

‘PERVERTING THE COURSE OF JUSTICE’

Official Investigator Question Schedule (Condensed Version – Maximum 10 Questions Per Addressee)

Separated questions for Liquidators, Keystone Law, Irwin Mitchell, Mark Coote, Mark Endersby, SRA, BSB, and other regulators/oversight bodies.

Purpose: This schedule is drafted for use in an official investigative complaint. The questions are firm, direct, and designed to identify knowledge, responsibility, decision-making, document trails, escalation, and action or inaction after notice of complaints, judicial criticism, disputed authority, and alleged misleading narratives.

Instruction to interviewer: Where a witness gives a general answer, require names, dates, job titles, documents, file references, and the precise action taken. Where no action was taken, require the witness to identify who made that decision and why.

Important framing note: These questions are drafted to test whether any person or firm knowingly advanced a false or misleading narrative to the court, including the continued reliance on contrary material. These investigative questions are seeking direct answers and disclosure.

‘NO INSOLVENCY SET-OFF’ DISRUPTIVE DIRECTORS

A. Questions for Liquidators Heron Fisher & MHA

Please find Contact Details here:

chris.herron@herronfisher.co.uk

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Insolvency and Business Recovery
Satago Cottage
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Croydon
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2 London Wall Place, London, EC2Y 5AU

1. State your full name, official title, and the exact capacity in which you dealt with any complaint, report, notification, retainer, instruction, or action connected to Mark Coote, Mark Endersby, WFC, Formark Scaffolding (Holdings) Ltd and Astrosoccer 4 U Ltd, complaints made by IRAMA PTE LTD, or Mr Ian Rush.
2. Identify every person in your office who handled those complaints or reports, and state precisely what each person did.
3. When did you first receive or become aware of IRAMA's related complaints about the WFC liquidation?
4. Did you personally review those letters and supporting emails; if not, who did, and when?
5. What immediate action did you take after receiving material indicating that the information you had been advancing may have been false, incomplete, or misleading?
6. Did you escalate the matter internally, seek legal advice, notify the court, or notify any regulator? If not, why not?
7. When did you first become aware of judicial criticism or public findings concerning Mark Coote and Mark Endersby, and what did you do with that knowledge?
8. Did you investigate who had actual authority to speak for, bind, or make claims on behalf of WFC or any related entity, and what documents did you rely on?
9. Did you communicate any concern to Irwin Mitchell, Keystone Law, the court, or any regulator that the information being advanced was disputed or inaccurate? If yes, identify the date, recipient, and wording used.
10. If no meaningful action was taken after repeated notice, explain fully why no such action was taken and who was responsible for that decision.

B. Questions for Keystone Law

IRAMA PTE LTD V FORMARK SCAFFOLDING (HOLDINGS) LTD

Please find Contact Details here:

gavin.ballance@keystonelaw.co.uk

teresa.cullen@keystonelaw.co.uk

KEYSTONE LAW : Address: 48 Chancery Ln, London WC2A 1JF

11. State your full name, official title, and the exact capacity in which you dealt with any retainer, instruction, complaint, or action connected to Mark Coote, Mark Endersby, WFC, Astrosoccer 4 U Ltd, IRAMA PTE LTD, or Mr Ian Rush MBE.
12. Identify every person at Keystone Law who dealt with the complaints, reports, or disputed authority / standing issues, and state what each person did.
13. When did Keystone Law first receive or become aware of IRAMA's, repeated complaints, or material challenging the liquidation set-off narrative?
14. Who reviewed that material, who escalated it internally, and who had final responsibility for deciding Keystone Law's response?
15. Before accepting or continuing instructions, did Keystone Law know of prior judicial criticism by Justice Coulson concerning Mark Coote and Mark Endersby, and if so what was done with that knowledge?
16. Did Keystone Law independently verify the factual and legal basis of the position being advanced, particularly the alleged set-off defence and the authority/standing position? If so, what documents were relied on?
17. What exactly did Irwin Mitchell ask Keystone Law to do, and did Irwin Mitchell tell Keystone Law that the issues were disputed and that contrary letters had existed since January 2021?
18. Did anyone at Keystone Law raise a compliance, supervision, or misleading-the-court concern internally? If yes, identify the person, date, and substance of the concern.
19. Did Keystone Law pause, reconsider, qualify, or refuse to advance any part of the narrative after being put on notice that it may have been false or misleading? If not, why not?
20. Identify every attendance note, internal email, draft, risk note, and communication evidencing Keystone Law's knowledge, verification, escalation, and decision-making.

