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S.C. SUPREME COURT

Claim No. BL-20240001337

IN THE HIGH COURT OF JUSTICE

BUSINESS AND PROPERTY COURTS OF ENGLAND & WALES

BUSINESS LIST (CHD)

B E T W E E N:

(1) CAPE INTERMEDIATE HOLDINGS LIMITED

(2) CAPE PLC (a company incorporated under the laws of Jersey)

Claimants

-and-

PETER D PROTOPAPAS

Defendant

**CLAIMANTS' BILL OF COSTS - SUPPORTING PAPERS
(ORDER AND DISBURSEMENTS)**

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Authority for detailed assessment
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Claim No. BL-2024-001337



BL-2024-001337

IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES
BUSINESS LIST (CHD)

Before Mr Justice Mann, sitting in retirement

B E T W E E N:

- (1) CAPE INTERMEDIATE HOLDINGS LIMITED
(2) CAPE PLC (a company incorporated under the laws of Jersey)

Claimants

- and -

PETER D. PROTOPAPAS

Defendant

ORDER

UPON THE CLAIM of Cape Intermediate Holdings Limited (“CIHL”) and Cape plc (“the Claimants”) issued by Part 8 Claim Form on 6 September 2024

AND UPON HEARING Counsel for the Claimants, Mark Phillips KC, Derrick Dale KC, William Willson, Angus Groom and Louise Merrett

AND UPON READING the evidence, being the first witness statement of Ran Oren dated 6 September 2024 (“Oren 1”), the second witness statement of Ran Oren dated 8 November 2024 (“Oren 2”), the expert report of the Hon William W Wilkins dated 30 October 2024 (“the Wilkins Report”), the further expert report of the Hon William W Wilkins dated 11 November 2024 (“the Supplemental Wilkins Report”), the fifth witness statement of Paul Brehony dated 11 November 2024 (“Brehony 5”), the sixth witness statement of Paul Brehony dated 13 November 2024 (“Brehony 6”), and the seventh witness statement of Paul Brehony dated 21 November 2024 (“Brehony 7”)

AND UPON finding that the appointment of the Defendant as purported receiver of CIHL is not recognised by the laws of England and Wales (where CIHL is incorporated), because CIHL was not present in the state South Carolina at the date upon which the application for the appointment or the appointment was made and because CIHL has not submitted to the jurisdiction of that state

IT IS DECLARED THAT

1. The receivership order of the Court of Common Pleas for the Fifth Judicial Circuit of the State of South Carolina, County of Richland (“**the South Carolina Court**”) dated 16 March 2023 appointing Mr Peter Protopapas (“**Mr Protopapas**”) as a receiver over CIHL (“**the Receivership Order**”) is not recognised and has no legal effect in England and Wales and worldwide.
2. Mr Protopapas has and had no power or authority to act on behalf of CIHL in England and Wales or worldwide and has no power to or authority in respect of CIHL in England and Wales or worldwide to carry out the acts referred to in paragraph 6-10 below.
3. The rights and duties of the directors of CIHL remain unaffected by the appointment of Mr Protopapas as receiver of CIHL pursuant to the Receivership Order.
4. Mr Protopapas has and had no power or authority on behalf of CIHL to act for or to bind CIHL in the South Carolina Court in respect of Park Claim and the Tibbs Claim (as defined in Oren 1) and has and had no power or authority on behalf of CIHL to issue or pursue third party claims including in the Tibbs Claim against any of the third party defendants in those proceedings (“**the 3P Complaint**”), including (i) Mohed Altrad (ii) Altrad Investment Authority SAS (iii) Altrad UK Ltd (iv) Cape UK Holdings Newco Ltd (v) Cape Industrial Services Group Ltd (vi) Cape Holdco Ltd (vii) Altrad Services Ltd.
5. Mr Protopapas has and had no power or authority to accept service on behalf of CIHL in the claim brought in the South Carolina Court by a summons dated 11 November 2024 with claim number C/A NO. 2024-CP-40-06639 or any other legal proceedings issued against CIHL in the South Carolina Court or worldwide.

AND IT IS ORDERED THAT:

6. Mr Protopapas be restrained in England and Wales and worldwide from acting or purporting to act as agent or otherwise on behalf of CIHL pursuant to the Receivership Order.
7. Mr Protopapas be restrained in England and Wales and worldwide from appropriating, interfering with or usurping (in any way whatsoever) the lawful exercise of the rights and duties of the directors of CIHL.
8. Mr Protopapas be restrained from acting or purporting to act on behalf of CIHL in the Park Claim and the Tibbs Claim (as defined in Oren 1).
9. Mr Protopapas be restrained from continuing to prosecute the 3P Complaint (as defined in Oren 1).
10. Mr Protopapas be restrained from purporting to act for CIHL in the claim brought in the South Carolina Court by a summons dated 11 November 2024 and with claim number C/A NO. 2024-CP-40-06639 or in any other legal proceedings issued against CIHL in the South Carolina Court or worldwide.

Liberty to Apply

11. The Claimants shall have liberty to apply for further or related relief.

Costs

12. The Claimants' costs be paid by the Defendant on the standard basis, to be a matter of detailed assessment if not agreed.
13. The Claimants shall have liberty to apply for an interim payment on account of costs.

Service of this Order

This order shall be served by the Claimants on the Defendant.

The court has provided a sealed copy of this order to the serving party, Signature Litigation LL, 138 Fetter Lane, London, EC4A 1BT.

22 November 2024

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**Section B.1
Counsel
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Professional Fees of Mr Mark Phillips KC

VAT Registration No: 446913138

Winston & Strawn
100 Bishopsgate
London
EC2N 4AG
United Kingdom

SOUTH SQUARE

Barristers

3-4 South Square
Gray's Inn
London
WC1R 5HP

Tel : 020 7696 9900
Fax : 020 7696 9911
DX : 338 (Chancery Lane)

All BACS payments must include the case number in the reference. Please send remittance advice to finance@southsquare.com

Solicitor Ref No. Paul Flemming

Date 23 September 2024

Case Ref No. 103333

ALTRAD GROUP

Date	Description	Fees	VAT
03 Jun 2024	Call with Paul Flemming, considering defensive steps		
07 Jun 2024	Prep for Teams about relief and next steps, Teams meeting with Winston Strawn and Derek Dale KC	£5,500.00	
08 Jun 2024	working through draft affidavit, emails	£7,562.50	
09 Jun 2024	re-reading David Richards J's judgments in Cape Plc, emails	£6,187.50	
	Considering Services Agreements, Voting Trust Deed, AIA facility, funding agreement, draft injunction	£5,500.00	
10 Jun 2024	Instructions to Counsel		
11 Jun 2024	Note on structure, analysing T&N	£11,000.00	
12 Jun 2024	Prep for con; T&N judgments and Cape Judgment	£6,875.00	
13 Jun 2024	Prep and reading reports; Teams call with Winston & Strawn	£5,912.50	
14 Jun 2024	Notes for con, prep for con: reading reports:	£6,875.00	
17 Jun 2024	Prep; Con with Clients	£8,250.00	
18 Jun 2024	Call with team, considering timelines and steps	£1,500.00	
19 Jun 2024	Teams calls considering the US Ch11 options	£1,237.50	
01 Jul 2024	Teams meeting, emails	£1,375.00	

Note: Items marked ** are previously unbilled

Payment by bank transfer: Mark Phillips T/ A Mark Phillips KC (Lloyds) Sort Code: 30-65-41 Account: 47934060	OUTSTANDING FEES	C/Fwd
Please forward a remittance advice detailing the case ref. no. and amount to finance@southsquare.com	OUTSTANDING VAT	C/Fwd
Unless expressly agreed otherwise, members of Chambers are only able to accept payment from the instructing law firm and cannot accept any payments from the lay client directly	TOTAL OUTSTANDING	C/Fwd

Previously Rendered: 24 Jun 2024, 10 Jul 2024, 26 Jul 2024, 05 Aug 2024, 12 Aug 2024, 22 Aug 2024, 10 Sep 2024

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PLEASE QUOTE CASE REFERENCE NO. ON ALL CORRESPONDENCE

South Square, 3-4 South Square, Gray's Inn, London, WC1R 5HP

Professional Fees of Mr Mark Phillips KC

VAT Registration No: 446913138

Winston & Strawn
100 Bishopsgate
London
EC2N 4AG
United Kingdom

SOUTH SQUARE

Barristers

3-4 South Square
Gray's Inn
London
WC1R 5HP

Tel : 020 7696 9900
Fax : 020 7696 9911
DX : 338 (Chancery Lane)

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Solicitor Ref No. Paul Fleming

