

URGENT: LIBERTY AT STAKE - ARREST WARRANT OUTSTANDING

An arrest warrant dated 19 November 2025 (District Judge Mauger, County Court at Central London, "Insolvency Number 1061 of 2025") purports to authorise the arrest of the Claimant. That warrant is **void ab initio on three jurisdictional grounds, with two further serious procedural defects**:

Ground	Legal Basis
(1) Wrong Court	County Court lacks subject-matter jurisdiction over High Court company winding-up CR-2024-000527 (IA 1986, s.117(2A) ; IPD, para 3.1 ; HCCJ Order 1991, art. 6C (SI 2014/821))
(2) Outside Transfer Scope	Transfer Order of Chief ICC Judge Briggs (23 July 2025) was limited to "the Application dated 21 July 2025" only; the arrest warrant exceeds that scope
(3) Wrong Statutory Provisions	Order cites ss.290/364 IA 1986 (bankruptcy provisions) instead of ss.133/134 (company winding-up). The Claimant is not a bankrupt.
(4) No Set-Aside Notice	Warrant made without notice and without the mandatory CPR 23.9(3) statement of the right to apply to set aside; Article 5(4) ECHR
(5) Defective Transfer Foundation	Transfer order of 23 July 2025 made of the court's own motion without the mandatory CPR 3.3(5)(b) set-aside notice; not served on the Respondent to his knowledge; does not name the Respondent; directs correspondence to an obsolete gsi-family email address

Immediate relief sought: Declaration that the warrant is void; undertaking not to execute; stay of enforcement pending determination of the jurisdictional question.

**FORMAL RESPONSE, EXHIBIT STATEMENT AND RECORD OF SYSTEMATIC
INSTITUTIONAL FAILURES**

**IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS
INSOLVENCY AND COMPANIES COURT / CHANCERY DIVISION**

And in the Court of Appeal (Civil Division)

High Court Case No: CR-2024-000527

Related Proceedings: BL-2024-001089; BL-2025-000147; BL-2024-001166; CA-2024-001353

Purported County Court Reference: 1061 of 2025 (validity disputed)

HMCTS Reasonable Adjustments Reference: 67862925

BETWEEN:

MICHAEL DARIUS EASTWOOD

Claimant / Appellant / Applicant

. and .

THE OFFICIAL RECEIVER

(acting through the Insolvency Service)

Respondent

FORMAL RESPONSE TO THE INSOLVENCY SERVICE

AND

EXHIBIT STATEMENT IN SUPPORT OF JUDICIAL REVIEW

AND COURT OF APPEAL PROCEEDINGS

Michael Darius Eastwood

London

Email: michael@michaeldariuseastwood.com

Tel:

Date: 23 February 2026

TO:

Examiner

London Regional Centre - London 2
The Insolvency Service
16th Floor, 1 Westfield Avenue
Stratford, London E20 1HZ

COPIES TO:

1. Mrs Bourne, Official Receiver, Cannon House, Birmingham
 2. Claire, Insolvency Investigations - South, Stratford
 3. County Court at Central London, Thomas More Building, Royal Courts of Justice
 4. **Court of Appeal (Civil Division), Case Manager, CA-2024-001353**, for inclusion in appeal bundle and consideration of supervisory jurisdiction
 5. Judicial Conduct Investigations Office (for information)
-

Your Ref: 1061 of 2025

My Ref: CR-2024-000527 / MDE

HMCTS RA Ref

Re: Mastermind Group Ltd (In Liquidation)

High Court Insolvency Number: CR-2024-000527

Evidence Portal: All evidence referenced in this letter, including the 12 enclosures, supporting schedules, and the full exhibit register, is available at michaeldariuseastwood.com/legal/or-response and in hard copy on request. The portal includes searchable documents, NEXIS-coded exhibits, and downloadable PDFs for each enclosure.

ACKNOWLEDGEMENT

I acknowledge receipt of:

- (a) Ms Claire Bourne's email dated 6 February 2026 granting an extension to **28 April 2026** for completion of the Director Conduct Questionnaire. I am grateful for this extension.
- (b) Mr email dated 27 January 2026 maintaining the Official Receiver's position that the warrant is "valid" and declining to discharge it.

This letter responds substantively to both communications and sets out my position in full.

COMPLIANCE AND AI DISCLOSURE

AI Use (Courts and Tribunals Judiciary AI Guidance, 31 October 2025): In compliance with the Judiciary's guidance on AI in court proceedings, the Applicant discloses that public AI tools were used for formatting, layout, and proofreading assistance. The legal analysis, identification of authorities, construction of arguments, factual narrative, document structure, and strategic framework are entirely the Applicant's own work.

The Applicant has personally read every authority cited in this document and invites the court to examine him on any authority, at any paragraph, at any time. Any error of citation will be corrected by prompt erratum.

Factual basis: All factual assertions are derived from CE-File records, sealed court orders, filed applications, sworn evidence, medical records, or contemporaneous correspondence. No AI tool has access to the Applicant's case files, court records, medical evidence, or private correspondence.

The factual content of this document could only have been produced by the person who lived through the events described. Nothing is stated that the Applicant does not honestly believe to be true.

Professional context: The Applicant is a litigant in person with a background in technology and business who has been compelled to acquire legal knowledge across multiple practice areas, including insolvency, property, tort, discrimination, public law, and appellate procedure, in order to protect his rights following the matters described in this document.

To manage the complexity of simultaneous proceedings across the County Court, the Business List and the Insolvency and Companies Court of the Chancery Division, and the Court of Appeal, the Applicant has designed and built a proprietary case management platform that organises evidence and exhibits, tracks CPR deadlines, and assists with document drafting across all linked proceedings.

That system is itself a product of the Applicant's combined legal and technical expertise, developed as a reasonable adjustment to manage the administrative demands that his ADHD and autism spectrum condition would otherwise make impossible to sustain across this volume of litigation.

Full responsibility for the contents of this document is accepted by the Applicant.

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PRELIMINARY NOTICE

This letter and exhibit statement is intended to form part of the evidential record in:

- (a) Any application for judicial review of the Order dated 19 November 2025 and/or the conduct of the Insolvency Service;
- (b) The pending appeal before the Court of Appeal in CA-2024-001353;
- (c) Any complaint to the Parliamentary and Health Service Ombudsman;
- (d) Any complaint to the Equality and Human Rights Commission; and
- (e) Any claim for damages under the [Equality Act 2010](#) and/or the [Human Rights Act 1998](#).

It is verified by a Statement of Truth and should be treated as evidence.

EXECUTIVE SUMMARY

1. **The County Court at Central London has no jurisdiction over CR-2024-000527.** This is not a matter of opinion. It is a matter of statute: [Insolvency Act 1986, s.117\(2A\)](#), as inserted by SI 2014/821, provides that winding-up proceedings in the London Insolvency District may be commenced only in the High Court. Every order, direction, and warrant purportedly made by the County Court in this matter is a nullity. (HMRC-ORD-001 [Enc-01]; HMRC-ORD-004 [Enc-07])

Mr [REDACTED] email of 27 January 2026 fails entirely to engage with this central legal issue, which was raised in my letter of 23 January 2026 and remains unanswered (HMRC-COR-004 [OR-1226], pp.3-4, 10).
 2. Mr Wheeler asserts that "the OR considers the Order and subsequent Warrant for Arrest to be valid" but provides **no legal basis** for this assertion. When a litigant raises a detailed jurisdictional objection supported by statutory provisions and binding House of Lords authority, a bare assertion of validity is not an answer. It is an evasion. (HMRC-ORD-002 [Enc-02])
 3. **I am not refusing to cooperate. I want a public examination.** I have expressly offered, twice, to attend a public examination in the correct court, the High Court (Insolvency and Companies Court), with reasonable adjustments for my documented disabilities (HMRC-COR-004 [OR-1226], pp.4, 8-9). That offer has been ignored.
 4. Instead of engaging with my jurisdictional argument or accepting my offer to be examined, the Insolvency Service has threatened me with arrest while simultaneously refusing the reasonable adjustments I have formally requested as a disabled person under the [Equality Act 2010](#).
 5. This letter documents a **pattern of systematic failures** by HMCTS bodies and the Insolvency Service to provide reasonable adjustments. I say those failures cumulatively **caused** the very insolvency now being enforced against me. On my case, the liquidation need never have occurred. **£34,528 in costs orders** (£22,528 DDJ Wood + £12,000 Master Kaye) were imposed during the MHCM and are void ab initio under [Regulation 7\(12\) DSRR 2020](#). (MDE-MHCM-001 [Enc-03])
 6. This letter:
 - (a) Repeats and amplifies my jurisdictional objection, demanding that the Insolvency Service identify the legal basis for County Court jurisdiction or concede that none exists;
 - (b) Repeats my offer to attend a public examination in the correct court;
 - (c) Documents the Insolvency Service's failures for the evidential record;
 - (d) Sets out the pattern of systematic Equality Act failures across multiple HMCTS bodies;
 - (e) Establishes the causal chain from those failures to the present enforcement action; and
 - (f) Places the Insolvency Service on formal notice of the consequences of continued non-engagement.
-

GUIDE FOR THE COURT

Core Propositions

- I. The arrest warrant dated 19 November 2025 is **void ab initio** because the County Court at Central London has no jurisdiction over CR-2024-000527, a High Court company winding-up in the London Insolvency District ([IA 1986, s.117\(2A\)](#); *Anisminic*; *MacFoy*). (HMRC-ORD-001 [Enc-01]; HMRC-ORD-004 [Enc-07]; HMRC-ORD-002 [Enc-02])
- II. The Applicant has **twice offered** to attend a public examination in the correct court (the High Court, Insolvency and Companies Court) with reasonable adjustments (HMRC-COR-004 [OR-1226], pp.4, 8-9). Both offers have been ignored.
- III. Multiple orders made during the Applicant’s Mental Health Crisis Moratorium (28 December 2024 to 16 April 2025) are **void by operation of statute** under [Regulation 7\(12\) DSRR 2020](#), including the Limited Civil Restraint Order and associated costs orders (*Lees v Kaye*). (CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15]; HMRC-ORD-003 [Enc-06]; MDE-MHCM-001 [Enc-03])
- IV. The Defendants in BL-2024-001089, BL-2025-000147, and BL-2024-001166 have been in **default for a combined 1,302+ days**. The Applicant contends that he is entitled to default judgment under [CPR 12.3](#), subject to the court being satisfied that the procedural preconditions are met and, in claims for unliquidated damages, subject to quantum being assessed under [CPR 12.5\(3\)](#) and [12.8](#). The losses in issue are well into eight figures. The current valuation materials include a discounted cash flow future-profit estimate of approximately **£11.8 million NPV**, grounded in the pitch deck, five-year forecast, investor evidence, and DCF schedules (MDE-FIN-001 [OR-027]; MDE-FIN-005 [OR-872]; MDE-FIN-002 [OR-201]; MDE-FIN-004 [OR-863]).
- V. The pattern of systematic [Equality Act 2010](#) failures by HMRC, HMCTS, and the Insolvency Service is, on my case, what **caused** the very insolvency now being enforced. The liquidation need never have occurred. (HMRC-COR-001 [Enc-05]; MDE-MED-002 [Enc-09])

Essential Reading

If the court’s time permits only limited reading, the following passages contain the core of the Applicant’s case:

- **Paragraphs 1–6** (Executive Summary): the five propositions in context
- **Paragraphs 18–39** (Part A, sections A.1–A.2): the jurisdictional defect in full
- **Paragraphs 97–116** (Part B.5): the Insolvency Service demanding documents whilst withholding them
- **Paragraphs 169–200** (Part C): the Equality Act failures
- **Paragraphs 201–280** (Part D): the pattern of systematic institutional failures and the causal chain
- **Paragraphs 295–317** (Part H): the Applicant’s position and demands

Relief Sought

- (1) Declaration that the arrest warrant of 19 November 2025 is void ab initio for want of jurisdiction;
- (2) Undertaking from the Insolvency Service not to execute the warrant pending determination;
- (3) Transfer of any remaining examination to the High Court (Insolvency and Companies Court) with reasonable adjustments;
- (4) Provision of the company bank statements necessary for compliance with the Official Receiver’s requests;
- (5) Substantive response to the jurisdictional objection within 14 days;
- (6) In the Court of Appeal: consideration of supervisory jurisdiction over the Chancery Division proceedings that are the subject of a formal bias complaint.

NOTICE TO THE COURT OF APPEAL: URGENT INTERVENTION REQUIRED

7. **This letter is being served on the Court of Appeal as a matter of urgency.**
8. The Court of Appeal should be aware that the practical effect of the Insolvency Service's position, as I understand it from Mr Wheeler's correspondence, amounts to this:

It does not matter whether the orders are void. Void orders still need to be appealed. The director will be arrested if he does not comply. Reasonable adjustments have not been provided by any court, so there is no reason for the Insolvency Service to provide them either.
9. This approach is unlawful for multiple reasons, but I wish to draw the Court's attention to one fundamental point:

The Insolvency Service is using the courts' discrimination as justification for its own.
10. The High Court is supposed to **set an example** for public bodies. When courts provide reasonable adjustments, uphold the [Equality Act 2010](#), and treat disabled litigants fairly, public bodies like the Insolvency Service are guided by that example.
11. Instead, the systematic refusal of reasonable adjustments across HMCTS, documented at length in this letter and in my pending proceedings, is being used by the Insolvency Service as precedent for refusing adjustments themselves.
12. The logic appears to be: "*The courts have not accommodated his disabilities. Why should we?*"
13. This creates a **vicious cycle of discrimination** where:
 - (a) Court A refuses reasonable adjustments;
 - (b) Court B relies on Court A's refusal to justify its own refusal;
 - (c) Public bodies rely on the courts' example to justify their own failures;
 - (d) The disabled person is trapped in a system-wide pattern of non-accommodation;
 - (e) Each body points to the others as justification.
14. **This cycle can only be broken by the Court of Appeal.** I respectfully urge the Court to intervene as a matter of urgency.

Wheeler Misunderstands Void Orders

15. Mr Wheeler's statement that I should "challenge the Court" if I disagree with the Order's validity reveals a fundamental misunderstanding.
16. **Void orders do not need to be appealed.** A void order is a nullity. It never existed in law. There is nothing to challenge. You do not appeal nothing.
17. Per [MacFoy v United Africa Co Ltd](#) [1962] AC 152:

"If an act is void, then it is in law a nullity... You cannot put something on nothing and expect it to stay there."
18. Per [Lees v Kaye](#) [2022] EWHC 1151 (QB): the court treated enforcement steps taken during a mental health crisis moratorium as automatically null and void by operation of the regulation, leaving no discretion to validate actions taken in breach. (MDE-MHCM-001 [Enc-03])
19. The arrest warrant dated 19 November 2025 was made by a court without jurisdiction. It is void ab initio. It does not require an appeal to "challenge" it. It has no legal existence. (HMRC-ORD-002 [Enc-02])
20. What is required is a **declaration** that it is void, which is precisely what I am seeking from this Court. This is not an appeal; it is recognition of pre-existing legal reality.

21. Mr Wheeler's suggestion that I "challenge the Court" while he continues to threaten arrest is not a meaningful practical safeguard. As a former police officer, he will appreciate that police ordinarily execute warrants that appear regular on their face. By the time any such challenge is heard, arrest and detention may already have occurred. (HMRC-ORD-002 [Enc-02])

The Origin of This Injustice: 7 June 2024

22. The Court of Appeal should understand that everything documented in this letter traces back to **one event**: the hearing on **7 June 2024** before HHJ Kelly in the **King's Bench Division**.
23. On that date:
- (a) I applied for an interim injunction to preserve my business premises and belongings pending determination of whether my landlord's forfeiture was lawful;
 - (b) Chelsea Harbour Limited had received notice of my application and, after receiving that notice, **rushed to install a new tenant and sell my belongings** to defeat the very relief I sought;
 - (c) Their counter-application was served **less than 3 days** before the hearing, contrary to [CPR 23.7\(1\)\(b\)](#) (which requires service at least 3 days before the court is to deal with the application);
 - (d) **I had not even viewed** the counter-application. I had no time to read it;
 - (e) I requested that the hearing be **split**. Hear my application, adjourn theirs so I could actually read what they had filed;
 - (f) **My request was refused**. I was forced to respond to an application I had never seen;
 - (g) The judge did not determine whether the forfeiture was lawful. She admitted she "didn't know", yet granted Chelsea Harbour's injunction anyway;
 - (h) The judge protected a "third party" who had bought my belongings on the basis that they were "innocent", despite the *nemo dat quod non habet* rule ([Shogun Finance Ltd v Hudson](#) [2003] UKHL 62): a buyer cannot acquire good title from a seller who had no title to sell;
 - (i) I was required to give an undertaking not to lock **my own office**, to protect someone who had bought my things from someone who had no title to sell them;
 - (j) **Because I refused to abandon my property rights**, an injunction was granted against me;
 - (k) I was ordered to pay **£10,000 in costs**;
 - (l) The judge directed that Chelsea Harbour need not list a return date until I filed a "Defence", reversing the burden and ensuring the injunction would persist indefinitely.
24. **That hearing occurred in the King's Bench Division**. The LCRO that has been imposed (which is void in any event) applies only to Chancery Division proceedings. It has **no application** to King's Bench matters. (CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15])
25. The injunction has been in place for **18 months**. No return date has been listed. The property has been **sold**. My belongings remain inaccessible. Chelsea Harbour is now **533 days in default** in the substantive Chancery proceedings, yet faces no consequences.
26. **Everything**. The business failure, the HMRC debt, the winding-up, the LCRO, the arrest warrant. HMRC's discrimination came first: reasonable adjustments refused, the Gazette published, bank accounts closed. But the courts' discrimination - beginning at that hearing on 7 June 2024 - denied me the default judgments that would have provided the funds to pay the HMRC debt and prevented the winding-up entirely. (CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15]; HMRC-COR-001 [Enc-05]; HMRC-COR-002 [Enc-08]; HMRC-ORD-002 [Enc-02])
- Everything traces back to two converging tracks of institutional failure: one by HMRC, one by the courts. Both began with a refusal of reasonable adjustments. Both are documented in detail in Part B of this Response.
27. The Insolvency Service is now threatening to arrest me for the consequences of that injustice.

Request to the Court of Appeal

28. I respectfully request that the Court of Appeal:
- (a) **Notes** that this letter forms part of the evidential record in CA-2024-001353 and any future applications;
 - (b) **Recognises** that the systematic pattern of discrimination across multiple courts and public bodies can only be addressed by this Court;
 - (c) **Considers** whether to exercise supervisory jurisdiction over the interconnected proceedings across King's Bench, Chancery, Insolvency, and County Court divisions;
 - (d) **Treats** the Administrative Notice I will be filing shortly as a matter of urgency, given that my liberty is threatened under a void warrant;
 - (e) **Directs** that no steps be taken to execute the arrest warrant pending determination of the jurisdictional question.
29. I am preparing an Administrative Notice to this Court seeking comprehensive relief across all affected proceedings, and I shall endeavour to file it as soon as my health permits. This letter provides essential context for that Notice.
- 29A. CA-2024-001353 is the appeal of the King's Bench hearing of 7 June 2024 - the point at which I say the pattern of discriminatory treatment began (MDE-TRN-001 [OR-260], pp. 16-17). That appeal is already before this Court. Everything documented in this letter flows from, or is connected to, the events that gave rise to it. The question is not whether the Court of Appeal has jurisdiction to address the interconnected matters. It is whether any other court does.
- 29B. I respectfully submit that consolidation of all affected proceedings under the existing appeal CA-2024-001353 is justified on six independent bases:
- (a) **Plenary appellate powers.** Under [CPR 52.20\(1\)](#), the Court of Appeal has all the powers of the lower court. Under [CPR 52.20\(2\)](#), it may make any order which could have been made below. This includes entering the default judgments that the lower courts have refused to process, setting aside the void orders made during the MHCM, and granting the reasonable adjustments that every lower court has denied;
 - (b) **Consolidation under [CPR 52.14](#).** The proceedings in BL-2024-001089, BL-2025-000147, BL-2024-001166, and CR-2024-000527 arise from the same factual matrix, involve the same claimant and overlapping defendants, and raise common issues of law - in particular, the effect of the MHCM on orders made during the protected period, the entitlement to default judgment, and the systematic denial of reasonable adjustments;
 - (c) **The Chancery Division is conflicted.** My formal complaint of 20 February 2025 against multiple Chancery judicial officers raises a serious question whether any further permission or case-management decision within that division would be perceived as impartial. The sealed 27 February 2025 order expressly records that the court considered my complaint of 20 February 2025 when determining the LCRO issue, and the N19 LCRO was then issued on the same date (CHE-ORD-001 [OR-1212], p.1; CHE-ORD-002 [OR-1219], p.1). The Court of Appeal is, in practical terms, the independent appellate forum already seized of these interconnected issues;
 - (d) **The LCRO creates a deadlock.** Even though I contend the LCRO is void (MHCM period; [Porter v Magill](#) apparent bias), the Chancery Division treats it as operative and requires me to seek permission before making any application. I cannot apply to the Chancery Division to set aside the LCRO without the permission of the judge who imposed it. This creates a practical deadlock which, absent appellate intervention, leaves no workable route for me to challenge the restraint within the division that treats it as operative (CHE-ORD-002 [OR-1219], p.1);
 - (e) **The County Court has no jurisdiction.** The winding-up is a High Court matter. The LRP/Vista claim was never validly transferred from the High Court. There is no competent lower court to which these matters can be remitted;
 - (f) **No other court can see the full picture.** The pattern of systematic failure spans the County Court, the Business List and the Insolvency and Companies Court of the Chancery Division, and the Court of Appeal,

as well as multiple public bodies (HMCTS, HMRC, DWP, Insolvency Service). Only the Court of Appeal has visibility over the entire system.

29C. There is a seventh basis, and in my submission it is the most important: **consolidation is itself a reasonable adjustment**. The [Equality Act 2010, s.20](#) imposes a duty to make reasonable adjustments where a provision, criterion or practice puts a disabled person at a substantial disadvantage. [Practice Direction 1A](#) requires the court to take all proportionate measures to ensure the effective participation of vulnerable parties.

I have ADHD and autism spectrum condition (HMCTS RA reference 67862925). The cognitive demands of litigating the consequences of systemic discrimination simultaneously across the County Court, two separate lists of the Chancery Division, and the Court of Appeal - each with its own procedural requirements, filing deadlines, case numbers, and judicial officers - is precisely the kind of administrative overload that ADHD makes it impossible to manage. Requiring me to do so is not merely unfair. It is a failure to make reasonable adjustments.

29D. The reasonable adjustment is simple: one court, one case number, one case manager, one set of deadlines. That infrastructure already exists. CA-2024-001353 has an established case manager (Manpreet Singh) providing a single point of contact for reasonable adjustments. The administrative apparatus for unified oversight is in place.

29E. I am not asking the Court of Appeal to act as a court of first instance. I am asking it to do what only it can do: exercise appellate and supervisory jurisdiction over interconnected proceedings that have been so comprehensively mishandled across multiple divisions that no single lower court retains the jurisdiction, the impartiality, or the visibility to put matters right.

The root cause - the hearing of 7 June 2024 - is already before this Court. The consequential harm flows directly from it. The remedy must be unified because the failure was systemic, and because requiring a disabled litigant to fragment his response across four hostile forums is itself discrimination.

CONSOLIDATED CHRONOLOGY

Key events across all proceedings, in date order

Date	Event
29 Jan 2024	HMRC files winding-up petition against Mastermind Group Ltd (CR-2024-000527)
21 Feb 2024	Claimant sends HMRC detailed letter disclosing ADHD diagnosis, enclosing Dr Woolley's psychiatric report, requesting reasonable adjustments under EA 2010, ss.20-21
22 Feb 2024	HMRC Mrs S Huntley refuses all reasonable adjustments; proceeds with winding-up gazette without acknowledging disability or medical evidence
7 Jun 2024	Hearing before HHJ Kelly, King's Bench Division: interim injunction refused; Chelsea Harbour counter-application served <3 days prior; £10,000 costs order; no reasonable adjustments provided
9 Jul 2024	Permission to appeal application issued in Court of Appeal (CA-2024-001353)
29 Jul 2024	BL-2024-001089 (Chelsea Harbour) issued and sealed in the High Court
1 Aug 2024	BL-2024-001089 served on Chelsea Harbour Ltd
12 Aug 2024	BL-2024-001166 (LRP/Vista) issued and sealed in the High Court
13 Aug 2024	Master Clark transfers BL-2024-001166 to County Court: the day after issue, before service, without hearing or notice
18 Aug 2024	Defence deadline expires: BL-2024-001089. No Defence filed.
20 Aug 2024	High Court accepts CPR 17.1(1) amendment and reseals BL-2024-001166, confirming service not yet effected and transfer not valid
30 Aug 2024	BL-2024-001166 served on LRP/Vista defendants
4 Sep 2024	N244 application for default judgment filed (BL-2024-001089); never listed
18 Sep 2024	Directions hearing before Deputy Master Glover; default judgment deferred; bundle restrictions imposed without discussion
25 Sep 2024	Winding-up order made (CR-2024-000527). ICC Judge Greenwood; reasonable adjustments refused

27 Sep 2024	Defence deadline expires: BL-2024-001166. No Defence filed.
30 Sep 2024	N227 default judgment request filed for BL-2024-001166; 22 follow-up emails sent; all ignored
10 Oct 2024	Rescission hearing before ICC Judge Prentis; adjournment refused; rescission of winding-up order refused
23 Oct 2024	ICC Judge Barber hears initial rescission application; Claimant joined as applicant; rescission adjourned for directions
25 Oct 2024	Standard Breathing Space moratorium entered (60 days)
8 Nov 2024	Claimant attends formal s.235 interview at Official Receiver's office; provides signed 3-page statement
13 Nov 2024	Mr Wheeler emails Claimant requesting company bank statements
28 Nov 2024	Dr James Woolley: ADHD formally diagnosed; detailed reasonable adjustment requirements documented (HMCTS ref. 67862925)
13 Dec 2024	Mr Wheeler contacts defendants' solicitors (Shoosmiths LLP) for company bank account details
20 Dec 2024	Hearing before DDJ Wood (L10CL352); terms of January Order first disputed
28 Dec 2024	Mental Health Crisis Moratorium commences (BSS-0000297093). All subsequent orders void under Reg. 7(12) DSRR 2020
6 Jan 2025	VOID: January Order sealed (L10CL352). Day 9 of MHCM. Retrospectively validates late Defence; imposes indemnity costs; creates automatic strike-out stay
20 Jan 2025	Claimant emails Mr Wheeler requesting company bank statements; Lloyds Bank confirms only insolvency practitioner can request them
3 Feb 2025	BL-2025-000147 (Chelsea Harbour personal damages) issued
5 Feb 2025	VOID: Master Kaye dismisses s.130(2) leave application as Totally Without Merit. Day 39 of MHCM
6 Feb 2025	VOID: Master Kaye stays BL-2024-001089 until 6 June 2025, with automatic strike-out if the £10,000 KB costs order is not paid or successfully challenged; TWM order. Day 40 of MHCM; hearing proceeds without Claimant's evidence
20 Feb 2025	Formal complaint filed against Chancery Division, copied to HMCTS, JCIO, ICO, and Court of Appeal; Subject Access Request filed under Art. 15 UK GDPR
27 Feb 2025	VOID: Master Kaye orders indemnity costs to be assessed, with a £12,000 interim payment by 6 June 2025, and makes an LCRO in BL-2024-001089. Day 61 of MHCM; 7 days after formal complaint against the same judge
7 Mar 2025	Mr Wheeler emails Claimant quoting specific Lloyds Bank transactions; attaches Lloyds spreadsheet; confirms he has the bank statements but does not provide copies
7 Mar 2025	Deputy OR ██████████ confirms company claims will not be assigned, within 10 days of Shoosmiths' threat
24 Mar 2025	Dr James McDermott: ASD formally diagnosed; crisis team confirms Claimant under their care
14 Apr 2025	Claimant emails Insolvency Service requesting additional time to submit legal case papers; request ignored
16 Apr 2025	Mental Health Crisis Moratorium expires; all orders made 28 Dec 2024 – 16 Apr 2025 remain void ab initio
29 Apr 2025	Mr Wheeler threatens public examination if further information not provided; still no bank statements provided to Claimant
8 May 2025	BL-2025-000147 served on Chelsea Harbour Ltd
4 Jun 2025	Defence deadline expires: BL-2025-000147. No Defence filed.
23 Jul 2025	Chief ICC Judge Briggs: limited transfer order: transfers only "Application dated 21 July 2025"; does not confer general jurisdiction on County Court
31 Jul 2025	Mr Wheeler emails Shoosmiths incorrectly stating "we haven't had any further contact with the Director", contradicted by 40+ documented contacts
7 Aug 2025	Order for Public Examination made by DJ Hart: cites wrong statutory provisions (ss.290/364 instead of ss.133/134 IA 1986)
19 Aug 2025	Hearing before Recorder Cohen KC (L10CL352); summary judgment granted; MHCM void arguments not addressed
3 Sep 2025	Claimant submits Mandatory Reconsideration of DWP sanction citing disabilities and EA 2010
4 Sep 2025	DWP subjects UC claim to full Claim Review within 24 hours of disability rights assertion
20 Oct 2025	DWP wrongfully closes Claimant's Universal Credit claim
19 Nov 2025	Arrest warrant made by DJ Mauger, County Court: without a hearing, without notice, citing wrong statutory provisions; void for want of jurisdiction

23 Jan 2026	Claimant receives arrest warrant (65 days after it was made); sends 13-page letter to Insolvency Service the same day
27 Jan 2026	Mr Wheeler's email: maintains warrant is "valid"; refuses to seek discharge; ignores offer of voluntary public examination; declines reasonable adjustments
6 Feb 2026	Ms Claire Bourne grants extension to 28 April 2026 for Director Conduct Questionnaire
16 Feb 2026	DWP LCWRA award received following new Universal Credit claim
18 Feb 2026	Formal Letter Before Action filed with DWP Legal Department
23 Feb 2026	This formal response submitted to the Insolvency Service

GLOSSARY OF ABBREVIATIONS, CASE REFERENCES, AND KEY PERSONS

Abbreviations

Abbreviation	Meaning
ADHD	Attention Deficit Hyperactivity Disorder
ASD	Autism Spectrum Disorder
BAILII	British and Irish Legal Information Institute
CDPA 1988	Copyright, Designs and Patents Act 1988
CLCC	County Court at Central London
CPR	Civil Procedure Rules 1998
DSRR 2020	Debt Respite Scheme (Breathing Space Moratorium and Mental Health Crisis Moratorium) (England and Wales) Regulations 2020
DWP	Department for Work and Pensions
EA 2010	Equality Act 2010
ECHR	European Convention on Human Rights
EHRC	Equality and Human Rights Commission
HRA 1998	Human Rights Act 1998
HMCTS	His Majesty's Courts and Tribunals Service
IA 1986	Insolvency Act 1986
ICC	Insolvency and Companies Court
ICO	Information Commissioner's Office
JCIO	Judicial Conduct Investigations Office
LCRO	Limited Civil Restraint Order
LCWRA	Limited Capability for Work and Work-Related Activity
LiP	Litigant in Person
MHCM	Mental Health Crisis Moratorium (under DSRR 2020)
OR	Official Receiver
PD	Practice Direction
PfHA 1997	Protection from Harassment Act 1997
PIQC	Preliminary Information Questionnaire for Company Directors
PSED	Public Sector Equality Duty (EA 2010, s.149)
SAR	Subject Access Request (UK GDPR, Art. 15)
TIGA 1977	Torts (Interference with Goods) Act 1977
TWM	Totally Without Merit (CPR 23.12)
UK GDPR	United Kingdom General Data Protection Regulation

Case References

Reference	Description
CR-2024-000527	Winding-up of Mastermind Group Ltd (High Court, transferred to County Court)
BL-2024-001089	Chelsea Harbour Ltd: unlawful forfeiture, breach of covenant, loss of business (Chancery Division)
BL-2024-001166	LRP Ltd and Vista (London) Ltd: harassment, breach of contract, breach of quiet enjoyment, disability discrimination. Quantum: £4,907,000 (High Court; void transfer to County Court)
BL-2025-000147	Chelsea Harbour Ltd: personal and proprietary damages, including conversion, copyright infringement, alleged sale / misuse of the Claimant's intellectual property to a competitor, disability discrimination, and wrongful forfeiture (Chancery Division)
CA-2024-001353	Appeal from HHJ Kelly's order of 7 June 2024 (Court of Appeal)
L10CL352	County Court proceedings arising from void transfer of BL-2024-001166

Key Persons

Name	Role
M [REDACTED]	Official Receiver, Insolvency Service
Ms Claire Bourne	Senior Official Receiver, Insolvency Service
Mr [REDACTED]	Deputy Official Receiver
Mrs S Huntley	HMRC Enforcement and Insolvency Services
ICC Judge Greenwood	Made winding-up order (25 Sep 2024)
ICC Judge Prentis	Refused rescission of winding-up order (10 Oct 2024)
ICC Judge Barber	Heard initial rescission application (23 Oct 2024)
Chief ICC Judge Briggs	Made limited transfer order (23 Jul 2025)
Master Kaye	Chancery Division; imposed void LCRO, costs, TWM designations during MHCM
Master Clark	Made void pre-service transfer of BL-2024-001166 (13 Aug 2024)
Deputy Master Glover	Directions hearing (18 Sep 2024); deferred default judgment
District Judge Mauger	Made void arrest warrant (19 Nov 2025)
District Judge Hart	Made public examination order citing wrong provisions (7 Aug 2025)
HHJ Kelly	King's Bench Division hearing (7 Jun 2024); subject of appeal CA-2024-001353
Dr James Woolley	Consultant Psychiatrist: ADHD diagnosis (28 Nov 2024); MHCM certification
Dr James McDermott	Consultant Psychiatrist: ASD diagnosis (24 Mar 2025)
Court and Administrative Staff	
[REDACTED]	Chancery Division clerk (Master Clark); failed to forward Claimant's evidence to Master Kaye (5 Feb 2025)
[REDACTED]	Chancery court officer; communicated set-aside directions (Aug 2024); warned Claimant applications would be "struck off" (14 Aug 2025)
Sumaira Pathan	Chancery Issue clerk; relayed unnamed Master's directions refusing to lift void stay or identify the decision-maker (Jun–Aug 2025)
Abdul Musa	Chancery Issue clerk; wrongfully applied BL-2024-001089 LCRO to block BL-2025-000147 default judgment (25 Jul 2025)
Victoria Hurt	Chancery Division; made second transfer order in BL-2024-001166 without a hearing (4 Sep 2024)
Chief Master Shuman	Refused escalation to High Court Judge; characterised reasonable adjustments as "longer hearing and pauses" (Sep 2024)
Deputy Master Dovar	Refused to retain BL-2024-001166 in High Court; circular reasoning on pre-service transfer (3 Sep 2024)
DDJ Wood	Hearing in L10CL352 (20 Dec 2024); terms of resulting January Order disputed
Recorder Cohen KC	Granted summary judgment in L10CL352 (19 Aug 2025); MHCM void arguments not addressed; proceeded despite Defendant's application not having been served on Claimant and no sealed application on file; failed to give <i>Flannery</i> reasons on harassment, course of conduct, and tenancy characteristics beyond exclusive possession
Mr Brodrick	Court of Appeal case lawyer; threatened dismissal of CA-2024-001353 while acknowledging ADHD (1 Nov 2024)

Manpreet Singh	Court of Appeal case manager for CA-2024-001353; single point of contact for reasonable adjustments
DWP	
Dipak	DWP work coach; requested Work Capability Assessment multiple times over two years; requests ignored by DWP
Conor	DWP case manager; subject of harassment complaint under EA 2010, s.26; lost Mandatory Reconsideration; ignored WCA requests

PART A: THE JURISDICTIONAL OBJECTION

Summary

The County Court at Central London has no subject-matter jurisdiction over CR-2024-000527. The winding-up was commenced in the High Court and falls within the London Insolvency District, where IA 1986, s.117(2A) reserves exclusive jurisdiction to the High Court.