C. Questions for Irwin Mitchell - CASE -

IRAMA PTE LTD V FORMARK SCAFFOLDING (HOLDINGS) LTD

Please find Contact Details here:

kunal.Gadhvi@irwinmitchell.com , alice.Court@irwinmitchell.com , thomas.barnard@irwinmitchell.com

Irwin Mitchell LLP
28 Tudor St, Temple
London, EC4Y 0AY

Counsel for Irwin Mitchell : dmalone@18sjs.com , jessica.Lavelle@xxiv.co.uk , hugh.miall@xxiv.co.uk

Kennedy's Solicitors for Irwin Mitchell Indemnity Insurer : Axis Speciality SE :

jovana.Vasiljevic@kennedyslaw.com , paul.Castellani@kennedyslaw.com

21. State your full name, official title, and the exact capacity in which you dealt with any complaint, report, instruction, pleading, witness evidence, costs document, or advocacy decision relating to Mark Coote, Mark Endersby, WFC, Astrosoccer 4 U Ltd, IRAMA PTE LTD, or Mr Ian Rush MBE.
22. Identify every person at Irwin Mitchell who dealt with the disputed liquidation set-off narrative, the administrators' letters from January 2021 onward, and the repeated complaints from IRAMA PTE LTD or Mr Ian Rush, and state what each person did.
23. When did Irwin Mitchell first receive, read, or become aware of the court-appointed administrators' letters said to contradict the liquidation set-off defence, and who within the firm reviewed them?
24. Why did Irwin Mitchell continue to advance, support, or permit the liquidation set-off narrative in court over a period of years if the firm had material indicating that position was untrue, incomplete, or seriously disputed?
25. Did the firm investigate whether continuing to rely on that narrative risked misleading the court or amounting to participation in an alleged perversion of the course of justice? If not, why not? If yes, identify the reviewer, date, and outcome.
26. What did Irwin Mitchell know about the conduct, credibility, and history of Mark Coote and Mark Endersby, including any prior judicial criticism or findings describing them as disruptive, and how did that affect the firm's decision-making?
27. What role, if any, was played by Hugh Miall, Darren Malone, and Jessica Lavelle in carrying forward, approving, drafting, presenting, or maintaining the disputed narrative, and what did each of them know about the contrary letters and complaints?
28. Did any person within Irwin Mitchell raise concern that the case theory being advanced was false, misleading, unsupported, or being pursued for tactical or billing reasons rather than because it was true? If yes, identify the person, date, and substance of the concern.
29. Did Irwin Mitchell make any referral to compliance, COLP, risk, management, insurers, or supervising partners concerning the continued use of the disputed set-off narrative, and if not, why not?
30. Identify every attendance note, internal email, draft, advice, pleading, conference note, costs document, supervision note, and communication showing what the firm knew, when it knew it, why it continued, and whether billing or costs recovery was discussed as a factor.

D. Questions for Mark Coote - Director

IRAMA PTE LTD V FORMARK SCAFFOLDING (HOLDINGS) LTD

Please find Contact Details here:

MPCOOTE@FORMARK.CO.UK

**Address : The Old Gas Works, 1B Godstone Road,
Whyteleafe, Surrey, CR3 0EG
Tel : 020 8665 0848**

31. State your full name, role, and the capacity in which you say you acted in relation to WFC, Astrosoccer 4 U Ltd, or any connected matter during the relevant period.
32. When did you first become aware of the administrators' letters, the repeated complaints from IRAMA PTE LTD and Mr Ian Rush, and the challenge to the liquidation set-off narrative?
33. Did you read those complaints and letters yourself; if not, who explained them to you and when?
34. What role did you claim to have, and on what legal or factual basis did you claim authority, standing, representation, or decision-making power?
35. What documents did you rely on for any such claim to authority or standing?
36. When did you first become aware of judicial criticism or public findings concerning your conduct, and what action did you take after learning of them?
37. Did you tell Irwin Mitchell or Keystone Law about the contrary letters and repeated complaints, and if so what exactly did you tell them?
38. Did you ask any solicitor or counsel to continue advancing a set-off, authority, or standing narrative after it had been challenged as false or misleading? If yes, state precisely what you asked them to do.
39. Did you provide any statement, document, or instruction that you knew was disputed, incomplete, or potentially misleading? If yes, identify it.
40. Identify every email, message, note, draft, or communication showing your knowledge of the complaints and your instructions to lawyers or others in response.

