obvious’.

41. She proceeded to list a considerable number of breaches of the CPR and its Practice Directions by the Defendants (pp. 647-648 of the Claimant’s Bundle) and reiterated the Overriding objective supported her application of 12 August 2024 since:

‘6. Following the hearing of 1 August 2024, the Claimant filed and served an application for the strike out of the Defendants’ strike out application (on 12 August 2024) and an appeal against Master Dagnall’s orders (on 20 August 2024).

7. In the application of 12 August 2024, she requested an expedited hearing of 2h to dispose of all the issues that Master Dagnall should have disposed of on 1 August 2024 by holding a hearing of 2 h. The Claimant did so on the basis of the overriding objective (CPR r 1.1) which includes ensuring that parties are on equal footing and that cases are dealt with fairly and at a proportionate cost and the inherent power of the court to prevent abuse of its procedure (case law cited in C’s application of 12 August 2024 and, in particular, *Hunter v Chief Constable of the West Midlands Police* [1982] AC 529 which was reiterated and confirmed recently in *Mueen-Udin v SSHD* [2022] EWCA Civ 1073 at [37-39]).

8. The Claimant’s application was underpinned by her belief that what Master Dagnall had proposed was against the Overriding objective since it would protract proceedings unfairly and the issuing of a default judgment for several months and would require at least three witness statements (for which the Defendants in the 2021 litigation had claimed more than £ 20000 with bundles/exhibits), a two-day hearing (for which the Defendants in the 2021 litigation had claimed £ 23814), another skeleton argument (for which the Defendants in the 2021 litigation had claimed more than £ 2000), a bundle of documents and a bundle of authorities for which the Defendants had claimed in the 2021 litigation thousands of pounds (more than £ 10000). In other words, Master Dagnall had opened a path enabling the Defendants’ legal team to claim more than £ 50000 via artificially induced and unnecessary litigation.

9. Contrary to the clear and rule-based CPR process of filing a claim, acknowledgement of service, defence or filing a claim and a default judgment if no acknowledgement of service and/or defence is filed, the Claimant, who had thus far abided by all the rules and the law, had already been burdened with two hearings by Master Dagnall on 24 June and 1 August 2024 of the total duration of three hours, a bundle she submitted for the 1 August hearing, two lever arch files of court documents, Master Dagnall’s orders and correspondence with the Court and Ms Elsbury, attrition tactics in July 2024 and continued injustice. Yet, as stated in *Arrow Nominees v Blackledge and Others* [2000] EWCA Civ 200 at para 55, ‘A fair trial is a trial which is conducted without an undue expenditure of time and money and with proper regard to the demands of other litigants on the finite resources of the court.’

10. Indeed, ‘The paramount concern of the legal system is to administer justice, which must be, and must be seen by the litigants and fair-minded members of the public to be fair and impartial. Anything less is not worth having’ (*Morrison v AWG Group Ltd* [2006] EWCA Civ 6, Mummery LJ at [29]. And as Lord Bingham stated in *Johnson v Gore Wood and Co* [2002] 2 AC 1, ‘the law should be astute to defeat machinations of those who would use its forms to achieve ends inconsistent with the spirit of its rules’.

11. Such machinations are evident when the Defendants cause inordinate delays and obstruct the issue of a default judgment 'where there are no proper grounds for so doing' (- professional misconduct in postponing the implementation of decisions was criticised in *Hamid v Secretary for the Home Department* [2012] EWCA Civ 793, where the Court of Appeal emphasised the Court's intention to take the most vigorous action against legal representatives who fail to comply with its rules).

12. The Claimant's application of 12 August 2024 was not listed by the HC.'

42. She continued her submissions by including a copy of her letter of complaint to the High Court dated 30 September 2024 which noted:

"Despite the passage of seven (7) weeks, this application has not been listed for hearing, while the court continues to entertain the defendants' strike out application which has already imposed unacceptable costs and delays on the fair resolution of my claims. And I am not merely referring to the witness statement of seven pages I had to write and file on 25 September 2024. I have also received three letters from Ms Elsbury in relation to the application of 12 August 2024. She has announced that the Defendants intend to provide written grounds and supporting evidence to their strike out/summary judgment application in the future in breach of the CPR and rules of procedure since any such material should have been provided at the time of the filing of their application on 24 July 2024 and not three months or more afterwards.