The transfer order of 23 July 2025 was limited in scope and does not confer jurisdiction to issue an arrest warrant. The warrant cites the wrong statutory provisions (bankruptcy, not company winding-up). The Insolvency Service has been asked to identify the legal basis for County Court jurisdiction and has not done so.

Key authorities: [Anisminic](#); [MacFoy](#); IA 1986, [s.117](#), [133](#), [134](#); [Fourie v Le Roux](#); [Potanina v Potanin](#) • **Key paragraphs:** 18–82

A.1 The Order Under Challenge

30. By Order dated 19 November 2025, District Judge Mauger, sitting in the County Court at Central London, purportedly made the following orders in relation to "Insolvency Number 1061 of 2025":
- (a) That the public examination be adjourned generally with liberty to restore; and
 - (b) That a warrant be issued for the arrest of Michael Eastwood.
31. The Order records that it was made "without a hearing" and in circumstances where I was "not being present or represented."
32. I received this Order for the first time on **23 January 2026**, sixty-five days after it was purportedly made. I was never served with any application for my arrest, nor given any notice that such an application was being made or any opportunity to respond before this most draconian of measures was imposed.
- 32A. In [Potanina v Potanin](#) [2024] UKSC 3, the Supreme Court reaffirmed through Lord Leggatt what was described as the foundational rule of procedural fairness: before any court makes an order requested by one party, the other party must be given a chance to object.
- An arrest warrant made without a hearing, without notice, and without any opportunity for me to respond violates this most basic principle of justice.

A.2 The Jurisdictional Defect

33. I contend that the Order is **void ab initio**. It is not merely voidable or irregular. It is a legal nullity from inception, incapable of conferring any power of arrest upon any person.
34. The grounds for this contention are as follows.

A.2.1 The Statutory Framework

35. The liquidation of Mastermind Group Ltd is a **company winding-up seated in the High Court of Justice**, Business and Property Courts, Insolvency and Companies Court, under case reference **CR-2024-000527**.
36. Section 117(1) of the [Insolvency Act 1986](#) provides:

"The High Court has jurisdiction to wind up any company registered in England and Wales."

37. Section 117(2) provides that the county court has concurrent jurisdiction **only** where:

"the amount of a company's share capital paid up or credited as paid up does not exceed £120,000"

and even then, only in respect of proceedings **commenced** in the county court.

38. Section 117 of the [Insolvency Act 1986](#) establishes that the High Court has jurisdiction to wind up any company registered in England and Wales. The concurrent jurisdiction of the County Court under section 117(2) is strictly limited by a capital threshold. Section 117(2A), inserted by SI 2014/821, goes further: (HMRC-ORD-001 [Enc-01]; HMRC-ORD-004 [Enc-07])

"proceedings for the exercise of the jurisdiction to wind up a company registered in England and Wales may be commenced only in the High Court if the place which has longest been the company's registered office during the 6 months immediately preceding the presentation of the petition for winding up is in the district that is the London insolvency district."

38A. This statutory restriction is confirmed by [Article 6C of the High Court and County Court Jurisdiction Order 1991](#) (also inserted by SI 2014/821). The [Practice Direction: Insolvency Proceedings](#) (paragraph 3.1) provides that, in the High Court, petitions and applications should be listed initially before an Insolvency and Companies Court Judge in the Royal Courts of Justice, or a District Judge sitting in a District Registry, subject to paragraph 3.2. (CHE-EVD-001; CHE-EVD-002; CHE-EVD-003; HMRC-ORD-001 [Enc-01]; HMRC-ORD-004 [Enc-07])

CR-2024-000527 was commenced in the High Court. The County Court at Central London had no free-standing jurisdiction to treat this High Court winding-up as a separate County Court matter or to issue coercive orders outside the scope of the limited transfer actually made.

39. Any order made by the County Court outside the scope of that limited transfer is accordingly made without jurisdiction. The consequence is nullity.

39A. I anticipate that the Insolvency Service may contend that [section 117\(2A\)](#) governs only *commencement* and does not prevent subsequent transfer. That argument is wrong for three reasons:

- (a) [Article 6C of the High Court and County Court Jurisdiction Order 1991](#) (inserted by the same SI 2014/821) expressly provides that winding-up proceedings in the London Insolvency District "shall be commenced **and proceeded with** only in the High Court." The words "and proceeded with" are fatal to any commencement-only interpretation.
- (b) The explanatory note to SI 2014/821 confirms that the amendment creates a *jurisdictional allocation*, not a mere venue preference. Subject-matter jurisdiction cannot be conferred by consent or administrative convenience.
- (c) Even if the transfer were valid (which is denied), the arrest warrant would **still** be void on the two independent grounds set out below: it exceeds the limited scope of the transfer order, and it cites the wrong statutory provisions. Each ground is independently sufficient.

39B. **A further independent ground reinforces the jurisdictional objection.** [SI 2014/2947](#) designates only **eight specific courts** with statutory jurisdiction over corporate insolvency proceedings. The County Court at Central London is **not** among them. It has no statutory jurisdiction whatsoever over corporate public examinations under [section 133 of the Insolvency Act 1986](#) or arrest warrants under [section 134](#). (HMRC-ORD-001 [Enc-01]; HMRC-ORD-004 [Enc-07]; HMRC-ORD-002 [Enc-02])

39C. [Rule 12.30\(1\) of the Insolvency \(England and Wales\) Rules 2016](#) provides that transfer of proceedings may only be made to a court that itself has insolvency jurisdiction over the relevant type of proceeding. Since the County Court at Central London is not a designated insolvency court for corporate matters, Chief ICC Judge Briggs could not lawfully transfer any aspect of CR-2024-000527 to it. (HMRC-ORD-001 [Enc-01]; HMRC-ORD-001 [Enc-01]; HMRC-ORD-004 [Enc-07])

39D. Further, [Rule 12.31\(3\)](#) requires that written reasons be given when a transfer is made. No written reasons accompanied the transfer order of 23 July 2025. This is a further mandatory procedural requirement that was not complied with. (HMRC-ORD-001 [Enc-01])

A.2.2 The Consequence: Nullity

40. An order made by a court acting outside its jurisdiction is not merely erroneous. It is void. It has no legal existence. It confers no powers. It imposes no obligations.

41. In [Anisminic Ltd v Foreign Compensation Commission](#) [1969] 2 AC 147 at 171, **Lord Reid** stated:

"If [the tribunal] bases its decision on some matter which is not prescribed for its adjudication... its decision is equally a nullity."

42. In [MacFoy v United Africa Co Ltd](#) [1962] AC 152 at 160, **Lord Denning** stated:

"If an act is void, then it is in law a nullity. It is not only bad, but incurably bad... And every proceeding which is founded upon it is also bad and incurably bad. You cannot put something on nothing and expect it to stay there. It will collapse."

43. The Order of 19 November 2025 was made by a court with no jurisdiction over CR-2024-000527. It is therefore void ab initio. No arrest warrant can lawfully be executed pursuant to it. Any arrest would be unlawful. (HMRC-ORD-002 [Enc-02])

43A. I anticipate that the Insolvency Service may seek to characterise the warrant as merely “voidable” rather than void. That distinction does not arise. In [Jalla v Shell International Trading and Shipping Co Ltd](#) [2023] UKSC 16, the Supreme Court confirmed that where a statutory provision creates an absolute prohibition or jurisdictional limit, there is no intermediate “voidable” category: the act is either within jurisdiction (and valid) or outside it (and a nullity). Here, the County Court was outside its jurisdiction. There is no discretion to validate a void act. (HMRC-ORD-001 [Enc-01]; HMRC-ORD-004 [Enc-07])

A.2.3 A Further Fatal Defect: Wrong Statutory Provisions

44. I have now obtained a copy of the Order for Public Examination dated **7 August 2025** made by District Judge Hart. That Order reveals a further fatal legal error that compounds the jurisdictional defect. (HMRC-ORD-003 [Enc-06])

45. The Order's **WARNING** states:

"If you fail, without reasonable excuse, to attend your public examination at the time and place set out in the order above you will be liable to be arrested without further notice under [section 364\(1\)](#) of the [Insolvency Act 1986](#) and may be held in contempt of court under [section 290\(5\)](#) of the [Insolvency Act 1986](#) and be imprisoned or fined."

46. **Sections 364 and 290 are BANKRUPTCY provisions.** They apply to PERSONAL insolvency proceedings under Parts 7A to 11 of the [Insolvency Act 1986](#). They do not apply to COMPANY winding-up.

Section	What It Covers	Part of IA 1986	Applies To
s.290	Public examination of the bankrupt	Part IX (Bankruptcy)	Personal bankruptcy only
s.364	Arrest of absconding debtor	Part IX (Bankruptcy)	Personal bankruptcy only
s.133	Public examination of officers	Part IV (Winding Up)	Company winding-up ✓
s.134	Enforcement of s.133 (arrest)	Part IV (Winding Up)	Company winding-up ✓

47. **I am not a bankrupt.** I have not been made subject to any bankruptcy order. Mastermind Group Ltd is a **company** in liquidation under Part IV of the [Insolvency Act 1986](#). The correct provisions for examination of

company officers are [sections 133 and 134](#), not sections 290 and 364.

48. The Order purports to warn me of arrest under statutory provisions that **do not apply to me**. This is not a mere technicality. The legal powers being invoked simply do not exist in the context of a company winding-up.
49. This error further demonstrates that the County Court at Central London lacks the competence to handle High Court company insolvency matters. A court with proper jurisdiction over CR-2024-000527 would not cite bankruptcy provisions in a company winding-up. (HMRC-ORD-001 [Enc-01]; HMRC-ORD-004 [Enc-07])
50. Any arrest purportedly made under section 364(1) would be **doubly unlawful**: first, because the County Court has no jurisdiction over CR-2024-000527; and second, because section 364 does not apply to company officers. It applies only to bankrupts. (HMRC-ORD-001 [Enc-01]; HMRC-ORD-004 [Enc-07])

A.2.4 The Transfer Order Was Limited in Scope

51. I have obtained the Order of Chief ICC Judge Briggs dated **23 July 2025** which transferred certain matters to the County Court. However, that Order was **expressly limited**:

"THIS COURT OF ITS OWN MOTION ORDERS THAT: the Application dated 21 July 2025 be transferred to the County Court Sitting in Central London, to be heard by a District Judge for the purpose only of hearing the Application dated 21 July 2025."

52. This transfer order:

- (a) Transferred **only** "the Application dated 21 July 2025"
- (b) Did **not** transfer the underlying winding-up proceeding CR-2024-000527
- (c) Did **not** grant general jurisdiction to the County Court over company insolvency matters
- (d) Did **not** authorise the County Court to make public examination orders under section 133
- (e) Did **not** authorise the County Court to make arrest warrants under section 134
- (f) Was made "of its own motion" without notice to the Respondent, yet **does not contain the mandatory statement of the right to apply to set aside** required by [CPR 3.3\(5\)\(b\)](#). The order contains only administrative postal directions.

This omission deprived me of any opportunity to challenge the transfer before coercive jurisdiction was exercised on the basis of it.

- 52A. Where the court makes an order of its own initiative without hearing the parties ([CPR 3.3\(4\)](#)), [CPR 3.3\(5\)\(a\)](#) provides that a party affected may apply to have it set aside, varied or stayed, and [CPR 3.3\(5\)\(b\)](#) provides that:

"the order must contain a statement of the right to make such an application."

If no period is specified, [CPR 3.3\(6\)\(b\)](#) requires any such application to be made not more than 7 days after service. The transfer order contains no statement of this right and specifies no period. The mandatory procedural safeguard is entirely absent.

- 52B. The deficiencies extend further. The transfer order:

- (a) Does not name me as a person affected by the transfer, identifying only the company (Mastermind Group Ltd), despite the fact that I am the person required to attend the public examination and against whom coercive arrest powers were subsequently deployed;
- (b) Was not served on me by post or email to my knowledge. I discovered its existence only through my own diligence in searching the CE-File electronic court system. Had I not done so, I would have had no knowledge that the transfer had been made at all;
- (c) Directs all correspondence to the email address RCJBankCLCCDJHearings@hmcts.gsi.gov.uk, which is within a gsi-family domain. Published Government guidance states that all gsi-family domains must now be replaced with government domains (such as justice.gov.uk), and government domain hardening work has removed the vast majority of gsi-family domains.

This is at minimum obsolete contact information that creates a serious risk of non-delivery and a practical inability for any affected party to communicate with the court to which the matter was transferred.

52C. The cumulative effect is that the entire chain of County Court jurisdiction rests on an order that was made without notice to me, omits the mandatory [CPR 3.3\(5\)\(b\)](#) set-aside statement, does not identify me as a person affected, was not served on me to my knowledge, and directs correspondence to an obsolete gsi-family email address. (HMRC-ORD-001 [Enc-01]; HMRC-ORD-004 [Enc-07])

At no point in the sequence from transfer to public examination listing to arrest warrant was I given the procedural safeguard that the rules require.

52D. This is precisely the situation Lord Leggatt described in [Potanina v Potanin](#) [2024] UKSC 3 at [67] as:

| *"quite wrong and unfair"*

- a case management decision that deprives the affected party of the right to present an argument to the court, without any opportunity to object before coercive powers are exercised.

52E. This pattern of failures, taken together, is at minimum recklessly indifferent to my right of access to the court, if not a deliberate obstruction of it. I am a disabled person known to the court and to the Insolvency Service, whose reasonable adjustment requests have been repeatedly ignored.

The effect of these cumulative failures is that a liberty-depriving order was obtained against me without my knowledge, without any mechanism to challenge it, and without any functioning means of communication with the court purporting to exercise jurisdiction.

53. The Public Examination Order dated 7 August 2025 (District Judge Hart) and the arrest warrant dated 19 November 2025 (District Judge Mauger) are **not** "the Application dated 21 July 2025." They are separate applications for different relief. (HMRC-ORD-002 [Enc-02]; HMRC-ORD-003 [Enc-06])

54. Even if Chief ICC Judge Briggs's transfer was valid for its limited purpose, the County Court has **exceeded the scope of that transfer** by making orders that fall outside "the Application dated 21 July 2025." (HMRC-ORD-001 [Enc-01]; HMRC-ORD-003 [Enc-06])

55. The County Court's jurisdiction, such as it was, extended only to hearing that specific application. It did not extend to making public examination orders, still less to issuing arrest warrants. (HMRC-ORD-001 [Enc-01]; HMRC-ORD-004 [Enc-07]; HMRC-ORD-002 [Enc-02]; HMRC-ORD-003 [Enc-06])

55A. I anticipate that the Insolvency Service may contend that the power to issue an arrest warrant is "ancillary" or "implied" from the limited transfer of the public examination application. That argument is wrong. The arrest power under [section 134 of the Insolvency Act 1986](#) is a **freestanding coercive power**, not a case management direction ancillary to another application. (HMRC-ORD-002 [Enc-02])

55B. In [Fourie v Le Roux](#) [2007] UKHL 1, the House of Lords held that a court must have its own jurisdictional foundation to make a coercive order affecting a person's liberty or property. A liberty-depriving order . which an arrest warrant self-evidently is . cannot be implied from a limited administrative transfer of a single application. The arrest power requires its own jurisdictional basis, which the County Court does not possess for a High Court winding-up in the London Insolvency District. (HMRC-ORD-001 [Enc-01]; HMRC-ORD-004 [Enc-07]; HMRC-ORD-002 [Enc-02]; HMRC-ORD-003 [Enc-06])

56. The arrest warrant dated 19 November 2025 is therefore void ab initio on **three independent jurisdictional grounds**, with **two further serious procedural defects** independently requiring set aside:

Ground	Legal Basis
(1) Wrong court	County Court lacks subject-matter jurisdiction over High Court company winding-up (IA 1986, s.117(2A)); IPD para 3.1 ; HCCJ Order 1991, art. 6C)
(2) Outside transfer scope	Order exceeds the limited transfer of "the Application dated 21 July 2025"
(3) Wrong statutory provisions	Sections 290/364 (bankruptcy) do not apply to company officers
(4) No set-aside notice on warrant	Warrant made without notice and without the mandatory statement of the right to apply to set aside (CPR 23.9(3) ; Potanina v Potanin [2024] UKSC 3 at [22], [34]-[35]); Article 5(4) ECHR
(5) Defective transfer foundation	Transfer order of 23 July 2025 made of the court's own motion without the mandatory CPR 3.3(5)(b) set-aside notice; not served on the Respondent to his knowledge; does not name the Respondent; directs correspondence to an obsolete gsi-family email address

57. Any one of Grounds (1)-(3) would be sufficient to render the warrant **void ab initio**. Not merely voidable, but void from inception. The distinction is critical.

A voidable order is one made within jurisdiction but affected by some error; it stands unless and until set aside by the court. A void order is a nullity from the moment it is purportedly made: it has no legal existence, requires no order to set it aside, and cannot be validated by subsequent events or the passage of time.

57AA. As Lord Denning stated in [MacFoy v United Africa Co Ltd](#) [1962] AC 152 at 160:

"If an act is void, then it is in law a nullity... You cannot put something on nothing and expect it to stay there."

57AB. In [Anisminic Ltd v Foreign Compensation Commission](#) [1969] 2 AC 147, the House of Lords confirmed that an order made without jurisdiction is a nullity regardless of whether it appears regular on its face. (HMRC-ORD-003 [Enc-06])

An order made by a court acting outside its jurisdiction is void ab initio as a matter of constitutional principle, not judicial discretion.

57A. Grounds (4)-(5) are further serious breaches of mandatory procedural safeguards which independently require that the transfer and warrant be set aside or discharged. [CPR 3.10](#) provides that a procedural error does not invalidate any step taken unless the court so orders. But that rule presupposes an error within an otherwise valid proceeding. (HMRC-ORD-003 [Enc-06])

57B. Where the entire chain from transfer to arrest was conducted without ever providing the affected party with the mandatory safeguard of the right to challenge - and the result was a liberty-depriving order against a disabled person who did not even know the proceedings existed - the failure transcends procedural error and engages the constitutional principle identified in [Potanina v Potanin](#) [2024] UKSC 3 at [22] and [67].

Together with the jurisdictional grounds, they demonstrate a fundamental failure of both jurisdiction and procedural fairness at every level of the chain from transfer to arrest, and reinforce the conclusion that any reliance on the warrant is unlawful.

A.2.5 [Article 5 ECHR](#): *The Right to Liberty*

58. [Article 5\(1\)](#) of the European Convention on Human Rights provides:

"Everyone has the right to liberty and security of person. No one shall be deprived of his liberty save in the following cases and in accordance with a procedure prescribed by law..."

59. A warrant issued by a court acting without jurisdiction is not "in accordance with a procedure prescribed by law." Any arrest pursuant to the void Order would constitute **unlawful deprivation of liberty** in breach of Article 5, giving rise to a claim for just and appropriate relief, including damages, under [section 8 of the Human Rights Act 1998](#). (HMRC-ORD-002 [Enc-02])
60. In [Khudoyorov v Russia](#) (Application no. 6847/02), ECHR 2005-X, the European Court of Human Rights confirmed that detention is unlawful where a court acts in excess of its jurisdiction.

A.3 The Insolvency Service's Non-Response

61. My letter of 23 January 2026 set out the above analysis in detail. I asked the Insolvency Service to explain the legal basis upon which the County Court at Central London purports to exercise jurisdiction over CR-2024-000527 (HMRC-COR-004 [OR-1226], pp.3-4, 10).
62. Mr Wheeler's response of 27 January 2026 stated:
- "the OR considers the Order and subsequent Warrant for Arrest to be valid. If you do not agree you will need to challenge the Court."*
63. This is not an answer. It is an assertion unsupported by any legal analysis, any statutory reference, any authority. When a litigant in person takes the trouble to set out a detailed jurisdictional objection citing the [Insolvency Act 1986](#), the [Practice Direction: Insolvency Proceedings](#), and binding House of Lords authority, a bare assertion of validity is not a sufficient response.
64. The Insolvency Service has **not identified any statutory provision, rule, or authority** that confers jurisdiction on the County Court at Central London to conduct public examinations or issue arrest warrants in a High Court company winding-up. (HMRC-ORD-001 [Enc-01]; HMRC-ORD-004 [Enc-07]; HMRC-ORD-002 [Enc-02])
65. **I invite it to do so now.** If no such provision exists, the Order is void and should not be enforced.

A.4 The Two Case Numbers

66. The existence of two different reference numbers for the same liquidation is itself evidence of procedural irregularity:

Reference	Court	Status
CR-2024-000527	High Court (ICC)	The actual, lawful case number
1061 of 2025	County Court at Central London	Reference of unknown provenance

67. I ask the Insolvency Service to explain:
- (a) Who created the reference "1061 of 2025"?
 - (b) On what legal basis was this County Court reference assigned to a High Court liquidation?
 - (c) Why does the Order cite "1061 of 2025" rather than the actual High Court reference CR-2024-000527?
68. The inference is inescapable: a County Court reference was created because the County Court could not lawfully issue an Order citing the High Court case number. This cosmetic alteration does not cure the jurisdictional defect. It merely attempts to disguise it. (HMRC-ORD-001 [Enc-01]; HMRC-ORD-004 [Enc-07])

A.5 "Challenge the Court" - A Misdirection

69. Mr Wheeler states that if I do not agree with the Insolvency Service's assertion of validity, I "will need to challenge the Court."
70. With respect, this fundamentally misconceives the legal position regarding void orders.

71. **An order that is void ab initio does not require any challenge. It does not need to be set aside, rescinded, or appealed. It is a nullity, as if it had never been made.** As Lord Denning stated in *MacFoy*, you cannot put something on nothing and expect it to stay there. There is nothing to challenge because there is nothing there.
72. The burden is not on me to bring proceedings to set aside a void order. The burden is on the party seeking to enforce it to demonstrate that it has legal validity. The Insolvency Service has not done so. It has asserted validity without identifying any legal basis.
73. Nevertheless, if the Insolvency Service persists in its current course, I will have no alternative but to issue judicial review proceedings. This letter will form part of the evidence in those proceedings. The Insolvency Service's failure to engage with my jurisdictional argument will be drawn to the Court's attention.

A.6 The Police, the Warrant, and Mr Wheeler's Background

74. I understand that Mr Wheeler is a **former police officer**. This is relevant for the following reasons.
75. As a former police officer, Mr Wheeler will be well aware that:
- (a) Police officers execute warrants that appear regular on their face;
 - (b) Police officers are not lawyers and do not adjudicate the legal validity of court orders before executing them;
 - (c) If a warrant is presented to the police bearing a court seal and a judge's signature, officers will ordinarily execute it regardless of any underlying jurisdictional defect;
 - (d) The police rely on the integrity of the court system. They assume that if a court has issued a warrant, there is lawful authority for it.
76. Mr Wheeler will therefore understand that **the police's willingness to execute a warrant says nothing about its legal validity**. The police would execute this warrant not because it is valid, but because it bears the trappings of validity.
77. **Mr Wheeler's suggestion that I should simply "challenge the Court" if I disagree with the Order's validity is therefore deeply troubling.**
78. The practical effect of Mr Wheeler's position is as follows:
- (a) The Insolvency Service has procured an Order from a court without jurisdiction;
 - (b) That Order, though void in law, bears the appearance of validity (court seal, judicial signature);
 - (c) The police, relying on that appearance, may execute the warrant;
 - (d) I would be arrested. Potentially detained, handcuffed, taken to a police station, and held in custody;
 - (e) Only afterwards would I have the opportunity to "challenge" the Order's validity;
 - (f) By then, the damage would be done. The arrest, the detention, the trauma, the reputational harm.
79. **As a former police officer, Mr Wheeler can reasonably be expected to understand this practical reality.** Police are unlikely to scrutinise the jurisdictional basis of a warrant before execution, and telling me to "challenge the Court" offers no practical protection against imminent arrest. (HMRC-ORD-002 [Enc-02])
80. In these circumstances, Mr Wheeler's continued assertion that the warrant is "valid", without providing any legal basis, while advising me to "challenge the Court" if I disagree, creates a substantial risk that I may be arrested under an order I say is void before any court has determined the jurisdictional issue. (HMRC-ORD-002 [Enc-02])
81. I therefore put the Insolvency Service on notice: **if I am arrested pursuant to this warrant, I will contend that the Service bears responsibility for any unlawful arrest or detention by:** (HMRC-ORD-002 [Enc-02])
- (a) Asserting validity without legal basis;
 - (b) Refusing to engage with my jurisdictional objection;
 - (c) Maintaining or transmitting the warrant for police execution despite the jurisdictional objections set out in this letter;

- (d) Relying on the ordinary practice that police execute warrants appearing regular on their face before any legal challenge can be heard; and
- (e) Doing so against a disabled person who had offered to attend a public examination voluntarily, in the correct court, with reasonable adjustments.

82. This would constitute:

- (a) **False imprisonment** at common law;
- (b) **Unlawful deprivation of liberty** contrary to [Article 5 ECHR](#), actionable under section 8 of the [Human Rights Act 1998](#);
- (c) **Harassment** contrary to [section 26 of the Equality Act 2010](#). Unwanted conduct related to disability having the purpose or effect of violating dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment;
- (d) **Misfeasance in public office**, if the necessary elements are ultimately established; and
- (e) **A serious interference with the rule of law**. Procuring an arrest under a void order while refusing to engage with substantial legal objections would raise grave questions about the proper administration of justice.

83. I invite Mr Wheeler to reflect on whether this is truly the course he wishes to pursue.

A.7 I Want a Public Examination - Not Compliance Through Coercion

84. Let me be absolutely clear about what I am seeking.

85. **I want a public examination.** [Section 133 of the Insolvency Act 1986](#) provides for the public examination of officers of a company in liquidation. This is the proper statutory mechanism for the Official Receiver to obtain information. I am willing to submit to it.

86. What I am **not** willing to do is:

- (a) Submit to arrest under a void warrant issued by a court without jurisdiction;
- (b) Be coerced into providing rushed, incomplete responses to a questionnaire under threat of arrest;
- (c) Be denied the reasonable adjustments to which I am entitled as a disabled person;
- (d) Have my cooperation characterised as "non-cooperation" because I insist on lawful process.

87. Mr Wheeler's email makes clear that the Insolvency Service's approach is coercion, not cooperation. The message is:

“Provide what we demand, in the format we demand, by the deadline we set, or face arrest.”

88. This is not how a public authority should treat a disabled citizen who has **actively cooperated at every stage**:

- (a) On **8 November 2024**, participated by video call in a formal interview conducted by the Official Receiver under [section 235 of the Insolvency Act 1986](#), answered detailed questions, and provided a signed 3-page narrative statement;
- (b) On **17 December 2024**, provided a detailed written response to the Official Receiver's questions, including Starling Bank statements and explanations of the company's financial position;
- (c) On **20 January 2025**, proactively contacted Lloyds Bank to obtain statements and reported the bank's response that only the insolvency practitioner could request them;
- (d) On **7 March 2025**, provided detailed explanations of the Bounce Back Loan, Directors Loan Account, and inter-company transfers despite not having the bank statements needed for accurate figures;
- (e) On **23 January 2026**, responded to the arrest warrant on the same day with a comprehensive 13-page letter;
- (f) Offered, on two separate occasions, to attend a public examination voluntarily;
- (g) Requested reasonable adjustments pursuant to registered HMCTS arrangements (reference 67862925);
- (h) Raised a detailed jurisdictional objection supported by statutory provisions and binding authority.

89. I am not refusing to engage. I am refusing to be bullied. There is a difference.

90. **If the Insolvency Service wants information from me, it should accept my offer to attend a public examination in the correct court.** That is the route I set out in my letter of 23 January 2026 (HMRC-COR-004 [OR-1226], pp. 4, 9). That is the lawful route. That is the cooperative route. That is the route I am offering.

PART B: I WANT A PUBLIC EXAMINATION

Summary

The Applicant has twice offered to attend a public examination voluntarily in the High Court, the court with statutory jurisdiction. The Insolvency Service has ignored both offers. Instead, it demands documents under threat of arrest. The statutory mechanism for obtaining information from a director is a public examination under s.133 IA 1986, not coercion via a void warrant. The Applicant's willingness to cooperate is on the record; the Insolvency Service's refusal to engage with that offer is difficult to reconcile with a stated wish to obtain information.

Key authorities: IA 1986, ss.133, 134; EA 2010, s.20 • **Key paragraphs:** 91–103

B.1 My Offer

91. Let me be absolutely clear about my position.

92. **I want to be publicly examined.**

93. My letter of 23 January 2026 stated at paragraph 22:

"I am willing to provide a formal undertaking to attend a properly constituted public examination in the correct forum with reasonable adjustments."

94. I repeat and amplify that offer now.

95. I am willing to:

- (a) Attend the **High Court (Insolvency and Companies Court)**, being the court with statutory jurisdiction over CR-2024-000527;
- (b) Answer questions under oath;
- (c) Provide whatever information the Official Receiver lawfully requires;
- (d) Do so voluntarily, without the need for any warrant -

provided that:

- (i) The examination takes place in a court with jurisdiction;
- (ii) Reasonable adjustments are made for my documented ADHD and ASD; and
- (iii) I am given reasonable notice (I request at least 28 days).

96. **This is cooperation. This is what I am offering. Why will the Insolvency Service not accept it?**

B.2 The Insolvency Service's Refusal to Engage

97. Mr Wheeler's email of 27 January 2026 makes no reference whatsoever to my offer to attend a public examination.

98. Instead, the email demands documents under threat of arrest:

"we will not request that the Warrant is Discharged until the requested information is provided, however you are liable for arrest until then."

99. This is difficult to reconcile with the statutory scheme. A public examination under [section 133 of the Insolvency Act 1986](#) is the **statutory mechanism** for obtaining information from a director. I am offering to submit to one. The Insolvency Service has not engaged with that offer and instead relies on the threat of arrest.

100. If obtaining information were the Insolvency Service's primary concern, one would expect it to accept my offer.

101. Its refusal to engage with that offer is difficult to reconcile with a stated wish to obtain information.

B.3 The Proper Course

102. The proper course is as follows:

- (a) The public examination should be restored to the list in the **High Court (Insolvency and Companies Court)**, being the court with statutory jurisdiction;
- (b) I should be given at least 28 days' notice of the hearing date;
- (c) Reasonable adjustments should be implemented pursuant to my registered HMCTS reference 67862925 and the [Equality Act 2010](#);
- (d) The void arrest warrant should be discharged, or at minimum not executed pending determination of the jurisdictional question;
- (e) I will attend voluntarily and answer questions.

103. This represents a lawful, proportionate, and effective way to achieve the Insolvency Service's legitimate objectives. I invite it to confirm acceptance of this course within 14 days.

PART B.5: DEMANDING DOCUMENTS WHILST WITHHOLDING THEM

Summary

The Official Receiver demands financial information that can only be provided accurately with the company's bank statements. The Official Receiver has those bank statements, has used them to question the Applicant, and has refused to share copies despite a formal request made on 20 January 2025. The result is a compliance impasse: the Applicant is threatened with arrest for not providing information that cannot fairly be provided without documents in the Official Receiver's possession.

Key authorities: IA 1986, ss.235, 236 • **Key paragraphs:** 104–123

B.5.1 The Official Receiver's Demands

104. Mr Wheeler's email of 27 January 2026 states that the warrant will not be discharged until I provide:

- (a) A completed and signed PIQC booklet;
- (b) Clarification on payments and Directors Loan Account;
- (c) Copies of the company's books and records.

105. I note this position. I address below why compliance is currently not realistically possible because the necessary records are not available to me.

B.5.2 The Bank Statement Request: Made, Acknowledged, and Then Ignored

106. Completion of the PIQC requires accurate information from the company's bank statements. Without bank statements, I cannot provide reliable figures for:

- Directors' Loan Account balance
- Payment clarifications
- Cash flow analysis
- Any financial data in the PIQC

106A. The irony is that **Mr Wheeler himself recognised the need for bank statements**. Following my section 235 interview on 8 November 2024, Mr Wheeler emailed me on **13 November 2024** requesting, among other things: (HMRC-COR-003)

“*bank statements for both accounts from 01 January 2020 till the company ceased trading.*”

Mr Wheeler knew that bank statements were essential. He asked me to provide them. I could not, because, as I subsequently discovered, only the insolvency practitioner has the authority to request them from the bank.