Date 23 September 2024

Case Ref No. 103333

ALTRAD GROUP

Date	Description	Fees	VAT
02 Jul 2024	Structure, David Richards' judgments	£4,125.00	
03 Jul 2024	1st draft note on US proceedings, email to WW	£687.50	
04 Jul 2024	Considering emails of Derrick Dale on the US proceedings, discussion with WW email to Dale and WW about the evidence on what CIHL is doing, discussion with Paul Fleming	£2,750.00	
05 Jul 2024	Disbursement: courier bundles	£104.64	
	Teams with Derrick Dale and William Willson, email to Winston Strawn	£1,375.00	
06 Jul 2024	Marking up accounts, emailed thoughts	£5,500.00	
07 Jul 2024	Marking up accounts emailed thoughts	£5,500.00	
08 Jul 2024	Teams with Winston Strawn and counsel; Reading and marking up WTW reports, emails with WW and Derrick Dale	£11,000.00	
09 Jul 2024	Structure of the argument, emails to Derrick Dale and William Willson, analysis of law	£9,625.00	
10 Jul 2024	Marking up Adams v Cape	£4,125.00	
12 Jul 2024	Finishing materials	£1,375.00	
13 Jul 2024	Completing analysis of accounts, DD draft section on US law, emails	£4,125.00	

Note: Items marked '**' are previously unbilled

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	OUTSTANDING VAT	C/Fwd
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Professional Fees of Mr Mark Phillips KC

VAT Registration No: 446913138

Winston & Strawn
100 Bishopsgate
London
EC2N 4AG
United Kingdom

SOUTH SQUARE

Barristers

3-4 South Square
Gray's Inn
London
WC1R 5HP

Tel : 020 7696 9900
Fax : 020 7696 9911
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Solicitor Ref No. Paul Flenning

Date 23 September 2024

Case Ref No. 103333

ALTRAD GROUP

Date	Description	Fees	VAT
15 Jul 2024	Emails and discussions with Derrick Dale and William Willson, call with Paul Flenning	£2,062.50	
16 Jul 2024	First Draft of sections A to H of statement	£6,875.00	
17 Jul 2024	Prep for Teams, Teams with W&S, client and Derrick Dale; Witness statement	£14,300.00	
18 Jul 2024	Witness Statement	£6,875.00	
19 Jul 2024	Affidavit	£5,500.00	
21 Jul 2024	Draft Section J of the witness statement	£11,000.00	
22 Jul 2024	Drafting Executive Summary, emails to Counsel Team call	£6,875.00	
23 Jul 2024	Witness Statement, Call with W&S	£6,875.00	
24 Jul 2024	Con with solicitors and clients, prep for con (considering combined statement and discussing with WW)	£6,875.00	
25 Jul 2024	Considering enforceability of foreign judgments	£2,750.00	
26 Jul 2024	Considering the law on the effect of foreign judgments, emails	£2,750.00	
29 Jul 2024	Law on authority and effect of a foreign judgment, Draft witness statement	£15,125.00	
30 Jul 2024	Note on legal principles, emails	£6,875.00	

Note: Items marked ** are previously unbilled

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VAT Registration No: 446913138

Winston & Strawn
100 Bishopsgate
London
EC2N 4AG
United Kingdom

SOUTH SQUARE

Barristers

3-4 South Square
Gray's Inn
London
WC1R 5HP

Tel : 020 7696 9900
Fax : 020 7696 9911
DX : 338 (Chancery Lane)

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Solicitor Ref No. Paul Fleming

Date 23 September 2024

Case Ref No. 103333

ALTRAD GROUP

Date	Description	Fees	VAT
31 Jul 2024	Dale's note on abuse	£1,375.00	
01 Aug 2024	- 02.08.2024) Note on anti suit, emails about process	£2,750.00	
06 Aug 2024	Emails with WW and Derrick Dale	£1,375.00	
09 Aug 2024	Statement	£2,750.00	
12 Aug 2024	Emails, considering the construction of the argument	£687.50	
14 Aug 2024	US Order, law on recognition of overseas receiverships, discussions with DD and WW	£8,250.00	
15 Aug 2024	Emails concerning the US Federal Court decision; Statement on service out	£6,875.00	
16 Aug 2024	Final draft Oren statement	£4,125.00	
17 Aug 2024	Clear read of Oren 1	£4,125.00	
19 Aug 2024	Draft Letter Before Action	£2,750.00	
20 Aug 2024	Considering draft LBA	£2,062.50	
21 Aug 2024	Emails, calls	£2,062.50	
23 Aug 2024	Oren Statement	£2,750.00	
26 Aug 2024	Emails	£550.00	

Note: Items marked '+' are previously unbilled

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	OUTSTANDING VAT	C/Fwd
	TOTAL OUTSTANDING	C/Fwd

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VAT Registration No: 446913138

Winston & Strawn
100 Bishopsgate
London
EC2N 4AG
United Kingdom

SOUTH SQUARE

Barristers

3-4 South Square
Gray's Inn
London
WC1R 5HP

Tel : 020 7696 9900
Fax : 020 7696 9911
DX : 338 (Chancery Lane)

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Solicitor Ref No. Paul Fleming

Date 23 September 2024

Case Ref No. 103333

ALTRAD GROUP

Date	Description	Fees	VAT
27 Aug 2024	Call with Paul Fleming	£550.00	
28 Aug 2024	Prep; Call with Baker & McKenzie and client; Call with DD and WW; Call and Email to Fleming on injunctions; Con with clients	£6,600.00	
29 Aug 2024	Amended statement	£1,100.00	
03 Sep 2024	Commenting on Final draft Oren statement; Email to Ran	£4,537.50	
04 Sep 2024	Statement on service out, draft order, draft application, further draft statement	£2,750.00	
06 Sep 2024	Considering letter and Motion from Protopapas, discussing with Dale and Willson, approving final draft applications and statements	£5,500.00	
08 Sep 2024	Emails with DD regarding future prep	£687.50	
10 Sep 2024	* - 11.09.2024) Call with Paul Fleming, call with Derick Dale, emails, marking papers	£11,000.00	
12 Sep 2024	Call with W&S, Teams with DD discussing W&S issue, and recent developments, email advice, marking papers	£9,625.00	
13 Sep 2024	Call, marking up	£2,750.00	
17 Sep 2024	* Call with DD and WW, marking papers	£3,437.50	

Note: Items marked "*" are previously unbilled

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	OUTSTANDING VAT	C/Fwd
	TOTAL OUTSTANDING	C/Fwd

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VAT Registration No: 446913138

Winston & Strawn
100 Bishopsgate
London
EC2N 4AG
United Kingdom

SOUTH SQUARE

Barristers

3-4 South Square
Gray's Inn
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WC1R 5HP

Tel : 020 7696 9900
Fax : 020 7696 9911
DX : 338 (Chancery Lane)

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Solicitor Ref No. Paul Flemming

Date 23 September 2024

Case Ref No. 103333

ALTRAD GROUP

Date	Description	Fees	VAT
18 Sep 2024	<i>PAYMENT RECEIVED WITH THANKS via BACS (Total £104.64, Inv 3667)</i>	-£104.64	
	<i>PAYMENT RECEIVED WITH THANKS via BACS (Total £220950.00, Inv 3667)</i>	-£220,950.00	
19 Sep 2024	* Call with Paul Flemming, emails with Paul Brehony	£687.50	
20 Sep 2024	* Draft expedition, emails; Teams	£1,237.50	
22 Sep 2024	* Expedition application, affidavit and order, prep on Oren 1	£13,750.00	
23 Sep 2024	* Brehony expedition application affidavit; Con at W&S; prep and con	£4,125.00	

Note: Items marked '*' are previously unbilled

Payment by bank transfer: Mark Phillips T/A Mark Phillips KC (Lloyds) Sort Code:30-65-41 Account:47934060 Please forward a remittance advice detailing the case ref. no. and amount to finance@southsquare.com Unless expressly agreed otherwise, members of Chambers are only able to accept payment from the instructing law firm and cannot accept any payments from the lay client directly	OUTSTANDING FEES	£102,575.00
	OUTSTANDING VAT	£0.00
	TOTAL OUTSTANDING	£102,575.00

Previously Rendered: 24 Jun 2024, 10 Jul 2024, 26 Jul 2024, 05 Aug 2024, 12 Aug 2024, 22 Aug 2024, 10 Sep 2024

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Professional Fees of Mr Mark Phillips KC

VAT Registration No: 446913138

Signature Litigation LLP
138 Fetter Lane
London
EC4A 1BT
United Kingdom

SOUTH SQUARE

Barristers

3-4 South Square
Gray's Inn
London
WC1R 5HP

Tel : 020 7696 9900

Fax : 020 7696 9911

DX : 338 (Chancery Lane)

All BACS payments must include the case number in the reference. Please send remittance advice to finance@southsquare.com

Solicitor Ref No. Paul Brehony

Date 09 October 2024

Case Ref No. 106450

ALTRAD GROUP - SEPTEMBER 2024

Date	Description	Fees	VAT
23 Sep 2024	Instructions to Counsel		
24 Sep 2024	Marking up hearing bundles; Teams with Solicitors and Client 7hr 30m	£10,312.50	
25 Sep 2024	Letter to court, articles, marking files 12hrs	£16,500.00	
26 Sep 2024	Preparing bundles for hearing 12hrs	£16,500.00	
27 Sep 2024	Marking bundles; Teams with DD and WW and with Signature 8hrs	£11,000.00	
29 Sep 2024	Marking up bundles 10hrs	£13,750.00	
30 Sep 2024	Teams with WW and DD, marking up hearing bundles 10hrs	£13,750.00	