Ms Elsbury and Mr Smith know that filing an application without grounds and written evidence in support under CPR r 23.6 and 23.7 in order to prevent a default judgment is an abuse of process and their duty to the court to disclose all matters relating to their application, including those matters adverse to the applicant, at the time of the filing of the application. Despite their knowledge and the standard professional conduct rules, they are now contemplating another abuse of the Court's process by planning to introduce substantive grounds and whatever evidence they plan with a delay of nearly three months to increase costs, delay proceedings and force me into an artificially induced disadvantageous position.

I cannot really afford the time, resources and inconvenience of 'pretence applications' and illicit manoeuvres to avoid engaging with the substance of the claims as well as the delays in breach of the Overriding Objective which creates positive legal duties not only for the Court but also for the parties. Nor will I entertain a repeat of their 2021 tactics.

For this reason, I formally request that my application dated 12 August 2024 be listed for hearing as a matter of urgency. The continued delay in addressing this application is causing me significant prejudice.

I do not wish to find myself ambushed and snowed under voluminous material produced by the Defendants which is clearly inadmissible since whatever grounds, legal reasoning, substantive points and evidence they wished to present in relation to their strike out/summary judgment application should have been presented on 24 July 2024 and not several months later in response to my application of 12 August 2024 for the dismissal of their applications."

43. She then outlined the cost and resource implications (p. 652 of the Claimant's Bundle), in addition to the substantial prejudice to her. She drew attention to the disproportionate costs generated, CPR r 1.1(2)(b) regarding "saving expense", the delay in breach of CPR r 1.1(2)(d) regarding expeditious and fair handling and CPR r. 1.4 requiring active case management and the principle of proportionality. Having cited the legal principles supporting her position, such as *Arrow Nominees v Blackledge* [2000] EWCA Civ 200 ("A fair trial is a trial which is conducted without an undue expenditure of time and money") and *Johnson v Gore Wood and Co* [2002] (The law should defeat

machinations using court forms to achieve ends inconsistent with its rules) and proportionality, she proceeded to submit a default judgment request for KB-2024-001772 (pp. 654-655) and its exhibits which demonstrated the Defendants' breach of the inspection of documents rules of the CPR and the breach of the statement of truth in Mr Smith's witness statement of 5 September 2024 (p. 655 of the Claimant's Bundle). In particular, the Defendants had failed to comply with disclosure obligations under CPR r. 31.14 and 31.15, they had not provided the requested documents despite promising to do so in witness statements, breaching the statement of truth under CPR r. 22.1.

44. The Claimant expected to receive the listing of an oral hearing before Ms Justice Steyn in accordance with CPR rules since Ms Justice Steyn's previous order was on the Court's initiative, and the parties were not given an opportunity to make representations.

45. Instead of the Court adhering to CPR rules and the case law principles regarding the fair and efficient administration of justice, Mr Justice Spencer, a non-Media and Communications list judge, served the Claimant with void orders disregarding the applicable law and an unlawful civil restraint order which was unenforceable since it contained contradictory provisions (pp. 663-669 of the Claimant's Bundle). His orders, the totally without merit certifications on false premises and in breach of the law (and Ms. J. Collins-Rice's order dated 2 October 2024 (p. 609 of the Claimant's Bundle)) will be used as a mirror and a basis for the exposition of the Defendants' silencing, victimisation and rights denial tactics underpinning their civil restraint application as well as the manufacturing of TWM certifications without basis.

46. The Court has failed to address her letters, the urgent legal notice and the urgent declaration of the void orders of Ms J. Spencer thus far (application dated 6 November 2024 incorporating the previous letters)(pp. 670-698 of the Claimant's Bundle).

47. On 15 November 2024, the Claimant submitted to the Court an application requesting permission to include new evidence of fraud, which had just been discovered owing to DWF's disclosure of one interim bill of BLM for the period between 1 September 2021 and 23 November 2021 (pp. 710-et seq).

48. The fresh manifestations of fraud triggered CPR r 44.11(the Defendants' misconduct) and consisted of:

- I. A false statement to the High Court that Mr Munden's hearing fee in 2021 was £ 16,500. The actual charge was £13500.
- II. This continued to be a very inflated fee. The market rate for interim order hearings is between £ 750 and £ 3500, for one-day hearings between £ 900 and £ 3500, and a barrister's market rate

per hour for £600 today would never result in a fee of £ 13500 quoted and paid. Therefore, Mr Munden's fee represented an overcharge of more than 169.5% above the maximum market rate.