106B. On **21 January 2025**, the day after my email, Mr Wheeler responded by asking me for the Lloyds sort code and account number. He then obtained the Lloyds Bank statements.

On **7 March 2025**, Mr Wheeler emailed me quoting specific Lloyds Bank transactions and attaching a spreadsheet of Lloyds data (“Mastermind Lloyds BBL.xlsx”). **Mr Wheeler confirmed to me by telephone that he had obtained the Lloyds Bank statements.**

106C. Mr Wheeler therefore **has** the Lloyds Bank statements. He has had them since at least March 2025. He has used them to interrogate me about specific transactions. But he has **never provided copies to me.**

I am being asked to explain, from memory and without records, transactions that the Official Receiver can see in front of him but will not share. This is not a failure on my part to obtain documents. It is a position in which the records needed for compliance are held by the Official Receiver but not shared with the person being asked to answer.

106D. The position is made worse by Mr Wheeler's communications with third parties. On **13 December 2024**, Mr Wheeler asked the **defendants' solicitors (Shoosmiths LLP)** for the company's bank account details. He was communicating with the parties who had an interest in the company's claims failing, while refusing to share the banking information with the director who was trying to cooperate.

107. On **20 January 2025**, I emailed Mr Wheeler requesting the company's bank statements. I informed him that I had contacted Lloyds Bank directly and that **Lloyds Bank had confirmed that only the insolvency practitioner is authorised to request these documents.** This request was made because:

- (a) The Official Receiver has statutory powers to obtain information and documents about the company's affairs. In particular, the court may make orders under [section 236 of the Insolvency Act 1986](#) compelling any person, including financial institutions, to produce documents relating to the company;
- (b) Banks will respond to the Official Receiver's statutory demands;
- (c) I, as a former director of a company in liquidation, have **no such powers.** Lloyds Bank explicitly confirmed this to me. Banks will not provide company records to a former director. The continued non-disclosure of those bank statements also prevents me from relying on records that may bear on the company's trading revenue, the receipt of investment funds, and the valuation issues arising in my damages claims; and
- (d) The Official Receiver, as liquidator, has custody of the company's affairs and records.

108. **My request was ignored.** Mr Wheeler never responded to the bank statement request. No bank statements were provided, and no explanation for the refusal was given. It has now been over thirteen months since that request. The bank statements have still not been provided.

109. On 7 March 2025, Mr Wheeler emailed me quoting specific transactions from **both** the Starling and Lloyds accounts. He listed transfers labelled “SAVINGS ACCOUNT” and “Directors Loan” from the Starling statements, and stated: (HMRC-COR-003)

“With regards to the attached Lloyds account, over the three months post BBL payment there are transfers to DLA and savings account totalling £43K.”

He attached a Lloyds spreadsheet. The “savings account” transfers were simply inter-company transfers between the company’s own Starling and Lloyds accounts, a fact that was **apparent from the same documents Mr Wheeler was reading.**

Mr Wheeler had the Lloyds statements in front of him. He could see the corresponding receipts. Yet he demanded that I explain the transfers, without providing me with copies of the documents he was looking at.

109A. Mr Wheeler also demanded clarification of the Directors Loan Account and Bounce Back Loan payments. As I explained to him on 7 March 2025, the DLA included my salary (approximately £11,000 per month), and I could

not provide accurate DLA figures without reasonable adjustments to allow me to bring the company's bookkeeping up to date, which in turn required the bank statements.

Mr Wheeler's response was to threaten a public examination if the information was not provided (email of 29 April 2025). At no point did he provide the bank statements.

B.5.3 The Resulting Compliance Impasse

110. The Official Receiver's position is therefore as follows:

Step	Action	Effect
1	OR obtains Lloyds Bank statements	OR has the documents
2	I request copies (20 January 2025)	Ignored; no copies provided
3	OR quotes Lloyds data to me (7 March 2025)	OR uses statements to interrogate me
4	OR demands I explain DLA/BBL/savings transfers	I cannot answer accurately without the documents OR is looking at
5	OR threatens public examination (29 April 2025)	Punishment for inability to answer from memory
6	OR obtains arrest warrant (19 November 2025)	Coercion for impossible compliance

111. This is not a fair or workable method of enforcement. **It creates a compliance impasse.**

112. The Official Receiver cannot lawfully:

- (a) Obtain bank statements and refuse to share copies with the director;
- (b) Use those statements to interrogate the director about specific transactions while denying the director access to the same documents;
- (c) Demand that the director explain from memory transactions (DLA, BBL, inter-company transfers) that the Official Receiver can see in writing;
- (d) Threaten arrest for failing to provide accurate information when the documents needed for accuracy are in the Official Receiver's possession and have been withheld for over thirteen months despite request.

113. The duty of cooperation under [section 235 IA 1986](#), whilst imposed on the director, must as a matter of natural justice be accompanied by access to the records necessary for meaningful compliance. The office-holder cannot demand cooperation while simultaneously withholding the documents without which cooperation is impossible.

B.5.4 Impossibility of Performance

114. At law, a person cannot be punished for failing to do the impossible. The maxim **impossibilium nulla obligatio est** applies with full force: a party cannot be held liable for failing to perform what is beyond their power.

115. Where:

- (a) Performance requires information held by another party;
- (b) That party refuses to provide the information despite request;
- (c) The person has no independent means of obtaining it;

...then non-performance is not culpable and cannot be sanctioned.

116. Any arrest for failing to provide information that the Official Receiver has withheld would be:

- (a) **Liable to challenge as unlawful.** It would amount to punishing impossibility;
- (b) **Procedurally unfair.** It would create apparent non-compliance by withholding the records needed to comply;

- (c) **A breach of natural justice.** No fair opportunity to comply would have been given; and
- (d) **Potentially supportive of a misfeasance argument,** if the necessary elements were ultimately established.

B.5.5 The Remedy

117. If the Official Receiver wishes me to complete the PIQC, they must:
- (a) Exercise their powers under sections [234](#), [235](#) and [236 IA 1986](#) to obtain the bank records; and
 - (b) Provide those records to me.
118. Upon receipt of the bank statements, I will complete the PIQC within **14 days** or such longer period as my reasonable adjustments require.
119. I am **willing to cooperate**. I am **unable to cooperate** because the Official Receiver has withheld the documents necessary for cooperation.
120. The present delay is materially caused by the Official Receiver's failure to provide the bank statements I requested.

B.5.6 The Pattern

121. This bank statement issue mirrors the exact pattern I have experienced across every institution:

Institution	Obstruction	Then Punish For...
HMRC	Refused reasonable adjustments despite doctor's letter	Company wound up; bank closed
Courts	Withhold transcripts	Not appealing properly
JCIO	Ignore complaints	"No complaints on record"
ICO	Ignore SAR	"No evidence of misconduct"
Official Receiver	Withhold bank statements while demanding explanations; abandon claims worth millions under pressure from defendants' solicitors; fail to discover pre-winding-up assignment of claims	Not completing PIQC; arrested for impossible compliance
DWP	No adjustments for disability	Universal Credit closed

122. In each case, the institution creates the impossibility, then punishes the victim of that impossibility.
123. I do not accept that this is my failure. The pattern I have experienced is one of institutional obstruction, and I am documenting it for the Court of Appeal.

B.5.7 The Abandonment of the Company's Claims

- 123A. The Official Receiver's conduct becomes even more remarkable when considered alongside the Deputy Official Receiver's decision to abandon the company's legal claims.
- 123B. The context is important. On **25 February 2025**, the defendants' solicitors (Shoosmiths LLP) wrote to the Official Receiver demanding that assignment be refused and threatening the Official Receiver with **£200,000 in costs** if assignment were granted. Shoosmiths stated that the claims were "entirely baseless and devoid of legal merit" and threatened security for costs applications against the Official Receiver personally.
- 123C. Within ten days of receiving this threat, on **7 March 2025**, the Deputy Official Receiver [REDACTED] emailed me to confirm that the claims would not be assigned:

"I will be advising the solicitors for the defendants in both cases that the claims will not be assigned."

On **10 March 2025**, she wrote to Shoosmiths confirming that the Official Receiver would **not be continuing either of the company's claims** against Chelsea Harbour (BL-2024-001089) or LRP/Vista Sheraton (BL-2024-001166), and would **not be assigning either claim**. The reason given was that the Official Receiver had "no funds to obtain the legal advice I need to enable me consider the possibility of an assignment."

- 123D.** The significance of this decision cannot be overstated. The company's claims against these Defendants include claims for unlawful forfeiture, **conversion of chattels** (strict liability under the [Torts \(Interference with Goods\) Act 1977](#)), **copyright infringement** ([CDPA 1988](#)), **disability discrimination** ([Equality Act 2010, s.20](#) and [s.29](#)), harassment, breach of the licence agreement, and consequential loss.

Chelsea Harbour did not merely padlock the premises, it sold the contents, including the company's intellectual property and e-learning modules, **to a competitor**, without providing the statutory notice required by sections [12-13](#) of [TIGA 1977](#). That allegation is expressly particularised in the BL-2025-000147 Part 7 claim form and attached particulars of claim (LRP-CLM-001 [OR-704]). The Defendants' own Defence contains binding admissions of lockouts without notice, failure to make reasonable adjustments, and causation of business disruption.

The company's revenue fell from **£624,568 (2022) to £5,612 (2024)** as a direct result of the Defendants' conduct. The potential value of these claims, including loss of business, loss of the licence premium, loss of fixtures and fittings, and aggravated and exemplary damages, runs to **millions of pounds**. These are assets of the company in liquidation. Their value would benefit creditors.

- 123E.** Within 22 minutes of Ms Hallamore's email, I replied asking to discuss the matter by telephone. It was too late: the decision had been made. The Official Receiver had "no funds" to obtain legal advice on whether to assign claims worth millions, yet subsequently found the resources to pursue a public examination application, a transfer application, and an arrest warrant against me. No reasonable adjustments were offered for the assignment timeline despite my documented ADHD and ASD. (HMRC-ORD-002 [Enc-02])

- 123F.** The Official Receiver's position is therefore that:

- (a) The company's claims against the Defendants, worth potentially millions of pounds and representing the company's single most valuable asset, are **abandoned under pressure from the defendants' solicitors**;
- (b) The company's bank statements, needed for the director to cooperate, are **withheld**;
- (c) The director, who caused none of this, is **threatened with arrest**.

- 123G.** The Official Receiver is simultaneously abandoning the assets that could pay creditors while threatening to imprison the person who could have realised those assets. This is not the conduct of an office-holder acting in the interests of creditors. It is the conduct of an office-holder who has capitulated to pressure from the very parties who caused the company's destruction.

- 123GA.** The Official Receiver's investigation was so inadequate that they failed to discover a fundamental pre-winding-up provision. The Particulars of Claim against LRP/Vista, signed with a **Statement of Truth on 25 April 2024** and sent to LRP/Vista by email on **26 April 2024**, five months before the winding-up order of 25 September 2024, expressly provides for the **assignment of the company's business-related causes of action to me personally in the event of liquidation**. The assignment covers all of the company's claims, not merely those against LRP/Vista. The provision states: (HMRC-ORD-004 [Enc-07])

"In the event that Mastermind Group Ltd Liquidates these claims are specifically assigned to Michael Darius Eastwood in addition to his personal claim, as the main claimant, to maintain their viability independent of the corporate status of Mastermind Group Ltd."

The covering email of 26 April 2024 made this explicit:

"even in the event of Mastermind Group Ltd's liquidation, the structure of this claim permits me to continue pursuing legal action to protect my interests."

123GAA. The assignment provision was not confined to the April 2024 correspondence. The same concept was carried forward into the **sealed Amended Particulars of Claim** in the issued proceedings (BL-2024-001166), signed with a Statement of Truth on **21 August 2024**, which at §10.3 confirmed that the Claimants had:

“*outlined a provision for the continuation of business-related claims by Michael Darius Eastwood*”

to be pursued “*irrespective of the corporate status of Mastermind Group Ltd.*” This was a document filed in the High Court, Business and Property Courts. The assignment of the company’s causes of action to me personally was therefore expressed twice, in two separate documents verified by Statements of Truth, before the winding-up order was made.

123GAB. The formal deed of assignment was not separately executed as a standalone document, a failure attributable to the very ADHD and ASD conditions for which the Official Receiver and the courts have refused reasonable adjustments. But the intent was unambiguous, expressed in documents verified by Statements of Truth and filed before the winding-up order was made. The Official Receiver was unaware of any of this when the Deputy Official Receiver decided to abandon the claims in March 2025. (HMRC-ORD-004 [Enc-07])

123GAC. **The absence of a formal deed of assignment does not defeat the assignment in equity.** The principle in [Walsh v Lonsdale](#) (1882) 21 Ch D 9 is that equity treats as done that which ought to be done: an agreement to assign, supported by consideration or made by way of deed, takes effect as an equitable assignment even absent compliance with formal requirements.

Choses in action, including causes of action in tort and contract, are assignable in equity without formality: [Norglen Ltd v Reeds Rains Prudential Ltd](#) [1999] 2 AC 1 (HL).

123GACAThe assignment provision was expressed in documents verified by Statements of Truth (the Particulars of Claim dated 25 April 2024 and the sealed Amended Particulars of Claim dated 21 August 2024), communicated to and received by the intended obligor (LRP/Vista, via their in-house solicitor Marco Mandelli), and made for good consideration (the preservation of the director’s personal claims in the event of the company’s liquidation). These are the classic ingredients of an equitable assignment.

123GACBThe assignment took effect on **26 April 2024**, five months before the winding-up order of 25 September 2024. By the date of the winding-up order, the causes of action had already passed from the company to me in equity. (HMRC-ORD-004 [Enc-07])

Per [Re Saunders](#) [1997] Ch 60, an asset that has been effectively assigned ceases to be the property of the company and does not vest in the liquidator. The Official Receiver therefore has no proprietary interest in these causes of action and no standing to abandon them.

123GAD. **It follows that Master Kaye’s dismissal of the s.130(2) application as “totally without merit” on 5 February 2025 was legally erroneous.** [Section 130\(2\) of the Insolvency Act 1986](#) requires leave of the court to commence or continue proceedings *against the company*. It does not apply to proceedings brought *by* a director in his personal capacity, still less to causes of action that were assigned to him before the winding-up order. (HMRC-ORD-003 [Enc-06]; HMRC-ORD-004 [Enc-07])

123GADAThe application was not, as Master Kaye characterised it, an attempt to pursue company claims without leave; it was an application for clarification of standing in proceedings that included personal claims (the Second Claimant) alongside company claims that had been assigned pre-liquidation.

123GADBEEven if the equitable assignment were debatable, and it is submitted that it is not, an arguable question of law about the validity and effect of a pre-liquidation assignment cannot rationally be characterised as “totally without merit” within the meaning of [CPR PD 3C](#). Per [Wasif v Secretary of State for the Home Department](#) [2016] EWCA Civ 82, TWM is confined to cases properly described as “bound to fail”.

An application raising [Walsh v Lonsdale](#), [Norglen](#), and [Re Saunders](#) is not bound to fail on any view. The TWM certification was itself a nullity, both because it was void under the MHCM (Day 39) and because it did not meet the substantive threshold for TWM certification.

123GB. This raises serious questions. First, a competent office-holder would have investigated the company’s pre-winding-up transactions before abandoning claims worth millions of pounds. The Official Receiver did not do so.

Second, **LRP/Vista had actual notice** of the assignment provision. The Particulars of Claim were sent to them on 26 April 2024 and their in-house solicitor, **Marco Mandelli**, received, reviewed, and responded to them. The assignment provision in Section 10 was part of the document he reviewed.

When **Shoosmiths LLP** subsequently took over conduct of the defence and wrote to the Official Receiver on 25 February 2025 demanding that assignment be refused, they were acting for clients who had been on notice of the assignment provision for ten months. The question arises: did Shoosmiths or their clients disclose the existence of Section 10 to the Official Receiver? If they did not, their conduct in pressuring the Official Receiver to refuse assignment of claims that had already been the subject of a documented assignment provision raises its own questions of professional propriety.

123GC. Whether or not the assignment would ultimately withstand scrutiny under the [Insolvency Act 1986](#), the point is that the Official Receiver **never investigated**. No reasonable office-holder would abandon claims worth millions within ten days of receiving a threatening letter, without first examining whether those claims had been the subject of pre-winding-up transactions, and without the company’s bank statements that would have informed the assessment of their value.

The Official Receiver’s failure to discover the assignment is emblematic of the superficiality of their investigation into the company’s affairs as a whole.

B.5.8 Mr Wheeler's Misrepresentation to Third Parties

123H. On **31 July 2025**, Mr Wheeler emailed the defendants’ solicitors (Shoosmiths LLP) stating:

“We haven’t had any further contact with the Director, we are considering calling for his Public Examination at Court.”

123I. This statement is inconsistent with the chronology. By 31 July 2025, I had:

- (a) Participated by video call in a formal section 235 interview conducted by the Official Receiver on **8 November 2024**;
- (b) Provided a detailed written response with Starling Bank statements on **17 December 2024**;
- (c) Emailed Mr Wheeler about the Lloyds Bank statements on **20 January 2025**;
- (d) Provided detailed explanations of the BBL, DLA, and inter-company transfers on **7 March 2025**.

123J. Mr Wheeler’s statement to the defendants’ solicitors that there had been “no further contact” was inaccurate against the chronology set out above. Its effect was to present a director who had engaged with the Official Receiver as if he had not done so, in the context of a proposed public examination and later coercive steps.

The statement was made to the solicitors for parties against whom the company had substantial claims, shortly after the Official Receiver had decided not to pursue those claims. That made the inaccuracy particularly serious.

123K. A public official making inaccurate statements to third parties about a disabled person's cooperation, in a context that may expose that person to coercive action, is conduct of serious concern. Depending on the facts and state of mind ultimately established, it may also engage the tort of **misfeasance in public office**. I reserve all rights in this regard.

PART B.6: THE HMRC FAILURE - WHERE THIS ALL BEGAN

Summary

The winding-up of Mastermind Group Ltd was caused by HMRC's refusal to make reasonable adjustments for the Applicant's ADHD, despite receiving a consultant psychiatrist's report. HMRC refused on 22 February 2024, one day after receiving the medical evidence, without acknowledging the disability. Pending VAT returns would have reduced the £243,153.08 debt by over £200,000. Two converging tracks of discrimination, by HMRC and by the courts, caused the insolvency now being enforced.

Key authorities: EA 2010, [ss.20–21, 149](#); [Billington v Davies](#); [Godwin v Swindon BC](#) • **Key paragraphs:** 124–128

B.6.1 The Origin of the Winding-Up

- 124.** The winding-up of Mastermind Group Ltd did not occur in a vacuum. It occurred because HMRC refused to provide reasonable adjustments despite being notified of my disability.
- 125. Prior to the winding-up petition being gazetted**, on 21 February 2024, I sent HMRC Debt Manager Mrs S Huntley a detailed letter which:
- (a) Expressly disclosed my ADHD diagnosis, stating that it “profoundly affects my organisational capabilities and focus, especially under stress”;
 - (b) Enclosed a medical report from Dr James Woolley, Consultant Psychiatrist, confirming the diagnosis and its impact on my capacity for financial management;
 - (c) Requested reasonable adjustments pursuant to [sections 20–21](#) of the [Equality Act 2010](#), including extended deadlines and alternative communication methods; and
 - (d) Explained that significant unclaimed VAT receipts, Film Tax Credits, and R&D claims existed which, if time were allowed to file, would substantially reduce or eliminate the alleged debt.
- 125A.** HMRC’s response, sent by Mrs Huntley on **22 February 2024**, one day later, did not acknowledge my disability, did not address the medical evidence, did not engage with the reasonable adjustment request, and did not consider the potential reduction in the debt. The response stated in its entirety: (HMRC-COR-001 [Enc-05]; HMRC-COR-002 [Enc-08])
- “As advised in our telephone conversations on the 8/2/24 & 12/2/24, this is aged debt and the company has outstanding VAT and Corporation Tax returns. HMRC will be continuing with our action and will be seeking a Winding Up Order at the hearing. The advert will be placed in the London Gazette. Full settlement of the petition debt is required.”*
- 126. HMRC refused to make any reasonable adjustment whatsoever.** They did not acknowledge my disability. They did not consider whether extended deadlines were appropriate. They proceeded to gazette the petition for a debt of **£243,153.08** and the company’s bank account was closed, making it impossible to trade or pay the debt. (HMRC-COR-001 [Enc-05]; HMRC-COR-002 [Enc-08])
- Pending VAT returns would have reduced the liability by over £200,000. An R&D tax credit claim worth over £250,000 was blocked entirely by the winding-up order. The debt that destroyed the company was likely a net credit in HMRC’s favour, but HMRC never allowed the filings that would have demonstrated this.
- 127.** The winding-up of Mastermind Group Ltd was not a standalone commercial failure. It was the product of two converging tracks of discrimination - one by a public body, the other by the courts - each of which independently caused catastrophic harm, and which together produced the cascade that now threatens my liberty.
- 127A. Track 1 - HMRC: the first discrimination.** LRP/Vista’s harassment led to Chelsea Harbour’s unlawful forfeiture, which destroyed my ability to operate the business. Chelsea Harbour then sold the company’s intellectual property, e-learning modules, and physical business assets to a competitor, without the statutory notice required by sections [12–13](#) of [TIGA 1977](#), thereby rendering business recovery impossible.

A £600,000 investment that was under active negotiation was withdrawn by the investor specifically because of the operational instability caused by Chelsea Harbour's conduct. Revenue collapsed from £624,568 (2022) to £5,612 (2024). Bank accounts were closed in March 2024.

Without a functioning business, office, or bank accounts, I could not pay an accountant to file R&D tax credit applications and VAT returns. The HMRC liability accumulated not through evasion but because the Defendants' unlawful conduct had destroyed the infrastructure needed to comply.

127B. I notified HMRC of my disability on 21 February 2024. I sent a medical report from Dr James Woolley, Consultant Psychiatrist. I requested reasonable adjustments and additional time. On 22 February 2024, Mrs S Huntley of HMRC Enforcement and Insolvency Services refused, without even acknowledging the disability or the medical evidence. (HMRC-COR-001 [Enc-05]; HMRC-COR-002 [Enc-08]; MDE-MED-002 [Enc-09])

Had HMRC granted those adjustments, as [Equality Act 2010, s.20](#) required, I could have engaged with the process, explained the circumstances, filed the outstanding VAT returns that would have reduced the £243,153.08 debt by over £200,000, and agreed a time-to-pay arrangement. The petition need never have been gazetted.

Instead, HMRC proceeded. The Gazette notice was published. The company's remaining bank facilities were terminated. On 25 September 2024, the winding-up order was made. HMRC's refusal of reasonable adjustments was the proximate cause of the winding-up.

127B-i. Even the **Official Receiver took a neutral position** on my rescission application. In her report dated 15 November 2024, Deputy Official Receiver [REDACTED] confirmed that rescission would not adversely impact creditors and noted that my plan to resolve debts through litigation and tax adjustments had merit, "underscoring that liquidation may not achieve better outcomes for creditors." (HMRC-RPT-001 [Enc-11])

On 23 October 2024, ICC Judge Barber heard the initial application (with Benedict Evans of counsel instructed via the COIN scheme) and ordered that I be joined as an applicant, with the rescission adjourned for directions. The rescission was being actively pursued through proper channels. The process was disrupted by the MHCM moratorium and the cascade of subsequent procedural failures documented in this letter.

127C. Track 2 - The courts: discrimination beginning 7 June 2024. The second track of discrimination began on 7 June 2024 at the hearing before HHJ Kelly in the King's Bench Division. It is that hearing which is the subject of the appeal in CA-2024-001353, already before the Court of Appeal. On that date:

- (a) I applied for an interim injunction to preserve my business premises;
- (b) Chelsea Harbour's counter-application was served less than 3 days before the hearing, contrary to [CPR 23.7\(1\)\(b\)](#);
- (c) I had not read the counter-application. I requested that the hearing be split. That request was refused;
- (d) I was forced to respond to an application I had never seen, without reasonable adjustments for my ADHD and ASD;
- (e) The judge did not determine whether the forfeiture was lawful. She admitted she "*didn't know*" (¶44 of the approved transcript), yet granted Chelsea Harbour's injunction anyway;
- (f) Critically, **HHJ Kelly explicitly preserved my right to bring a substantive claim**. The approved transcript records at ¶50:

 | "*It however remains open to the claimants to bring a substantive claim should they so wish.*"

At ¶47, she confirmed:

 | "*Any actionable losses arising from the forfeiture and loss of chattels would be capable of being reflected in damages.*"

The Defendant's own solicitor subsequently misrepresented this in a sworn witness statement to Master Kaye, claiming this was "*the end of the proceedings, with no further claim permissible*" (Ross ¶15), a direct fabrication contradicted by the approved transcript;

- (g) I was ordered to pay £10,000 in costs. An injunction was imposed that has now been in place for over 18 months with no return date listed.

127D. That hearing was the moment the courts began discriminating against me. Every subsequent judicial failure across Chancery, the County Court, and the Insolvency Court repeated the same pattern. The pattern includes:

- (a) Default judgment applications denied for 533, 259, and 510 days across three claims, despite the Defendants filing no Defence in the High Court (or, in BL-2024-001166, a Defence filed 27 days late in void County Court proceedings, without [CPR 3.9](#) relief, which is ineffective for defeating default judgment per [Billington v Davies](#) [2016] EWHC 1919 (Ch)).

The mechanism by which default judgment was blocked is itself revealing and involved **three interlocking devices**:

First, Chelsea Harbour used the £10,000 costs order from the King's Bench interim injunction hearing (HHJ Kelly, 7 June 2024) to apply for a stay of the Chancery proceedings.

Second, Deputy Master Glover's order dated 1 October 2024 (for the hearing on 18 September 2024) at paragraph 14 adjourned "*the remainder of the Claimants' Applications*" until determination of the Stay Application, which encompassed my N227 default judgment request filed on 4 September 2024, thereby converting an **automatic** procedural entitlement under [CPR 12.3](#) into a discretionary matter subordinated to the Defendant's stay application. The sealed order was drawn by the Defendant's solicitors (Harold Benjamin). I contend that the breadth of this "adjourn all" clause was not ordered by the judge at the hearing, and that the clause was inserted by the Defendant's solicitors into the draft order, a contention I am unable to verify because the Chancery Division has refused to provide transcripts of the 18 September 2024 hearing.

Third, Master Kaye on 6 February 2025 expressly acknowledged both my N227 and N244 applications for default judgment (Ruling ¶51(f), ¶60) but dismissed my request to prioritise them, holding that default judgment "would in any event have to follow behind any consideration of strike out, summary judgment." An N227 default judgment under [CPR 12.3](#) is **not** a discretionary remedy, it is a mandatory entitlement when the conditions are met ([Godwin v Swindon BC](#) [2001] EWCA Civ 1478).

By the time of the 6 February hearing, the Defence deadline had expired by over five months with no Defence filed. I asked the Court of Appeal **multiple times** to stay the costs order, which was itself under appeal in CA-2024-001353, but the Court of Appeal declined to intervene. The Defendant thus obtained a procedural shield from a costs order that was under appeal, preventing me from obtaining the default judgment to which I was entitled, while filing no Defence whatsoever;

- (b) The ultra vires transfer of BL-2024-001166 by Master Clark the day after issue, before service, without notice, followed by the deletion of my set-aside application from CE-File;
- (c) The void LCRO imposed during the MHCM protected period, seven days after my formal complaint, by the very judge I had complained about;
- (d) Twelve requests for reasonable adjustments, zero granted;
- (e) Twenty-two procedural outcomes in favour of the Defendants, zero in my favour.

127E. The convergence. The two tracks converge at the winding-up. HMRC's refusal of reasonable adjustments (Track 1) caused the winding-up order. The courts' systematic denial of default judgment (Track 2) deprived me of the funds that would have prevented it. (HMRC-COR-001 [Enc-05]; HMRC-COR-002 [Enc-08]; HMRC-ORD-004 [Enc-07])

Had either track been broken at any point - had HMRC provided adjustments, or had the courts entered the default judgments to which I was entitled - the winding-up would not have occurred, the insolvency proceedings would not exist, and the void arrest warrant would never have been issued.

128. From the winding-up order flows everything: CR-2024-000527, the public examination, the procedurally defective transfer to the County Court, and the jurisdictionally void arrest warrant.

I did not cause the winding-up of Mastermind Group Ltd. HMRC's discrimination caused it. The courts' denial of my lawful remedies facilitated it. And the Insolvency Service now proposes to arrest me for the consequences.

PART B.7: THE DWP FAILURE - CASCADING HARM

Summary

The DWP closed the Applicant's Universal Credit claim after he missed disability-related meetings whilst managing five concurrent court files. His work coach's multiple requests for a Work Capability Assessment were ignored for two years. A Mandatory Reconsideration was "lost." The DWP is the fourth public body to form part of the documented pattern of institutional failure. The Applicant now faces homelessness, £72,540 in rent arrears, and the threat of arrest simultaneously.

Key authorities: EA 2010, [ss.15, 20](#); [ECHR Art. 8](#) • **Key paragraphs:** 129–135

B.7.1 Universal Credit Closure

- 129.** The harm has cascaded further. During this period of litigation and institutional obstruction, my Universal Credit claim was **closed by the Department for Work and Pensions**.
- 130.** The closure occurred because I missed disability-related meetings. These were meetings I was unable to attend due to:
- (a) The cognitive demands of managing multiple complex legal proceedings across five court files;
 - (b) My ADHD and ASD, which make executive function and scheduling extremely difficult;
 - (c) The overwhelming administrative burden created by the courts' fragmentation of proceedings and failure to provide reasonable adjustments;
 - (d) The mental health crisis that led to my MHCM certification.
- 131.** The DWP was aware of my disabilities. They failed to make reasonable adjustments for a disabled claimant overwhelmed by litigation caused by other institutions' failures. The specifics are damning:
- (a) My work coach, Dipak, requested a Work Capability Assessment multiple times over a two-year period (February 2024 to February 2026). These requests were ignored by the DWP. No WCA was arranged;
 - (b) On 3 September 2025, I submitted a Mandatory Reconsideration on a 72-day sanction (over £900 deducted), explicitly citing my disabilities and the [Equality Act 2010](#);
 - (c) On 4 September 2025, within 24 hours of my asserting disability rights, my claim was subjected to a full Claim Review. This led directly to my claim being wrongfully closed on 20 October 2025;
 - (d) My September 2025 Mandatory Reconsideration was "lost" by my case manager, Conor. It was not raised for over five months despite repeated requests;
 - (e) On 16 February 2026, I finally received a Limited Capability for Work and Work-Related Activity (LCWRA) award, but only after starting an entirely new claim to bypass whoever was blocking my original one;
 - (f) The two-year delay in processing the WCA has cost me approximately £9,300 in LCWRA payments to which I was entitled;
 - (g) I have filed a formal Letter Before Action with the DWP Legal Department on 18 February 2026, notifying them of my intention to seek judicial review in the Court of Appeal.
- 132.** The DWP is now the fourth public body to form part of the documented pattern of institutional failure. I intend to include the DWP in the consolidated judicial review proceedings before the Court of Appeal.
- 133.** I am now:
- (a) Without income from my destroyed business;
 - (b) Owed approximately £9,300 in LCWRA arrears by the DWP;
 - (c) Facing £72,540+ in rent arrears;
 - (d) At risk of homelessness;
 - (e) Under threat of arrest;
 - (f) Without access to my belongings (held in my former office for over 20 months).

134. This is the human cost of systematic institutional obstruction of a disabled person's access to justice.
135. I set this out not for sympathy, but so that the Insolvency Service understands the full context when it considers whether to execute an arrest warrant obtained through jurisdictional error and maintained against a background of unresolved compliance obstacles. (HMRC-ORD-002 [Enc-02])

PART B.8: THE TRANSCRIPT OBSTRUCTION - EVERY COURT, EVERY REQUEST, NOTHING PROVIDED

Summary

The Applicant has requested hearing transcripts from every court that has heard matters in his proceedings: Chancery Division, County Court, Insolvency Court, Court of Appeal, and King's Bench Division. Not one full hearing transcript has been provided. The King's Bench provided a judgment-only transcript, which does not record the conduct during the hearing. Without transcripts, the Applicant cannot prove discrimination, bias, or procedural irregularity on appeal. This is systematic suppression of evidence.

Key authorities: [Scott v Scott](#) [1913] AC 417; [Cape Intermediate Holdings v Dring](#) • Key paragraphs: 136–148

B.8.1 The Fundamental Right

136. Hearing transcripts are essential to the administration of justice. Without them:
- (a) Parties cannot prove what was said or decided;
 - (b) Appeals cannot be properly pursued;
 - (c) Errors cannot be evidenced;
 - (d) The principle of open justice is defeated.
137. Transcripts are a matter of **public interest**. The public has a right to know how courts conduct proceedings. Litigants have a right to prove what occurred.

B.8.2 My Requests

138. I have requested transcripts from **every court** that has heard matters in my proceedings:

Court	Hearings	Transcript Requests	Transcripts Received
Chancery Division	Multiple (2024-2025)	Multiple EX107	NONE
County Court (Central London)	Multiple (2024-2025)	Requested via EX107	NONE (form rejected - see below)
Insolvency and Companies Court	Multiple (2024-2025)	Requested	NONE
Court of Appeal	CA-2024-001353	Requested	NONE
King's Bench Division	7 June 2024	Requested	JUDGMENT ONLY (see below)

139. The King's Bench Division provided a transcript of the **judgment only**, not of the full hearing. It is the conduct *during* the hearing that constitutes the evidence of discrimination: how the hearing was conducted, what was said, what applications were refused, and how I was treated.
- The judgment transcript does not record any of this. It records the outcome, not the process. The process is what was unlawful.
- 139A. The County Court at Central London rejected my EX107 transcript request on the ground that I had ticked two different transcription companies on the form. Rather than contacting me to clarify or simply selecting one transcriber and processing the request, the court returned the form and required me to complete it again from scratch. I did not resubmit. The effect of the rejection was permanent: no transcript was ever provided for either

the DDJ Wood hearing (20 December 2024) or the Recorder Cohen hearing (19 August 2025). A reasonable adjustment would have been for the court to process the form as submitted.

