

‘PERVERTING THE COURSE OF JUSTICE’

Official Reporter Question Schedule (Condensed Version – 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 condensed schedule is drafted for use by investigative reporters seeking on-the-record responses, document trails, decision-making histories, and explanations for action or inaction after notice of complaints, judicial criticism, disputed authority, and alleged misleading narratives.

Reporter note: Where a source gives a general answer, ask for names, dates, job titles, documents, file references, and the precise action taken. Where no action was taken, ask who made that decision and why.

Important framing note: These questions are drafted for journalism, right-of-reply, and pre-publication verification. They are designed to test what was known, when it was known, who made decisions, what documents existed, and how each person or body responds to the allegation that a false or misleading narrative may have been sustained after contrary material was available.

‘NO INSOLVENCY SET-OFF’ DISRUPTIVE DIRECTORS

A. Questions for Liquidators Heron Fischer & MHA

Please find Contact Details here:

chris.herron@herronfisher.co.uk

steven.illes@mha.co.uk, james.snowdon@mha.co.uk

Herron Fisher, Insolvency and Business Recovery

Satago Cottage, 360a Brighton Road, Croydon, CR2 6AL

Tel 020 8688 2100 , D: +44(0)208 1264237

2 London Wall Place, London, EC2Y 5AU

1. When did you first receive or become aware of complaints from IRAMA PTE LTD or Mr Ian Rush concerning the WFC liquidation, disputed authority, or alleged inaccuracies in the position being advanced?
2. Who within your office reviewed those complaints, letters, and supporting emails, and what did each person do with that material?
3. Did you personally review the correspondence said to challenge the factual or legal basis of the position being taken? If not, who did?
4. What steps, if any, did you take to verify whether the information being relied upon by others was accurate, complete, and fairly presented?
5. Were you at any stage concerned that the material being advanced to the court or to creditors may have been disputed, incomplete, or misleading?
6. Did you investigate who actually had authority to speak for or bind WFC or related entities, and what documents did you rely on?
7. When did you first become aware of any prior judicial criticism concerning Mark Coote or Mark Endersby, and did that affect your handling of the matter?
8. Did you communicate any concern to solicitors, counsel, the court, or any regulator about disputed facts, authority, or standing?
9. Are there file notes, attendance notes, internal emails, or reports that show what your office knew and how it responded?

10. Looking back, do you believe your office took adequate steps once it was put on notice that a central narrative in the case was being challenged?

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. When did Keystone Law first receive material from IRAMA PTE LTD or Mr Ian Rush challenging the liquidation set-off narrative or the authority/standing position being advanced?

12. Who at Keystone Law reviewed that material, and who had final responsibility for deciding how the firm would respond?

13. Before acting or continuing to act, what steps did Keystone Law take to independently verify the factual and legal basis of the case it was being asked to advance?

14. Was Keystone Law made aware of prior judicial criticism concerning Mark Coote and Mark Endersby, and if so, how did that affect the firm's approach?

15. What, specifically, did Irwin Mitchell tell Keystone Law about the disputed issues, the complaints, and the existence of contrary letters said to date back to January 2021?

16. Did anyone inside Keystone Law raise a concern about compliance, supervision, accuracy, or the risk of misleading the court?

17. At any stage did Keystone Law pause, reconsider, or qualify the position it was being asked to support?

18. What documents did Keystone Law rely on to satisfy itself that the set-off and authority narrative was properly arguable?

19. Are there attendance notes, internal emails, draft documents, or risk notes that show what Keystone Law knew and when?

20. What is Keystone Law's response to the allegation that it continued to support a case theory after being put on notice that it may have been false or materially incomplete?

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

Kennedys Solicitors for Irwin Mitchell Indemnity Insurer : Axis Speciality SE:

jovana.vasiljevic@kennedyslaw.com, paul.castellani@kennedyslaw.com

21. When did Irwin Mitchell first receive or become aware of the court-appointed administrators' letters said to contradict the liquidation set-off defence?
22. Who within the firm reviewed those letters, and what conclusions were reached at the time?
23. Why did the firm continue to advance or support the liquidation set-off narrative after receiving material said to challenge it?
24. What did Irwin Mitchell understand about the conduct, credibility, and litigation history of Mark Coote and Mark Endersby when deciding how to run the case?
25. What role did Hugh Miall, Darren Malone, and Jessica Lavelle play in drafting, approving, presenting, or maintaining the disputed narrative?
26. Did anyone within Irwin Mitchell raise concern that the position being advanced risked misleading the court or was no longer sustainable in light of the contrary letters and repeated complaints?
27. Was the issue ever referred internally to compliance, risk, a COLP, supervising partners, or insurers? If so, what was the outcome?
28. Did billing, costs recovery, litigation strategy, or tactical pressure play any part in the decision to continue with that narrative?

29. What documents exist - including attendance notes, internal emails, conference notes, pleadings, costs documents, and supervision records - showing what the firm knew and when?