E. Questions for Mark Endersby - Director

IRAMA PTE LTD V FORMARK SCAFFOLDING (HOLDINGS) LTD

Please find Contact Details here:

endersby@formark.co.uk

**Address : The Old Gas Works, 1B Godstone Road,
Whyteleafe, Surrey, CR3 0EG**

Tel : 020 8665 0848

41. State your full name, role, and the capacity in which you say you acted in relation to WFC, Astrosoccer 4 U Ltd, or any connected matter during the relevant period.
42. When did you first become aware of the administrators' letters, the repeated complaints from IRAMA PTE LTD and Mr Ian Rush, and the challenge to the liquidation set-off narrative?
43. Did you read those complaints and letters yourself; if not, who explained them to you and when?
44. What role did you claim to have, and on what legal or factual basis did you claim authority, standing, representation, or decision-making power?
45. What documents did you rely on for any such claim to authority or standing?
46. When did you first become aware of judicial criticism or public findings concerning your conduct, and what action did you take after learning of them?
47. Did you tell Irwin Mitchell or Keystone Law about the contrary letters and repeated complaints, and if so what exactly did you tell them?
48. Did you ask any solicitor or counsel to continue advancing a set-off, authority, or standing narrative after it had been challenged as false or misleading? If yes, state precisely what you asked them to do.
49. Did you provide any statement, document, or instruction that you knew was disputed, incomplete, or potentially misleading? If yes, identify it.
50. Identify every email, message, note, draft, or communication showing your knowledge of the complaints and your instructions to lawyers or others in response.

F. Questions for the Solicitors Regulation Authority (SRA)/SDT

IRAMA PTE LTD V FORMARK SCAFFOLDING (HOLDINGS) LTD

Please find Contact Details here:

david.Browne@sra.org.uk CASE REF: RGC-000148523

leah.Saich@sra.org.uk. CASE REF : RGC-000145873 , RGC-000146754

Ray Dhanowa , **Generic Email : Enquiries@solicitorsdt.com**

Clerk to the Tribunal / Chief Legal Adviser

Solicitors Disciplinary Tribunal

Tel: 0207 329 4808

DDI: 0207 778 0772

SDT CASE REF'S : 12916-2026 SDT:0103392 , 12918-2026 SDT:0103391 , SDT:0286072 , SDT:0038715 , SDT:0038710 , 12905-2026 , SDT:0103328 , SDT:0286012 , SDT:0038663 , SDT:0038103 ,

51. State your full name, official title, department, and the exact capacity in which you dealt with any complaint, report, or email from IRAMA PTE LTD or Mr Ian Rush concerning these matters.
52. Identify every person at the SRA who handled the complaints once received, and state what each person did.
53. When did the SRA first receive complaints or material alleging that solicitors had continued to advance a false or misleading liquidation set-off narrative despite contrary letters from January 2021 onward?
54. Who reviewed that material, who escalated it internally, and who had final responsibility for deciding whether to investigate or reopen any issue?
55. What exact documents, judgments, complaints, and supporting evidence were reviewed before any decision was made?
56. Did the SRA assess whether the complaints suggested a pattern of misleading-the-court risk, integrity failures, supervision failures, or conduct capable of amounting to facilitation of an alleged perversion of justice? State the conclusion reached.
57. Did the SRA contact Irwin Mitchell, Keystone Law, the liquidators, IRAMA PTE LTD, or Mr Ian Rush for further information, and if not why not?
58. Were written reasons given for any decision not to investigate, not to reopen, or not to take further action? If yes, identify the document and author.
59. Was the matter recorded on any register, internal decision log, or case management system, and if so what did the record say?
60. If no meaningful action was taken after repeated complaints and fresh material, explain fully why no such action was taken and who made that decision.

G. Questions for the Bar Standards Board (BSB)

IRAMA PTE LTD V FORMARK SCAFFOLDING (HOLDINGS) LTD

Please find Contact Details here: CASE REF : 2025/3736 , 2025 3735 , 2025/3734 ,

ReviewatBSB@barstandardsboard.org.uk

Bar Mutual : adrian.Mee@thomasmiller.com

Adrian Mee

Thomas Miller Professional Indemnity

90 Fenchurch Street

London EC3M 4ST

61. State your full name, official title, department, and the exact capacity in which you dealt with any complaint, report, or email from IRAMA PTE LTD or Mr Ian Rush concerning counsel or chambers connected to these matters.
62. Identify every person at the BSB who handled the complaint once received, and state what each person did.
63. When did the BSB first receive complaints or material alleging that counsel continued to advance a false or misleading set-off narrative despite contrary letters and repeated notice?
64. Who reviewed that material, who escalated it internally, and who had final responsibility for deciding whether to investigate or close the matter?
65. What exact judgments, complaints, correspondence, and supporting documents were reviewed before any decision was made?
66. Did the BSB assess whether any barrister failed to act independently, advanced a case known to be false or misleading, or continued after being put on notice of contrary material? State the conclusion reached.
67. Did the BSB seek further information from complainants, chambers, instructing solicitors, or any regulator, and if not why not?
68. Were written reasons given for any decision not to investigate or not to take further action? If yes, identify the document and author.
69. Did the BSB record the matter as a potentially ongoing pattern rather than a single historic event, and if not why not?
70. If no meaningful action was taken after repeated complaints, explain fully why no such action was taken and who made that decision.