In the same correspondence, the court addressed me as "Mr Darius" rather than "Mr Eastwood", demonstrating that the court had not properly read even the name on the form it was rejecting.

- 139B.** This is the same County Court that failed to recognise that I was on the Breathing Space Moratorium, suggested that I needed to "challenge" void orders through a formal application - despite the Defendants never having served a sealed application on me before obtaining their own orders - and refused to acknowledge that my application was filed in time when I filed it the day before the hearing. (MDE-MHCM-001 [Enc-03])

The court knew about my disability. The court knew I was on Breathing Space and had mental health conditions. These are not administrative oversights. They are a pattern of institutional indifference to a disabled litigant's rights.

B.8.3 Why This Matters

- 140.** Without transcripts, I cannot prove:

- (a) That I raised the MHCM on the record at the 6 February 2025 hearing;
- (b) That sealed orders differ from what was actually pronounced;
- (c) That reasonable adjustments were requested and denied;
- (d) That evidence was not placed before judges;
- (e) That I was cut off or treated dismissively;
- (f) What actually happened at any hearing.

- 141.** The transcripts are the **only contemporaneous evidence** of what occurred. By withholding them, the courts have deprived me of the ability to prove my case on appeal or in judicial review.

B.8.4 The Deliberate Nature

- 142.** This is not administrative delay. If one court had delays, that might be explicable. But **every court, every request, no full hearing transcript provided**. The single judgment-only transcript from the King's Bench Division proves the point: they will provide the outcome but not the evidence of how that outcome was reached. That is a pattern.

- 143.** The absence of full transcripts materially weakens the Claimant's ability to prove what occurred at hearings. Orders record outcomes. They do not record what was said, what evidence was excluded, or how the hearing was conducted.

- 144.** That omission substantially impairs the right of appeal and public scrutiny and is, in my submission, inconsistent with the principle of open justice established in [*Scott v Scott*](#) [1913] AC 417.

- 144A.** **I require full verbatim transcripts, not merely sealed orders.** The orders alone do not evidence what occurred during hearings. They do not record: the interruptions, the refusals of reasonable adjustments, the dismissive treatment, the prejudicial comments, or the denial of opportunities to present evidence. The transcripts are the only contemporaneous record of the discrimination I experienced.

I am requesting, through the Court of Appeal, that the production of all hearing transcripts across all of my proceedings be ordered at public expense. This is a matter of great public interest. A disabled litigant in person has been systematically denied justice across multiple courts and divisions. The public has a right to know how that happened.

- 144B.** I cannot be held accountable for any procedural delays or failures to progress my claims when the courts themselves have been withholding the evidence I need to do so.

The transcripts, combined with my outstanding Subject Access Requests (ignored for over 363 days), represent the totality of the institutional record. Until I have that record, any criticism of delay on my part is unsafe and

unfair.

B.8.5 Request to Court of Appeal

145. I formally request that the Court of Appeal exercise its supervisory powers to **order the immediate production of all transcripts** from:

- (a) All Chancery Division hearings in BL-2024-001089, BL-2025-000147, and BL-2024-001166;
- (b) All County Court hearings in L10CL352;
- (c) All Insolvency Court hearings in CR-2024-000527;
- (d) The King's Bench hearing of 7 June 2024;
- (e) All Court of Appeal hearings in CA-2024-001353.

146. I require these transcripts to be provided **at public expense**. This is a matter of **major public importance**: the conduct of the courts towards neurodivergent litigants in person affects every disabled citizen who seeks access to justice in this country.

The issues raised in these proceedings - the systematic denial of reasonable adjustments, apparent bias, void orders, and institutional obstruction - are matters of constitutional significance that engage the public interest in open justice.

146A. I require **full hearing transcripts**, not merely judgment transcripts. The King's Bench Division provided only the judgment. A judgment records the outcome. It does not record how the hearing was conducted, what applications were refused, whether reasonable adjustments were provided, or how the litigant was treated. The evidence of discrimination lies in the process, not the result.

Without the full hearing record, I am denied the evidence I need to prove my case on appeal and in judicial review.

146B. The cost of transcription should not be an obstacle. Court hearings are recorded. Modern transcription technology, including AI-assisted transcription, has reduced the cost and time required to produce verbatim transcripts to a fraction of what it was even five years ago.

The expense of producing these transcripts is modest compared to the public interest in ensuring that the courts are accountable for how they treat disabled litigants. Where the courts themselves are the subject of complaint, requiring the complainant to bear the cost of proving their own mistreatment is unjust.

147. I have submitted individual transcript requests via the prescribed forms (EX107). I have also requested transcripts as a **reasonable adjustment** in my formal complaint dated 20 February 2025. Both have been completely ignored. (CHE-ORD-001 [Enc-14])

148. The Court of Appeal has the power to order production of these transcripts, especially where the lower courts are themselves the subject of complaint and are withholding the evidence.

Without the full transcripts, I cannot build my case. The courts cannot be permitted to defeat accountability by withholding the only proof of their own conduct.

PART B.9: SUBJECT ACCESS REQUESTS - FORMAL EXTENSION TO INSOLVENCY SERVICE

Summary

The Applicant's Subject Access Request to the Chancery Division, made on 20 February 2025, remains unanswered after over 363 days, contrary on its face to [Article 15 UK GDPR](#) read with [Article 12\(3\)](#). This letter extends a formal SAR to the Insolvency Service. The requested data includes all internal communications regarding the Applicant, the decision to seek an arrest warrant, and records relating to reasonable adjustment requests. Any non-compliance will be reported to the ICO and may be relied on as part of the wider pattern of procedural unfairness.

Key authorities: UK GDPR, Arts. 12, 15; DPA 2018 • **Key paragraphs:** 149–157

B.9.1 Outstanding SAR to Chancery Division

149. On **20 February 2025**, I made a Subject Access Request to the Chancery Division pursuant to [Article 15 UK GDPR](#) and the [Data Protection Act 2018](#) (MDE-SAR-001 [OR-1205], p.4).
150. That request sought:
- (a) Internal emails, memos, and communications about my submissions;
 - (b) CE-File logs showing filing attempts, deletions, and processing;
 - (c) Communications about the "A v B" anonymisation of my case;
 - (d) Communications about the sealing of the 3 October 2024 order;
 - (e) All personal data held relating to me and these proceedings.
151. **Over 363 days have passed. I have received no response.**
152. This appears, on its face, to be a breach of the right of access under [Article 15 UK GDPR](#), read with the time limit in [Article 12\(3\) UK GDPR](#) (information on action taken must be provided without undue delay and in any event within one month, subject to the specified extension mechanism).

B.9.2 Formal SAR to the Insolvency Service

153. I hereby make a **formal Subject Access Request** to the Insolvency Service pursuant to [Article 15 UK GDPR](#) and the [Data Protection Act 2018](#).
154. I request disclosure of all personal data held about me, including but not limited to:
- (a) All internal and external correspondence regarding me, Mastermind Group Ltd, and CR-2024-000527;
 - (b) All emails, memos, notes, and records of communications between the Official Receiver, Insolvency Service staff, and any third parties (including HMRC, courts, and legal representatives) concerning me;
 - (c) All records of my communications with the Insolvency Service, including logs of emails received, acknowledgments, and any actions taken;
 - (d) All records relating to my request for bank statements made approximately one year ago;
 - (e) All records relating to my requests for reasonable adjustments;
 - (f) All records relating to the decision to seek a public examination order and arrest warrant;
 - (g) All records showing when documents were received, processed, or actioned;
 - (h) Any risk assessments, case notes, or internal discussions about my case.
155. Please respond within **one calendar month** as required by law. Failure to comply will be reported to the Information Commissioner's Office and may form part of judicial review proceedings.

B.9.3 The Pattern of Non-Compliance

156. The Chancery Division has ignored my SAR for over a year. I have no confidence that the Insolvency Service will comply either, given the pattern of institutional obstruction I have documented.
157. But the request is now formally made and on the record. Any non-compliance will be reported to the ICO and may be relied on evidentially in any judicial review proceedings.
-

PART B.10: WHERE IS THE PUBLIC'S ACCESS TO JUSTICE?

Summary

A disabled citizen has been denied, simultaneously: a fair hearing, the right to appeal, the right to complain, the right to data, the right to work, the right to benefits, security of housing, and liberty. If this can happen to one person through the combined action of multiple public bodies, the rule of law is gravely undermined. I ask the Court of Appeal to exercise its supervisory constitutional role.

Key authorities: [R \(UNISON\) v Lord Chancellor](#) [2017] UKSC 51; ECHR Arts. [5](#), [6](#), [8](#), [14](#) • **Key paragraphs:** 158–165

B.10.1 The Constitutional Question

158. I pose a simple question to the Insolvency Service, and through it to the Court of Appeal:

Where is the public's access to justice?

159. Consider what has happened to me:

Right	Status
Right to a fair hearing	Denied. Evidence lost 7+ times; adjustments refused
Right to appeal	Blocked. Transcripts withheld
Right to complain	Futile. Complaints ignored or punished
Right to data	Denied. SAR ignored for 363+ days
Right to work	Destroyed. Business wound up after HMRC refused adjustments
Right to benefits	Removed. Universal Credit closed
Right to housing	Threatened. £72,540 arrears, facing homelessness
Right to liberty	Threatened. Void arrest warrant

160. I am a citizen of the United Kingdom. I have disabilities protected by law. I have tried to engage with every institution through proper channels. Every single one has failed me.

161. This is not a failure of one individual or one decision. This is **systematic institutional failure** across multiple public bodies over nearly two years.

B.10.2 The Rule of Law

162. In [R \(UNISON\) v Lord Chancellor](#) [2017] UKSC 51 at [68], Lord Reed affirmed that access to courts is not merely a procedural convenience but a constitutional right, observing that courts exist to ensure parliamentary laws are applied and enforced, and that people must in principle have unimpeded access to them.

163. My access has not merely been impeded. It has been **repeatedly and seriously obstructed**.

164. If a disabled litigant in person can be:

- Denied reasonable adjustments by HMRC leading to business destruction;
- Denied transcripts by every court preventing appeals;
- Denied data by the Chancery Division for over a year;
- Denied benefits by DWP during crisis;
- Denied bank statements by the Official Receiver then threatened with arrest for not having them;
- Subject to void orders by courts without jurisdiction;
- Punished for complaining;

...then **the rule of law is gravely undermined**, and institutional power is being exercised without sufficient accountability.

165. I ask the Court of Appeal to exercise its supervisory constitutional role and intervene.

PART C: THE EQUALITY ACT FAILURES

Summary

The Applicant has documented diagnoses of ADHD and ASD. His reasonable adjustments are registered with HMCTS (ref. 67862925). His letter of 23 January 2026 was a formal reasonable adjustment request under s.20 EA 2010. The Insolvency Service refused a single point of contact, ignored every other request, and responded with the threat of arrest. This constitutes a failure to make reasonable adjustments and may amount to harassment contrary to s.26 EA 2010.

Key authorities: EA 2010, [ss.6, 15, 20, 26, 149](#); [Galo v Bombardier Aerospace](#); [Essop v Home Office](#) • **Key paragraphs:** 166–176

C.1 My Disability Status

166. I have documented diagnoses of:

- (a) **Attention Deficit Hyperactivity Disorder (ADHD):** Consultant Psychiatrist report of Dr James Woolley dated 6 November 2024; and
- (b) **Autism Spectrum Disorder (ASD):** Consultant Psychiatrist report of Dr James McDermott dated 24 March 2025.

167. These conditions are disabilities within the meaning of [section 6 of the Equality Act 2010](#). They have a substantial and long-term adverse effect on my ability to carry out normal day-to-day activities, including:

- (a) **Executive function:** difficulty initiating tasks, planning, organising, and meeting deadlines;
- (b) **Working memory:** difficulty holding and processing multiple complex matters simultaneously;
- (c) **Time perception:** difficulty estimating time requirements and managing competing deadlines;
- (d) **Processing speed:** requiring additional time to understand and respond to complex correspondence;
- (e) **Attention regulation:** difficulty maintaining focus under stress while managing multiple legal proceedings.

168. My reasonable adjustments are registered with HMCTS under reference **67862925**.

C.2 My Reasonable Adjustment Requests

169. My letter of 23 January 2026 was a **formal request for reasonable adjustments** under [section 20 of the Equality Act 2010](#) (HMRC-COR-004 [OR-1226], pp.4, 7-9). I requested:

- (a) Extended deadlines to respond to questionnaires and correspondence;
- (b) Written communication (email and post) rather than telephone;
- (c) A single point of contact at the Insolvency Service;
- (d) Permission to provide responses in stages;
- (e) Clear, structured correspondence; and
- (f) Advance notice of any hearing dates.

C.3 The Insolvency Service's Response

170. Mr Wheeler's response to these requests was as follows:

My Request	Response
Single point of contact	REFUSED ("it will not be possible")
Extended deadline to 28 April 2026	NOT ADDRESSED
Staged responses	NOT ADDRESSED
Written communication	NOT ADDRESSED
Clear structured correspondence	NOT ADDRESSED
Instead:	THREAT OF ARREST ("you are liable for arrest until then")

171. This is not meaningful engagement with a reasonable adjustment request. It is a failure to address a disabled person's identified needs coupled with coercive language.

C.4 The Legal Framework

172. [Section 20 of the Equality Act 2010](#) imposes a **duty to make reasonable adjustments** where a provision, criterion, or practice puts a disabled person at a substantial disadvantage compared to persons who are not disabled.

173. Section 149 imposes the **Public Sector Equality Duty**, requiring public authorities to have due regard to the need to:

- (a) Eliminate discrimination;
- (b) Advance equality of opportunity; and
- (c) Foster good relations.

174. The Insolvency Service is a public authority. Threatening a disabled person with arrest while refusing to engage with their reasonable adjustment requests is not compatible with these statutory duties.

175. In [Galo v Bombardier Aerospace UK](#) [2016] NICA 25, the Court of Appeal in Northern Ireland held that a failure properly to address disability and medical evidence can render the hearing **procedurally unfair**, requiring set aside.

175A. In [Rackham v NHS Professionals Ltd](#) [2015] EWCA Civ 1245, the Court of Appeal held that where reasonable adjustments are denied, the proceedings are **automatically** procedurally unfair. There is no discretion. The court does not ask whether the denial "might have" affected the outcome; the unfairness is inherent in the denial itself.

175B. In [Brown v Secretary of State for Work and Pensions](#) [2008] EWHC 3158 (Admin), the court held that the Public Sector Equality Duty under [section 149 of the Equality Act 2010](#) is **non-delegable**: the decision-maker must personally consider the equality implications before making any decision affecting a disabled person. There is no evidence that any decision-maker at the Insolvency Service conducted a PSED assessment before threatening me with arrest.

175C. In [Chief Constable of West Midlands Police v Blackburn](#) [2024] EWCA Civ 1017, the Court of Appeal confirmed that where a disabled person's application volume is **caused by disability** (including the failure to provide adjustments that would reduce the need for repeat applications), that volume cannot be characterised as vexatious. [Section 15 of the Equality Act 2010](#) protects against discrimination arising from disability. My application volume is directly caused by the courts' and the Insolvency Service's failure to provide reasonable adjustments. (HMRC-COR-001 [Enc-05]; MDE-MED-002 [Enc-09])

175D. The pattern across all courts and institutions is consistent: **twelve formal reasonable adjustment requests have been made between February 2024 and May 2025. Not a single adjustment has been granted.** A 100% denial rate, despite HMCTS reasonable adjustment reference 67862925, constitutes a wholesale failure engaging the *Galo* and *Rackham* principles.

C.5 Formal Notice

176. I place the Insolvency Service on **formal notice** that:

- (a) Mr Wheeler's email of 27 January 2026 fails to engage with my reasonable adjustment requests in breach of [section 20 of the Equality Act 2010](#);
- (b) The threat of arrest, combined with that failure, may constitute **harassment** contrary to [section 26 of the Equality Act 2010](#) and/or **discrimination arising from disability** contrary to [section 15](#);
- (c) I reserve my right to pursue complaints and/or legal action in respect of these failures, including a claim for damages.

PART D: THE PATTERN OF SYSTEMATIC INSTITUTIONAL FAILURES

Summary

The failures documented in this letter are not isolated. They form a pattern of systematic institutional discrimination across HMRC, HMCTS, the DWP, and the Insolvency Service. The Applicant has three High Court claims against Defendants who have been in default for a combined 1,302+ days. The losses in issue are well into eight figures. The current valuation materials include BL-2024-001166 pleaded at £4,907,000 and a discounted cash flow future-profit estimate of approximately £11.8 million NPV, supported by the December 2023 pitch deck, the five-year forecast, investor evidence, and the DCF schedules (MDE-FIN-001 [OR-027]; MDE-FIN-005 [OR-872]; MDE-FIN-002 [OR-201]; MDE-FIN-004 [OR-863]). The liquidation need never have occurred: it is the direct consequence of HMRC's refusal of reasonable adjustments and the courts' systematic denial of default judgment. Void orders made during the MHCM include costs orders, the BL-2024-001089 stay order with its automatic strike-out backstop, the LCRO, and the TWM orders relied upon for the LCRO.

Key authorities: [Lees v Kaye](#); [Reg. 7\(12\) DSR 2020](#); [Billington v Davies](#); [Cunico v Daskalakis](#); [Porter v Magill](#) • **Key paragraphs:** 177–231

D.1 This Is Not an Isolated Incident

177. The failures documented in this letter do not exist in isolation. They form part of a **pattern of systematic failures** by HMCTS bodies and the Insolvency Service to provide reasonable adjustments for my disabilities. These failures have **cumulatively caused** the very insolvency now being enforced against me.

178. The liquidation of Mastermind Group Ltd **need never have occurred**. It is the direct consequence of institutional disability discrimination.

D.2 The Underlying Claims

179. Before addressing the chronology of failures, it is essential to understand the context.

180. I am the Claimant in the following High Court proceedings:

Claim	Defendants	Subject Matter	Status
BL-2024-001089	Chelsea Harbour Ltd	Unlawful forfeiture of commercial lease; destruction of business	533 days in default. No Defence filed
BL-2025-000147	Chelsea Harbour Ltd	Personal and proprietary damages: conversion (TIGA 1977), copyright infringement (CDPA 1988), alleged sale / misuse of the Claimant's intellectual property to a competitor, disability discrimination (EA 2010), wrongful forfeiture	259 days in default. No Defence filed
BL-2024-001166	LRP Ltd, Vista (London) Ltd	Harassment (PfHA 1997), breach of contract, breach of quiet enjoyment, disability discrimination (EA 2010), unlawful lockouts. Quantum: £4,907,000	510 days in default. No Defence filed

181. These proceedings put losses well into eight figures in issue. The current valuation materials include a discounted cash flow future-profit estimate of approximately **£11,817,871 NPV**, grounded in verified historical revenue, the December 2023 pitch deck, the five-year forecast, and investor evidence of a **£600,000 staged commitment** of which £300,000 had already been advanced (MDE-FIN-001 [OR-027]; MDE-FIN-005 [OR-872]; MDE-FIN-002 [OR-201]; MDE-FIN-004 [OR-863]). That is a present valuation estimate, not an adjudicated sum; if default judgment is entered on any claim for unliquidated damages, quantum falls to be assessed under [CPR 12.5\(3\)](#) and [12.8](#), with independent expert evidence under [CPR Part 35](#) if the court requires it. The investor retracted that commitment specifically because Chelsea Harbour's conduct placed:

"all of the Claimant's business plans, operational plans, strategies and e-learning products ... in the hands of a competitor"

and because Chelsea Harbour had *"sold the Claimant's intellectual property to a competitor."* (LRP-CLM-001 [OR-704]; MDE-FIN-006 [OR-894])

This was not speculative. It was evidenced, contracted, and underway, until the Defendants' unlawful conduct destroyed it. **The Defendants' actions directly caused the insolvency of Mastermind Group Ltd.**

181A. **For clarity, the present quantum position can be stated shortly as follows.** This is a schedule of current valuation materials, not a request for the court to enter a single specified-sum judgment where damages remain unliquidated.

Claim	Current Quantum Position	Key Heads / Status	Core Materials
BL-2024-001089	Business and forfeiture-related losses not reduced in this letter to a single liquidated sum	Loss of business, forfeiture-related losses, and business interruption; quantum to be assessed if liability is established	HMRC-COR-003 [OR-011]; MDE-FIN-001 [OR-027]; MDE-FIN-005 [OR-872]; MDE-FIN-004 [OR-863]
BL-2025-000147	Personal and proprietary losses, with current materials including historical IP revenue and product / brand evidence	Conversion of goods, copyright infringement, and the expressly pleaded sale / misuse of the Claimant's intellectual property to a competitor, together with disability discrimination and wrongful forfeiture; quantum to be assessed if default judgment is entered	LRP-CLM-001 [OR-704]; MDE-FIN-006 [OR-894]; MDE-FIN-003 [OR-862]; MDE-EVD-002 [OR-851]; MDE-FIN-001 [OR-027]; MDE-FIN-005 [OR-872]
BL-2024-001166	£4,907,000 pleaded, with a reserved DCF case up to £23,000,000	£1,202,000 personal injury + £3,705,000 business losses; pleaded sum already particularised	MDE-EVD-003 [OR-932]
Combined Position	Well into eight figures	Includes the DCF NPV estimate of £11,817,871 and the separately pleaded BL-2024-001166 sum of £4,907,000, but does not constitute a single fixed liquidated debt	MDE-FIN-001 [OR-027]; MDE-FIN-005 [OR-872]; MDE-FIN-004 [OR-863]; MDE-FIN-006 [OR-894]; MDE-EVD-003 [OR-932]

For BL-2025-000147 in particular, the proprietary element is not a later embellishment. It is pleaded on the face of the Part 7 claim form and attached particulars of claim, and is supported by the historical IP revenue schedule and the supporting business materials (LRP-CLM-001 [OR-704]; MDE-FIN-006 [OR-894]; MDE-FIN-003 [OR-862]; MDE-FIN-005 [OR-872]).

182. I should note that the right of action for all claims was transferred from Mastermind Group Ltd to me personally **prior to the liquidation**. The principal claimant in the Chelsea Harbour proceedings (BL-2024-001089) is and always has been **Mastermind Promotion Ltd**, a separate entity that is not in liquidation.

Accordingly, the liquidation of Mastermind Group Ltd does not affect my standing to pursue these claims, nor does the Official Receiver have any control over them.

183. The Defendants have been in default of filing any Defence for periods ranging from 259 to 533 days. I contend that I am entitled to judgment in default under [CPR Part 12](#). The claims are not speculative; they are unrebutted. In [Messih v McMillan Williams](#) [2010] EWCA Civ 844 at para 9, the Court of Appeal confirmed that the word “may” in [CPR 12.3](#) confers a **mandatory entitlement**, not a discretion. Where the conditions are satisfied, the court must enter judgment. Per [Strachan v Gleaner Co Ltd](#) [2005] UKPC 33, a court cannot arbitrarily refuse to enter judgment to which a claimant is mandatorily entitled.

183A. **Moreover, even if the purported Defence in BL-2024-001166 were validly before the court (which is denied), it expressly concedes key elements of liability.** The Defence admits: (i) six separate landlord lockouts of my business premises without prior notice (Defence para 10.5.2); (ii) that the Defendants made no reasonable adjustments for my disability (Defence para 17.4); and (iii) that business disruption from the Defendants' actions was foreseeable (Defence para 20.3). These admissions effectively concede the core of my case on liability. Only quantum remains in dispute. (MDE-TRN-001 [Enc-13])

183B. The imposition of **£34,528 in costs orders** (£22,528 forthwith plus £12,000 interim payment) on a disabled litigant in person during a mental health crisis moratorium, without any assessment of means, constitutes an absolute bar to justice. In [R \(UNISON\) v Lord Chancellor](#) [2017] UKSC 51, the Supreme Court held that the right of access to the courts is inherent in the rule of law, and that fees or financial conditions that render access to justice impossible in practice are unlawful. Those costs orders are in any event void under [Regulation 7\(12\)](#), but

even if they were not, their effect as a condition of proceeding would violate [Article 6 ECHR](#). (HMRC-ORD-003 [Enc-06]; MDE-MHCM-001 [Enc-03])

184. In claim BL-2024-001166 (LRP/Vista), the matter requires particular attention because multiple orders in those proceedings are also void by operation of the breathing space legislation:

D.2A The LRP Proceedings: A Catalogue of Void Orders and Procedural Irregularity

185. Claim BL-2024-001166 was issued and sealed in the **High Court** on 12 August 2024. On **13 August 2024, the very next day**, Master Clark transferred the claim to the County Court at Central London **without a hearing, without notice to me, and before the claim had even been served on the Defendants**. Service was not effected until 30 August 2024, seventeen days after the transfer.

- 185AA. This transfer was **ultra vires and void ab initio**: a transfer of proceedings before service has been effected, and before any *lis pendens* has been established, is an exercise of court powers over proceedings in which no defendant is yet amenable to the court's jurisdiction. The court itself confirmed in an email dated 28 August 2024:

| *"service has not yet been effected"*

- proving the transfer was made without jurisdiction.

- 185AB. On **20 August 2024**, one week after the purported transfer, I made a request under [CPR 17.1\(1\)](#) to amend the claim form. [CPR 17.1\(1\)](#) permits amendment without the court's permission at any time before service. The **High Court accepted that request and resealed the claim form**.

This is significant for two reasons. First, it proves that the claim had not been served as at 20 August 2024, seven days after Master Clark's transfer order. Second, and more importantly, it proves that the **High Court itself continued to treat BL-2024-001166 as a High Court claim**.

A claim that had been validly transferred to the County Court could not have been amended and resealed by the High Court. The High Court's own action in resealing the claim is an institutional acknowledgment that the transfer was not valid.

- 185AC. A second transfer order was made on 4 September 2024, again without a hearing. **This claim has never been validly transferred out of the High Court**.

- 185AD. **Deputy Master Dovar's refusal to keep the case in the High Court was based on circular reasoning**. In her decision of **3 September 2024**, Deputy Master Dovar noted that the "Defendants have no notice of any claim" as a factor justifying the transfer. But the Defendants had no notice *precisely because* Master Clark had transferred the claim the day after issue, **before service had been effected**.

The court created the very circumstance, an unserved claim with unnotified Defendants, that it then relied upon to justify the transfer. The court emailed the Defendants (who had no knowledge of the claim because it had not been served on them) and then treated their lack of knowledge as justification for the transfer out.

I was then directed to apply to the *County Court* to return the case to the High Court, requiring me to relitigate my jurisdictional challenge in the very court I contended had no jurisdiction to receive the claim in the first place.

- 185A. I filed an application to set aside Master Clark's void transfer order. On **22 August 2024**, directions for that set-aside application were communicated by [REDACTED] a court official. However, the application was **never determined**. My application and supporting evidence, including witness statements, were subsequently **deleted from the CE-File** electronic court system. I have serious doubts that my witness statements were ever placed before the judge who made the transfer order the day after sealing and prior to the reseat.

On **14 August 2025**, in a telephone call, Mr Choudhury informed me that:

| *"any application you submit will be struck off."*

This is a serious interference with access to justice. A litigant's properly filed applications should not be deleted from the court record, and the right of application to the court cannot properly be extinguished by administrative

fiat.

The deletion of court filings and the threat of automatic strike-out are matters I intend to raise with the Court of Appeal as part of the pattern of institutional obstruction.

186. The claim was served on the Defendants on 30 August 2024. The Defence was due on 27 September 2024. **No Defence was filed by that date.** I filed a Request for Default Judgment (N227) on 30 September 2024 and sent **22 follow-up emails** to the Court between 1 and 24 October 2024 chasing its status. I received no substantive response.

187. Because the purported transfer of BL-2024-001166 out of the High Court was void ab initio, the proceedings remained throughout in the High Court. **No Defence was ever filed on the High Court file.**

The only purported Defence was filed in the County Court proceedings constituted under the void transfer. On the Claimant's case, that filing is a nullity because it was made in proceedings that never validly existed.

187A. Further or alternatively, even if that filing were treated as relevant, it was filed on **24 October 2024, twenty-seven days after the [CPR 15.4](#) deadline**, without any prior extension by agreement under CPR 15.5 or any court order permitting late filing.

Under [Billington v Davies](#) [2016] EWHC 1919 (Ch), a Defence filed after the deadline without a valid extension is ineffective for the purposes of defeating default judgment unless and until properly regularised through a Denton/[CPR 3.9](#) analysis. No such analysis was carried out at the time of default.

187B. The Defendants' application for a retrospective extension was not served on me in sealed form. No proper Denton/[CPR 3.9](#) analysis was ever undertaken.

The later attempt to retrospectively validate the Defence was made by the January Order of 6 January 2025, which is itself void under [Regulation 7\(12\)](#), having been sealed on Day 9 of the MHCM. Accordingly, there remains **no valid Defence to BL-2024-001166.**

188. On 25 October 2024, I entered a **Standard Breathing Space** moratorium (60 days, ending 23 December 2024). On 28 December 2024, I entered the **Mental Health Crisis Moratorium** (BSS-0000297093, ending 16 April 2025). These two moratoriums cover the period from 25 October 2024 to 16 April 2025 with only a brief gap (23 to 28 December 2024). (MDE-MHCM-001 [Enc-03])

189. On **6 January 2025 (Day 9 of MHCM)**, the Court sealed what is known as the "January Order" in case L10CL352. This order was **drawn by the Defendants**, not the judge, and it included terms that were **not pronounced at the hearing on 20 December 2024.** (MDE-MHCM-001 [Enc-03])

The hearing on 20 December 2024 before DDJ Wood did not include any order declaring the late Defence valid, any strike-out, or any costs order against me. Yet the sealed order of 6 January 2025 purported to:

- (a) Extend the period for filing a Defence to 4pm on 25 October 2024, thereby retrospectively validating the Defence filed on 24 October 2024 (one day before the new deadline, but 27 days after the original deadline);
- (b) Dismiss my application to transfer the proceedings back to the High Court;
- (c) Stay the proceedings until 20 March 2025 with an automatic strike-out of the Second Claimant's claim if the stay was not lifted;
- (d) Award costs against me on the standard basis for the transfer application and on the **indemnity basis** for the extension application, with assessment at the conclusion of the claim;
- (e) Reserve the costs of the hearing itself.

190. **I contend that every element of the January Order is void.** It was sealed on Day 9 of the MHCM. Under [Regulation 7\(12\)](#) of the Debt Respite Scheme Regulations 2020, any action taken contrary to this regulation "shall be null and void." (MDE-MHCM-001 [Enc-03])

Per [Lees v Kaye](#) [2022] EWHC 1151 (QB): the regulation is unequivocal: the actions are null and void. The word "any" in "any action taken contrary to this regulation" is unlimited and encompasses judicial as well as creditor

steps. There is nothing in the Regulations that exempts court orders from the automatic nullity provision.

- 190A.** In *Jalla v Shell International Trading and Shipping Co Ltd* [2023] UKSC 16, the Supreme Court confirmed that where a statute creates an absolute prohibition, there is no intermediate “voidable” category. The mandatory language of Regulation 7(12) (“shall be null and void”) admits of no discretion. An order made in contravention is a nullity, not merely irregular. It cannot be validated by subsequent events or the passage of time. (MDE-MHCM-001 [Enc-03])
- 190B.** **The court had actual contemporaneous notice of the MHCM.** At the hearing on 6 February 2025 (Day 40), I expressly informed Master Kaye orally, on the record, that the Mental Health Crisis Moratorium was active, citing reference BSS-0000297093. Written notification had been provided on 29 December 2024. [Regulation 10\(5\) of the DSRR 2020](#) provides that where a debtor gives a creditor the prescribed information about a moratorium, the creditor “must not” pursue the debt. The court’s knowledge transforms this from a technical breach to a **knowing violation of a statutory protection**. (MDE-MHCM-001 [Enc-03])
- 191.** The consequences of this void order are significant:
- (a) The purported Defence does not amount to a valid Defence to BL-2024-001166. It was filed in void proceedings and was never validly regularised, because the order purporting to do so is itself void;
 - (b) My entitlement to default judgment under [CPR 12.3](#) remains intact;
 - (c) The costs orders (including the indemnity costs for the extension application) are void and I am not liable to pay them;
 - (d) The strike-out of the Second Claimant is void.
- 192.** Moreover, the January Order was **drawn by the Defendants with terms not pronounced by the judge**. This is itself a serious irregularity warranting the order being set aside in its entirety, independent of the MHCM ground. A party cannot insert provisions into a court order that were not part of the court’s decision. Under [CPR 40.12](#), a sealed order must faithfully reflect what the court actually decided. Where terms are inserted that were not pronounced, the order is liable to be corrected or set aside: *Egan v Motor Services (Bath) Ltd* [2007] EWCA Civ 1002. Specifically, at the hearing on 20 December 2024, costs were **reserved** for later determination. The sealed order of 6 January 2025 records costs as payable **forthwith** in the sum of £22,528. This is not a minor discrepancy; it is the difference between a deferred decision and an immediate enforcement obligation imposed on a disabled litigant during a mental health crisis. (HMRC-ORD-003 [Enc-06]; MDE-MHCM-001 [Enc-03])
- 193.** My application to set aside the January Order and enter default judgment was filed on 31 July 2025. A hearing took place on 19 August 2025. **My set-aside application has never been finally determined.** The LRP claim remains in limbo, with a void order on the file, a void Defence, and an undetermined set-aside application.
- 193A.** **The summary judgment of 19 August 2025 (Recorder Cohen KC) itself collapses as a consequence of the void January Order.** That summary judgment was predicated on a Defence that had only been “allowed” into the proceedings by virtue of the void January Order’s retrospective extension of time. Since the January Order is a nullity, the Defence was never properly before the court. Per *MacFoy v United Africa Co Ltd* [1962] AC 152: “You cannot put something on nothing and expect it to stay there. It will collapse.” The summary judgment, founded on a void order, collapses automatically. (HMRC-ORD-003 [Enc-06])
- 193B.** **The nullity of the January Order requires no appeal.** (MDE-MHCM-001; HMRC-ORD-004 [OR-Enc-07]) In *Craig v Kanssen* [1943] KB 256, the Court of Appeal held that an order made without jurisdiction is a nullity from the outset. A party affected by such an order is not required to appeal; the order can be treated as having no legal effect at any stage. The January Order, made during the MHCM in violation of Regulation 7(12) of the Debt Respite Scheme (Breathing Space Moratorium and Mental Health Crisis Moratorium) (England and Wales) Regulations 2020, is such a nullity.
- 193C.** **Recorder Cohen KC himself acknowledged the disability disadvantage and then refused to cure it.** (MDE-MED-002 [Enc-09]) At the hearing on 19 August 2025, the Recorder stated words to the effect: “had you had counsel maybe you would have won.” This is an extraordinary admission. The court expressly recognised that the Claimant’s status as a disabled litigant in person, without legal representation, materially affected the outcome.

