

73 Palmerston Road,
Belfast,
BT4 1QD
20th February 2020

IN THE MATTER OF APPLICATIONS FOR LEAVE BY RURAL INTEGRITY (LISBURN 01) LIMITED
AND RELATED COMPANIES

AND

IN THE MATTER OF APPLICATIONS TO DISMISS VARIOUS

Dear Sir,

I represent Rural Integrity (Lisburn 01) Ltd and various related companies. I refer to the recent correspondence of the Court dated 17th February and the decision of the Court of Appeal attached thereto.

The various Applicants have applied for leave to apply for Judicial Review. If leave is granted in any matter the Applicant will have two weeks to commence proceedings by lodging its Notice of Motion.

One or two of the Applicants may be in a position to proceed with representation by a solicitor subject to shareholder support or successful fundraising. I also may be prepared to co-join with a selected Applicant and personally carry responsibility for costs in a lead case.

As proceedings have not yet commenced the Applicant has not yet fallen foul of Order 5 Rule 6 of the Rules of the Court of Judicature 1980. In every case the Applicant has a right to be heard (Order53 Rule 3(10)) and security for costs may be imposed as appropriate after leave (Order53 Rule 3(8)).

The various applications being invited by the Court are therefore premature as such applications cannot be properly brought when an Applicant has simply asked the Court for leave to apply.

The Applicants cannot be responsible for the unnecessary costs associated with these applications.

Neither do any of the Applicants intend to unreasonably promote hopeless cases. As in the Applicant's letter of 9th September 2019 (attached) the Applicants are willing to withdraw their applications if it is apparent that there are costs hurdles or representation issues with which the Applicants cannot comply. This has not yet been established yet.

Rural Integrity (Lisburn 01) Ltd has been refused permission to appeal to the Supreme Court by the Court of Appeal on 14th February 2020 (copy email attached). Subsequently it intends to renew its application to appeal directly with the Supreme Court and due to the

complexity of the issues and the volume of necessary supporting documents this will take some time to submit and the Applicants may not be able to prepare or focus on the hearing which is scheduled for the 26th February. The Appellant believes there are several pertinent points of law to be raised.

As the deadline for this renewal expires on the 13th March 2020 and the outcome will impact the multitude of dismissal applications being brought against the Applicants, the Applicants respectfully suggest the hearing date of 26th February should be postponed until the appeal process is complete.

Sincerely

Gordon Duff
(Director for the Applicants)