Note: Items marked "*" are previously unbilled

Payment by bank transfer: Mark Phillips T/A Mark Phillips KC (Lloyds) Sort Code:30-65-41 Account:47934060 Please forward a remittance advice detailing the case ref. no. and amount to finance@southsquare.com Unless expressly agreed otherwise, members of Chambers are only able to accept payment from the instructing law firm and cannot accept any payments from the lay client directly	OUTSTANDING FEES	£81,812.50
	OUTSTANDING VAT	£0.00
	TOTAL OUTSTANDING	£81,812.50

Previously Rendered: 02 Oct 2024

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PLEASE QUOTE CASE REFERENCE NO. ON ALL CORRESPONDENCE

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Professional Fees of Mr Mark Phillips KC

VAT Registration No: 446913138

Signature Litigation LLP
138 Fetter Lane
London
EC4A1BT
United Kingdom

SOUTH SQUARE

Barristers

3-4 South Square
Gray's Inn
London
WC1R 5HP

Tel : 020 7696 9900

Fax : 020 7696 9911

DX : 338 (Chancery Lane)

All BACS payments must include the case number in the reference. Please send remittance advice to finance@southsquare.com

Solicitor Ref No. Paul Brehony

Date 01 November 2024

Case Ref No. 106479

ALTRAD GROUP - OCTOBER 2024

Date	Description	Fees	VAT
01 Oct 2024	Marking up bundles and emails 10hrs	£13,750.00	
02 Oct 2024	Marking up bundles and emails 8hrs	£11,000.00	
03 Oct 2024	Prep for hearing, marking up bundles and emails 10hrs	£13,750.00	
04 Oct 2024	Marking up papers, Teams call, emails 5hrs	£6,875.00	
05 Oct 2024	- 06.10.2024) Marking up bundles and emails, first draft of speaking notes to Dale and WW; Marking up bundles, emails, draft 2nd statement 14hrs	£19,250.00	
07 Oct 2024	Prep for hearing, working up submissions on the Core documents, emails and Teams with DD discussing submissions, dealing with points raised in various emails, settling skeleton 14hrs	£19,250.00	

Note: Items marked 'b' are previously unbilled

Payment by bank transfer: Mark Phillips T/A Mark Phillips KC (Lloyds) Sort Code:30-65-41 Account:47934060 Please forward a remittance advice detailing the case ref. no. and amount to finance@southsquare.com Unless expressly agreed otherwise, members of Chambers are only able to accept payment from the instructing law firm and cannot accept any payments from the lay client directly	OUTSTANDING FEES	C/Fwd
	OUTSTANDING VAT	C/Fwd
	TOTAL OUTSTANDING	C/Fwd

Previously Rendered: 09 Oct 2024, 30 Oct 2024

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Professional Fees of Mr Mark Phillips KC

VAT Registration No: 446913138

Signature Litigation LLP
138 Fetter Lane
London
EC4A1BT
United Kingdom

SOUTH SQUARE

Barristers

3-4 South Square
Gray's Inn
London
WC1R 5HP

Tel : 020 7696 9900
Fax : 020 7696 9911
DX : 338 (Chancery Lane)

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Solicitor Ref No. Paul Brehony

Date 01 November 2024

Case Ref No. 106479

ALTRAD GROUP - OCTOBER 2024

Date	Description	Fees	VAT
08 Oct 2024	Prep for hearing, working on Notes, Adams v Cape, discussions with DD and WW 7hrs	£9,625.00	
09 Oct 2024	Prep for court, court, debrief 5hrs	£6,875.00	
10 Oct 2024	Schedule of alleged vs established facts Brief Stage Payment	£400,000.00	
11 Oct 2024	Emails and schedule		
13 Oct 2024	Grounds of appeal, speaking notes for 11th Nov trial		
14 Oct 2024	Prep for trial - marking up and speaking notes		
15 Oct 2024	Prep for trial - speaking notes, the Appendix to the Court of Appeal's judgment, emails		
16 Oct 2024	Prep for trial: Teams with client and solicitors, Teams with Derrick Dale, judgment of Scott J		
17 Oct 2024	Prep: Facts found by Scott, appendix, schedule, speaking notes, discussions with team		

Note: Items marked '**' are previously unbilled

Payment by bank transfer: Mark Phillips T/A Mark Phillips KC (Lloyds) Sort Code:30-65-41 Account:47934060 Please forward a remittance advice detailing the case ref. no. and amount to finance@southsquare.com Unless expressly agreed otherwise, members of Chambers are only able to accept payment from the instructing law firm and cannot accept any payments from the lay client directly	OUTSTANDING FEES	C/Fwd
	OUTSTANDING VAT	C/Fwd
	TOTAL OUTSTANDING	C/Fwd

Previously Rendered: 09 Oct 2024, 30 Oct 2024

VALID ONLY WHEN RECEIPTED

PLEASE QUOTE CASE REFERENCE NO. ON ALL CORRESPONDENCE

South Square and it's members are regulated by the Bar Standard Board

Professional Fees of Mr Mark Phillips KC

VAT Registration No: 446913138

Signature Litigation LLP
138 Fetter Lane
London
EC4A1BT
United Kingdom

SOUTH SQUARE

Barristers

3-4 South Square
Gray's Inn
London
WC1R 5HP

Tel : 020 7696 9900
Fax : 020 7696 9911
DX : 338 (Chancery Lane)

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Solicitor Ref No. Paul Brehony

Date 01 November 2024

Case Ref No. 106479

ALTRAD GROUP - OCTOBER 2024

Date	Description	Fees	VAT
18 Oct 2024	Prep: schedule of facts, speaking notes, insert for skeleton, emails		
19 Oct 2024	Prep for hearing, marking up, emails to team members		
21 Oct 2024	Prep: completing marking up files, speaking notes, emails, Amended Fact schedule		
22 Oct 2024	Disbursement - Courier of docs	£131.75	
23 Oct 2024	Prep for hearing - speaking notes, call with Signature		
24 Oct 2024	Call with Andrew Kinnear KC		
25 Oct 2024	Considering legal issues		
28 Oct 2024	Prep: Draft Submissions on Amended TP claim, emails, legal submissions		
29 Oct 2024	Prep for hearing, submissions on legal issues		
30 Oct 2024	Prep on the law, overview, Adams v Cape, meeting with client		
31 Oct 2024	Prep for hearing, Expert Evidence, draft skeleton		
01 Nov 2024	<i>PAYMENT RECEIVED WITH THANKS (via BACS re £182,187.50 payment) (Total £100375.00, Inv 3682)</i>	<i>-£100,375.00</i>	

Note: Items marked '*' are previously unbilled

Payment by bank transfer:	OUTSTANDING FEES	£400,131.75
Mark Phillips T/A Mark Phillips KC (Lloyds) Sort	OUTSTANDING VAT	£0.00
Code:30-65-41 Account:47934060	TOTAL OUTSTANDING	£400,131.75
Please forward a remittance advice detailing the case ref. no. and amount to finance@southsquare.com		
Unless expressly agreed otherwise, members of Chambers are only able to accept payment from the instructing law firm and cannot accept any payments from the lay client directly		

Previously Rendered: 09 Oct 2024, 30 Oct 2024

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Solicitor Ref No. Paul Brehony

Date 09 January 2025

Case Ref No. 106479

ALTRAD GROUP - OCTOBER 2024

Date	Description	Fees	VAT
01 Oct 2024	Marking up bundles and emails 10hrs	£13,750.00	
02 Oct 2024	Marking up bundles and emails 8hrs	£11,000.00	
03 Oct 2024	Prep for hearing, marking up bundles and emails 10hrs	£13,750.00	
04 Oct 2024	Marking up papers, Teams call, emails 5hrs	£6,875.00	
05 Oct 2024	- 06.10.2024) Marking up bundles and emails, first draft of speaking notes to Dale and WW; Marking up bundles, emails, draft 2nd statement 14hrs	£19,250.00	
07 Oct 2024	Prep for hearing, working up submissions on the Core documents, emails and Teams with DD discussing submissions, dealing with points raised in various emails, settling skeleton 14hrs	£19,250.00	

Note: Items marked '*' are previously unbilled

Payment by bank transfer: Mark Phillips T/A Mark Phillips KC (Lloyds) Sort Code:30-65-41 Account:47934060	OUTSTANDING FEES	C/Fwd
Please forward a remittance advice detailing the case ref. no. and amount to finance@southsquare.com	OUTSTANDING VAT	C/Fwd
Unless expressly agreed otherwise, members of Chambers are only able to accept payment from the instructing law firm and cannot accept any payments from the lay client directly	TOTAL OUTSTANDING	C/Fwd

Previously Rendered: 09 Oct 2024, 30 Oct 2024, 01 Nov 2024, 02 Dec 2024, 30 Dec 2024.