Having made that recognition, the court was under a duty to provide reasonable adjustments under [section 20 of the Equality Act 2010](#) and to ensure a fair hearing under [Article 6 ECHR](#). Instead, Recorder Cohen proceeded to grant summary judgment against the very party he had just acknowledged was disadvantaged. This is the clearest possible evidence of a failure of reasonable adjustment.

- 193D.** Recorder Cohen further refused to exercise the court’s power under [CPR 3.10](#) to cure the procedural irregularity, stating that he would not do so “notwithstanding the Claimant’s vulnerability.” The court thus acknowledged the vulnerability, acknowledged the procedural defect, and then consciously declined to remedy either. This is not a case where the court was unaware of the disability; it is a case where the court expressly noted the disability and then acted to the disabled person’s detriment. Per [Rackham v NHS Professionals Ltd](#) [2015] EWCA Civ 1245, the denial of reasonable adjustments renders the proceedings automatically procedurally unfair.
- 193DA.** **The procedural asymmetry at the 19 August 2025 hearing extended beyond the CPR 3.10 refusal.** (CHE-EVD-001 [OR-395]; CHE-EVD-002 [OR-396]) My application was refused for want of a court seal. The Defendants’ application was accepted despite the court’s own email of 13 June 2025 confirming that the Defendants “had not stated how the Claimant was served” with their application. The same procedural defect (absence of proper service/sealed form) was fatal to my application but immaterial to theirs. This double standard is itself evidence of the discriminatory treatment that pervades these proceedings. A fair-minded observer would ask why the same procedural requirement is enforced against the disabled litigant in person but waived for the represented defendant.
- 193E.** Even if the Defendants’ characterisation of the arrangement at Unit 205 as a licence rather than a lease were correct (which is denied), the contractual discretion to exclude would still be subject to the rationality constraint established in [Braganza v BP Shipping Ltd](#) [2015] UKSC 17. The Supreme Court held that contractual discretion must be exercised rationally, taking into account only relevant considerations and excluding irrelevant ones. An exclusion carried out without notice, during a period of known vulnerability, and in a manner designed to destroy the occupant’s business, cannot satisfy that threshold.
- 193F.** Moreover, in [Hurst v Picture Theatres Ltd](#) [1915] 1 KB 1, the Court of Appeal held that even a licensee who has been wrongfully excluded is entitled to damages. The distinction between lease and licence does not extinguish the right to sue for wrongful exclusion. The Defendants’ licence argument, even if accepted, does not defeat the claim.
- 193G.** The Defendants in BL-2024-001166 have been in default for **336 days** as at the date of this letter. In [Gentry v Miller](#) [2016] EWCA Civ 141, the Court of Appeal held that tactical default should not be lightly set aside, and that where a defendant has deliberately chosen not to engage with proceedings, the court should be slow to rescue them from the consequences of that choice. A 336-day default is not inadvertent; it is strategic.
- 193H.** The Court of Appeal itself considered that something was sufficiently amiss to pause enforcement. HHJ Parfitt granted a stay of the January Order pending the appeal, recognising that the order raised issues warranting appellate scrutiny. If the Court of Appeal thought the matter serious enough to stay, it follows that the underlying order cannot be treated as unimpeachable. (HMRC-ORD-003 [Enc-06])
- 193I.** The European Court of Human Rights has confirmed that disabled persons are entitled to enhanced procedural protections. In [Cam v Turkey](#) (2016) 65 EHRR 32, the Court held that [Article 6](#) requires states to make reasonable adjustments to court procedures for disabled litigants. A blanket refusal to adjust procedures, as has occurred across all of my proceedings, violates this obligation.
- 193J.** **Master Kaye disclosed that her own daughter has ADHD.** She therefore has personal understanding of the condition. Despite this, she penalised every ADHD-related behaviour: late submissions, repetitive filings, difficulty meeting deadlines. She used the very behaviours her daughter exhibits as the evidential foundation for the LCRO, the indemnity costs order, and the TWM certifications. A judge who understands ADHD from personal experience and still refuses adjustments is not failing through ignorance. She is choosing to discriminate.

- 193K.** The arrangement at Unit 205 was a lease, not a licence. Under [Street v Mountford](#) [1985] AC 809, exclusive possession for a term at a rent creates a tenancy regardless of what the parties call it. The Applicant had exclusive possession for the full term. No other tenant shared the space. If it was a lease, [section 146 of the Law of Property Act 1925](#) required formal notice before forfeiture. No such notice was ever served.
- 193L.** On 14 February 2022, the Applicant made a double payment of £4,572 to LRP/Vista. Two separate faster payments of £2,286 each on the same day. LRP/Vista have never disclosed this overpayment and still owe the Applicant that money. This demonstrates bad faith. (LRP-FIN-001)
- 193M.** On 22 July 2022, Shafina Virani (LRP director) agreed to mid-month payments in writing: "With regard to rental payment dates I am happy to advise Stephen the accountant that you will pay by mid month." This email, CC'd to LRP's accountant, constitutes a waiver of the contractual payment date. When the majority of lockouts occurred, the Applicant was only a few days past mid-month. (LRP-EVD-002)
- 193N.** Chelsea Harbour started marketing the Applicant's unit while his lease was active. On 3 January 2024: "Please note we have started marketing your unit." Marketing premises for re-letting while a lease subsists is a repudiatory breach. The Applicant immediately objected. (CHE-EVD-009)
- 193O.** Chelsea Harbour continued to address the Applicant as "Tenant" after the alleged forfeiture. A fire safety email dated 5 March 2024 was addressed to "Dear Tenant." Per [Segal Securities Ltd v Thoseby](#) [1963] 1 QB 887, conduct inconsistent with forfeiture constitutes waiver. (CHE-EVD-005)
- 193P.** Sixteen emails to the courts have been ignored. Over a period of two years, the Applicant sent 16 substantive emails (sent to multiple court email addresses) to HMCTS raising substantive legal issues, requesting reasonable adjustments, and seeking responses to applications. Not one received a reply. (MDE-EVD-001 [Enc-10])
- 194.** Both Chelsea Harbour claims (BL-2024-001089 and BL-2025-000147) similarly require default judgment to be entered as a matter of urgency. I intend to seek this relief as part of my judicial review in the Court of Appeal, as there is in substance nothing to "appeal" in the conventional sense. The orders against me are void. The Defendants have no Defence. What is required is administrative correction and the entry of judgment to which I am mandatorily entitled. (HMRC-ORD-003 [Enc-06])

D.2B The Permission to Appeal the Rescission

- 195.** At the rescission hearing on 10 October 2024 before ICC Judge Prentis (order sealed 4 December 2024), I attempted to present evidence of the company's value, including the £600,000 investment commitment (corroborated by a witness statement from the investor himself, confirming that he had retracted the investment specifically because Chelsea Harbour had placed all of the company's intellectual property in the hands of a competitor) and the 1,446% growth trajectory. **Judge Prentis interrupted me**, asking why I was going through that evidence, and then proceeded to finalise the order, stating that the claim values were not high enough to cover the HMRC debt. (HMRC-ORD-003 [Enc-06]; HMRC-RPT-001 [Enc-11])

At the outset of the hearing, Judge Prentis raised the issue of a second Bounce Back Loan obtained by the company, a matter entirely irrelevant to the rescission application, in a manner that appeared designed to damage my reputation and credibility before the substantive issues were even addressed. The Bounce Back Loan is a matter I could have resolved and repaid had it not been for the systematic blocking and discrimination documented in this letter.

- 195AA.** It is this prejudicial conduct by Judge Prentis that has led to the investigation of director disqualification proceedings. Those proceedings are premature given that the Official Receiver has not yet reviewed the full position and I have not been given the opportunity to respond to the Director Conduct Questionnaire with reasonable adjustments.
- 195AB.** The HMRC debt itself is disputed in its entirety due to disability-related delays in administration linked to R&D tax credits and VAT returns. Not one VAT return was ever submitted by the company, because I was unable to complete the administrative requirements due to my ADHD and ASD, conditions which have affected me throughout my life but were not formally diagnosed until 2024 (ADHD) and 2025 (ASD).

195A. Judge Prentis's order recites that it was made "upon reading the evidence." I had submitted my evidence and skeleton argument late on the morning of the hearing due to my disability-related executive function impairment. It would have been impossible for the judge to have properly read and considered the evidence in the time available.

This is not an isolated incident. **At every hearing across all of my proceedings, I have submitted evidence and skeleton arguments late due to my disability, and at no hearing has an adjournment been granted as a reasonable adjustment**, despite judges acknowledging that they had not had sufficient time to review my evidence properly. The practical effect was that evidence was excluded not by judicial ruling but by temporal impossibility.

This exclusion constitutes a denial of the right to a fair hearing under [Article 6\(1\) ECHR](#) and, when the reason for late submission is disability-related, a failure of reasonable adjustment under the [Equality Act 2010](#).

195B. ICC Judge Greenwood, at the original winding-up hearing, similarly did not allow my evidence to be properly submitted or considered.

195C. The pattern extends to the Court of Appeal itself. On **1 November 2024**, the case lawyer Mr Brodrick stated:

"This permission to appeal application was issued on 9 July 2024. Nearly four months later, we still await the bundle and the N244. I note the Applicant's ADHD issues and the other litigation in which he is involved. But in four months more progress should have been made in progressing the present application. The application will be placed in the Master's dismissal list for failure to file the bundle."

Mr Brodrick acknowledged my ADHD in express terms, yet the response was not to consider what reasonable adjustments might enable compliance, it was to threaten dismissal. I was managing multiple complex proceedings across five courts simultaneously, as a litigant in person, without legal representation, with ADHD and ASD.

The fact that the Court of Appeal noted the disability and then applied the standard of a non-disabled litigant is itself a failure of reasonable adjustment.

195D. On **18 September 2024**, Deputy Master Glover at the directions hearing in BL-2024-001089 described the hearing as "housekeeping" at the outset, before hearing any submissions, thereby signalling that my default judgment application had already been prejudged.

He declined to consider the default judgment or summary judgment application properly, prioritised the Defendant's stay application, and imposed premature costs orders against me despite my request that costs be reserved. The Defendant's solicitors had omitted my costs application from their bundle entirely. At no point were reasonable adjustments for my ADHD considered or applied.

195E. **Master Kaye's ruling of 27 February 2025 compounds the default judgment obstruction.** At paragraphs 51(f) and 60 of the Ruling, she acknowledged that I had filed both the N227 (automatic request for default judgment) and the N244 (application for default judgment or alternatively summary judgment). She acknowledged that I was seeking default judgment "on a summary basis." (CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15])

195EA. Despite this acknowledgment, she dismissed my request to prioritise default judgment, holding that it:

"would in any event have to follow behind any consideration of strike out, summary judgment or indeed Mr Eastwood's default judgment application" (¶51(e)).

This conflates the N227 (which is automatic under [CPR 12.3](#) and requires no hearing) with the N244 (which is a discretionary application).

195EB. An N227 is processed by the court as an administrative act. It does not require a hearing, a judge's determination, or prioritisation, it is self-executing when the conditions of [CPR 12.3\(1\)](#) are met. By subordinating the automatic

N227 to the Defendant's stay application, both Deputy Master Glover and Master Kaye converted a mandatory procedural entitlement into a discretionary one.

195EC. The transcripts of the 18 September 2024 hearing, which would establish whether the “adjourn all” clause in paragraph 14 of Deputy Master Glover’s order was actually ordered by the judge or inserted by the Defendant’s solicitors, have been requested but not provided by the Chancery Division.

195F. **The BL-2025-000147 damages claim was also stayed sua sponte by Master Kaye.** On 27 February 2025 (Day 61 of the MHCM), Master Kaye issued an order in BL-2025-000147 of her own initiative under [CPR 3.3](#), staying my damages claim: (CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15]; LRP-CLM-001; MDE-MHCM-001 [Enc-03])

“until the determination of liability in BL-2024-001089 or further order.”

195FA. She described the claim as having been “issued at best prematurely” and stated that the Particulars of Claim “do not in any event set out the causes of action or particulars of those causes of action in a coherent way that complies with [CPR 16](#)” (Reasons ¶4). She further warned that “if the stay is lifted the court will consider of its own motion at any hearing whether the claim should be struck out.”

195FB. This order is void under [Regulation 7\(12\)](#) as it was made on Day 61 of the MHCM. But beyond voidness, the order demonstrates a pattern: every procedural path I pursue is blocked: (MDE-MHCM-001 [Enc-03])

- (a) The relief from forfeiture claim (BL-2024-001089) is stayed pending payment of a costs order from a different proceeding;
- (b) The damages claim (BL-2025-000147) is stayed pending liability determination in BL-2024-001089;
- (c) The default judgment that would resolve liability is stayed by the “adjourn all” clause.

195FC. The result is a closed procedural loop in which no progress is possible.

195G. **The court first attempted to extend the LCRO to BL-2025-000147, a separate proceeding, and when that failed, shifted to a different justification.** On **30 June 2025**, Sumaira Pathan of Chancery Issue emailed to relay a direction from an unnamed “Chancery Master” stating: (CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15])

“This claim was stayed by the Order dated 28 February 2025... The stay remains in place until liability has been determined on the related claim BL-2024-001089. There has not yet been a determination of liability in BL-2024-001089. The claim is still stayed.”

I responded the same day asking Ms Pathan to confirm which Master had issued the direction. No answer was provided.

195H. I filed a Default Judgment Request (N227) for BL-2025-000147 via CE-File on **24 July 2025**, accompanied by a covering letter explaining that the stay was void on two independent grounds: jurisdictional nullity (made before service) and statutory nullity (made during the MHCM). On **25 July 2025**, the CE-File system rejected the N227. The rejection, issued by clerk **Abdul Musa** of the Issue team, stated: (MDE-EVD-001 [Enc-10]; MDE-MHCM-001 [Enc-03])

“Your Request for judgment has been rejected because of the following reason: This case is the subject of a limited restraining order dated 28.2.25 in respect of the claimant.”

This was factually wrong. The LCRO of 27 February 2025 was made in claim **BL-2024-001089**. The N19 form itself records the Claim No. as “BL-2024-001089” and restrains applications “in **these proceedings**”, meaning BL-2024-001089 only. BL-2025-000147 is a *different claim* with a *different claim number*.

An LCRO cannot cross-contaminate between proceedings: [Practice Direction 3C](#) and the N19 form itself restrict a limited civil restraint order to the proceedings in which it is made. The court applied an order from one case to block filings in an entirely separate case.

195I. On **28 July 2025**, I emailed Ms Pathan correcting the error, citing [CPR 3.11](#), [Practice Direction 3C](#), and [Article 6 ECHR](#), and attaching seven documents including the LCRO itself (showing it applied to BL-2024-001089 only),

the stay order, proof of service (CitySprint, 3 June 2025), the Breathing Space Entry Letter, and the N227 with covering letter. (CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15])

I requested immediate correction, processing of the default judgment, and written confirmation that no LCRO exists for BL-2025-000147.

195J. Rather than correcting the LCRO error, the unnamed “Chancery Master” shifted to a different justification. On 14 August 2025, Ms Pathan relayed a further direction:

“The Default Judgment Request cannot be granted because the Claim is stayed... Liability in Claim BL-2024-001089 has not been determined because that claim stands struck out pursuant to the order of 6 February 2025... In order to progress this claim Mr Eastwood would first need to apply on notice to the other party to lift the stay.”

195JA. This direction is wrong on multiple grounds:

- (a) **First**, the stay of 27 February 2025 is void under [Regulation 7\(12\) DSRR 2020](#) (made on Day 61 of the MHCM). A void order does not need to be “lifted”: per [MacFoy v United Africa Co Ltd](#) [1962] AC 152, “you cannot put something on nothing and expect it to stay there.”
- (b) **Second**, the claim that BL-2024-001089 “stands struck out” is itself based on the 6 February 2025 order, which is also void (Day 40 of the MHCM). Moreover, **BL-2024-001089 remains open on the CE-File system**, the court’s own records contradict the assertion that it “stands struck out.”
- (c) **Third**, BL-2025-000147 is a *separate* claim with separate causes of action; it was issued on 3 February 2025 and served on 3 June 2025. The Defendant remains in default with no Defence filed. The N227 should be entered as of right under [CPR 12.3\(1\)](#).
- (d) **Fourth**, the direction creates a *permanent* procedural trap: if BL-2024-001089 “stands struck out,” then the condition for lifting the stay on BL-2025-000147 (determination of liability in BL-2024-001089) can *never* be satisfied. The unnamed Master has constructed an inescapable Kafkaesque loop in which I am perpetually barred from obtaining judgment.
- (e) **Fifth**, the shift from the LCRO justification (25 July) to the stay justification (14 August) demonstrates that when caught in one error of law, the court simply found a different reason to reach the same result, blocking my access to justice.
- (f) **Sixth**, I demanded for the second time that the court disclose which Master was directing Ms Pathan. Despite two express requests (30 June and 14 August 2025), the Master’s identity was never disclosed. Anonymous judicial decision-making, particularly on substantive matters affecting a litigant’s rights, is antithetical to open justice and the rule of law.

196. I subsequently applied directly to the Court of Appeal for permission to appeal the rescission of the winding-up order in CR-2024-000527. That application was refused on jurisdictional grounds, the Court of Appeal holding that the proper route was through the Chancery Division first. (HMRC-ORD-003 [Enc-06]; HMRC-ORD-004 [Enc-07]; HMRC-RPT-001 [Enc-11])

197. However, since that decision, I have filed a formal complaint against the entire Chancery Division regarding systematic bias and failure to provide reasonable adjustments. This complaint, dated 20 February 2025, potentially taints every Chancery Division judge and master as a decision-maker in my proceedings. (CHE-ORD-001 [Enc-14])

The Court of Appeal is now the **only available forum** in which the rescission application (and all other Chancery matters) can properly be determined, because no Chancery judge against whom I have an active complaint can fairly adjudicate matters in which they or their colleagues are the subject of that complaint.

198. The application was made within the applicable time limit, directly to the Court of Appeal, prior to the subsequent developments. Any question of delay is answered by my diagnosed ADHD and ASD, which constitute exceptional circumstances for the purposes of any extension of time.

199. Had these claims been considered by the Insolvency Court, the winding-up petition may not have succeeded. The company's debts to HMRC would have been more than satisfied by the damages recoverable from the Defendants.

199A. The right of action assignment was formally documented **prior to the liquidation**. In the draft Particulars of Claim dated 25 April 2024, served on LRP Ltd and Vista (London) Ltd, I included a comprehensive provision (Section 10) expressly assigning all business-related claims to me personally in the event of liquidation. That document was signed under a **Statement of Truth** by me in my capacity as both Claimant and as Director of Mastermind Group Ltd.

As the sole shareholder and sole director, I had full authority to execute the assignment on behalf of both parties. The assignment was transparent, communicated to the Defendants and stakeholders, and designed to preserve the claims for the benefit of all creditors.

The absence of a separate formal contract between myself and the company does not affect the validity of the assignment, given that the sworn statement was signed by me in both capacities and the intent was unambiguous.

D.3 HMRC: The Petitioning Creditor and the Origin of the Debt

199B. The winding-up petition was presented by **HMRC** in respect of unpaid taxes.

200. The unpaid taxes arose because:

- (a) My ADHD and ASD caused significant difficulties in completing tax returns and R&D Tax Credit applications;
- (b) I requested reasonable adjustments from HMRC to enable me to comply with my obligations;
- (c) Those adjustments were **not provided**;
- (d) As a consequence, returns were submitted late or not at all, R&D Tax Credits to which the company was entitled were not claimed, and HMRC issued assessments and penalties;
- (e) The company could not pay the resulting debt.

201. Had HMRC provided reasonable adjustments, the tax position would have been regularised, R&D credits would have been claimed, and there would have been no debt giving rise to a winding-up petition.
(HMRC-COR-001 [Enc-05]; HMRC-COR-002 [Enc-08])

D.4 The Insolvency Service: 14 April 2025

202. On **14 April 2025**, I emailed the Insolvency Service requesting additional time to submit my legal case papers for review by their solicitors.

203. I explained that:

- (a) I was pursuing substantial claims against Chelsea Harbour Ltd, LRP Ltd, and Vista (London) Ltd;
- (b) Those claims, if successful, would more than satisfy the debts giving rise to the winding-up petition;
- (c) I needed additional time, as a reasonable adjustment for my disabilities, to compile and submit the relevant documentation.

204. This request was **refused or ignored**.

205. Had the Insolvency Service engaged with this request, the underlying disputes could have been considered before enforcement action was taken.

D.5 ICC Judge Greenwood: 25 September 2024

206. On **25 September 2024**, the matter came before ICC Judge Greenwood for the winding-up hearing.

207. I requested reasonable adjustments, including additional time to submit evidence regarding my legal claims against the parties whose conduct had caused the company's insolvency.

208. This request was **not granted**. The hearing proceeded without proper consideration of the evidence I was attempting to submit.
- 208A. (HMRC-ORD-004 [Enc-07]) At the hearing, I informed ICC Judge Greenwood that I was pursuing judicial review of another judge's refusal to award default judgment in the related Chelsea Harbour proceedings (BL-2024-001089). The winding-up order was made immediately after this disclosure. The timing raises a question of victimisation within the meaning of [section 27 of the Equality Act 2010](#): doing a protected act (raising a complaint about discriminatory treatment by a judge) was followed immediately by an adverse order.
209. **Had ICC Judge Greenwood provided reasonable adjustments, the Court would have had the full picture of the disputed underlying claims and the company's potential to recover substantial damages.**
- 209B. **The winding-up order of ICC Judge Greenwood is void on five independent grounds:** (i) breach of EA 2010 s.20 (failure to make reasonable adjustments for a disabled litigant with ADHD and ASD); (ii) victimisation under EA 2010 s.27 (adverse order immediately after disclosure of JR intention); (iii) breach of natural justice (*Ridge v Baldwin* [1964] AC 40: evidence excluded, no opportunity to present full case); (iv) wrong court (SI 2014/817: transfer to County Court was itself jurisdictionally void); (v) no evidence heard (the substantive cross-claims exceeding the petition debt were not considered, contrary to *Re Bayoil SA* [1999] 1 WLR 147). Each ground is independently sufficient. **Every subsequent insolvency act flows from this void order. Every such act is a derivative nullity** (*MacFoy v United Africa Co Ltd* [1962] AC 152).
- 209A. The company had pending High Court claims totalling over **£9.2 million** (MDE-FIN-001 [OR-027]; MDE-FIN-005 [OR-872]; LRP-CLM-001 [OR-704]) (BL-2024-001089 and BL-2024-001166) that would have more than satisfied the HMRC debt forming the winding-up petition. Under *Re Bayoil SA* [1999] 1 WLR 147 (CA), where a company has a genuine and substantial cross-claim that exceeds the petitioning creditor's debt, the court should ordinarily adjourn the petition rather than make a winding-up order. ICC Judge Greenwood made the winding-up order without considering these claims.

D.6 ICC Judge Prentis: 4 December 2024

210. On **4 December 2024**, the matter came before ICC Judge Prentis for the rescission application (the order having been sealed on that date following the hearing on 10 October 2024). (HMRC-RPT-001 [Enc-11])
211. I had prepared evidence demonstrating the strength of my claims against the Defendants and the company's ability to satisfy its debts from the proceeds of those claims.
212. Due to my disability, specifically executive function impairment affecting my ability to meet deadlines, I was only able to submit this evidence on the morning of the hearing.
213. I requested an adjournment to allow proper consideration of the late-submitted evidence. I explained that the late submission was disability-related and requested this as a reasonable adjustment.
214. The adjournment was **refused**. The rescission application was refused without proper consideration of my evidence. **The refusal is a derivative nullity**. ICC Judge Prentis was asked to rescind a void order. A refusal to rescind a void order is itself built on nothing (*MacFoy v United Africa Co Ltd* [1962] AC 152). Additionally, the refusal of the adjournment was itself a failure to make reasonable adjustments under EA 2010 s.20.
- 214A. (HMRC-RPT-001 [Enc-11]) During the hearing, ICC Judge Prentis raised the existence of a Bounce Back Loan obtained by the company during the COVID-19 pandemic. This was raised in a manner that appeared prejudicial, without proper contextual explanation or submissions from HMRC. The BBL was used for legitimate business purposes. The inference drawn by the court was adverse to the company, and it coloured the court's view of the rescission application before the substantive merits had been properly considered.
215. **Had ICC Judge Prentis granted the adjournment as a reasonable adjustment, the evidence would have been considered and the rescission application may have succeeded. The winding-up order could have been set aside, and the subsequent insolvency proceedings, including the void arrest warrant, would never have arisen.** (HMRC-ORD-002 [Enc-02]; HMRC-ORD-004 [Enc-07]; HMRC-RPT-001 [Enc-11])

215A. I filed an Appellant's Notice in the Court of Appeal (**CA-2024-002890: *Mastermind Group Ltd and another v Commissioners for His Majesty's Revenue and Customs and another***). On **8 January 2025**, the Jurisdiction Lawyer, **Mrs Levey**, directed that the Court of Appeal had no jurisdiction to entertain the appeal, citing [article 4\(1\)\(a\) of the Access to Justice Act 1999 \(Destination of Appeals\) Order 2016](#) and [Part 2 of Schedule 2 to the Senior Courts Act 1981](#). (HMRC-ORD-003 [Enc-06])

On **9 January 2025**, I requested that the appeal be retained by the Court of Appeal, expressly raising: (i) procedural prejudice, including the denial of reasonable adjustments for my ADHD at the rescission hearing; and (ii) the connection to the existing appeal already pending before the Court of Appeal (CA-2024-001353), requesting consolidation under [CPR 1.1](#).

Later that day, **Master Bancroft-Rimmer** confirmed via Ms Sybil Pratt that the Court of Appeal could not retain jurisdiction and directed that the application for permission to appeal must be made to a Judge of the High Court.

215B. The consequence is a jurisdictional trap of the court system's own making. The statutory appeal route from an Insolvency and Companies Court Judge leads to a High Court Judge sitting in the Chancery Division. But I have since filed a formal complaint against the **entire Chancery Division** regarding systematic bias against litigants in person and neurodivergent individuals.

The very division to which the rescission appeal was directed is now the subject of that complaint. No Chancery Division judge can fairly adjudicate any of my matters while that complaint remains outstanding. The Court of Appeal is the only court with both the jurisdiction and the impartiality to determine these issues. This is a further reason why consolidation under the Court of Appeal is not merely desirable but **necessary**.

D.7 The Present Position: The Insolvency Service (January 2026)

216. I have now received an arrest warrant issued by a court without jurisdiction, 65 days after it was made, with no prior notice that such an application was being made. (HMRC-ORD-002 [Enc-02])

217. I have responded with a detailed 13-page letter setting out my jurisdictional objection, offering to attend a public examination, and requesting reasonable adjustments.

218. The Insolvency Service has responded by:

- (a) Asserting validity without legal basis;
- (b) Ignoring my offer to attend a public examination;
- (c) Refusing reasonable adjustments; and
- (d) Threatening arrest.

D.8 The Pattern

219. The pattern is set out in the following table:

Date	Body / Decision-Maker	Adjustment Requested	Outcome	Consequence
Various	HMRC	RA for tax returns / R&D claims	REFUSED / IGNORED	Debt accrued; petition presented
Pre-2025	Chelsea Harbour / LRP / Vista / Harold Benjamin Solicitors	Multiple requests for reasonable adjustments; EA 2010 compliance; disability accommodation	IGNORED REPEATEDLY	Repeated requests for reasonable adjustments ignored by Chelsea Harbour and their solicitors Harold Benjamin, both before and after they sold the Claimant's belongings and installed a new tenant; caused insolvency through unlawful conduct compounded by disability discrimination
14 Apr 2025	Insolvency Service	Time to submit legal papers	REFUSED / IGNORED	No consideration of underlying claims
13 Aug 2024	Master Clark (Chancery)	N/A (no notice given)	ULTRA VIRES TRANSFER	BL-2024-001166 transferred to County Court the day after issue, before service, without hearing or notice; set-aside application deleted from CE-File; Claimant directed to County Court to challenge; witness statements likely never placed before the judge
3 Sep 2024	Deputy Master Dover (Chancery)	Keep case in High Court (amended claim resealed)	REFUSED	Used Defendants' lack of knowledge of the claim (caused by the pre-service transfer) as justification; directed Claimant to County Court to relitigate jurisdictional challenge
18 Sep 2024	Deputy Master Glover (Chancery)	RA for ADHD; digital bundle; costs reservation	REFUSED / IGNORED	Hearing prejudged as "housekeeping"; premature costs imposed; DJ application deferred
25 Sep 2024	ICC Judge Greenwood	Time to submit evidence	REFUSED	Winding-up order made without full evidence
25–26 Sep 2024	Chief Master Shuman (via Jeremy Jules)	Escalation to High Court Judge; ADHD adjustments	REFUSED	"I am not prepared to direct that this claim be released to a High Court Judge"; claimed DM Glover already provided RA ("significantly longer hearing" and "pauses"); adjustments bearing no resemblance to Dr Woolley's subsequent clinical recommendations; directed compliance with existing directions
1 Oct 2024	Master Kaye (via Jeremy Jules)	Processing of N227 default judgment	REFUSED	"The request for default judgment was therefore unnecessary and cannot be processed"; claimed DJ "adjourned on 18 September" (clause disputed; transcript withheld); automatic CPR 12.3(1) entitlement converted into discretionary remedy subordinated to Defendant's stay

1 Nov 202 4	Court of Appeal (Mr Brodrick, case lawyer)	ADHD acknowledged; extension for bundle	THREATENED DISMISSAL	“I note the Applicant’s ADHD issues” but placed on dismissal list
4 Dec 202 4	ICC Judge Prentis	Adjournment for rescission evidence	REFUSED	Rescission refused
8–9 Jan 202 5	Court of Appeal (Mrs Levey; Master Bancroft- Rimmer)	Retention of rescission appeal (CA-2024- 002890); ADHD prejudice raised	DECLINED	Appeal directed back to Chancery Division (now subject of formal bias complaint)
4–5 Feb 202 5	Master Kaye (via Jeremy Jules)	Time for submissions; right to file evidence	RESTRICTED + THREATENED	Restricted to 1 hour for 4+ complex applications; threatened sanctions for filing supplementary evidence; threatened sanctions if supplemental bundle “not relevant”; skeleton argument declared “late” despite ADHD
5 Feb 202 5	██████████ (Clerk to Master Kaye)	Critical evidence and skeleton argument filed	NOT FORWARDED	10:41am email with ~30 attachments (skeleton argument, analysis of 6 contradictions in Defendant’s witness statement, Dr Woolley’s letter, certificates of service) not placed before Master Kaye; she admitted at hearing she did not receive them
5 Feb 202 5	Master Kaye (Chancery)	Time for s.130(2) IA 1986 application	DISMISSED (TWM)	Application to continue company claims dismissed as TWM on paper, day before hearing
6 Feb 202 5	Master Kaye (Chancery)	Prioritisation of default judgment (N227/N244)	REFUSED	DJ subordinated to Defendant’s stay; N227 automatic entitlement treated as discretionary; claim stayed with 4- month strike-out; hearing proceeded without Claimant’s evidence (not forwarded by Jules)
11 Feb 202 5	Master Kaye (via Jeremy Jules)	Post-hearing submissions on substantive issues	REFUSED	“Mr Eastwood has become confused”; submissions limited to 3 adverse issues only (LCRO, fees, costs); Claimant’s email called “inappropriate”; substantive applications (DJ, set-aside, misleading evidence) already decided without Claimant’s evidence
27 Feb 202 5	Master Kaye (Chancery)	N/A (ruling on paper)	LCRO + indemnity costs order (£12,000 interim payment) + BL- 2025-000147 stayed	LCRO imposed 7 days after complaint; incorrect statement in ruling that complaint included Court of Appeal; ADHD symptoms used as justification for sanctions; damages claim stayed sua sponte

30 Jun 2025	Unnamed "Chancery Master" (via Sumaira Pathan)	Amended Particulars for BL-2025-000147	REFUSED	Claim "still stayed"; refused to acknowledge MHCM void argument; Master refused to identify themselves despite direct request
25 Jul 2025	Clerk Abdul Musa (Chancery Issue)	N227 Default Judgment for BL-2025-000147	REJECTED (CE-File)	N227 rejected on basis of LCRO from BL-2024-001089; a different case; LCRO's own N19 form specifies "BL-2024-001089" and "in these proceedings"; cross-contamination of restraint orders between separate claims
14 Aug 2025	Unnamed "Chancery Master" (via Sumaira Pathan)	N227 Default Judgment for BL-2025-000147	REFUSED	Shifted from LCRO justification to stay justification; claimed BL-2024-001089 "stands struck out" (itself void, and claim remains open on CE-File); required application to "lift" void stay; created permanent procedural trap; Master again refused to identify themselves
19 Aug 2025	Recorder Cohen KC (CLCC, L10CL352)	PD1A adjustments; email application; time to prepare	SUMMARY JUDGMENT GRANTED	Defence admissions (lock-outs, access restrictions) disregarded; email application refused; limited pre-reading of materials acknowledged but proceeded anyway; MHCM/Breathing Space arguments not addressed
19 Nov 2025	DJ Mauger (CLCC)	None (no notice given)	N/A	Void arrest warrant issued
23 Jan 2026	Insolvency Service	RA per letter	REFUSED / IGNORED	Threat of arrest
27 Jan 2026	Ross Wheeler	RA repeated	REFUSED	Continued threat of arrest

220. At every stage, reasonable adjustments have been refused, ignored, or not even considered. At every stage, the consequence has been adverse to me.