30. What is Irwin Mitchell's response to the allegation that it helped sustain a false narrative in litigation over a number of years despite having contrary material?

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. When did you first become aware of the administrators' letters, repeated complaints from IRAMA PTE LTD and Mr Ian Rush, and the challenge to the liquidation set-off narrative?

32. Did you personally read those letters and complaints, and if not, who explained them to you?

33. What role did you say you had in relation to WFC or related entities, and what documents did you rely on for that claimed authority or standing?

34. When did you first become aware of judicial criticism or findings concerning your conduct, and what did you do after learning of them?

35. What did you tell Irwin Mitchell or Keystone Law about the contrary material and the repeated complaints?

36. Did you ask any solicitor or counsel to continue advancing a set-off, authority, or standing narrative after it had been challenged?

37. Did you provide any statement, document, or instruction that you knew was disputed, incomplete, or potentially misleading?

38. Are there emails, messages, notes, or drafts that show what you knew and what instructions you gave to lawyers or others?

39. Do you accept that others may have relied on information you provided when presenting the case to the court?

40. What is your response to the allegation that you continued to promote a narrative that had been seriously challenged by contrary documents?

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. When did you first become aware of the administrators' letters, repeated complaints from IRAMA PTE LTD and Mr Ian Rush, and the challenge to the liquidation set-off narrative?

42. Did you personally read those letters and complaints, and if not, who explained them to you?

43. What role did you say you had in relation to WFC or related entities, and what documents did you rely on for that claimed authority or standing?

44. When did you first become aware of judicial criticism or findings concerning your conduct, and what did you do after learning of them?

45. What did you tell Irwin Mitchell or Keystone Law about the contrary material and the repeated complaints?

46. Did you ask any solicitor or counsel to continue advancing a set-off, authority, or standing narrative after it had been challenged?

47. Did you provide any statement, document, or instruction that you knew was disputed, incomplete, or potentially misleading?

48. Are there emails, messages, notes, or drafts that show what you knew and what instructions you gave to lawyers or others?

49. Do you accept that others may have relied on information you provided when presenting the case to the court?

50. What is your response to the allegation that you continued to promote a narrative that had been seriously challenged by contrary documents?

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. 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?

52. Who reviewed that material, who escalated it internally, and who had final responsibility for deciding whether to investigate or reopen any issue?

53. What documents, judgments, complaints, and supporting evidence were reviewed before any decision was made?

54. Did the SRA assess whether the complaints suggested misleading-the-court risk, integrity failures, supervision failures, or a continuing pattern rather than a single event?

55. Did the SRA contact Irwin Mitchell, Keystone Law, the liquidators, IRAMA PTE LTD, or Mr Ian Rush for further information?

56. Were written reasons given for any decision not to investigate, not to reopen, or not to take further action?

57. Was the matter recorded on any internal register, decision log, or case management system, and what did the record show?

58. Did the SRA consider whether fresh material altered the regulatory position previously taken?

59. Are there internal notes, file records, or decision documents that show how the complaints were handled?

60. What is the SRA's response to the allegation that repeated complaints supported by contrary material did not receive a meaningful regulatory response?

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. 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?

62. Who reviewed that material, who escalated it internally, and who had final responsibility for deciding whether to investigate or close the matter?

63. What judgments, complaints, correspondence, and supporting documents were reviewed before any decision was made?

64. 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?

65. Did the BSB seek further information from complainants, chambers, instructing solicitors, or any regulator?

66. Were written reasons given for any decision not to investigate or not to take further action?

67. Did the BSB consider whether the material suggested an ongoing pattern rather than a single historic incident?

68. Are there internal records, review notes, or decision documents showing how the complaints were handled?

69. Did the BSB consider whether counsel's duties to the court required further scrutiny in light of the contrary material?

70. What is the BSB's response to the allegation that repeated complaints about counsel's conduct were not meaningfully pursued?

H. Questions for Other Regulators and Oversight Bodies

71. When did your organisation first receive complaints or material alleging ongoing reliance on a false or misleading litigation narrative despite contrary letters and repeated notice?

72. Who reviewed that material, who escalated it internally, and who had final responsibility for deciding what action would be taken?

73. What documents, judgments, complaints, and supporting materials were reviewed before any decision was made?

74. Did your organisation assess whether the material suggested an ongoing pattern of misleading conduct, abuse of process, authority confusion, prejudice to third parties, or regulatory failure?

75. Did your organisation request further information from the complainants, solicitors, office-holders, or any other regulator?

76. Were written reasons given for any decision not to investigate, not to intervene, or not to take further action?

77. Was the matter logged as a continuing issue on your internal systems, and what was recorded?

78. Did your organisation consider whether fresh material altered any previous decision not to act?

79. Are there internal notes, file records, or communications showing how the complaints were handled?

80. What is your organisation's response to the allegation that repeated complaints supported by contrary material did not lead to meaningful oversight or intervention?