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Date 09 January 2025

Case Ref No. 106479

ALTRAD GROUP - OCTOBER 2024

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10 Oct 2024	Schedule of alleged vs established facts Brief Stage Payment	£400,000.00	
11 Oct 2024	Emails and schedule		
13 Oct 2024	Grounds of appeal, speaking notes for 11th Nov trial		
14 Oct 2024	Prep for trial - marking up and speaking notes		
15 Oct 2024	Prep for trial - speaking notes, the Appendix to the Court of Appeal's judgment, emails		
16 Oct 2024	Prep for trial: Teams with client and solicitors, Teams with Derrick Dale; judgment of Scott J		
17 Oct 2024	Prep: Facts found by Scott, appendix, schedule, speaking notes, discussions with team		

Note: Items marked '*' are previously unbilled

Payment by bank transfer:	OUTSTANDING FEES	C/Fwd
Mark Phillips T/A Mark Phillips KC (Lloyds) Sort	OUTSTANDING VAT	C/Fwd
Code:30-65-41 Account:47934060	TOTAL OUTSTANDING	C/Fwd
Please forward a remittance advice detailing the case ref. no. and amount to finance@southsquare.com		
Unless expressly agreed otherwise, members of Chambers are only able to accept payment from the instructing law firm and cannot accept any payments from the lay client directly		

Previously Rendered: 09 Oct 2024, 30 Oct 2024, 01 Nov 2024, 02 Dec 2024, 30 Dec 2024

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Date 09 January 2025

Case Ref No. 106479

ALTRAD GROUP - OCTOBER 2024

Date	Description	Fees	VAT
18 Oct 2024	Prep: schedule of facts, speaking notes, insert for skeleton, emails		
19 Oct 2024	Prep for hearing, marking up, emails to team members		
21 Oct 2024	Prep: completing marking up files, speaking notes, emails, Amended Fact schedule		
22 Oct 2024	Disbursement - Courier of docs	£131.75	
23 Oct 2024	Prep for hearing - speaking notes, call with Signature		
24 Oct 2024	Call with Andrew Kinnear KC		
25 Oct 2024	Considering legal issues		
27 Oct 2024	Amended TP claim, emails, input on legal issues		
28 Oct 2024	Prep: Draft Submissions on Amended TP claim, emails, legal submissions		
29 Oct 2024	Prep for hearing, submissions on legal issues		
30 Oct 2024	Prep on the law, overview, Adams v Cape, meeting with client		
31 Oct 2024	Prep for hearing, Expert Evidence, draft skeleton		

Note: Items marked "*" are previously unbilled

Payment by bank transfer: Mark Phillips T/A Mark Phillips KC (Lloyds) Sort Code:30-65-41 Account:47934060 Please forward a remittance advice detailing the case ref. no. and amount to finance@southsquare.com Unless expressly agreed otherwise, members of Chambers are only able to accept payment from the instructing law firm and cannot accept any payments from the lay client directly	OUTSTANDING FEES	C/Fwd
	OUTSTANDING VAT	C/Fwd
	TOTAL OUTSTANDING	C/Fwd

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Solicitor Ref No. Paul Brehony

Date 09 January 2025

Case Ref No. 106479

ALTRAD GROUP - OCTOBER 2024

Date	Description	Fees	VAT
01 Nov 2024	PAYMENT RECEIVED WITH THANKS (via BACS re £182,187.50 payment) (Total £100375.00, Inv 3682)	-£100,375.00	
07 Nov 2024	PAYMENT RECEIVED WITH THANKS via BACS (Total £200000.00, Inv 3683)	-£200,000.00	
04 Dec 2024	PAYMENT RECEIVED WITH THANKS (via BACS) (Total £200000.00, Inv 3689)	-£200,000.00	
01 Jan 2025	PAYMENT RECEIVED WITH THANKS via BACS received on the 04.12.2024 (Total £131.75, Inv 3695)	-£131.75	
	PAYMENT RECEIVED WITH THANKS via BACS received on the 04.12.2024 (Total £200000.00, Inv 3695)	-£200,000.00	
04 Jan 2025	PAYMENT CANCELLATION advised incorrect amount (Total £200000.00, Inv 3694)	£200,000.00	

Note: Items marked '*' are previously unbilled

Payment by bank transfer: Mark Phillips T/A Mark Phillips KC (Lloyds) Sort Code:30-65-41 Account:47934060 Please forward a remittance advice detailing the case ref. no. and amount to finance@southsquare.com Unless expressly agreed otherwise, members of Chambers are only able to accept payment from the instructing law firm and cannot accept any payments from the lay client directly	OUTSTANDING FEES	£0.00
	OUTSTANDING VAT	£0.00
	TOTAL OUTSTANDING	£0.00

Previously Rendered: 09 Oct 2024, 30 Oct 2024, 01 Nov 2024, 02 Dec 2024, 30 Dec 2024

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Solicitor Ref No. Paul Brehony

Date 30 December 2024

Case Ref No. 106546

ALTRAD GROUP - NOVEMBER 2024

Date	Description	Fees	VAT
01 Nov 2024	Prep for hearing, marking caselaw, draft skeleton, emails, Adams v Cape material		
02 Nov 2024	Prep, marking up Schedule of Facts, Grounds of Appeal		
03 Nov 2024	Prep for hearing, Appendix, bundles		
04 Nov 2024	Teams with US team Prep Adams v Cape and Wilkins		
05 Nov 2024	Prep for hearing		
06 Nov 2024	Disbursement - Courering bundle to Mark Phillip KC. Prep for hearing, orders from US, update on Wilkins, draft trial skeleton, discussion with WWW, notes for hearing	£147.32	£29.46
07 Nov 2024	Prep for hearing - speaking notes		
08 Nov 2024	Disbursement - Courier of documents to Mark Phillips	£147.32	£29.46
09 Nov 2024	Prep for trial		
10 Nov 2024	Trial prep		
11 Nov 2024	Day 1 of trial		
13 Nov 2024	Refresher - Day 2 of trial	£16,500.00	£3,300.00

Note: Items marked '**' are previously unbilled

Payment by bank transfer: Mark Phillips T/A Mark Phillips KC (Lloyds) Sort Code:30-65-41 Account:47934060 Please forward a remittance advice detailing the case ref. no. and amount to finance@southsquare.com Unless expressly agreed otherwise, members of Chambers are only able to accept payment from the instructing law firm and cannot accept any payments from the lay client directly	OUTSTANDING FEES	C/Fwd
	OUTSTANDING VAT	C/Fwd
	TOTAL OUTSTANDING	C/Fwd

Previously Rendered: 28 Nov 2024, 02 Dec 2024

VALID ONLY WHEN RECEIPTED

PLEASE QUOTE CASE REFERENCE NO. ON ALL CORRESPONDENCE

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Professional Fees of Mr Mark Phillips KC

VAT Registration No: 446913138

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Solicitor Ref No. Paul Brehony

Date 30 December 2024

Case Ref No. 106546

ALTRAD GROUP - NOVEMBER 2024

Date	Description	Fees	VAT
14 Nov 2024	Refresher - Day 3 of trial	£16,500.00	£3,300.00
19 Nov 2024	Jersey law and SC deadline (inc Teams call)	£687.50	£137.50
20 Nov 2024	Jersey evidence, schedule for Judge, emails	£1,100.00	£220.00
21 Nov 2024	Considering consequential orders	£687.50	£137.50
22 Nov 2024	Considering draft judgment, consequential's hearing, order	£4,812.50	£962.50

Note: Items marked '**' are previously unbilled

Payment by bank transfer:
Mark Phillips T/A Mark Phillips KC (Lloyds) Sort
Code: 30-65-41 Account: 47934060
Please forward a remittance advice detailing the case ref.
no. and amount to finance@southsquare.com
Unless expressly agreed otherwise, members of Chambers
are only able to accept payment from the instructing law
firm and cannot accept any payments from the lay client
directly

OUTSTANDING FEES
OUTSTANDING VAT
TOTAL OUTSTANDING

Previously Rendered: 28 Nov 2024, 02 Dec 2024

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South Square and its members are regulated by the Bar Standard Board



Fountain Court

Fountain Court Chambers
Fountain Court
Temple
London
EC4Y 9DH
DX: 5 LDE

London +44 (0)20 7583 3335
Singapore +65 6808 6611

www.fountaincourt.co.uk

Ben Bruton,
Winston & Strawn London LLP,
CityPoint, One Ropemaker Street,
London,
EC2Y 9AW,
UK

Professional Fees of Derrick Dale KC

VAT Registration No: 524391258

Please quote case reference 110126 number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 12/06/2024 Case Ref No: 110126 Solicitor Ref No: Ben Bruton

Case Name: Project Sentinel

Date	Description	Amount	Vat%	Val
21/05/2024	* Reading into material on US Proceedings	£5,040.00	0%	£0.00
22/05/2024	* Reading into material on US Proceedings	£5,760.00	0%	£0.00
23/05/2024	* Considering issues on recognition of US orders by English Courts and legal research and telecon with Winston & Strawn	£5,040.00	0%	£0.00
24/05/2024	* Reviewing draft advice and legal research on recognition of orders, the appointment of foreign receivers and corporate governance issues	£5,760.00	0%	£0.00
28/05/2024	* Considering issues re US litigation and approach, advising sols on potential applications and legal basis for applications in England	£5,040.00	0%	£0.00
29/05/2024	* Working on issues and note concerning third party rights to bring claims against Cape in England, the law on the requirement for a present dispute	£5,760.00	0%	£0.00
30/05/2024	* Reviewing scope of orders in US, considering antisuist issues, legal research and foreign case law on interim receiverships	£5,040.00	0%	£0.00
04/06/2024	* Strategy meeting with sols, legal research and considering potential draft order to be sought and cases	£2,880.00	0%	£0.00
06/06/2024	* Considering draft claim form and affidavit and reading material in relation to the scheme of arrangements and telecon with sols	£3,600.00	0%	£0.00
07/06/2024	* Reviewing affidavit, scheme of arrangement material, considering potential issues with receiver and telecon with sols and counsel	£2,880.00	0%	£0.00

* denotes a previously unbilled work item.