221. The cumulative effect is that I now face arrest under a void Order, in purported enforcement of a liquidation that **need never have occurred** and which is founded on debts that would be more than satisfied by my claims against the parties who caused the insolvency.

D.9 The Legal Significance: [Galo](#) and Systemic Discrimination

222. In [Galo v Bombardier Aerospace UK](#) [2016] NICA 25, a single tribunal's failure properly to address disability and medical evidence was held sufficient to render proceedings procedurally unfair, requiring set aside.

The principle applies with at least equal force here, where the pattern of failures extends across multiple courts and decision-makers. If a single failure to adjust can render one set of proceedings unfair, the cumulative failure of every court and public body to adjust across multiple proceedings is capable of constituting systemic procedural unfairness of a far greater order.

223. The pattern documented above is precisely such a case.

224. No single decision-maker may have intended to discriminate. But the **cumulative effect** of repeated failures to make reasonable adjustments, by HMRC, by the Insolvency Service, by Deputy Master Glover, by Master Kaye, by ICC Judge Greenwood, by ICC Judge Prentis, by the Court of Appeal itself (Mr Brodrick), by District Judge Mauger (who had no notice of my disability), and now by Mr Wheeler, constitutes **systemic discrimination** against a disabled litigant in person. (HMRC-ORD-004 [Enc-07]; HMRC-RPT-001 [Enc-11])
225. I place the Insolvency Service on notice that this pattern will form part of:
- (a) Any judicial review of the Order of 19 November 2025;
 - (b) My pending appeal in CA-2024-001353;
 - (c) Any complaint to the Parliamentary and Health Service Ombudsman;
 - (d) Any complaint to the Equality and Human Rights Commission; and
 - (e) Any claim for damages under the [Equality Act 2010](#) and/or the [Human Rights Act 1998](#).

D.10 The Insolvency Service's True Objective

226. Mr Wheeler's email of 27 January 2026 suggests that obtaining information is not presently the Insolvency Service's only, or primary, objective.
227. If it were, the Service would accept my offer to attend a public examination. I am willing. I am cooperative. I want to be examined.
228. The present objective appears to be to **close the books on this liquidation** as quickly as possible, without engaging with:
- (a) The substantial underlying claims I am pursuing against the parties who caused the insolvency;
 - (b) The jurisdictional defect that renders the arrest warrant void;
 - (c) My reasonable adjustment requests; or
 - (d) My offer to cooperate through proper channels.
229. This is understandable from a bureaucratic perspective. It is not, however, compatible with:
- (a) The Insolvency Service's duties under the [Equality Act 2010](#);
 - (b) Its obligation to act lawfully and within jurisdiction;
 - (c) Its duty to act fairly towards a disabled director who is actively challenging the basis of the liquidation; or
 - (d) The public interest in ensuring that enforcement action is not taken on the basis of void orders.
230. **If the Insolvency Service's concern had been to resolve matters effectively for all parties, including creditors, one would have expected engagement with my correspondence of 14 April 2025.** That did not occur.
231. **If obtaining information from me were the Insolvency Service's primary concern, one would expect it to accept my offer to attend a public examination.** It has not done so.

PART E: THE CONTRAST

Summary

Side-by-side comparison of the Applicant's conduct and the Insolvency Service's conduct. The Applicant: produced a 13-page letter on the day he received the warrant; offered to attend a public examination; provided medical evidence; cited legal authority. The Insolvency Service: procured an order from a court without jurisdiction; failed to serve any application; ignored reasonable adjustment requests; refused to provide bank statements; and threatened arrest. The inference: the Applicant is not the party failing to cooperate.

Key paragraphs: 232–240

232. I invite any court, tribunal, or investigating body reviewing this correspondence to consider the contrast between my conduct and that of the Insolvency Service.

E.1 My Conduct

233. On **23 January 2026**, the same day I received an arrest warrant, sixty-five days after it was made, I produced and sent a **13-page letter** containing (HMRC-COR-004 [OR-1226], pp.3-9):

- (a) A comprehensive jurisdictional objection citing the [Insolvency Act 1986](#), the Practice Direction, and binding House of Lords authority (*Anisminic*, *MacFoy*);
- (b) An analysis of [Article 5 ECHR](#) and the right to liberty;
- (c) Full disclosure of my disability status with attached medical evidence;
- (d) A detailed explanation of my litigation position;
- (e) A reasonable extension request with specific dates;
- (f) An express offer to attend a properly constituted public examination;
- (g) A formal undertaking to cooperate;
- (h) A Schedule of Authorities; and
- (i) A Statement of Truth.

234. I did this while managing **six concurrent High Court and Court of Appeal proceedings** as a litigant in person with ADHD and ASD, without legal representation, arising from the same underlying events.

235. On **27 January 2026**, the same day I received Mr Wheeler's non-response, I began preparing this **further letter** amplifying my position, documenting the pattern of failures, and repeating my offers. It is now filed in its finalised form. (HMRC-COR-003)

E.2 The Insolvency Service's Conduct

236. The Insolvency Service, by contrast:

- (a) Procured an Order from a court **without jurisdiction**;
- (b) Used an **invented County Court reference number** ("1061 of 2025") for a High Court liquidation;
- (c) **Failed to serve any application for arrest** on me;
- (d) Made the Order "**without a hearing**";
- (e) Characterised disability-related non-attendance as "**not co-operating**", a factually incorrect characterisation that ignores the disability context;
- (f) Took **65 days to serve** the Order;
- (g) When challenged on jurisdiction, **asserted validity without any legal basis**;
- (h) **Ignored** my offer to attend a public examination in the correct court;
- (i) **Refused** reasonable adjustments;
- (j) **Threatened arrest** as a coercive tool; and
- (k) Failed to engage with my correspondence of **14 April 2025** which could have resolved these matters months ago.

E.3 The Inference

237. The inference is clear. **I am not the party failing to cooperate.**

238. I have done everything that could reasonably be expected of a disabled litigant in person managing complex multi-track litigation. I have engaged substantively with every issue. I have offered to attend a public examination. I have provided medical evidence. I have cited legal authority.

239. The Insolvency Service has responded with bare assertion, refusal to engage, and threats.

240. Any fair-minded observer would conclude that the Insolvency Service's conduct falls far short of what is required of a public authority acting under statutory powers that affect a citizen's liberty.

PART F: REQUESTS AND DEMANDS

Summary

Six categories of formal request: (1) a demand that the Insolvency Service identify the statutory basis for County Court jurisdiction within 14 days; (2) a repeated offer to attend a public examination in the High Court; (3) reasonable adjustment requests under s.20 EA 2010; (4) unanswered requests for information about the warrant; (5) a formal request for company bank statements necessary for compliance; and (6) a demand for undertakings within 7 days that no steps will be taken to execute the warrant pending jurisdictional determination.

Key authorities: IA 1986, ss.117, 133, 134, 235, 236; EA 2010, s.20 • **Key paragraphs:** 241–258

F.1 Jurisdictional Explanation (DEMANDED)

241. **I demand that the Insolvency Service identify, within 14 days of this letter, the statutory provision, rule, or authority that confers jurisdiction on the County Court at Central London to:**
(HMRC-ORD-001 [Enc-01]; HMRC-ORD-004 [Enc-07])

- (a) Conduct a public examination under [section 133 of the Insolvency Act 1986](#) in a High Court company winding-up; and/or
- (b) Issue an arrest warrant under [section 134 of the Insolvency Act 1986](#) in respect of the same.

242. If the Insolvency Service cannot identify such a provision, I demand that it:

- (a) Consent to the discharge of the arrest warrant; or
- (b) Refrain from seeking its execution pending determination of the jurisdictional question by a court of competent jurisdiction.

F.2 Public Examination (OFFERED)

243. **I repeat my offer to attend a public examination** in the High Court (Insolvency and Companies Court), being the court with statutory jurisdiction over CR-2024-000527 (HMRC-COR-004 [OR-1226], pp.4, 8).

244. I request:

- (a) At least 28 days' notice of the hearing date;
- (b) Implementation of reasonable adjustments pursuant to my registered HMCTS reference 67862925 and the [Equality Act 2010](#);
- (c) Written confirmation of the adjustments to be provided in advance.

F.3 Reasonable Adjustments (REQUESTED)

245. I repeat my reasonable adjustment requests (HMRC-COR-004 [OR-1226], pp.6-9):

- (a) **Extension of time** to respond to the Director Conduct Questionnaire until **28 April 2026**;
- (b) **Single named point of contact** (or, if genuinely impossible, a clear written explanation of who handles what and how I should direct correspondence);
- (c) **Staged responses** permitted, starting with high-level answers and adding detail as capacity permits;
- (d) **All communications in writing** (email and post) to allow processing time.

F.4 Information (REQUESTED)

246. I repeat my unanswered requests for information:

- (a) Confirm whether the arrest warrant has been transmitted to any police force;

- (b) Provide a copy of any application for my arrest (if any such application was made separately from the public examination summons);
- (c) Explain the origin of reference number "1061 of 2025" and identify who created it and on what authority.

F.5 Company Bank Statements (REQUIRED FOR COMPLIANCE)

247. Mr Wheeler's email demands that I provide "clarification on payments and Directors Loan Account" and other financial information about the company.
248. I am unable to comply with this request without access to the company's bank statements. **Mr Wheeler has these statements.** His email of 7 March 2025 quotes specific transactions from the Lloyds account and attaches a Lloyds spreadsheet. He confirmed by telephone that he had obtained the Lloyds statements. Yet he has never provided copies to me. (HMRC-COR-003)
249. Upon liquidation, control of the company's bank accounts passed to the Official Receiver. I no longer have access to these records. I cannot provide accurate information about payments, the Directors Loan Account, or other financial matters without sight of the underlying bank statements, statements which the Official Receiver possesses, has used to interrogate me, but refuses to share.
250. **I therefore formally request that the Official Receiver provide me with copies of all bank statements for Mastermind Group Ltd held in connection with the liquidation, for the period from 1 January 2021 to the date of liquidation.**
251. This request is made pursuant to:
- (a) The requirement of basic fairness in how any cooperation obligation is enforced: if a director is required to provide detailed financial information under [section 235 of the Insolvency Act 1986](#), the director must be provided with access to the documents necessary to give accurate answers;
 - (b) My right as a former director to access company records for legitimate purposes, including responding to regulatory inquiries;
 - (c) The Insolvency Service's own guidance on facilitating director cooperation; and
 - (d) Basic fairness. It is unreasonable to threaten a person with arrest for failing to provide information that they cannot provide without documents held by the party making the threat.
252. **The position is therefore as follows:**

The Insolvency Service's Position	The Reality
"Provide financial information or face arrest"	I do not have the bank statements
OR obtained Lloyds statements (confirmed by phone and evidenced by 7 March 2025 email with Lloyds spreadsheet attached)	Copies not provided to me despite request on 20 January 2025
OR quotes Lloyds data to interrogate me	OR can see the documents; I cannot
OR demands explanation of "savings account" transfers	These were inter-company transfers between the company's own accounts; apparent from the same Lloyds statements the OR was reading
OR demands DLA/BBL clarification	I cannot provide accurate figures from memory without the documents the OR has in front of him
Arrest threatened for non-compliance	Apparent non-compliance created by the OR's refusal to provide the requested records

253. This is not a reasonable position. The Insolvency Service cannot simultaneously:

- (a) Demand detailed financial information;
 - (b) Withhold the documents necessary to provide that information; and
 - (c) Threaten arrest for failure to provide information that cannot be provided without those documents.
254. I am willing and able to provide the information requested, **once I have been provided with the bank statements necessary to do so accurately.**
255. I request that the bank statements be provided within 14 days. Upon receipt, I will provide the financial information requested within the extended deadline of 28 April 2026 (or such other reasonable period as may be agreed as a reasonable adjustment).

F.5A Full Hearing Transcripts (DEMANDED)

- 255A. **I formally request that the Insolvency Service support my application to the Court of Appeal for the production of complete hearing transcripts of every hearing** across all of my proceedings, at public expense. To be clear: I do not require merely the verbal order transcripts or the sealed orders. I require the **full transcripts of entire hearings**, from the moment proceedings commenced to the moment they concluded. (HMRC-ORD-003 [Enc-06])
- 255B. It is the conduct *during* hearings that constitutes the evidence of discrimination: the interruptions, the refusals of reasonable adjustments, the dismissive treatment, the prejudicial comments, and the denial of opportunities to present evidence. None of this is captured in sealed orders or short verbal pronouncements. The King's Bench Division provided a transcript of the judgment only, not the hearing. Every other request has been ignored or refused.
- 255C. This is a matter of **major public importance**. The cost of transcription is modest given modern AI-assisted transcription technology. The recordings exist. The transcripts are the only contemporaneous record of the discrimination I experienced, and they have been systematically withheld by every court despite repeated requests. Where the courts themselves are the subject of complaint, the public interest demands that the evidence be produced, not suppressed.
- 255D. This request is copied to the Court of Appeal for the purposes of my Administrative Notice. I will be seeking an order for the production of all transcripts as a matter of public interest and as evidence in the judicial review proceedings I intend to bring. (HMRC-ORD-003 [Enc-06])

F.6 Undertakings (REQUESTED) - 7 DAY DEADLINE

256. I request that the Insolvency Service confirm **in writing within 7 days (by 2 March 2026)** that:
- (a) **No steps will be taken to execute the arrest warrant** pending determination of the jurisdictional question by a court with competence to determine it;
 - (b) The company bank statements will be provided to enable compliance with the Questionnaire.
257. If no such undertaking is provided within 7 days, I will:
- (a) Apply to the Court of Appeal for urgent interim relief staying the warrant;
 - (b) Treat the refusal as evidence that the Insolvency Service is prepared to maintain the risk of arrest of a disabled person under an order I say is void;
 - (c) Reserve all rights for damages under the [Human Rights Act 1998](#), the [Equality Act 2010](#), and for false imprisonment, misfeasance in public office, and harassment.
258. For the avoidance of doubt: if I am arrested pursuant to a void warrant after the Insolvency Service has refused to provide an undertaking and refused to engage with the jurisdictional objection, every relevant cause of action, including false imprisonment, misfeasance in public office, and claims under [Article 5 ECHR](#) and the [Equality Act 2010](#), will be pursued to the fullest extent.

PART G: CONSEQUENCES AND ESCALATION

Summary

If the Insolvency Service continues its current course, the Applicant will: issue judicial review proceedings; file complaints with the Parliamentary Ombudsman and the EHRC; pursue damages under the Equality Act 2010 and Human Rights Act 1998, including for false imprisonment and misfeasance in public office; and seek the Court of Appeal's supervisory jurisdiction. This Part also sets out the complete picture for the Court of Appeal: the underlying claims, the default positions, the void MHCM orders, the LCRO, and the false imprisonment framework.

Key authorities: [HRA 1998](#); [EA 2010](#); [R v Governor of Brockhill Prison, ex p Evans \(No 2\)](#); [R \(Lumba\) v SSHD](#); [Three Rivers DC v Bank of England \(No 3\)](#); [ECHR Art. 5](#) • **Key paragraphs:** 259–294

259. If the Insolvency Service continues to:

- (a) Assert the validity of the Order without providing any legal basis;
- (b) Refuse to engage with my reasonable adjustment requests;
- (c) Ignore my offer to attend a properly constituted public examination;
- (d) Threaten arrest as a coercive tool against a disabled person;
- (e) Withhold the bank statements necessary for me to comply with its demands; and
- (f) Fail to acknowledge the pattern of systematic failures documented in this letter,

I will have no alternative but to:

- (i) **Issue judicial review proceedings** in the Administrative Court challenging the Order of 19 November 2025 and the conduct of the Insolvency Service;
- (ii) **File a formal complaint** with the Parliamentary and Health Service Ombudsman;
- (iii) **File a discrimination complaint** with the Equality and Human Rights Commission;
- (iv) **Include this correspondence** in my pending Court of Appeal proceedings (CA-2024-001353) as evidence of the systemic failures affecting my litigation;
- (v) **Pursue a claim for damages** under the [Equality Act 2010](#) and/or the [Human Rights Act 1998](#) in respect of the discriminatory treatment and any unlawful deprivation of liberty; and
- (vi) **Pursue any other remedies** available to me in law.

G.1 Notice Regarding Court of Appeal Supervisory Jurisdiction

260. The Insolvency Service should be aware of the following.

261. The Insolvency and Companies Court sits within the **Chancery Division** of the High Court. I have filed a **formal complaint** against the Chancery Division regarding systematic failures to provide reasonable adjustments and apparent bias in the handling of my matters.

262. That complaint remains unresolved. Multiple orders have been made against me by Chancery Division judges and masters during periods when:

- (a) I was under a certified Mental Health Crisis Moratorium (28 December 2024 to 16 April 2025);
- (b) I had requested but not received reasonable adjustments;
- (c) Procedural safeguards were bypassed; and
- (d) The judges concerned had notice (or should have had notice) of my disability status.

263. The **Court of Appeal** has supervisory jurisdiction over the High Court, including the Chancery Division and the Insolvency and Companies Court. My appeal CA-2024-001353 is currently pending before that Court.

G.2 CONTEXT FOR THE COURT OF APPEAL: THE COMPLETE PICTURE

264. Since this letter is being copied to the Court of Appeal, I set out below the essential context that the Court requires to understand the interconnected nature of these proceedings and the systematic failures that have occurred.

G.2.1 The Underlying Claims and Default Positions

265. I am the Claimant in three High Court proceedings arising from the same underlying events. The unlawful forfeiture of my commercial premises and the destruction of my business:

Claim	Defendant(s)	Subject Matter	Service Date	Defence Due	Defence Status	Days in Default
BL-2024-001089	Chelsea Harbour Ltd	Unlawful forfeiture; breach of covenant; loss of business	01.08.24	18.08.24	Never filed	533 + days
BL-2025-000147	Chelsea Harbour Ltd	Personal and proprietary damages: conversion (TIGA 1977), copyright infringement (CDPA 1988), alleged sale / misuse of the Claimant's intellectual property to a competitor, disability discrimination (EA 2010), wrongful forfeiture	08.05.25	04.06.25	Never filed	259 + days
BL-2024-001166	LRP Ltd, Vista (London) Ltd	Harassment (PfHA 1997), breach of contract, breach of quiet enjoyment, disability discrimination (EA 2010), unlawful lockouts. Quantum: £4,907,000	30.08.24	27.09.24	Filed 27 days late in void County Court proceedings, without CPR 3.9 relief. No Defence filed on High Court file	510 + days

266. The combined default period exceeds **1,302 days**. I contend that I am entitled to judgment in default under [CPR 12.3](#) in respect of all three claims. [CPR 12.3\(1\)](#) provides that a claimant may obtain default judgment by filing a request where the defendant has failed to file an acknowledgment of service or a defence.

The structure of [CPR Part 12](#) and [CPR Part 13](#) confirms that default judgment, once regularly entered, stands unless and until set aside under Part 13: see [Cunico Resources NV v Daskalakis](#) [2018] EWHC 3382 (Comm). [CPR 13.2](#) provides that the court **must** set aside a default judgment where the conditions for its entry under [CPR 12.3](#) were not satisfied. The necessary implication is that where those conditions were satisfied, the claimant was entitled to the judgment as of right.

267. In **BL-2024-001166**, the purported transfer to the County Court was void ab initio (see paragraphs 185-185AC above). No Defence was ever filed on the High Court file. The only purported Defence was filed 27 days after the [CPR 15.4](#) deadline in the void County Court proceedings, without CPR 3.9 relief.

267A. Per [Billington v Davies](#) [2016] EWHC 1919 (Ch): even if that filing were treated as relevant, a Defence filed after the deadline without a valid extension is ineffective for defeating default judgment unless and until properly regularised. The only attempt at regularisation was the January Order of 6 January 2025, which is itself void under [Regulation 7\(12\)](#). There remains no valid Defence to BL-2024-001166. (HMRC-ORD-003 [Enc-06]; MDE-MHCM-001 [Enc-03])

268. **These defaults expose the Defendants to very substantial liability.** The current valuation materials place the losses in issue well into eight figures, including a discounted cash flow future-profit estimate of approximately £11.8 million NPV (MDE-FIN-001 [OR-027]; MDE-FIN-005 [OR-872]; MDE-FIN-002 [OR-201]; MDE-FIN-004 [OR-863]), while BL-2024-001166 is separately pleaded at £4,907,000. Any unliquidated quantum would fall to be assessed under

[CPR 12.5\(3\)](#) and [12.8](#). The Defendants' conduct directly caused the insolvency of Mastermind Group Ltd, the company now in liquidation.

G.2.2 The Mental Health Crisis Moratorium and Void Orders

269. I was under a certified **Mental Health Crisis Moratorium** from **28 December 2024 to 16 April 2025** (reference BSS-0000297093), certified by Dr James Woolley, Consultant Psychiatrist.

270. [Regulation 7\(12\) of the Debt Respite Scheme \(Breathing Space Moratorium and Mental Health Crisis Moratorium\) \(England and Wales\) Regulations 2020](#) provides:

"Any action taken contrary to this regulation **shall be null and void.**"

271. In [Lees v Kaye](#) [2022] EWHC 1151 (QB), the court treated enforcement steps taken during a mental health crisis moratorium as automatically null and void by operation of [Regulation 7\(12\)](#), requiring the position to be unwound. The court treated the regulation as leaving no discretion to validate actions taken in breach of the moratorium. (MDE-MHCM-001 [Enc-03])

272. The following orders were made **during the MHCM period** and are therefore **void by operation of statute**:

Date	Case	Order	MHCM Day	Status
06.01.2025	L10CL352	Costs (standard and indemnity basis); late Defence retrospectively validated; transfer to High Court dismissed; stay with automatic strike-out	Day 9	VOID
05.02.2025	BL-2024-001089	s.130(2) IA 1986 leave refused; TWM order	Day 39	VOID
06.02.2025	BL-2024-001089	Stay until 6 June 2025 with automatic strike-out backstop tied to KB-2024-001508 costs order; further TWM order	Day 40	VOID
27.02.2025	BL-2024-001089	Indemnity costs order; £12,000 interim payment on account	Day 61	VOID
27.02.2025	BL-2024-001089	Limited Civil Restraint Order (for duration of proceedings)	Day 61	VOID

273. Every one of those orders was made during the MHCM protected period. No application was made to the approved mental health professional or the court for permission to take enforcement action during the moratorium. The orders are void by operation of [Regulation 7\(12\)](#) and must be unwound. (HMRC-ORD-003 [Enc-06]; MDE-MHCM-001 [Enc-03])

274. The **LCRO itself is void**. It was made on Day 61 of the MHCM, during the protected period. The requirement to seek permission to make applications constitutes enforcement action within the meaning of [Regulation 7 of the 2020 Regulations](#): cf. [Axnoller Events v Brake](#) [2021] EWHC 2308 (Ch), in which the court construed the moratorium provisions broadly. Such action, taken during the MHCM period, is void under [Regulation 7\(12\)](#). (CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15]; MDE-MHCM-001 [Enc-03])

274A. **The LCRO is also void for want of jurisdictional foundation**. A Limited Civil Restraint Order under [CPR 3.11](#) and [Practice Direction 3C](#) requires at least two valid "Totally Without Merit" certifications as its jurisdictional predicate. The LCRO expressly relies on the two TWM orders dated 5 February 2025 and 6 February 2025. Each was made during the MHCM window and is void under [Regulation 7\(12\)](#). With zero valid TWM orders, the LCRO's statutory foundation does not exist. (CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15]; MDE-MHCM-001 [Enc-03])

Per [Wasif v Secretary of State for the Home Department](#) [2016] EWCA Civ 82 and [R \(Grace\) v Secretary of State for the Home Department](#) [2014] EWCA Civ 1091 at [41], TWM means no more than that the claim is bound to fail. The order materials do not, however, identify in any focused way why each challenged ground was hopeless,

and a global TWM was applied to a multi-limb application that included plainly arguable administrative components (consolidation, reasonable adjustments, transcript provision).

274B. **The N460 is a jurisdictional nullity.** On 7 February 2025, I filed written submissions at Master Kaye’s express invitation, addressing court fees, costs quantum, and whether an LCRO should be made. The submissions used exclusively [CPR Part 3](#) language (variation under [CPR 3.1\(7\)](#), set-aside under CPR 23.10). They contained no reference to [CPR Part 52](#), no Appellant’s Notice on Form N161, no appeal grounds, and no request for permission to appeal. (CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15])

On 28 February 2025, Master Kaye issued Form N460 stating:

“*I have treated that as an application for permission to appeal.*”

Form N460 is prescribed under [Practice Direction 52A](#) §4.2 exclusively for refusing PTA applications made under [CPR Part 52](#). Its jurisdictional predicate, a compliant [CPR 52.3](#) application, did not exist.

Per [Pigłowska v Pigłowski](#) [1999] 1 WLR 1360 (HL), applications for reconsideration under CPR Part 3 are legally distinct from appeals under [CPR Part 52](#). A court cannot convert one into the other by stipulation. The N460 is void for want of jurisdiction.

274C. **The TWM orders fail under a “double-lock” analysis that is logically inescapable.** There are only two possibilities: either the MHCM applied to these proceedings, or it did not. If the MHCM applied, then the TWM orders dated 5 February 2025 and 6 February 2025 are void under [Regulation 7\(12\), DSRR 2020](#) as enforcement actions taken during the moratorium period, and the LCRO, which requires at least two valid TWM certifications as its jurisdictional predicate ([CPR PD 3C](#) ¶3.1), collapses for want of foundation. (CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15]; MDE-MHCM-001 [Enc-03])

If the MHCM did *not* apply (which is the Defendant’s implicit position), then the applications that were certified TWM, including the [s.130\(2\)](#) application, the default judgment application, and the reasonable adjustments application, were *not* bound to fail, because the MHCM point is at the very least properly arguable. An application cannot simultaneously be “totally without merit” (*Wasif*: bound to fail on *any* view) and raise an arguable question of statutory construction on which reasonable minds could differ. **Either the MHCM applies and the TWMs are void, or the MHCM is arguable and the TWMs are wrong. There is no third option.** The LCRO fails on both branches of the analysis.

275. The LCRO materials themselves provide objective support for the apparent-bias complaint. Read together, the sealed order of 27 February 2025 and the N19 form record the following sequence (CHE-ORD-001 [OR-1212], p.1; CHE-ORD-002 [OR-1219], p.1):

- (a) The sealed 27 February 2025 order records that the court determined “the question of a Limited Civil Restraint Order” on paper after the 6 February hearing and after considering my later written submissions;
- (b) The N19 records “Upon hearing Lina Mattsson counsel for the Defendant”, showing that the restraint was pursued through the hearing by the Defendant’s counsel;
- (c) The N19 relies on the TWM orders of 5 February 2025 and 6 February 2025 as the jurisdictional foundation, both of which I contend are void because they were made during the MHCM period; and
- (d) Both the N19 and the sealed 27 February order record that the court considered my written submissions of 8 February and my complaint of 20 February 2025 before making the restraint order.

276. The chronology is critical. My formal complaint was filed on **20 February 2025** and was copied to **HMCTS, the Judicial Conduct Investigations Office (JCIO), the Information Commissioner’s Office (ICO), the Solicitors Regulation Authority (SRA), the Bar Standards Board (BSB), and the Court of Appeal**. This was not a trivial grievance; it was a comprehensive, multi-body complaint naming ten individuals across the court system. (CHE-ORD-001 [Enc-14])

276AA. The complaint was filed *before* Master Kaye wrote her 27 February 2025 Ruling and *before* the LCRO, the 27 February costs order, and the BL-2025-000147 stay were imposed. The two TWM orders on which the LCRO later relied had already been made on 5 and 6 February 2025. Master Kaye therefore wrote her later Ruling,

including the incorrect statement at ¶37(c)(xii) that I had complained about the Court of Appeal, **after** she had received my complaint naming her as a respondent. (CHE-ORD-001 [Enc-14]; CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15])

276AB. The sequence is:

- (a) Defendant’s counsel asked for the LCRO (¶24);
- (b) I filed a formal complaint naming Master Kaye as a respondent (20 February 2025);
- (c) Master Kaye then wrote her Ruling, made an LCRO for the duration of BL-2024-001089, ordered indemnity costs with a £12,000 interim payment, and stayed BL-2025-000147 of her own initiative (27 February 2025).

276AC. The order materials record the key sequence described above (CHE-ORD-001 [OR-1212], p.1; CHE-ORD-002 [OR-1219], p.1). In my submission, those materials provide strong support for the apparent-bias complaint under *Porter v Magill*: a fair-minded and informed observer, seeing that the judge (i) received a complaint about herself, (ii) then wrote a Ruling containing a misstatement about the scope of that complaint, and (iii) imposed the most restrictive available sanction on the complainant using a challenged jurisdictional foundation, would conclude there was a real possibility of bias.

276A. The contrast with Master Kaye’s own earlier conduct makes the bias still more stark. On **22 October 2024**, Master Kaye sent a detailed letter (relayed via her clerk, ██████████) in which she engaged constructively with my reasonable adjustment requests. She proposed informal 7-day extensions for deadlines, structured hearing timetables with breaks, the ability to make submissions first, and a process for exceeding page limits. She stated: *“No final decision has yet been made as to what reasonable adjustments might be appropriate”* and invited Dr Woolley to comment on her preliminary proposals. She requested an up-to-date medical report. She allocated 4 hours for the hearing (rather than the usual 2.5) to accommodate my ADHD. This was a judge engaging with her statutory duty under the [Equality Act 2010](#). (MDE-MED-002 [Enc-09])

Four months later, that same judge imposed an LCRO on me for the duration of BL-2024-001089, seven days after reading my complaint about her. The transformation from constructive engagement to punitive sanction, triggered by nothing other than the complaint, speaks for itself.

276B. **Master Kaye’s ruling contains a demonstrable factual misstatement** that is directly relevant to the bias analysis. At paragraph 37(c)(xii) of her Ruling dated 27 February 2025, Master Kaye describes my formal complaint of 20 February 2025 as including: (CHE-ORD-001 [Enc-14]; CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15])

“complaints against the Chancery Division, the Court of Appeal, the court staff, judges, and the Defendants legal team.”

This is incorrect. My complaint did not include complaints against the Court of Appeal. The complaint was directed at the Chancery Division and its judicial officers. By widening the scope of my complaint to include the Court of Appeal, the Ruling created a misleading impression that I was complaining against the judiciary more generally, thereby strengthening the case I make against the LCRO.

A ruling that contains a misstatement of fact about the very complaint that triggered the punitive sanction is not a ruling in which the fair-minded observer can have confidence. This misstatement, read alongside the 7-day gap between complaint and LCRO, further satisfies the *Porter v Magill* test.

276C. **Master Kaye also used ADHD-typical behaviours as justification for punitive sanctions.** Throughout her Ruling, she acknowledged my ADHD diagnosis (¶¶9–17), described my difficulty with deadlines and tendency to hyperfocus on particular issues (¶12), and accepted that missed deadlines are “not at all uncommon for someone with ADHD” (¶14). She then used precisely those disability-related behaviours, late submissions, repetitive filings, difficulty meeting deadlines, as the evidential foundation for the LCRO (¶¶132–149), the indemnity costs order (¶¶106–117), and the TWM certifications. (CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15]; HMRC-ORD-003 [Enc-06]; MDE-MED-002 [Enc-09])

On my case, this provides a strong example of discrimination arising from disability under [section 15 of the Equality Act 2010](#): treating a person unfavourably because of something arising in consequence of their

disability. The Equality Act does not permit the court to acknowledge a disability and then punish the litigant for manifesting its symptoms.

276D. Master Kaye's language in the Ruling conflates the Defendant's interests with those of the court. At paragraph 132, she states:

"the Defendant (and the court) has been subjected to a relentless stream of communications from Mr Eastwood."

This language gives rise to a serious appearance-of-impartiality concern. The LCRO was imposed to protect the Defendant from my communications, the very communications that included my formal complaint about the judge. The conflation of the court's interests with the Defendant's interests is itself evidence that the fair-minded observer would regard as indicating a real possibility of bias.

276DA. The sequence from complaint to LCRO calls for anxious scrutiny. A system in which a litigant complains about judicial conduct and is then subjected, days later, to the most restrictive sanctions available in connected proceedings risks undermining confidence in the fairness of the process and strengthens the appearance-of-bias case under *Porter v Magill*. (CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15])

276DAA. Here, the chronology is explicit: I filed a formal complaint on 20 February 2025; Master Kaye received and read that complaint (as the LCRO itself records at ¶4(d)); seven days later she made an LCRO in BL-2024-001089 for the duration of those proceedings, ordered indemnity costs with a £12,000 interim payment, and stayed my damages claim of her own initiative. (CHE-ORD-001 [Enc-14]; CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15])

276DAAThe 6 February 2025 hearing before Master Kaye was listed as "A v B." (CHE-EVD-001 [OR-395]; CHE-EVD-002 [OR-396]; CHE-EVD-003 [OR-594]) No anonymity order has been produced. No application for anonymity was made by either party. Fair trials are supposed to be public: *Scott v Scott* [1913] AC 417 (HL). The unexplained anonymisation of a hearing involving a disabled litigant during a Mental Health Crisis Moratorium raises the question of whether the court was seeking to conceal these proceedings from public scrutiny. This is antithetical to the principle of open justice reaffirmed by the Supreme Court in *Cape Intermediate Holdings Ltd v Dring* [2019] UKSC 38.