- III. A grossly exaggerated fee for 1h hour 'post-hearing conference' charged at £3,000 for Mr Munden – an impossible sum.
- IV. A fraudulent overcharge of more than £4,500 for the hearing bundle and the bundle of authorities in the High Court statements of costs.
- V. Significant overcharge of at least £3,500 in item 41 of Costs statement 2 to the High Court (difference between the bill taken as given without queries and the statement of costs).
- VI. Multiple instances of double counting and inflated costs.
- VII. Fabricated claim for comparison work costing £153 that was unnecessary.
- VIII. Material non-disclosure of significant information (on pages 721 and 722 of the Claimant's bundle about the Defendants' orchestration of the asset stripping strategy and property title searches). Evidence that the University had planned an "asset stripping strategy" and had used inflated costs to revictimise and put financial pressure on the Claimant.
- IX. An extraordinary number of meetings, devising billing narratives, and articulating cost statements among several BLM solicitors between 23 September and 15 October 2021 showed a pre-planned strategy of fraudulent overcharging to put financial pressure on Professor Kostakopoulou.

48. In addition, she sought urgent judicial directions. The Claimant alerted the Court to the Defendants' attempt to introduce grounds and evidence regarding their application dated 24 July 2024 retrospectively and through unlawful (i.e., in breach of CPR rules) means (pp. 739-741 of the Claimant's bundle). The procedural abuse via the Defendants' attempt to introduce particularised grounds for their application of 24 July via a skeleton argument just before the hearing, the use of delays and procedural tactics to increase costs were compounded by their systematic cover-up: their refusal to provide evidence for their charges in the statement of costs for several months, promising in early September 2024 to disclose BLM receipts and the final statute bill in a witness statement and then refusing to provide them, the concealment of billing narratives and actual work done, multiple solicitors charging for the same work all showed a pattern of behaviour suggesting coordinated and systematic fraud rather than isolated incidents, with apparent intent to obstruct justice and cause financial harm to the Claimant while enriching the defendants' legal team.

49. Nothing happened.

50. On 21 November 2024, the Claimant requested the High Court to issue two witness summonses for Mr Munden and Mr Smith. She paid the required fee. She sent email communications and spent hours on the telephone line. Nothing happened.

CONCLUSION

51. *Arrow Nominees Inc v Blackledge* has affirmed the court's power to prevent parties from taking further part in proceedings when they act abusively. *Summers v Fairclough Homes Ltd* [2012] UKSC 26 has done the same. The Defendants have used a manifestly unfounded and procedurally defective application to delay default judgments, foil the submission of defence and pervert the course of justice. They have disregarded the prohibitions of obstructing justice, abusing the court's process and using procedure tactically per *Hunter v Chief Constable of West Midlands Police* [1982] AC 529. They have replicated the 2021 litigation tactics but in a more aggressive form. They have breached their duties under the Overriding Objective and have operated contrary to the "clean hands" principle. The High Court litigation is just a part of their overall strategy of disempowering the Claimant and foiling the Employment Appeal Tribunal proceedings via tactics of procedural abuse.

52. The correspondence with Ms Elsbury (DWF) in October and November 2024 shows the Defendants' persistent disregard of CPR rules and fair trial requirements despite being notified and reminded. This has been the pattern since June 2024; rather than attempting to stop the violation of the rules, they have been compounding their procedural irregularities while maintaining awareness of their improper conduct. The Claimant made a last attempt on 19 November 2024 (pp. 798-799 of the Bundle) by requesting them to desist from attempting to cure the defects of their 24 July application and creating unnecessary costs by retrospective and last-minute supplementation of grounds and evidence to deny Claimant the opportunity to respond. They have behaved unreasonably and continue to seek to circumvent the proper legal process and the fair hearing requirements. The Court should strike out all new material/arguments not included in the original application and the Defendants' 24 July 2024 application as procedurally defective, substantively inadmissible, abuse of process and a manifestation of professional misconduct. It should also declare that their attempt 4.5 months later to supplement it via skeleton argument is impermissible and condemn their tactical abuse and the violations of the CPR. I have been prejudiced by the voluminous materials I have received and continue to receive from the Defendants' legal team. It is impossible to check their five bundles, go through them, and study any authorities bundle they might send me. I will seek costs and a plan for the disposal of all undetermined applications, including the declaration of nullity of 6 November 2024.

Professor Dora Kostakopoulou, Claimant in Person

Dated: 27 November 2024