Case ref: 110126 / DD

Fee rates are subject to an annual review. Please note that, in the event that terms have not been expressly agreed, the continued instruction of the Barrister will constitute acceptance by conduct of the terms offered by the Barrister (including the limitation of liability set out in paragraph 7 of the cover sheet in respect of such terms) unless the Barrister expressly agrees in writing to the contrary.

Printed on 12/06/2024 Page 1 of 2

London
Fountain Court Chambers
Fountain Court, Temple, London, EC4Y 9DH

Singapore
Fountain Court Chambers
10 Collyer Quay, Ocean Financial Centre #40-38, Singapore 049315

T +44 (0)20 7583 3335

T +65 6808 6611

Barristers regulated by the Bar Standards Board

Date: 12/06/2024

Case Ref No: 110126

Solicitor Ref No: Ben Bruton

Case Name: Project Sentinel

VAT SUMMARY

0% (FEE) Amount: £46,800.00, VAT: £0.00

Total Fees £46,800.00

Total VAT £0.00

Total Due £46,800.00

This fee note supersedes previous fee notes

Please make cheques payable to Derrick Dale KC

Or BACS to A/C Name: FC Derrick Dale KC, HSBC, Sort Code 40-14-13, Account Number 23829022

IBAN: GB15HBUK40141323829022 SWIFT: HBUKGB4B

Please email remittances to accounts@fountaincourt.co.uk, quoting 110126/DD

Case ref: 110126 / DD

Printed on 12/06/2024 Page 2 of 2

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Professional Fees of Derrick Dale KC

VAT Registration No: 524391258

Please quote case reference 110126 number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 25/09/2024 Case Ref No: 110126 Solicitor Ref No: Ben Bruton

Case Name: Project Sentinel

Date	Description	Amount	Vat%	Vat
10/06/2024	Working on non recognition declaration and terms of proposed injunction and production of draft order	£7,200.00	0%	£0.00
11/06/2024	Working on review of available information re the 2006 Court approved Scheme and working on draft overview of application and case theory	£7,200.00	0%	£0.00
12/06/2024	Working on review of available information re the 2006 Court approved Scheme and working on draft overview of application and case theory	£7,200.00	0%	£0.00
16/06/2024	Considering issues and preparing for conference	£4,680.00	0%	£0.00
17/06/2024	Attending conference at sols offices and liaising with leading counsel	£4,680.00	0%	£0.00
18/06/2024	Considering subjects and information required for draft affidavit and telecon with sols and leading counsel	£2,520.00	0%	£0.00
26/06/2024	Reviewing material and meeting junior counsel to discuss case	£2,880.00	0%	£0.00
27/06/2024	Reviewing material and documentation	£5,760.00	0%	£0.00
28/06/2024	Working on case	£2,160.00	0%	£0.00
01/07/2024	Telephone conference with solicitors and counsel and drafting witness statement structure and liaising with junior counsel	£3,600.00	0%	£0.00
02/07/2024	Working on case	£5,760.00	0%	£0.00
03/07/2024	Working on case, telephone conference with solicitors and counsel and drafting notes	£5,760.00	0%	£0.00
04/07/2024	Drafting note to solicitors, reviewing documents and considering issues	£5,760.00	0%	£0.00
05/07/2024	Telephone conference with solicitors and liaising with counsel and working on case	£4,320.00	0%	£0.00

Case ref: 110126 / DD

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Printed on 25/09/2024 Page 1 of 4

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Date: 25/09/2024

Case Ref No: 110126

Solicitor Ref No: Ben Bruton

Case Name: Project Sentinel

Date	Description	Amount	Vat%	Vat
08/07/2024	Working on the USA proceedings draft document and underlying materials and liaising with junior counsel and leading counsel and telecon	£7,200.00	0%	£0.00
09/07/2024	Working on the USA proceedings draft document and underlying materials and considering factual issues re USA presence and Adams v Cape	£7,200.00	0%	£0.00
10/07/2024	Working on the USA proceedings draft document and underlying materials and legal points on Adams v Cape, agency, functions of a receiver and jurisdiction	£7,200.00	0%	£0.00
11/07/2024	Working on the USA proceedings draft document and underlying materials, reviewing corporate structure and liaising with junior counsel	£6,480.00	0%	£0.00
12/07/2024	Working on draft document and underlying materials and considering issues	£6,480.00	0%	£0.00
13/07/2024	Working on the USA proceedings draft document and underlying materials and considering issues	£4,320.00	0%	£0.00
15/07/2024	Liaising with counsel, drafting note on approach and considering issues and considering legal points on jurisdiction and authority	£2,880.00	0%	£0.00
16/07/2024	Working on main witness statement and considering background sections and considering comments and telecon with sols	£5,040.00	0%	£0.00
17/07/2024	Reviewing and considering formulation of issues on prejudice and damage - and working on review of main sections of witness statement and considering issues and telecon and liaising with Counsel	£2,880.00	0%	£0.00
18/07/2024	Working on comments on witness statement and reviewing sections and documents and considering client input on damage etc	£2,880.00	0%	£0.00
19/07/2024	Working on statement and structure and form of application and requirements of Part 8 and liaising with counsel	£4,320.00	0%	£0.00
22/07/2024	Working on executive summary /overview and reviewing material and effect on Cape sections	£2,880.00	0%	£0.00
23/07/2024	Working on review on comments on USA proceedings section, reviewing further documents, and liaising with junior counsel and leading counsel	£5,040.00	0%	£0.00
24/07/2024	Preparing for meeting with client, sols and counsel and revised statement and liaising with counsel and meeting with client	£3,600.00	0%	£0.00
28/07/2024	Working on Overview and USA proceedings	£5,760.00	0%	£0.00
29/07/2024	Working on Overview and USA proceedings	£5,760.00	0%	£0.00
30/07/2024	Working on legal theory issues, main witness statement, research on law of incorporation and governing law and impact on jurisdiction and authority of court issues	£6,480.00	0%	£0.00
31/07/2024	Working on legal theory note on non recognition, declarations and injunctions	£5,040.00	0%	£0.00
04/08/2024	Liaising with junior counsel over main witness statement and exhibits	£1,440.00	0%	£0.00
06/08/2024	Liaising with junior counsel on witness statement issues, notification to Protopapas, position if lenders and financing agreement and reviewing gateway provisions	£2,160.00	0%	£0.00
07/08/2024	Working on review of main draft witness statement and considering the legal formulation of Cape's rights	£1,800.00	0%	£0.00
09/08/2024	Liaising with junior counsel and working on service out issues	£1,440.00	0%	£0.00
12/08/2024	Reviewing latest draft main statement and liaising with junior counsel on LBA issues and call with solicitors and junior counsel and working on service out / gateway issues and approach to service our witness statement, legal theories and full and frank disclosures	£6,120.00	0%	£0.00
14/08/2024	Working on service out issues and case law and liaising with junior counsel	£5,760.00	0%	£0.00
15/08/2024	Working on service out witness statement, liaising with junior counsel, working on cause of action and gateway issues	£6,480.00	0%	£0.00