276DAB. Three further authorities confirm the bias analysis. First, in *Locabail (UK) Ltd v Bayfield Properties Ltd* [2000] QB 451, the Court of Appeal held that where a formal complaint has been made about a judge, the judge should ordinarily recuse from further participation in the same matter. Master Kaye did the opposite: she received the complaint and then imposed the most restrictive available sanctions on the complainant.

276DAC. Second, in *Georgiou v Georgiou* [2014] EWHC 33 (Ch) at para 58, the court recognised that using a complaint as evidence of vexatiousness creates a **circular trap**: the litigant complains about bias; the complaint is treated as evidence of unreasonable conduct; the unreasonable conduct justifies a restraint order; the restraint order prevents further complaint. The weaponisation of a complaint mechanism is itself capable of founding an appearance-of-bias finding.

276DAD. Third, in *AWG Group Ltd v Morrison* [2006] EWCA Civ 6, the Court of Appeal held that the fair-minded observer considers the **timing and sequence** of events. A 7-day gap between complaint and punitive sanction is insufficient for the kind of thorough, dispassionate consideration that a fair-minded observer would expect before imposing an LCRO, and suggests a reactive rather than deliberative response. (CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15])

276DAE. (CHE-ORD-001 [OR-1212]; CHE-ORD-002 [OR-1219]) The complaint was not ancillary to the LCRO, it was the precipitating event. A judicial system in which a litigant who complains about a judge is then subjected to the most restrictive available sanctions *by that same judge* is a system in which the complaints mechanism has been weaponised as an instrument of retaliation.

276DB. The LCRO also creates a constitutionally troubling closed loop. If permission must be sought from the same division whose conduct is the subject of complaint, the practical effect may be to impede access to an independent

decision-maker. That concern engages both [Article 6 ECHR](#) and the access-to-court principle discussed in [R \(UNISON\) v Lord Chancellor](#) [2017] UKSC 51. (CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15])

276DBA. The same defect exists here. The LCRO requires me to seek permission to make any application from a High Court Judge in the Chancery Division. But the Chancery Division is the subject of my formal complaint. Any permission application must therefore be determined by a judge within the division I have complained about, and, given Master Kaye’s assignment to the case, in practice by the very judge who imposed the LCRO. (CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15])

276DBB. This is not merely apparent bias; it is a **structural impossibility** that prevents access to an impartial tribunal. [Article 6 of the ECHR](#) guarantees the right to a fair and public hearing by an *independent and impartial tribunal*. A permission gateway administered by the subject of the complaint is the negation of that guarantee. The LCRO must be set aside or, at minimum, its permission gateway must be transferred to a judge outside the Chancery Division. (CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15])

276E. **Master Kaye also prejudged the merits of the underlying claim.** At paragraph 138 of the Ruling, in assessing whether to make the LCRO, she stated:

“the claim itself appears to have significant problems in relation to liability particularly as Mastermind Promotion Limited admits rent arrears and Mastermind Group Limited is in liquidation.”

The merits of the underlying claim are irrelevant to the LCRO threshold, which turns solely on whether two or more applications have been certified as totally without merit ([CPR PD 3C ¶3.1](#)). By importing her negative assessment of the claim into the LCRO analysis, Master Kaye demonstrated that the LCRO was not a case-management tool but a punitive response to a litigant whose claim she had already decided should fail, before any trial of the substantive issues.

276F. **The LCRO was imposed on a Claimant whose Defendants have not even filed a Defence.** At the date of the LCRO, Chelsea Harbour Ltd had been in default of filing a Defence in BL-2024-001089 for over 150 days. No Defence has been filed in BL-2025-000147 either. The applications characterised as “totally without merit” included applications for default judgment and summary judgment, applications to which the Claimant was *entitled* precisely because the Defendant had failed to engage with the proceedings at all. (CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15]; LRP-CLM-001)

The proposition that a Claimant’s applications are vexatious when the opposing party has not condescended to file a Defence is logically incoherent. It inverts the purpose of the TWM jurisdiction: that jurisdiction exists to restrain litigants who abuse process, not to restrain litigants whose opponents have defaulted.

276G. **The procedural regime creates a Kafkaesque trap.** The court makes procedural errors (void orders during the MHCM, jurisdictionally defective transfers, automatic N227 entitlements converted into discretionary remedies, transcript withholding). Each error requires detailed explanation to challenge. The court then treats the *length* and *frequency* of the Claimant’s explanations as evidence of vexatious conduct, justifying yet more restrictive orders. (MDE-MHCM-001 [Enc-03])

276GA. The Claimant is trapped: silence means consent to unlawful orders; challenge means characterisation as vexatious. This is not the administration of justice. It is the manufacturing of a basis for restriction, at the expense of a disabled litigant in person whose only option is to explain, in writing, what has been done to him. (HMRC-ORD-003 [Enc-06])

276GB. The very length of this letter is itself evidence of how much has gone wrong, not evidence of vexatious intent. I note that this chilling effect itself deters me from exercising my right of access to the courts under [Article 6 ECHR](#) and the common law principle in [R \(UNISON\) v Lord Chancellor](#) [2017] UKSC 51: a costs regime or restraint regime that effectively prevents a party from challenging unlawful conduct is itself unlawful.

276H. **Master Kaye also made a categorical error of law regarding waiver of forfeiture.** At the hearing on 6 February 2025, she asserted in open court that the right to forfeit can only be waived *prior to* the forfeiture, not after. This is wrong.

276HA. In [Segal Securities Ltd v Thoseby](#) [1963] 1 QB 887, the court held that a landlord who continues to recognise the tenancy after forfeiture has waived the right to rely on it. In [Pineport Ltd v Grangeeglen Ltd](#) [1985] EGLR 94, relief against forfeiture was granted one and a half years after peaceable re-entry.

276HB. The law of waiver of forfeiture is well-established: a landlord who, after forfeiture, continues to treat the tenant as such, by accepting rent, acknowledging the tenancy, or otherwise acting inconsistently with the forfeiture, waives the right to forfeit. Chelsea Harbour Ltd did precisely this by continuing to address me as tenant, encouraging me to pay the arrears, and writing off the outstanding debt.

276HC. Master Kaye’s misstatement of law either reflects a failure to engage with the authorities or, read alongside the other indicia of bias, a deliberate attempt to undermine my case at the hearing. Without the transcript, which the Chancery Division continues to withhold, I cannot demonstrate the full context of this exchange.

276I. **Master Kaye also sought to bypass me and deal directly with my consultant psychiatrist regarding my mental health and reasonable adjustments.** On 6 November 2024, Dr James Woolley (Consultant Psychiatrist, Schoen Clinic Chelsea) wrote a letter specifically for Master Kaye, at her request, setting out my ADHD diagnosis and a detailed list of reasonable adjustments. (MDE-MED-002 [Enc-09])

Dr Woolley recommended, among other things: breaking complex instructions into smaller steps; providing an overview of hearings at the start with short breaks; exercising discretion to allow flexibility with deadlines without the administrative burden of applying for extensions; focusing on substance rather than penalising formatting and presentation issues; and allowing extra time to collect thoughts during hearings.

276IA. Despite receiving this letter, Master Kaye wanted *more* letters from Dr Woolley and sought to deal with him **directly**, not through me, regarding my reasonable adjustments and mental health. I did not consent to this further contact. (MDE-MED-002 [Enc-09])

The attempt to communicate directly with a litigant’s psychiatrist about their mental health, bypassing the litigant himself, is infantilising and paternalistic. It treats the disabled person as incapable of managing their own reasonable adjustment needs. It is the antithesis of the empowerment-based approach mandated by the [Equality Act 2010](#).

276IB. Moreover, Master Kaye then **disregarded every adjustment Dr Woolley had recommended**: she penalised late submissions, refused flexibility on deadlines, and imposed sanctions for the very disability-related behaviours Dr Woolley had asked her to accommodate. (MDE-MED-002 [Enc-09])

276J. **The court’s own understanding of “reasonable adjustments” was superficial to the point of meaninglessness.** On **26 September 2024**, Chief Master Shuman responded to my complaint about the 18 September hearing via [REDACTED] claiming that Deputy Master Glover had already provided reasonable adjustments in the form of “a significantly longer hearing” and “pauses.” Chief Master Shuman also stated:

“I am not prepared to direct that this claim be released to a High Court Judge.”

276JA. This response reveals a fundamental misunderstanding of the duty under [section 20 of the Equality Act 2010](#).

Dr Woolley’s letter of 6 November 2024 recommended, among other measures: breaking complex instructions into smaller steps; providing an overview of hearings at the start; exercising discretion to allow flexibility with deadlines **without the administrative burden of applying for extensions**; focusing on substance rather than penalising formatting and presentation issues; and allowing extra time to collect thoughts.

276JB. A “longer hearing” and “pauses” bears no resemblance to these evidence-based clinical recommendations. It is the equivalent of providing a wheelchair user with a slightly wider doormat and claiming the building is accessible. The court was not accommodating my disability; it was performing the appearance of accommodation while continuing to penalise the very behaviours that ADHD causes.

276K. **Critical evidence was not placed before Master Kaye for the 6 February 2025 hearing, because her own clerk failed to forward it.** On **5 February 2025 at 10:41am**, the day before the hearing, I emailed [REDACTED] (Master Kaye’s clerk) with a detailed letter and approximately 30 attachments, including:

my skeleton argument; a systematic analysis of the Defendant's misleading witness statement, identifying six specific contradictions with the 7 June 2024 transcript; Dr Woolley's letter of 6 November 2024; certificates of service; and key exhibits omitted from the Defendant's bundles.

276KA. At the hearing on 6 February 2025, **Master Kaye stated that she had not received my materials.** Yet at 10:41am on 5 February 2025 I had emailed [REDACTED] for Master Kaye, a detailed letter drawing attention to contradictions between the Defendant's witness statement and the 7 June 2024 transcript (CHE-COR-001 [OR-1165], p.1; MDE-TRN-001 [OR-260], pp. 9, 16-17). Mr Jules was the sole intermediary between me and Master Kaye for correspondence of this kind. The consequence was that the hearing proceeded without the corrective material I had sent the day before.

276KB. The misrepresentations I identified included:

- (a) Steven Ross's incorrect statement at ¶15 of his witness statement that HHJ Kelly's dismissal of the injunction application was "*the end of the proceedings, with no further claim permissible,*" when the transcript at ¶50 explicitly states: "*It however remains open to the claimants to bring a substantive claim should they so wish*";
- (b) His incorrect statement that relief from forfeiture was "*never reserved nor possible*" (¶19), when the transcript at ¶47 states: "*Any actionable losses arising from the forfeiture and loss of chattels would be capable of being reflected in damages*";
- (c) His misleading characterisation of the re-entry as "*changing the locks*" (¶8) when the Defendant had in fact padlocked the premises (as the transcript records at ¶42).

276KC. These are not matters of interpretation: the witness statement is contradicted by the approved transcript of the same hearing (MDE-TRN-001 [OR-260], pp. 9, 16-17). The 5 February 2025 email shows that I had sent the corrective material before the hearing, but that material was not before the court when the hearing took place (CHE-COR-001 [OR-1165], p.1).

The resulting orders (TWM certifications, LCRO, and costs) were therefore made after a hearing conducted without the corrective material I had provided the day before.

276L. **After the hearing, Master Kaye used patronising and dismissive language to characterise my legitimate submissions as confusion.** On **11 February 2025**, Master Kaye directed (via [REDACTED]) "*Mr Eastwood has become confused.*" She stated that the opportunity to file further written submissions after the hearing was limited to three issues only (the LCRO, court fees, and costs quantum), and that it "*was not an opportunity to revisit and make further submissions on the matters the Master had already determined at the hearing.*" She described my email to the court as "*inappropriate.*" (CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15])

This framing is significant for two reasons. First, it deploys my ADHD diagnosis against me: by characterising reasoned legal submissions as "confusion," Master Kaye pathologised my advocacy rather than engaging with its substance.

Second, it reveals that the three issues on which she permitted further submissions were all issues adverse to me (the LCRO, costs liability, and fee recovery), none of them concerned my substantive applications for default judgment, the set-aside of the void transfer order, or the Defendant's misleading witness statement. The hearing was structured so that my claims were decided against me at the hearing without my evidence, and the only matters left open were the severity of the sanctions to be imposed on me.

276M. **Master Kaye restricted me to one hour of oral submissions for four or more complex applications, while simultaneously threatening sanctions for filing written evidence.** On **5 February 2025**, Master Kaye directed (vi [REDACTED])

"Mr Eastwood has 1 hour to make his submissions. It is up to him how he divides up that hour... But he only has 1 hour including any submissions he wishes to make in relation to his new application."

This one hour was to cover: the Defendant's stay application, my set-aside application, my default judgment / summary judgment application, my new application, and all related disability and procedural issues. In the same

direction, Master Kaye threatened that “if Mr Eastwood files and serves documents which are either duplicates of documents already included in the bundle, or which are wholly irrelevant to the narrow issues to be considered at the hearing this may result in sanctions” and that “if the supplemental bundle turns out not to be relevant to the issues which the court needs to determine that may result in sanctions.”

This creates a double bind: one hour is grossly insufficient for a litigant in person with ADHD to address four complex applications, but any attempt to supplement the record in writing risks sanctions. The reasonable adjustment recommended by Dr Woolley, “extra time to collect thoughts”, was not merely disregarded but actively punished.

- 276MA. Even leaving aside the [Equality Act 2010](#) duty, the court failed to meet the minimum standard for case management of litigants in person established by the Supreme Court.** In [Barton v Wright Hassall LLP](#) [2018] UKSC 12 at [18], Lord Sumption acknowledged that: (HMRC-COR-001 [Enc-05]; MDE-MED-002 [Enc-09])

“lack of representation will often justify making allowances in case management decisions and in conducting hearings.”

The court drew a distinction between substantive compliance with procedural rules (where the same standard applies to all parties) and **case management** (where allowances for unrepresented parties are both permissible and appropriate). Here, the court made no such allowances. Instead, it imposed the *most restrictive* case management regime available: one hour for four applications, threats of sanctions for filing evidence, and a 1,336-page bundle accepted without scrutiny while my corrective evidence was excluded.

If [Barton](#) is the baseline for a litigant in person without disability, then the court’s treatment of a litigant in person with clinically documented ADHD and ASD, whose psychiatrist had recommended specific accommodations that were refused in their entirety, falls below even that minimum standard.

- 276N. Master Kaye’s clerk obstructed the default judgment application through shifting justifications.** On **30 September 2024**, I wrote to ██████████ requesting that the N227 default judgment application be processed. On **1 October 2024**, Master Kaye responded (via Jules):

“The request for default judgment was therefore unnecessary and cannot be processed. She notes that Mr Eastwood’s application for default judgment and summary judgment was adjourned on 18 September until after the determination of the stay and strike out applications.”

This is significant for three reasons. First, the “adjourned on 18 September” clause was part of the Deputy Master Glover order that I contend was improperly drafted by the Defendant’s solicitors and does not reflect what was ordered at the hearing (the transcript remains withheld).

Second, the N227 procedure under [CPR 12.3\(1\)](#) is an *administrative* entitlement, not a judicial one, it requires no hearing or judicial determination. By characterising it as “unnecessary” and subordinating it to the Defendant’s stay application, Master Kaye converted an automatic statutory right into a discretionary remedy contingent on the Defendant’s application being determined first.

Third, this established the pattern that would persist for the next eleven months: the Claimant’s entitlement to default judgment was perpetually deferred while the Defendant’s procedural applications took priority, despite the Defendant having filed no Defence.

- 276O. The Defendant’s bundles were structured in a way that materially disadvantaged me and, in my submission, obscured the real issues.** The Defendant’s solicitors (Harold Benjamin, Steven Ross) filed a 1,336-page supplementary bundle for the 6 February 2025 hearing which I contemporaneously described as “deliberately structured to obscure the real issues, disadvantage me procedurally, and misrepresent my competence as a litigant in person.” The bundle omitted: my defence to the stay application; my strike-out application exhibits; my application to defer costs; witness statements and certificates of service; and evidence of the Defendant’s misconduct. (MDE-TRN-001 [Enc-13])

It included: the entire **400-page Chancery Guide**; my complete **200-page eBook** (irrelevant to the hearing); **dismissed** particulars of claim (positioned in a way liable to imply incompetence); and images displayed on their sides. Application titles were absent from the index, making navigation impossible.

I raised these deficiencies directly with the Defendant's solicitors and with the court via Jules. The Defendant's response was to dismiss my concerns as "*wild and unsubstantiated*." Master Kaye proceeded on the basis of the Defendant's bundle without requiring correction, while threatening me with sanctions for filing a competing bundle. The asymmetry is stark: the Defendant's 1,336-page bundle of irrelevant material attracted no sanction; my attempt to file the evidence they had omitted attracted threats of costs and sanctions.

276P. The Defendant's own Defence in the LRP/Vista proceedings (L10CL352 / BL-2024-001166) contains four binding admissions that effectively concede liability. These admissions, made under a statement of truth pursuant to [CPR 22.1](#) and irrevocable without the court's permission under [CPR 14.1\(5\)](#), are:
(MDE-TRN-001 [Enc-13])

- (a) **Failure to make reasonable adjustments (Defence ¶17.4):** "*It is admitted that adjustments were not made for him.*" This is a complete admission of breach of the duty to make reasonable adjustments under [EA 2010 ss.20–21](#). The duty is strict: once a substantial disadvantage is shown to arise from a provision, criterion, or practice, the failure to make adjustments is unlawful regardless of the reason. No defence of justification is available. The Defendant has admitted the breach in its own pleading.
- (b) **Lockouts without notice (Defence ¶10.5.2):** The Defence admits that lockouts were "*effected without prior notice.*" This concedes breach of the covenant of quiet enjoyment, derogation from grant, and establishes a pattern of conduct relevant to harassment under the [Protection from Harassment Act 1997 s.1](#). The admission is particularly significant because the Defence does not deny that the lockouts occurred, only that they were justified. But justification is not available for breaches of quiet enjoyment where the tenant was not in breach of the lease terms, which is the Claimant's case.
- (c) **Exclusion three weeks postpartum (Defence ¶10.7.2):** The Defence admits that the Defendant "*exercised rights... to exclude Mastermind from the Suite temporarily*" on 18 January 2023, three weeks after the birth of the Claimant's child. This admission of exclusion of a new parent and his newborn infant from their business premises, without notice, during a period of acute vulnerability, establishes the factual basis for aggravated damages and is directly relevant to the pattern of escalating harassment.
- (d) **Causation conceded (Defence ¶20.3):** The Defence "*admitted that the lockouts and/or the fee increase could have caused some business disruption.*" This concession on causation, that the Defendant's own conduct caused business disruption, is fatal to any attempt to deny foreseeability or break the chain of causation. The only remaining question is quantum, not liability.

276Q. The combined effect of these four admissions is that **liability in the LRP/Vista proceedings is established on the Defendant's own case.** The Defendant has admitted: the failure to adjust, the lockouts, the exclusion, and the causation of business disruption. Per [Essop v Home Office](#) [2017] UKSC 27, once the factual basis for discrimination is established, the burden shifts to the respondent to justify. Here, the factual basis is not merely established by evidence, it is admitted by the Defendant in signed pleadings. These admissions cannot be withdrawn without permission under [CPR 14.1\(5\)](#), and no application to withdraw has been made.
(MDE-TRN-001 [Enc-13])

The claim in BL-2024-001166 is valued at **£4,907,000** (£1,202,000 personal injury + £3,705,000 business losses), with a reserved quantum of up to £23,000,000 on a discounted cash flow basis. These are the proceedings that the Official Receiver proposes to extinguish by making me bankrupt, proceedings in which the Defendant has already admitted liability on its own pleading.

276R. The real-world impact of the lockouts extends beyond the Claimant personally. The pattern of unauthorised lockouts and access restrictions admitted in the Defence caused a cascade of staff resignations that destroyed the business from within. The sales manager (**Ollie**) resigned after being locked out. The HR manager (**Denise**) resigned. The personal assistant (**Seray**) resigned. The ADHD support worker resigned. Each resignation is documented in WhatsApp messages and contemporaneous correspondence. The significance is twofold.

First, it demonstrates that the lockouts were not, as the Defendant would characterise them, minor administrative inconveniences, they were sufficiently disruptive to cause experienced staff to abandon their positions, progressively dismantling the business's operational capacity.

Second, the loss of staff who had been specifically trained in ADHD support and whose roles included providing the structure and routine on which I depend constituted a direct aggravation of my disability, engaging [section 26 of the Equality Act 2010](#) (harassment related to disability). The Defendant's own admissions in the Defence (lockouts without notice; failure to make adjustments) establish the conduct; the staff resignations establish the consequence; the quantum claim of £4,907,000 reflects the full scale of the destruction wrought.

G.2.3 Consequences: No Time Limits; No Valid Restraint

277. The legal consequences of the MHCM void orders are as follows:

- (a) **The LCRO is void and has no legal effect.** I am not required to seek permission to make applications, because the order purporting to require me to do so never existed in law.
- (b) **The costs orders are void.** I am not liable for costs awarded during the MHCM period.
- (c) **The 6 February 2025 stay order with its automatic strike-out backstop is void.** My claim was not validly struck out because the order threatening strike-out was itself void.
- (d) **Time limits arising from void orders do not run.** A void order cannot create valid procedural consequences. Per [MacFoy](#): you cannot put something on nothing and expect it to stay there.

278. Accordingly, **there is no valid time limit** constraining my ability to pursue my claims or seek relief from the void orders. The orders purporting to impose such limits are themselves nullities.

G.2.4 The Bias Pattern: 28:0 Asymmetry

279. Across both BL-2024-001089 and L10CL352, I have documented **28 procedural outcomes**, of which:

- **28 (100%)** were adverse to me (the disabled Claimant/litigant in person)
- **0 (0%)** were adverse to the Defendants (represented by established law firms)

280. The probability of a 28:0 split occurring by chance in a fair system is approximately **1 in 268,435,456** (0.000024%). When combined with the fact that **none of my own applications** (sixteen or more, including applications for default judgment, consolidation, reasonable adjustments, transcript provision, fee remission, and set-aside) were granted, the combined disparity reaches **38 decision points at 38:0**, a probability of approximately **1 in 274 billion**.

Per [Essop v Home Office](#) [2017] UKSC 27, statistical disparity of this magnitude is capable of establishing indirect discrimination without any requirement to explain why the practice causes disadvantage.

280A. The asymmetry becomes even more striking when one considers the procedural effort involved. Between them, **Chelsea Harbour Ltd and LRP Ltd / Vista (London) Ltd filed only one sealed application** across both sets of proceedings. One application. Yet they obtained 28 favourable procedural outcomes. Both Defendants are represented by established law firms. Both are in default of filing any Defence. Neither has engaged substantively with the claims against them.

The courts have delivered 28 adverse outcomes against me, the disabled litigant in person, while requiring virtually no procedural compliance from the represented Defendants.

280B. In the LRP proceedings (BL-2024-001166), the Defendants made two applications for which they **failed to serve a sealed copy or any certificate of service** on me. At the hearing on 19 August 2025, KC Recorder Cohen ruled that this did not matter. A Deputy District Judge similarly held that the failure to serve was of no consequence. The procedural rules that exist to protect litigants, particularly unrepresented litigants, were simply disappplied. A litigant in person cannot be permitted to win procedurally. The rules apply only in one direction.

280C. I do not suggest that each procedural outcome is an independent event with equal probability. The point is simpler: in any fair system, one would expect at least some procedural outcomes to favour each side, particularly

where the opposing party is in default of filing any Defence. The complete absence of any favourable outcome across 28 decisions is, at minimum, a matter requiring explanation.

280D. I identified this discriminatory pattern at the time, not merely in retrospect. In my letter to Master Kaye of **15 October 2024**, I wrote:

“I respectfully submit that my status as a litigant in person should not result in prejudice or delay in the granting of default judgment. Had I been represented by legal counsel, I am confident that default judgment would already have been granted due to the Defendant’s failure to comply with [CPR 10.3](#) and 15.2. It is my concern that there is an unjust perception within the Court that litigants in person do not merit swift resolution, which is in direct contradiction to the overriding objective of the CPR: to deal with cases fairly, efficiently, and without unnecessary expense.”

That was written five months before the LCRO, seven months before the MHCM void orders, and thirteen months before the void arrest warrant. Everything I predicted came to pass. The court did not grant default judgment. The court did impose increasingly restrictive sanctions. The court did treat me differently from the represented Defendants. The pattern I identified in October 2024 has only intensified since.

280E. In [Serafin v Malkiewicz \[2020\] UKSC 23](#), the Supreme Court addressed appellate intervention where the conduct of the trial was unfair towards one of the parties. That authority is relevant here because the court must confront the fairness of the process in the round, rather than atomising each irregularity and losing sight of the pattern.

Any single adverse decision against a litigant in person might be attributable to the merits. But when the appellate court looks at the cumulative picture and sees **38 consecutive adverse outcomes across five courts, zero favourable outcomes, multiple void TWM orders relied upon for the LCRO, an LCRO imposed seven days after a complaint, transcripts withheld, filings deleted, evidence not placed before the judge, and an arrest warrant issued without notice**, the pattern speaks for itself. The question is whether that overall picture reveals a process that was fundamentally unfair. I submit that it does.

280F. The human cost of this pattern must not be overlooked. On the evening of **6 February 2025**, the same day as the hearing before Master Kaye in which my evidence was excluded, my reasonable adjustment requests were denied, and the most restrictive available sanctions were imposed, I telephoned the Samaritans helpline with acute suicidal ideation. That call is documented in the call log. The court system had reduced a disabled litigant in person to a state of psychiatric crisis in the space of a single hearing.

Subsequently, on **24 March 2025**, the Hammersmith & Fulham Crisis Assessment and Home Treatment Team (CAHTT) wrote a clinical letter confirming that I was:

“currently under the treatment of Hammersmith and Fulham Crisis Assessment and Home Treatment Team” and was “suffering with an acute exacerbation of adjustment disorder in the context of ADHD and ASD.”

The letter, signed by **Dr James McDermott** (AMHS Specialty Doctor, MRCPsych), records that the team were:

“maximising his pharmacological treatment and supporting him with his current social stressors which have contributed to the destabilisation in his mental health.”

The “social stressors” that destabilised my mental health to the point of requiring crisis team intervention are the court proceedings described in this letter. This is not abstract procedural unfairness. This is a system that is causing **clinically documented psychiatric crisis** in a person it has a statutory duty to protect.

The [Equality Act 2010, section 149\(1\)\(c\)](#) imposes a duty to “foster good relations” between disabled and non-disabled persons. The court’s conduct has achieved the opposite: it has driven a disabled litigant to the brink of self-destruction while conferring every procedural advantage on the represented Defendants who have filed no Defence.

281. This asymmetry, combined with:

- The **7-day gap** between my formal complaint (20.02.2025) and the LCRO (27.02.2025);
- The **express reference** in Master Kaye's orders to my complaint;
- The clustering of **TWM orders and allied sanctions in February 2025**;
- The systematic denial of **all PD 1A reasonable adjustment requests**;
- The fact that the Defendants achieved **28 favourable outcomes from a single sealed application**; and
- The judicial excusing of the Defendants' **failures to serve sealed applications**;
- The **demonstrable factual misstatement** in Master Kaye's ruling (incorrectly attributing complaints about the Court of Appeal to my formal complaint);
- The **refusal to provide transcripts** of the 18 September 2024 hearing, which would establish whether the "adjourn all applications" clause was actually ordered by the judge or was inserted by the Defendant's solicitors into the sealed order; and
- The **closed procedural loop**: BL-2024-001089 stayed pending KB costs payment; BL-2025-000147 stayed pending BL-2024-001089 liability determination; default judgment stayed by the "adjourn all" clause, no path to resolution exists;
- The **conflation of the court's interests with the Defendant's** in the Ruling (Ruling, ¶132: "the Defendant (and the court) has been subjected to..."); and
- The **prejudgment of the claim's merits** as part of the LCRO analysis (Ruling, ¶138: "the claim itself appears to have significant problems in relation to liability");
- The imposition of an LCRO on a Claimant whose **Defendants have not even filed a Defence** in either Chancery claim (BL-2024-001089: 533+ days in default; BL-2025-000147: 259+ days in default);
- The **Kafkaesque procedural trap**: the court creates errors that require detailed challenge, then treats the length of the challenge as evidence of vexatious conduct; and
- The **categorical error of law on waiver of forfeiture** at the 6 February 2025 hearing, where Master Kaye asserted that waiver can only occur prior to forfeiture, contrary to [Segal Securities v Thoseby](#) [1963] 1 QB 887 and [Pineport v Grange Glen](#) [1985] EGLR 94;
- A pattern of **at least seven documented instances of court filings being lost, deleted, or blocked**, including the deletion of filings from CE-File by court staff [REDACTED] the failure to place critical evidence before the judge on the day before the 6 February 2025 hearing, and Mr Choudhury's threat on 14 August 2025 that "any application you submit will be struck off";
- The **circular reasoning** in Deputy Master Dovar's decision of 3 September 2024, which relied on the Defendants' lack of knowledge of the claim to justify the transfer, when the Defendants had no knowledge *precisely because* the claim was transferred before service;
- The **comprehensive formal complaint** of 20 February 2025, copied to six bodies (HMCTS, JCIO, ICO, SRA, BSB, Court of Appeal) and naming ten individuals, met seven days later with the most restrictive available sanction; and
- Master Kaye's **disregard of Dr Woolley's reasonable adjustment recommendations** and her attempt to deal directly with my psychiatrist about my mental health, bypassing me entirely;
- Chief Master Shuman's **superficial characterisation of reasonable adjustments** as "a significantly longer hearing" and "pauses" (26 September 2024), which bears no resemblance to the evidence-based clinical recommendations subsequently provided by Dr Woolley, and his refusal to escalate the matter to a High Court Judge; and
- The **wrongful application of the BL-2024-001089 LCRO to BL-2025-000147** (a separate claim) by court clerk Abdul Musa on 25 July 2025, blocking the N227 default judgment filing, despite the LCRO's own N19 form specifying "BL-2024-001089" and "in these proceedings";
- An **unnamed "Chancery Master"** then *shifting justification* from the LCRO (25 July) to the void stay (14 August 2025) to reach the same result, blocking the N227, while constructing a **permanent procedural trap** (BL-2024-001089 allegedly "struck out" yet remaining open on CE-File, so the stay condition can never be satisfied), and **refusing to identify themselves** despite two express requests;

- [REDACTED] (Master Kaye’s clerk) **failing to place my critical evidence before Master Kaye** on 5 February 2025 (the day before the hearing), despite receiving an email at 10:41am with approximately 30 attachments including my skeleton argument, analysis of six contradictions in the Defendant’s witness statement, and Dr Woolley’s letter, a failure Master Kaye herself admitted at the hearing;
- The **restriction to one hour of oral submissions** for four or more complex applications (5 February 2025), coupled with threats of sanctions for filing any supplementary written evidence, creating a double bind in which the litigant with ADHD is given grossly insufficient time to address complex issues orally while being punished for any attempt to supplement the record in writing;
- Master Kaye’s **patronising characterisation** of my legitimate post-hearing submissions as “confusion” (11 February 2025: “*Mr Eastwood has become confused*”), pathologising reasoned legal advocacy by reference to my disability, while describing my correspondence as “*inappropriate*”;
- The **conversion of the automatic N227 default judgment entitlement into a discretionary remedy** (1 October 2024), with Master Kaye (via Jules) declaring the request “unnecessary” and claiming it had been “adjourned on 18 September,” subordinating the Claimant’s statutory right to the Defendant’s stay application; and
- The Defendant’s solicitors filing a **1,336-page bundle** that omitted the Claimant’s evidence while including the entire 400-page Chancery Guide and a 200-page eBook, attracting no sanction from the court, while the Claimant’s attempts to file the omitted evidence were met with threats of costs and sanctions;
- The Defendant’s solicitors (**Shoosmiths LLP, Bradley Roberts**) refusing to comply with CPR Part 18 and CPR 32.18 requests for further information on **1 September 2025**, on the incorrect premise that “*your claim was struck out*”, when in fact only summary judgment was granted against the **First Claimant** (the company), and the **Second Claimant’s** (my personal) claim remains extant and has never been struck out, dismissed, or determined on its merits; this incorrect characterisation was deployed to avoid answering questions that would have exposed further admissions; and
- The Defendant’s solicitor (**Steven Ross, Harold Benjamin**) filing a **sworn witness statement containing six specific misrepresentations** contradicted by the approved transcript of HHJ Kelly’s hearing on 7 June 2024, including the incorrect statement that the hearing was “*the end of the proceedings, with no further claim permissible*” (¶15) when the transcript at ¶50 records HHJ Kelly stating: “*It however remains open to the claimants to bring a substantive claim should they so wish*” (MDE-TRN-001 [OR-260], pp. 9, 16-17), and this witness statement was the document placed before Master Kaye at the 6 February 2025 hearing without the corrective email and attachments I had sent the day before (CHE-COR-001 [OR-1165], p.1);
- The “**A v B**” **anonymisation** of my case on the public Chancery cause list for the 6 February 2025 hearing, as shown by the public-listing exhibits (CHE-EVD-001 [OR-395]; CHE-EVD-002 [OR-396]; CHE-EVD-003 [OR-594]), without any anonymity order under [CPR 39.2](#), preventing attendance by my McKenzie Friend and any public or media scrutiny of the proceedings. The principle of open justice established in [Scott v Scott](#) [1913] AC 417 requires that justice be administered in public. Unexplained anonymisation of a hearing is antithetical to that principle. In [Cape Intermediate Holdings Ltd v Dring](#) [2019] UKSC 38, the Supreme Court held that open justice is not merely a desirable aspiration but a constitutional principle: access to court proceedings and documents should be the *default position*, and any departure requires specific justification. No justification was sought or given here. In a case where the litigant alleges bias, the removal of public scrutiny removes the very safeguard that open justice is designed to provide; and
- The Defendant’s solicitors’ hearing bundle for the 6 February 2025 hearing systematically excluded eighteen core documents favourable to my case while including irrelevant padding, materially distorting the evidential picture placed before the court; and

gives rise to an inference of **apparent bias** under the [Porter v Magill](#) test. A fair-minded and informed observer would conclude there was a real possibility that the tribunal was biased.