Case ref: 110126 / DD

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Case Ref No: 110126

Solicitor Ref No: Ben Bruton

Case Name: Project Sentinel

Date	Description	Amount	Vat%	Vat
16/08/2024	Working on main witness statement, liaising with junior counsel, working on cause of action and gateway issues and competence of English Courts to deal with internal management of company's incorporated in England, forum conveniens and case law	£4,680.00	0%	£0.00
18/08/2024	Reviewing case law on breach of authority/mandate cause of action, unlawful interference and procuring breach of contract	£2,880.00	0%	£0.00
19/08/2024	Working on draft LBA, service out witness statement, legal research, formulating breach of mandate/authority cause of action and case law and interaction with want of competent jurisdiction, liaising with junior counsel	£5,760.00	0%	£0.00
21/08/2024	Working on LBA points, liaising with junior counsel, reviewing service out case law and working on service out issues	£5,760.00	0%	£0.00
27/08/2024	Reviewing latest draft witness statement and further material and call with junior counsel to discuss financial agreements, US proceedings, French issues and service out issues	£2,160.00	0%	£0.00
28/08/2024	Considering issues for call with client, call with junior and leading counsel and telecon with client and reviewing documentation	£2,520.00	0%	£0.00
29/08/2024	Reviewing amendments to main witness statement, considering facility issue and drafting, clients points, calls with junior counsel, working on service out and gateway issues and legal research, reviewing LBA and order	£6,120.00	0%	£0.00
30/08/2024	Working on service out, gateway issues and witness statement and formulation of negative declarations.	£6,120.00	0%	£0.00
02/09/2024	Working on gateway issues, legal research, facility agreement and confidentiality issue, main witness statement	£6,120.00	0%	£0.00
03/09/2024	Working on gateway issues, legal research, service out statement, main statement	£6,120.00	0%	£0.00
04/09/2024	Working on claim form, service out witness statement, main witness statement, application notice, considering legal materials, reviewing new US material, liaising with junior counsel	£6,120.00	0%	£0.00
05/09/2024	Working on Claim Form, main witness statement, service out witness statement, letter to judge, application notice and draft order, liaising with junior counsel and reviewing notice, letter and exhibits from Mr Protopapas.	£7,200.00	0%	£0.00
06/09/2024	Reviewing letter and exhibits from Mr Protopapas, telephone conference with counsel, drafting email advice, Working on Claim Form, main witness statement, service out witness statement, letter to judge, application notice and draft order	£5,760.00	0%	£0.00
08/09/2024	- 09/09/2024 - liaising with Leading Counsel, solicitors and dealing with expedition issues	£360.00	0%	£0.00
10/09/2024	Reviewing materials in bundles, dealing with expedition of service issues, liaising with solicitors	£2,520.00	0%	£0.00
11/09/2024	Reviewing cases on service out, liaising with solicitors on documents to be served out and considering issues	£3,240.00	0%	£0.00
12/09/2024	Telephone consultation with leading counsel, working on draft email of advice, reviewing service out compliance issues and advising solicitors by telephone	£2,880.00	0%	£0.00
16/09/2024	* Liaising with junior counsel and call with junior counsel and solicitors and considering points on expedition application and service issues	£1,080.00	0%	£0.00
17/09/2024	* Working on expedition application and listing issues, liaising with junior counsel, call with Leading Counsel and junior counsel	£2,520.00	0%	£0.00
18/09/2024	* Working on expedition application and listing issues and liaising with junior counsel	£3,240.00	0%	£0.00
19/09/2024	* Drafting further amendments to expedition application and liaising with junior counsel	£1,320.00	0%	£0.00

* denotes a previously unbilled work item.

Case ref: 110126 / DD

Printed on 25/09/2024 Page 3 of 4

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Singapore
Fountain Court Chambers
10 Collyer Quay, Ocean Financial Centre #40-38, Singapore 049315

T +44 (0)20 7583 3335

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Date: 25/09/2024

Case Ref No: 110126

Solicitor Ref No: Ben Bruton

Case Name: Project Sentinel

VAT SUMMARY

0% (FEE) Amount: £317,400.00, VAT: £0.00

Total Fees £270,600.00

Total VAT £0.00

Total Due £270,600.00

This fee note supersedes previous fee notes

Previously rendered on 12/06/2024,

08/07/2024, 29/08/2024, 11/09/2024,

19/09/2024

Or BACS to A/C Name: FC Derrick Dale KC, HSBC, Sort Code 40-14-13, Account Number 23829022

IBAN: GB15HBUK40141323829022 SWIFT: HBUKGB4B

Please email remittances to accounts@fountaincourt.co.uk, quoting 110126/DD

Please make cheques payable to Derrick Dale KC

Case ref: 110126 / DD

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Fountain Court Chambers
Fountain Court
Temple
London
EC4Y 9DH
DX: 5 LDE

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Paul Brehony,
Signature Litigation LLP,
138 Fetter Lane,
London,
EC4A 1BT,
UK

Professional Fees of Derrick Dale KC

VAT Registration No: 524391258

Please quote case reference 111152 number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 30/10/2024 Case Ref No: 111152 Solicitor Ref No: Paul Brehony

Case Name: Project Sentinel

Date	Description	Amount	Vat%	Vat
24/09/2024	Working on case and expedition issues and liaising with counsel and sols and reviewing correspondence - 6 hours	£4,320.00	0%	£0.00
25/09/2024	Working on expedition issues - 2.5 hours	£1,800.00	0%	£0.00
26/09/2024	Working on expedition issues - 4.5 hours	£3,240.00	0%	£0.00
27/09/2024	Working on expedition application, telecon and liaising with counsel - 8.5 hours	£6,120.00	0%	£0.00
29/09/2024	Liaising with counsel by email on expedition - 45 minutes	£540.00	0%	£0.00
30/09/2024	Working on res judicatory/estoppel point re Adams v Cape and telecon with counsel - 7.5 hours	£5,400.00	0%	£0.00
01/10/2024	Legal research and liaising with junior counsel on legal points and telecon on legal points - 7 hours	£5,040.00	0%	£0.00
02/10/2024	Working on case and liaising with leading counsel and material required for expedition - 6.5 hours	£4,680.00	0%	£0.00
03/10/2024	Working on case and reviewing material and liaising on US issues - 7.5 hours	£5,400.00	0%	£0.00
04/10/2024	Working on US law issues, skeleton issues, response of receiver, telecon - 7 hours	£5,040.00	0%	£0.00
06/10/2024	Working on draft skeleton, witness statement and liaising with counsel - 6.5 hours	£4,680.00	0%	£0.00
07/10/2024	Working on Skeleton and bundle issues and preparing for hearing and liaising with counsel - 10 hours	£7,200.00	0%	£0.00
08/10/2024	Preparing for hearing, liaising with counsel - 9.5 hours	£6,840.00	0%	£0.00

Case ref: 111152 / DD

Fee rates are subject to an annual review. Please note that, in the event that terms have not been expressly agreed, the continued instruction of the Barrister will constitute acceptance by conduct of the terms offered by the Barrister (including the limitation of liability set out in paragraph 7 of the cover sheet in respect of such terms) unless the Barrister expressly agrees in writing to the contrary.

Printed on 30/10/2024 Page 1 of 2

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Barristers regulated by the Bar Standards Board

Date: 30/10/2024

Case Ref No: 111152

Solicitor Ref No: Paul Brehony

Case Name: Project Sentinel

Date	Description	Amount	Vat%	Vat
09/10/2024	Preparing for hearing and expedition hearing and con with client and considering expert evidence - 7.5 hours	£5,400.00	0%	£0.00
18/10/2024	* Perusing Papers & Advising by Telephone			
28/10/2024	* Perusing Papers & Advising by Telephone			
30/10/2024	* 10th October to 11th November - Agreed brief fee £225,000 to be paid in 2 stages 30 October and 14 November 2024	£112,500.00	0%	£0.00
30/10/2024	* 10th October to 11th November - Agreed brief fee £225,000 to be paid in 2 stages 30 October and 14 November 2024	£112,500.00	0%	£0.00

* denotes a previously unbilled work item.

VAT SUMMARY

0% (FEE) Amount: £290,700.00, VAT: £0.00

Total Fees £290,700.00

Total VAT £0.00

Total Due £290,700.00

This fee note supersedes previous fee notes

Previously rendered on 09/10/2024

Or BACS to A/C Name: FC Derrick Dale KC, HSBC, Sort Code 40-14-13, Account Number 23829022

IBAN: GB15HBUK40141323829022 SWIFT: HBUKGB4B

Please email remittances to accounts@fountaincourt.co.uk, quoting 111152/DD

Case ref: 111152 / DD

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Singapore
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Fountain Court Chambers
Fountain Court
Temple
London
EC4Y 9DH
DX: 5 LDE

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www.fountaincourt.co.uk

Paul Brehony,
Signature Litigation LLP,
138 Fetter Lane,
London,
EC4A 1BT,
UK

Professional Fees of Derrick Dale KC

VAT Registration No: 524391258

Please quote case reference 111152 number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 18/12/2024 Case Ref No: 111152 Solicitor Ref No: Paul Brehony

Case Name: Project Sentinel

Date	Description	Amount	Vat%	Vat
18/10/2024	Perusing Papers & Advising by Telephone			
28/10/2024	Perusing Papers & Advising by Telephone			
06/11/2024	Brief to attend hearing			
12/11/2024	Refresher	£7,200.00	0%	£0.00
13/11/2024	Refresher	£7,200.00	0%	£0.00
14/11/2024	Refresher	£7,200.00	0%	£0.00
15/11/2024	Liaising with junior counsel on matters relating to the draft order and matters requested by the judge	£360.00	0%	£0.00
19/11/2024	Liaising with junior counsel on jersey law issues and reviewing transcript and working on issues to be covered by expert	£1,440.00	0%	£0.00
20/11/2024	Liaising with junior counsel on short form report from Jersey lawyers and considering position and response	£720.00	0%	£0.00
21/11/2024	Liaising with junior counsel on potential cost and consequential orders and considering issues	£720.00	0%	£0.00
22/11/2024	Reviewing draft judgment and considering consequential orders and attending court for hand down and orders and advising on costs orders and reviewing draft orders	£3,060.00	0%	£0.00

Case ref: 111152 / DD

Fee rates are subject to an annual review. Please note that, in the event that terms have not been expressly agreed, the continued instruction of the Barrister will constitute acceptance by conduct of the terms offered by the Barrister (including the limitation of liability set out in paragraph 7 of the cover sheet in respect of such terms) unless the Barrister expressly agrees in writing to the contrary.