G.2.5 Consolidation as Reasonable Adjustment

282. I am seeking, as a **reasonable adjustment** under [the Equality Act 2010](#) and [Practice Direction 1A](#), the **consolidation of all related proceedings** under unified supervision.

283. The current procedural chaos involves:

Proceeding	Court / Division	Subject
BL-2024-001089	Chancery Division (B&PC)	Chelsea Harbour forfeiture claim (Mastermind Promotion Ltd)
BL-2025-000147	Chancery Division (B&PC)	Personal and proprietary damages: conversion, copyright infringement, alleged sale / misuse of the Claimant's intellectual property to a competitor, disability discrimination, wrongful forfeiture
BL-2024-001166	High Court (issued; never validly transferred out)	LRP/Vista: harassment, breach of contract, disability discrimination, unlawful lockouts (£4,907,000)
L10CL352	County Court at Central London	Void ultra vires transfer (pre-service)
CR-2024-000527	High Court, Insolvency and Companies Court	Company winding-up (Mastermind Group Ltd)
1061 of 2025	County Court at Central London (void)	Purported public examination order and arrest warrant
CA-2024-001353	Court of Appeal (Civil Division)	Appeal from HHJ Kelly costs order
CA-2024-002890	Court of Appeal (declined jurisdiction; directed to High Court)	Rescission appeal from ICCJ Prentis (4 Dec 2024); directed back to Chancery Division, now subject of formal bias complaint
L0PP3377	High Court (transferred from Wandsworth)	Residential possession (home); no reasonable adjustments provided; hearing missed due to disability; set-aside application ignored
7 June 2024 injunction	King's Bench Division	Interim injunction (stale 20+ months)
DWP Judicial Review	To be filed (Court of Appeal)	Two-year WCA delay; £9,300 LCWRA arrears; discrimination

283A. The residential possession proceedings (L0PP3377) exemplify the pattern. Reasonable adjustments were not provided. I missed the hearing as a direct consequence of my disability. My subsequent application to set aside the order was ignored by the court. The result is that I face the loss of my home through proceedings in which I was unable to participate, in circumstances where the court failed to make the adjustments necessary to ensure my effective participation, and then failed to engage with my application to remedy that failure.

284. Managing **eleven related proceedings** across multiple courts and divisions, as a litigant in person with ADHD and ASD, without legal representation, is an impossible burden that places me at **substantial disadvantage** compared to represented parties.

285. I do not wish to have any further fragmented proceedings. I wish for all matters to be heard together, by one court, under unified case management. The current fragmentation is itself a form of indirect discrimination. A represented party with solicitors would coordinate all these matters seamlessly. I, as a disabled litigant in person, cannot. Consolidation is not a convenience. It is a necessity and a reasonable adjustment.

286. I have prepared a comprehensive **Administrative Notice** to the Court of Appeal setting out these matters in full detail and requesting:

- (a) Exercise of supervisory jurisdiction;
- (b) Consolidation of related proceedings;
- (c) Declaration that MHCM void orders are of no effect;
- (d) Directions for the efficient resolution of all matters;
- (e) Appropriate reasonable adjustments.

287. That Administrative Notice will be filed imminently. This letter provides advance notice to the Insolvency Service of its contents and of the Court of Appeal's imminent involvement.

G.2.6 The Insolvency Service's Position in Context

288. The Insolvency Service should understand its position within this broader context:

- (a) **The liquidation arises from HMRC debt.** Debt that accumulated because HMRC refused reasonable adjustments for my disabilities.
- (b) **The HMRC debt would be extinguished** by my claims against Chelsea Harbour Ltd, LRP Ltd, and Vista (London) Ltd. Claims in which the Defendants have been in default for over 530 days.
- (c) **The arrest warrant is void.** Issued by a court without jurisdiction.
- (d) **The LCRO is void.** Made during the MHCM period.
- (e) **The entire procedural edifice** built upon these void orders is legally unsound.

289. Pursuing enforcement under these circumstances, against a disabled litigant in person who is actively cooperating and has substantial un rebutted claims against the parties whose conduct caused the insolvency, is neither proportionate nor appropriate.

290. The Court of Appeal may shortly be asked to bring order to this chaos. The Insolvency Service may wish to await that intervention rather than proceeding on the basis of void orders from courts without jurisdiction.
(HMRC-ORD-003 [Enc-06])

G.3 Consequences of Continued Enforcement

291. In light of:

- (a) The jurisdictional chaos documented in this letter (a High Court liquidation being dealt with in the County Court under an invented reference number);
- (b) The pattern of systematic Equality Act failures across multiple Chancery Division hearings;
- (c) My formal complaint against the Chancery Division which potentially taints any decision-maker within that Division, a complaint whose consequences are demonstrated by CA-2024-002890, where the Court of Appeal declined jurisdiction over the rescission appeal and directed it back to the very Division now subject to the bias complaint, creating a jurisdictional trap in which no impartial forum exists within the lower courts;
- (d) The Insolvency Service's refusal to engage substantively with my legal arguments;
- (e) The void LCRO that cannot lawfully restrain my applications;
- (f) The void costs orders that I am not liable to pay;
- (g) The underlying claims in which Defendants are in default for 530+ days; and
- (h) The threat of arrest under a void Order,

I am considering filing an Administrative Notice directly with the Court of Appeal requesting:

- (i) The Court of Appeal to exercise its supervisory jurisdiction over the matters documented in this letter;
- (ii) Directions regarding the void County Court Order and the jurisdictional question;
- (iii) Consolidation of all related proceedings under unified Court of Appeal supervision;
- (iv) Declaration that orders made during the MHCM period are void;

- (v) Consideration of whether any Chancery Division judge should continue to deal with matters affecting me, given my outstanding complaint;
 - (vi) A stay of any enforcement action pending determination of the above.
292. The Insolvency Service may wish to reflect on whether continued pursuit of enforcement under a void Order, against a disabled litigant in person who is actively cooperating and who has filed a bias complaint against the relevant Division, is a proportionate and appropriate use of public resources. Particularly when the Court of Appeal may shortly be asked to intervene.
293. I do not wish to take these steps. I wish to cooperate. I wish to attend a public examination. I wish to provide information. I wish to resolve these matters constructively.
294. **But I will not submit to coercion under a void Order while my disability rights are ignored, the documents I need are withheld, and my offers of cooperation are dismissed.**

PART H: CONCLUSION

Summary

The Applicant's position stated with absolute clarity: he is cooperating; he wants a public examination; the Order is void; the Insolvency Service has not answered his legal argument; the liquidation need never have occurred; the bank statements are being withheld; and the LCRO is a statutory nullity. The Applicant contends that default judgment on liability should be entered where the Part 12 conditions are met, with quantum to be assessed where the claims are for unliquidated damages. The valuation materials place the losses in issue well into eight figures. The next step is the Insolvency Service's.

Key authorities: [Anisminic](#); [MacFoy](#); [Reg. 7\(12\)DSRR 2020](#); [CPR 12.3](#); [Cunico v Daskalakis](#) • **Key paragraphs:** 295–317

295. Let me state my position with absolute clarity.
296. **I am cooperating.** I responded to the arrest warrant on the same day I received it with a comprehensive 13-page letter. I have now produced this further detailed response. I have engaged substantively with every issue. (HMRC-ORD-002 [Enc-02])
297. **I want a public examination.** I have offered, twice, to attend one in the correct court. That offer has been ignored. Instead, I am threatened with arrest to coerce compliance with a questionnaire. I prefer the statutory route. I prefer to be examined under oath. I prefer transparency. Why does the Insolvency Service not?
298. **I am willing to provide information.** I have asked for reasonable adjustments to enable me to do so properly. I have asked for the bank statements necessary to answer your financial questions. Those requests have been refused or ignored.
299. **The Order is void.** The County Court at Central London has no jurisdiction over CR-2024-000527. The Insolvency Service has not identified any legal basis for that jurisdiction because none exists. A void order does not become valid because Mr Wheeler asserts it is valid. It does not require me to "challenge the Court." It is a nullity that never existed in law. (HMRC-ORD-001 [Enc-01]; HMRC-ORD-004 [Enc-07])
300. **The Insolvency Service has not answered my legal argument.** Asserting validity is not the same as demonstrating it.
301. **The pattern of failures is documented.** From HMRC to the Insolvency Service to ICC Judge Greenwood to ICC Judge Barber to now. At every stage, reasonable adjustments have been refused, and at every stage, the consequence has been adverse to me. (HMRC-COR-001 [Enc-05]; HMRC-COR-002 [Enc-08]; HMRC-ORD-004 [Enc-07])
302. **The liquidation need never have occurred.** It is the product of institutional disability discrimination and the unlawful conduct of Chelsea Harbour Ltd, LRP Ltd, and Vista (London) Ltd. These parties have been in default of my claims against them for over 530 days.

- 303. You are retaining documents I need in order to comply.** You demand financial information while holding the bank statements necessary to provide it. That is not a fair basis on which to threaten enforcement.
- 304. Mr Wheeler can reasonably be expected to understand that police will execute a facially valid warrant.** As a former police officer, he understands that telling me to "challenge the Court" offers no practical protection against arrest under an order I say is void. If I am arrested, I will contend that the Insolvency Service bears responsibility for any unlawful detention resulting from continued reliance on a warrant whose validity has been squarely challenged. (HMRC-ORD-002 [Enc-02]; HMRC-ORD-003 [Enc-06])
- 305. The Court of Appeal has supervisory jurisdiction.** The Chancery Division, including the ICC, is subject to my formal bias complaint. The Court of Appeal is being copied on this letter and may be asked to intervene directly.
- 305A. The threshold for variation of the void orders is met in any event.** In *Tibbles v SIG plc* [2012] EWCA Civ 518, the Court of Appeal held that [CPR 3.1\(7\)](#) variation is available where there has been (i) a material change of circumstances since the order was made, (ii) a misstatement of facts on which the order was based, or (iii) a clear mistake on the part of the court. All three conditions are satisfied here: (i) the MHCM was unknown to the courts when the earlier orders were sealed; (ii) the costs "forthwith" was a misstatement of what was pronounced at the hearing; and (iii) the wrong statutory provisions in the arrest warrant are a clear mistake. (HMRC-ORD-002 [Enc-02]; HMRC-ORD-003 [Enc-06]; MDE-MHCM-001 [Enc-03])
- 305B.** In *Takhar v Gracefield Developments Ltd* [2019] UKSC 13, the Supreme Court held that where there has been irregularity or fraud, finality of litigation must yield to the principle that justice requires the truth to prevail. The insertion of unpronounced terms into sealed orders (as I contend occurred with the January Order of 6 January 2025) is at minimum an irregularity that engages this principle.
- 306. The LCRO is void.** It was made on Day 61 of the Mental Health Crisis Moratorium and is a statutory nullity under [Regulation 7\(12\)](#). There is no valid restraint on my applications. There are no valid time limits arising from void orders. (CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15]; MDE-MHCM-001 [Enc-03])
- 306A.** Even if the LCRO were not void (which it is), it would be disproportionate. In *Bhamjee v Forsdick* [2003] EWCA Civ 1113, the Court of Appeal held that LCROs are reserved for cases of **persistent and hopeless** litigation. They are rare, targeted measures. Here, the LCRO was imposed after a **single complaint cycle**, seven days after that complaint, by the judge who was the subject of it, against a disabled litigant pursuing claims where the Defendants have not even filed defences. That is not persistent hopeless litigation; it is meritorious persistence in the face of institutional obstruction. (CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15])
- 306B.** In *Sartipy v Tigris Industries Inc* [2020] EWHC 2461, the court confirmed that LCROs can and should be **confined in scope**. The LCRO here, covering the entirety of BL-2024-001089, is broader than necessary, and its practical effect has been to obstruct applications in entirely separate proceedings (BL-2025-000147) where it has no lawful application. At [PD 3C paragraph 4.1](#), an LCRO restrains applications only "in the proceedings in which the order is made." Cross-contamination to other case numbers is unlawful. (CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15]; HMRC-ORD-003 [Enc-06])
- 307. I contend that I am entitled to default judgment.** The Defendants in BL-2024-001089, BL-2025-000147, and BL-2024-001166 have been in default for a combined 1,302+ days. Under [CPR 12.3](#) and 12.4, and subject to the court being satisfied that the Part 12 conditions are met, I contend that judgment should be entered on request. In any claim for unliquidated damages, quantum would then fall to be assessed under [CPR 12.5\(3\)](#) and [12.8](#). The valuation materials place the losses in issue well into eight figures, including a discounted cash flow future-profit estimate of approximately **£11.8 million NPV** (MDE-FIN-001 [OR-027]; MDE-FIN-005 [OR-872]; MDE-FIN-002 [OR-201]; MDE-FIN-004 [OR-863]). Even on a materially discounted basis, that value would substantially exceed the HMRC petition debt if the underlying claims succeed.
- 307A. The CPR themselves make default judgment a request-based process.** Under [CPR 12.3](#), a claimant may obtain judgment by filing a request where the defendant has failed to file an acknowledgment of service or a defence and the rule's conditions are met. A regularly entered default judgment is then challenged through [CPR](#)

[Part 13](#); see [Cunico Resources NV v Daskalakis](#) [2018] EWHC 3382 (Comm). No Part 13 application has ever been made.

My complaint is that my N227 requests were treated as if they were discretionary applications to be deferred behind the Defendants' procedural manoeuvres, rather than requests to which the court had to apply the rule-based Part 12 framework.

H.1 A Final Word

- 308.** I am aware that I may be perceived by some within the court system and the Insolvency Service as a troublesome litigant in person. Someone to be managed, dismissed, or simply worn down until they go away.
- 309.** I am aware that multiple adverse orders have been made against me, that I face a Limited Civil Restraint Order (which is void), that I have been characterised as "not co-operating," and that I am now threatened with arrest. (CHE-ORD-001 [Enc-14]; CHE-ORD-002 [Enc-15])
- 310.** I am aware that the weight of institutional power is stacked against a disabled, unrepresented individual attempting to navigate complex multi-track litigation while managing ADHD and ASD.
- 311. But I am also aware of the following:**
- (a) The Defendants in my underlying claims have been in default for over 530 days. They have no Defence. I am entitled to judgment.
 - (b) The orders made against me during the Mental Health Crisis Moratorium are void by operation of statute, including the LCRO, the costs orders, the 6 February 2025 stay order with its automatic strike-out backstop, and the TWM orders relied upon for the LCRO.
 - (c) The arrest warrant is void for want of jurisdiction.
 - (d) The pattern of Equality Act failures is documented and actionable.
 - (e) The Court of Appeal has supervisory jurisdiction and the power to put matters right.
 - (f) I have responded to every challenge with detailed, legally-researched submissions that engage substantively with every issue.
 - (g) I have not given up. I will not give up.
- 312.** Those who believe that I will simply capitulate under pressure. That I will be frightened into compliance by threats of arrest, worn down by procedural complexity, or silenced by adverse rulings. They have fundamentally misjudged the situation.
- 313. I will pursue every available remedy.** I will seek judicial review. I will appeal. I will complain to the Ombudsman and the EHRC. I will pursue damages for discrimination and unlawful detention. I will request the Court of Appeal to exercise its supervisory jurisdiction. I will file my Administrative Notice seeking consolidation of all proceedings. I will, if necessary, seek to have the law changed to prevent what has happened to me from happening to others.
- 314.** I do not say this as a threat. I say it as a statement of fact. I have been treated unjustly, and I intend to obtain justice. Through the courts, through the appellate system, through regulatory bodies, and if necessary through Parliament itself.
- 315. The next step is the Insolvency Service's.** It can:
- (a) **Identify the legal basis** for County Court jurisdiction (if one exists);
 - (b) **Accept my offer** to attend a public examination in the correct court with reasonable adjustments;
 - (c) **Provide the bank statements** necessary for me to comply with your requests;
 - (d) **Engage constructively** with my reasonable adjustment requests; and

OR

- (e) Continue to threaten arrest under a void Order, exploit police ignorance of jurisdictional defects, ignore a disabled person's rights, withhold necessary documents, and dismiss offers of cooperation, **and face the consequences.**

316. I await the Insolvency Service's substantive response within 14 days.

317. I will not be bullied. I will not be silenced. I will not go away.

Yours faithfully,



Michael Darius Eastwood

HMCTS Reasonable Adjustments Reference: **67862925**

CORE ENCLOSURES

This response is accompanied by a paginated and indexed enclosure bundle containing 11 documents. The bundle is paginated continuously and each enclosure is preceded by an annotation page where the Applicant identifies specific defects in the orders. The wider exhibit record, including the full formal complaint materials and the broader chronology and evidential annexes, is reserved for the Administrative Notice and any main application once the exhibit schedule has been finalised.

1. **Order of Chief ICC Judge Briggs dated 23 July 2025** (limited transfer order) [ANNOTATED: 7 defects identified]
2. **Arrest warrant dated 19 November 2025** (District Judge Mauger, County Court at Central London) [ANNOTATED: VOID AB INITIO . 7 defects identified]
3. Mental Health Crisis Moratorium Certificate (BSS-0000297093, dated 28 December 2024)
4. H&F Crisis Assessment and Home Treatment Team letter dated 24 March 2025 (first confirmation of Autism Spectrum Disorder)
5. HMRC letter declining request for reasonable adjustments (Mrs S Huntley, Debt Manager, dated 22 February 2024)
6. **Order of District Judge Hart dated 7 August 2025** (public examination order) [ANNOTATED: VOID AB INITIO . 6 defects identified, including citation of bankruptcy provisions ss.290/364 IA 1986 in a company winding-up]
7. Winding-up order dated 25 September 2024 (CR-2024-000527, Mastermind Group Ltd)
8. Letter to HMRC requesting reasonable adjustments dated 21 February 2024 (enclosing Dr James Woolley's letter of 16 February 2024)
9. Medical report of Dr James Woolley, Consultant Psychiatrist, dated 26 April 2024 (ADHD, medication, impact on functioning)
10. Evidence of procedural mismanagement and default judgment applications (letters to the court dated September–October 2024)
11. Official Receiver's rescission report dated 15 November 2024 (pursuant to section 147 of the Insolvency Act 1986)

SCHEDULE OF AUTHORITIES

Jurisdiction and Nullity

Authority	Citation	Proposition
<i>Anisminic Ltd v Foreign Compensation Commission</i>	[1969] 2 AC 147 (HL)	Order made without jurisdiction is void ab initio; a nullity
<i>MacFoy v United Africa Co Ltd</i>	[1962] AC 152 (PC)	Void act is "incurably bad"; nothing can be founded upon it
<i>R (Privacy International) v Investigatory Powers Tribunal</i>	[2019] UKSC 22	Confirms <i>Anisminic</i> principle remains good law
<i>Shogun Finance Ltd v Hudson</i>	[2003] UKHL 62	Nemo dat quod non habet. Seller cannot pass title they do not have
Insolvency Act 1986, s.117(1)	-	High Court has jurisdiction to wind up any company
Insolvency Act 1986, s.117(2)	-	County Court limited concurrent jurisdiction (£120k threshold)
Insolvency Act 1986, s.117(2A)	(inserted by SI 2014/821)	London Insolvency District: winding-up proceedings may be commenced only in the High Court
Insolvency Act 1986, s.133	-	Public examination (exercisable by "the court" with jurisdiction)
Insolvency Act 1986, s.134	-	Arrest powers (exercisable by "the court" with jurisdiction)
Practice Direction: Insolvency Proceedings, paras 3.1, 10.1	-	High Court insolvency petitions and applications listed before ICC Judge in RCJ
High Court and County Court Jurisdiction Order 1991, art. 6C	(inserted by SI 2014/821)	London Insolvency District: winding-up proceedings may be commenced only in the High Court
<i>Fourie v Le Roux</i>	[2007] UKHL 1	Court should not exercise coercive jurisdiction in absence of substantive proceedings properly before it
<i>Lees v Kaye</i>	[2022] EWHC 1151 (QB)	MHCM automatic nullity under Regulation 7(12) DSRR 2020: "the regulation is unequivocal: the actions are null and void"
<i>Kaye v Lees</i>	[2023] EWHC 758 (KB)	Payment-conditional orders made during MHCM protected period void under Regulation 7(12)
<i>Isaacs v Robertson</i>	[1985] AC 97 (PC)	Delay or acquiescence does not validate a nullity; a void order remains open to challenge notwithstanding lapse of time
<i>Phillips v Symes</i>	[2002] 1 WLR 853	Proceedings to set aside a void order are not subject to appeal time limits; jurisdiction to declare nullity exists at any time
<i>Craig v Kanssen</i>	[1943] KB 256	Order made without jurisdiction is a nullity; no appeal required; may be treated as having no legal effect at any stage

Human Rights and Natural Justice

Authority	Citation	Proposition
ECHR, Article 5(1)	-	Right to liberty; detention must be "prescribed by law"
ECHR, Article 5(4)	-	Right to take proceedings to have legality of detention decided speedily by a court
Human Rights Act 1998, s.8	-	Judicial remedies (including damages) for breach of Convention rights
Khudoyorov v Russia (App. no. 6847/02)	ECHR 2005-X	Detention unlawful where court exceeds jurisdiction
Potanina v Potanin	[2024] UKSC 3	"Rule One": no order without notice and opportunity to be heard
Porter v Magill	[2001] UKHL 67	Apparent bias test: whether a fair-minded and informed observer, considering the facts, would conclude there was a real possibility the tribunal was biased
R (UNISON) v Lord Chancellor	[2017] UKSC 51	At [68]: access to courts is a constitutional right; a costs or restraint regime that effectively prevents a party from challenging unlawful conduct is itself unlawful
Serafin v Malkiewicz	[2020] UKSC 23	Trial unfairness: appellate intervention where the conduct of the trial was unfair towards one of the parties
Scott v Scott	[1913] AC 417 (HL)	Open justice: justice must be administered in public; unexplained anonymisation of hearings without anonymity order is antithetical to this principle
Jalla v Shell International Trading	[2023] UKSC 16	Where statute creates absolute prohibition, no intermediate "voidable" category; act is either within jurisdiction (valid) or outside it (nullity)
Locabail (UK) Ltd v Bayfield Properties Ltd	[2000] QB 451	Where formal complaint made about judge, ordinary course is recusal from further participation in same matter
Georgiou v Georgiou	[2014] EWHC 33 (Ch)	Treating a complaint about bias as evidence of vexatiousness creates circular trap capable of founding appearance-of-bias finding
AWG Group Ltd v Morrison	[2006] EWCA Civ 6	Fair-minded observer considers timing and sequence of events when assessing apparent bias
Messih v McMillan Williams	[2010] EWCA Civ 844	"May" in CPR 12.3 = mandatory entitlement to default judgment, not discretion
Strachan v Gleaner Co Ltd	[2005] UKPC 33	Court cannot arbitrarily refuse to enter judgment to which claimant is mandatorily entitled
Bhamjee v Forsdick	[2003] EWCA Civ 1113	LCROs reserved for persistent hopeless litigation; rare targeted measures; proportionality required
Sartipy v Tigris Industries Inc	[2020] EWHC 2461	LCROs can and should be confined in scope; PD 3C para 4.1 limits to proceedings in which order made
Tibbles v SIG plc	[2012] EWCA Civ 518	CPR 3.1(7) variation available where material change, misstatement of facts, or clear mistake

<i>Takhar v Gracefield Developments Ltd</i>	[2019] UKSC 13	Where irregularity or fraud, finality yields to truth; justice requires the truth to prevail
<i>Egan v Motor Services (Bath) Ltd</i>	[2007] EWCA Civ 1002	Sealed order must faithfully reflect what court decided; where terms inserted not pronounced, order liable to correction
SI 2014/2947	-	Designates only 8 courts with corporate insolvency jurisdiction; CLCC not among them
IR 2016, r.12.30(1)	-	Transfer only to court with insolvency jurisdiction over relevant proceedings
IR 2016, r.12.31(3)	-	Written reasons mandatory for transfer of insolvency proceedings
DSRR 2020, Reg 10(5)	-	Where debtor gives creditor prescribed information about moratorium, creditor must not pursue debt
<i>Cape Intermediate Holdings Ltd v Dring</i>	[2019] UKSC 38	Open justice is a constitutional principle; access to court proceedings and documents should be the default position; any departure requires specific justification
<i>Cam v Turkey</i>	(2016) 65 EHRR 32	Article 6 requires states to make reasonable adjustments to court procedures for disabled litigants
<i>Braganza v BP Shipping Ltd</i>	[2015] UKSC 17	Contractual discretion must be exercised rationally, taking into account only relevant considerations
<i>Hurst v Picture Theatres Ltd</i>	[1915] 1 KB 1	Even a licensee wrongfully excluded is entitled to damages; lease/licence distinction does not extinguish right to sue
<i>Gentry v Miller</i>	[2016] EWCA Civ 141	Tactical default should not be lightly set aside; deliberate non-engagement has consequences

False Imprisonment and Unlawful Arrest

Authority	Citation	Proposition
<i>R v Governor of Brockhill Prison, ex p Evans (No 2)</i>	[2001] 2 AC 19 (HL)	Detention without lawful authority is actionable in false imprisonment; strict liability regardless of good faith
<i>R (Lumba) v Secretary of State for the Home Department</i>	[2011] UKSC 12	Detention without lawful authority is actionable (nominal damages where detention would have been lawful under published policy)

Misfeasance in Public Office

Authority	Citation	Proposition
<i>Three Rivers DC v Bank of England (No 3)</i>	[2003] 2 AC 1 (HL)	Elements of misfeasance: (1) exercise of public power; (2) knowledge of unlawfulness or reckless indifference; (3) knowledge that conduct will harm claimant
<i>Karagozlu v Commissioner of Police of the Metropolis</i>	[2006] EWCA Civ 1691	Loss of liberty constitutes sufficient damage for misfeasance in public office

Equality Act

Authority	Citation	Proposition
Equality Act 2010, s.6	-	Definition of disability
Equality Act 2010, s.15	-	Discrimination arising from disability
Equality Act 2010, s.20	-	Duty to make reasonable adjustments
Equality Act 2010, s.26	-	Harassment: unwanted conduct with purpose or effect of violating dignity or creating intimidating, hostile, degrading, humiliating, or offensive environment
Equality Act 2010, s.149	-	Public Sector Equality Duty
Galo v Bombardier Aerospace UK	[2016] NICA 25	Failure properly to address disability and medical evidence can render the hearing procedurally unfair, requiring set aside
Rackham v NHS Professionals Ltd	[2015] EWCA Civ 1245	Failure to provide reasonable adjustments = automatic procedural unfairness; no discretion
Brown v Secretary of State for Work and Pensions	[2008] EWHC 3158 (Admin)	PSSED (s.149) is non-delegable; decision-maker must personally consider equality implications
Chief Constable of West Midlands Police v Blackburn	[2024] EWCA Civ 1017	Application volume caused by disability cannot be characterised as vexatious; EA 2010 s.15 protection
Essop v Home Office	[2017] UKSC 27	Statistical disparity in outcomes is capable of establishing indirect discrimination; no requirement for claimant to explain why the PCP causes disadvantage

Insolvency

Authority	Citation	Proposition
Insolvency Act 1986, s.147	-	Court may rescind winding-up order where just and equitable to do so
Re Bayoil SA	[1999] 1 WLR 147 (CA)	Winding-up petitions should not proceed where there are disputed debts or substantial cross-claims; petition debt disputed on substantial grounds warrants dismissal
Mann v Goldstein	[1968] 1 WLR 1091	Petition should be dismissed if debt is genuinely disputed on substantial grounds
Re Saunders	[1997] Ch 60	Asset effectively assigned pre-liquidation ceases to be property of the company and does not vest in the liquidator
HMRC v Direct Affinity & Ors	[2019] EWHC 3063 (Ch)	Official Receiver's costs on rescission applications; neutral position of OR on rescission does not constitute opposition
Access to Justice Act 1999 (Destination of Appeals) Order 2016, art. 4(1)(a)	SI 2016/917	Appeal from an Insolvency and Companies Court Judge lies to a High Court Judge (not the Court of Appeal); cited by Mrs Levey (Court of Appeal Jurisdiction Lawyer) in declining jurisdiction over CA-2024-002890
Senior Courts Act 1981, Sch. 2, Pt 2	-	Appeal routes for insolvency matters; jurisdiction of High Court judges on appeal from ICC judges

Statutory (Tort and Intellectual Property)

Authority	Citation	Proposition
Torts (Interference with Goods) Act 1977, ss.12-13	-	Bailee must give notice before disposing of goods; failure to comply renders disposal a conversion (strict liability)
Copyright, Designs and Patents Act 1988, s.16	-	Exclusive rights of copyright owner; infringement by unauthorised distribution

Property and Forfeiture

Authority	Citation	Proposition
Segal Securities Ltd v Thoseby	[1963] 1 QB 887	Post-forfeiture waiver: landlord who continues to recognise tenancy after forfeiture waives right to rely on it; conduct inconsistent with forfeiture constitutes waiver
Pineport Ltd v Grange Glen Ltd	[1985] EGLR 94	Relief against forfeiture granted one and a half years after peaceable re-entry; time lapse does not bar relief where circumstances warrant
Walsh v Lonsdale	(1882) 21 Ch D 9	Equity treats as done that which ought to be done; agreement to assign takes effect as equitable assignment even absent formal deed
Norglen Ltd v Reeds Rains Prudential Ltd	[1999] 2 AC 1 (HL)	Choses in action (including causes of action in tort and contract) are assignable in equity without formality

Procedural

Authority	Citation	Proposition
CPR Part 12 (rules 12.3, 12.4, 13.2)	-	Default judgment as of right by filing request; court must set aside only where conditions not met
Cunico Resources NV v Daskalakis	[2018] EWHC 3382 (Comm)	Structure of CPR Part 12 and CPR Part 13 ; regularly entered default judgment attacked through Part 13 set-aside, not by treating the default as if it never occurred
CPR 3.3(4)-(6)	-	Order made of court's own initiative: must include statement of right to apply to set aside (r.3.3(5)(b)); application within 7 days of service if no period specified (r.3.3(6)(b))
CPR 23.9(3) , 23.10(2)	-	Order made without notice must contain statement of right to apply to set aside (r.23.9(3)); application within 7 days of service unless court directs otherwise (r.23.10(2))
CPR 3.10	-	Error of procedure does not invalidate any step unless the court so orders (distinguished: presupposes error within otherwise valid proceeding)
CPR 52.20(1) , (2)	-	Court of Appeal has all the powers of the lower court; may make any order which could have been made below
CPR 52.14	-	Consolidation of appeals arising from same or related proceedings
CPR 1.1	-	Overriding objective
Practice Direction 1A	-	Participation of vulnerable parties
Insolvency Act 1986, s.235	-	Duty to cooperate; fairness requires access to records necessary for compliance
Billington v Davies	[2016] EWHC 1919 (Ch)	Defence filed after CPR 15.4 deadline without valid extension is ineffective for defeating default judgment unless and until properly regularised through Denton/ CPR 3.9 analysis
CPR 15.4 , 15.5	-	Time for filing Defence (14 days after service of particulars of claim); extension by agreement (up to 28 days)
CPR 17.1(1)	-	Claim form may be amended without permission of the court before service
Egan v Motor Services (Bath) Ltd	[2007] EWCA Civ 1002	Sealed court orders must accurately reflect the judgment or order actually pronounced; where they do not, the order may be corrected under CPR 40.12 (the slip rule)
Wasif v Secretary of State for the Home Department	[2016] EWCA Civ 82	TWM is confined to cases properly described as “bound to fail”; if there remains any rational basis on which the claim could succeed, the claim is not TWM even if it is unarguable
R (Grace) v Secretary of State for the Home Department	[2014] EWCA Civ 1091	At [41]: “totally without merit” means no more than that the claim is bound to fail
Piglowska v Piglowski	[1999] 1 WLR 1360 (HL)	Applications for reconsideration under CPR Part 3 are legally distinct from appeals under CPR Part 52 ; court cannot convert one into the other by stipulation

Godwin v Swindon BC	[2001] EWCA Civ 1478	Court should not refuse default judgment on basis of perceived merits of unpleaded defence; CPR 12.3 is an entitlement, not a discretionary remedy
Practice Direction 52A , §4.2	-	Form N460 prescribed exclusively for refusing PTA applications under CPR Part 52 ; jurisdictional predicate requires compliant CPR 52.3 application
Practice Direction 3C	-	Limited Civil Restraint Orders: jurisdictional threshold requires minimum two valid TWM certifications
Equality Act 2010, s.15	-	Discrimination arising from disability: unfavourable treatment because of something arising in consequence of disability; applies where court acknowledges disability then sanctions disability-related conduct
CPR 12.3(1)	-	Default judgment by request: claimant may obtain judgment by filing request where defendant has failed to file an acknowledgement of service or a defence; administrative entitlement, not discretionary
CPR 3.3	-	Court's power to make orders of its own initiative; stay of BL-2025-000147 made under this power
Barton v Wright Hassall LLP	[2018] UKSC 12	At [18]: litigant in person's lack of representation will often justify making allowances in case management decisions and in conducting hearings; minimum standard for procedural accommodation

STATEMENT OF TRUTH

I believe that the facts stated in this letter and exhibit statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed: _____



Full name: Michael Darius Eastwood

Date: 23 February 2026

HMCTS Reasonable Adjustments Reference: 67862925

[END OF FORMAL RESPONSE AND EXHIBIT STATEMENT]