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Date: 18/12/2024

Case Ref No: 111152

Solicitor Ref No: Paul Brehony

Case Name: Project Sentinel

Date	Description	Amount	Vat%	Vat

This fee note supersedes previous fee notes

Please make cheques payable to Derrick Dale KC

Previously rendered on 09/10/2024,

Or BACS to A/C Name: FC Derrick Dale KC, HSBC, Sort Code 40-14-13, Account Number 23829022

30/10/2024, 05/12/2024

IBAN: GB15HBUK40141323829022 SWIFT: HBUKGB4B

Please email remittances to accounts@fountaincourt.co.uk, quoting 111152/DD

Case ref: 111152 / DD

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Signature Litigation LLP,
138 Fetter Lane,
London,
EC4A 1BT,
UK

Professional Fees of Dr Louise Merrett

VAT Registration No: 337419784

Please quote case reference 111152 number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 18/12/2024 Case Ref No: 111152 Solicitor Ref No: Paul Brehony

Case Name: Project Sentinel

Date	Description	Amount	Vat%	Vat
01/11/2024	* engaged from 11 October 2024: Reading material, conducting legal research and working on various drafts of the skeleton argument	£19,200.00	0%	£0.00
05/11/2024	* Reviewing and amending final draft of skeleton argument	£2,000.00	0%	£0.00

* denotes a previously unbilled work item.

VAT SUMMARY
0% (FEE) Amount: £21,200.00, VAT: £0.00

Total Fees	£21,200.00
Total VAT	£0.00
Total Due	£21,200.00

This fee note supersedes previous fee notes

Please make cheques payable to Dr Louise Merrett

Or BACS to A/C Name: FC Louise Merrett, HSBC, Sort Code 40-14-13, Account Number 63994090

IBAN: GB75HBUK40141363994090 SWIFT: HBUKGB4B

Please email remittances to accounts@fountaincourt.co.uk, quoting 111152/LAM

Case ref: 111152 / LAM

Fee rates are subject to an annual review. Please note that, in the event that terms have not been expressly agreed, the continued instruction of the Barrister will constitute acceptance by conduct of the terms offered by the Barrister (including the limitation of liability set out in paragraph 7 of the cover sheet in respect of such terms) unless the Barrister expressly agrees in writing to the contrary.

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Date: 18/12/2024

Case Ref No: 111152

Solicitor Ref No: Paul Brehony

Case Name: Project Sentinel

Case ref: 111152 / LAM

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Professional Fees of Mr William Willson

VAT Registration No: 911969992

Winston & Strawn
100 Bishopsgate
London
EC2N 4AG
United Kingdom

SOUTH SQUARE

Barristers

3-4 South Square
Gray's Inn
London
WC1R 5HP

Tel : 020 7696 9900
Fax : 020 7696 9911
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All BACS payments must include the case number in the reference. Please send remittance advice to finance@southsquare.com

Solicitor Ref No. Paul Fleming

Date 23 September 2024

Case Ref No. 103333

ALTRAD GROUP

Date	Description	Fees	VAT
26 Jun 2024	Perusing papers, meeting DD	£1,950.00	
	perusing papers, meeting DD	£1,950.00	
27 Jun 2024	Instructions to Counsel		
28 Jun 2024	perusing judgments, drafts, orders, further reading, perusing e-papers	£5,850.00	
01 Jul 2024	perusing papers, speaking in conference, speaking to DD	£2,600.00	
02 Jul 2024	Work on evidence	£5,200.00	
03 Jul 2024	speaking to PF, perusing documents, work on evidence	£5,200.00	
	work on evidence	£5,200.00	
04 Jul 2024	work on evidence	£3,250.00	
05 Jul 2024	Call with MP/DD, drafting evidence	£3,250.00	
08 Jul 2024	perusing further papers/working on evidence/speaking to PF + team	£2,600.00	
	work on Witness Statements, speaking to DD, conference with PF and team	£3,250.00	
09 Jul 2024	perusing further documents	£1,950.00	

Note: Items marked ** are previously unbilled

Payment by bank transfer: Mr C. W. L. Willson (Natwest) Sort Code:54-21-23 Account:24651621 Please forward a remittance advice detailing the case ref. no. and amount to finance@southsquare.com Unless expressly agreed otherwise, members of Chambers are only able to accept payment from the instructing law firm and cannot accept any payments from the lay client directly	OUTSTANDING FEES	C/Fwd
	OUTSTANDING VAT	C/Fwd
	TOTAL OUTSTANDING	C/Fwd
Previously Rendered: 11 Jul 2024, 26 Jul 2024, 29 Jul 2024, 12 Aug 2024, 16 Aug 2024, 22 Aug 2024, 10 Sep 2024		

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PLEASE QUOTE CASE REFERENCE NO. ON ALL CORRESPONDENCE

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Professional Fees of Mr William Willson

VAT Registration No: 911969992

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London
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3-4 South Square
Gray's Inn
London
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Tel : 020 7696 9900
Fax : 020 7696 9911
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Solicitor Ref No. Paul Fleming

Date 23 September 2024

Case Ref No. 103333

ALTRAD GROUP

Date	Description	Fees	VAT
11 Jul 2024	drafting	£3,900.00	
15 Jul 2024	work on evidence	£3,900.00	
19 Jul 2024	speaking to MP/DD, drafting evidence	£2,600.00	
23 Jul 2024	work on evidence/application	£6,500.00	
24 Jul 2024	work on evidence/application/meeting with Winston and Ran	£5,200.00	
25 Jul 2024	work on evidence/application	£6,500.00	
26 Jul 2024	work on evidence/application	£3,900.00	
30 Jul 2024	Perusing legal notes, research	£1,950.00	
01 Aug 2024	Work on exhibits, work on service out analysis	£3,900.00	
02 Aug 2024	Speaking to Winston by phone, work on evidence/legal analysis	£3,900.00	
03 Aug 2024	work on legal analysis	£3,900.00	
05 Aug 2024	work on legal analysis	£6,500.00	
06 Aug 2024	Work on main WS	£5,200.00	
07 Aug 2024	Work on service out	£6,500.00	
08 Aug 2024	Work on main Witness Statements	£6,500.00	

Note: Items marked '*' are previously unbilled

Payment by bank transfer:	OUTSTANDING FEES	C/Fwd
Mr C W L Willson (Natwest) Sort Code:54-21-23	OUTSTANDING VAT	C/Fwd
Account:24651621	TOTAL OUTSTANDING	C/Fwd
Please forward a remittance advice detailing the case ref. no. and amount to finance@southsquare.com		
Unless expressly agreed otherwise, members of Chambers are only able to accept payment from the instructing law firm and cannot accept any payments from the lay client directly		

Previously Rendered: 11 Jul 2024, 26 Jul 2024, 29 Jul 2024, 12 Aug 2024, 16 Aug 2024, 22 Aug 2024, 10 Sep 2024

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VAT Registration No: 911969992

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3-4 South Square
Gray's Inn
London
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Tel : 020 7696 9900
Fax : 020 7696 9911
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Solicitor Ref No. Paul Flerring

Date 23 September 2024

Case Ref No. 103333

ALTRAD GROUP

Date	Description	Fees	VAT
09 Aug 2024	Work on main Witness Statements	£6,500.00	
12 Aug 2024	legal research, speaking to DD x 4, speaking to W&S)	£3,900.00	
13 Aug 2024	Preparing prompt sheets for RO on evidence, advising on confidentiality issues	£3,900.00	
14 Aug 2024	Further legal research	£5,200.00	
15 Aug 2024	Finalising service out Witness Statement	£5,200.00	
16 Aug 2024	Finalising main Witness statement /bundles for SO	£3,250.00	
19 Aug 2024	Finalising SO, order, main WS, legal research	£5,200.00	
20 Aug 2024	Redrafting LBA	£3,900.00	
21 Aug 2024	Prep for meeting/meeting	£5,200.00	
22 Aug 2024	Drafting order/amendments to WS	£3,900.00	
23 Aug 2024	Finalising statements	£3,900.00	
27 Aug 2024	Catch up with DD/SS, perusing PP docs, drafting	£2,600.00	
28 Aug 2024	Perusing further documents, Counsel call, call with PF and group	£2,600.00	
29 Aug 2024	Finalising main Witness Statements and service out Witness statements	£5,200.00	

Note: Items marked '*' are previously unbilled

Payment by bank transfer:	OUTSTANDING FEES	C/Fwd
Mr C W L Willson (Natwest) Sort Code:54-21-23	OUTSTANDING VAT	C/Fwd
Account:24651621	TOTAL OUTSTANDING	C/Fwd
Please forward a remittance advice detailing the case ref. no. and amount to finance@southsquare.com		
Unless expressly agreed otherwise, members of Chambers are only able to accept payment from the instructing law firm and cannot accept any payments from the lay client directly		
Previously Rendered: 11 Jul 2024, 26 Jul 2024, 29 Jul 2024, 12 Aug 2024, 16 Aug 2024, 22 Aug 2024, 10 Sep 2024		

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100 Bishopsgate
London
EC2N 4AG
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3-4 South Square
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Fax : 020 7696 9911
DX : 338 (Chancery Lane)

All BACS payments must include the case number in the reference. Please send remittance advice to finance@southsquare.com

Solicitor Ref No. Paul Fleming

Date 23 September 2024

Case Ref No. 103333

ALTRAD GROUP

Date	Description	Fees	VAT
30 Aug 2024	Finalising evidence	£5,200.00	
01 Sep 2024	PAYMENT RECEIVED WITH THANKS via BACS (Total £3990.00, Inv 2203)	-£3,990.00	
02 Sep 2024	Finalising service out papers	£3,900.00	
03 Sep 2024	Finalising MAIN WS and SO WS	£3,900.00	
04 Sep 2024	Finalising MAIN WS and SO WS	£3,900.00	
05 Sep 2024	Finalising drafts	£3,900.00	
06 Sep 2024	Perusing further papers from US, finalising documents	£5,200.00	
09 Sep 2024	Advising x 3	£325.00	
11 Sep 2024	Advising x 3	£325.00	
13 Sep 2024	Advising x 4	£325.00	
16 Sep 2024	Advising by phone and by email x 4	£650.00	
17 Sep 2024	Speaking to DD/legal research	£1,950.00	
	PAYMENT RECEIVED WITH THANKS via BACS (Total £119600.00, Inv 2202)	-£119,600.00	
18 Sep 2024	* Finalising expedition papers	£4,550.00	

Note: Items marked '*' are previously unbilled

Payment by bank transfer: Mr C W L Willson (Natwest) Sort Code:54-21-23 Account:24651621 Please forward a remittance advice detailing the case ref. no. and amount to finance@southsquare.com Unless expressly agreed otherwise, members of Chambers are only able to accept payment from the instructing law firm and cannot accept any payments from the lay client directly	OUTSTANDING FEES	C/Fwd
	OUTSTANDING VAT	C/Fwd
	TOTAL OUTSTANDING	C/Fwd

Previously Rendered: 11 Jul 2024, 26 Jul 2024, 29 Jul 2024, 12 Aug 2024, 16 Aug 2024, 22 Aug 2024, 10 Sep 2024

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Solicitor Ref No. Paul Fleming

Date 23 September 2024

Case Ref No. 103333

ALTRAD GROUP

Date	Description	Fees	VAT
	* Finalising expedition papers	£4,550.00	
19 Sep 2024	* Legal research	£1,950.00	
20 Sep 2024	* Further drafting on expedition papers, con with MP, conference with Signature	£2,600.00	
21 Sep 2024	* Preliminary work on skeleton argument	£5,850.00	
22 Sep 2024	* Preliminary work on skeleton argument	£5,850.00	
23 Sep 2024	* Finalising application, attending conference at W&S, further finalisation of application papers, liaising with Court	£3,250.00	

Note: Items marked '*' are previously unbilled

Payment by bank transfer: Mr C W L Willson (Natwest) Sort Code:54-21-23 Account:24651621	OUTSTANDING FEES	£108,135.00
Please forward a remittance advice detailing the case ref. no. and amount to finance@southsquare.com Unless expressly agreed otherwise, members of Chambers are only able to accept payment from the instructing law firm and cannot accept any payments from the lay client directly	OUTSTANDING VAT	£0.00
	TOTAL OUTSTANDING	£108,135.00
Previously Rendered: 11 Jul 2024, 26 Jul 2024, 29 Jul 2024, 12 Aug 2024, 16 Aug 2024, 22 Aug 2024, 10 Sep 2024		

VALID ONLY WHEN RECEIPTED

PLEASE QUOTE CASE REFERENCE NO. ON ALL CORRESPONDENCE

South Square and its members are regulated by the Bar Standard Board

Professional Fees of Mr William Willson

VAT Registration No: 911969992

Signature Litigation LLP
138 Fetter Lane
London
EC4A 1BT
United Kingdom

SOUTH SQUARE

Barristers

3-4 South Square
Gray's Inn
London
WC1R 5HP

Tel : 020 7696 9900
Fax : 020 7696 9911
DX : 338 (Chancery Lane)

Approved:

Date:

Client: 5346.1

Normal:

Posted: BC

Date: 31/10/2024

Paid:

All BACS payments must include the case number in the reference. Please send remittance advice to finance@southsquare.com

Solicitor Ref No. Paul Brehony

Date 30 October 2024

Case Ref No. 106479

ALTRAD GROUP - OCTOBER 2024

Date	Description	Fees	VAT
01 Oct 2024	Con with DD/AG, identifying issues for skeleton 4 hrs	£2,600.00	
02 Oct 2024	Advising x 4, perusing papers 4hrs	£2,600.00	
04 Oct 2024	Skeleton argument for expedition application 10 hrs	£6,500.00	
05 Oct 2024	Work on evidence 2hrs	£1,300.00	
06 Oct 2024	Skeleton argument for expedition 6hrs	£3,900.00	
07 Oct 2024	Finalising skeleton argument/evidence, advising x 10 6hrs	£3,900.00	
08 Oct 2024	Finalising skeleton argument, bundle of authorities, speaking notes for the hearing/speaking to DD+MP x 4/preparation for hearing 10hrs	£6,500.00	

Note: Items marked '*' are previously unbilled

Payment by bank transfer:	OUTSTANDING FEES	C/Fwd
Mr C W L Willson (Natwest) Sort Code:54-21-23	OUTSTANDING VAT	C/Fwd
Account:24651621	TOTAL OUTSTANDING	C/Fwd
Please forward a remittance advice detailing the case ref. no. and amount to finance@southsquare.com Unless expressly agreed otherwise, members of Chambers are only able to accept payment from the instructing law firm and cannot accept any payments from the lay client directly		

Previously Rendered: 09 Oct 2024

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Professional Fees of Mr William Willson

VAT Registration No: 911969992

Signature Litigation LLP
138 Fetter Lane
London
EC4A 1BT
United Kingdom

SOUTH SQUARE

Barristers

3-4 South Square
Gray's Inn
London
WC1R 5HP

Tel : 020 7696 9900

Fax : 020 7696 9911

DX : 338 (Chancery Lane)

All BACS payments must include the case number in the reference. Please send remittance advice to finance@southsquare.com

Solicitor Ref No. Paul Brehony

Date 30 October 2024

Case Ref No. 106479

ALTRAD GROUP - OCTOBER 2024

Date	Description	Fees	VAT
09 Oct 2024	Preperation for hearing/hearing before Trower J/con at Signature/settling order/speaking to the Court/legal research for skeleton argument/work on expert issues 10hrs	£6,500.00	
10 Oct 2024	* Brief Stage Payment Finalising order, legal research, speaking to DD and MP, structure for skeleton, perusing further papers	£200,000.00	
11 Oct 2024	Work on skeleton argument		
12 Oct 2024	Work on skeleton argument		
13 Oct 2024	Work on skeleton argument		
14 Oct 2024	Work on skeleton argument		
15 Oct 2024	Work on skeleton argument		
16 Oct 2024	Work on skeleton argument		
17 Oct 2024	Work on skeleton argument		
18 Oct 2024	Work on skeleton argument		

Note: Items marked '*' are previously unbilled

Payment by bank transfer: Mr C W L Willson (Natwest) Sort Code:54-21-23 Account:24651621	OUTSTANDING FEES	£233,800.00
Please forward a remittance advice detailing the case ref. no. and amount to finance@southsquare.com Unless expressly agreed otherwise, members of Chambers are only able to accept payment from the instructing law firm and cannot accept any payments from the lay client directly	OUTSTANDING VAT	£0.00
	TOTAL OUTSTANDING	£233,800.00

Previously Rendered: 09 Oct 2024

VALID ONLY WHEN RECEIPTED

PLEASE QUOTE CASE REFERENCE NO. ON ALL CORRESPONDENCE

South Square and it's members are regulated by the Bar Standard Board

Professional Fees of Mr William Willson

VAT Registration No: 911969992

Signature Litigation LLP
138 Fetter Lane
London
EC4A 1BT
United Kingdom

SOUTH SQUARE

Barristers

3-4 South Square
Gray's Inn
London
WC1R 5HP

Tel : 020 7696 9900
Fax : 020 7696 9911
DX : 338 (Chancery Lane)

All BACS payments must include the case number in the reference. Please send remittance advice to finance@southsquare.com

Solicitor Ref No. Paul Brehony

Date 30 December 2024

Case Ref No. 106546

ALTRAD GROUP - NOVEMBER 2024

Date	Description	Fees	VAT
13 Nov 2024	Refresher - Day 2 of trial	£7,800.00	£1,560.00
14 Nov 2024	Refresher - Day 3 of trial	£7,800.00	£1,560.00
19 Nov 2024	Perusing, advising by phone/con, drafting LOI, perusing instructions	£3,250.00	£650.00
20 Nov 2024	working on Jersey evidence, speaking to Ogier, making amends65		
21 Nov 2024	counsel conference, advising x 2	£650.00	£130.00
22 Nov 2024	judgment, hearing, order	£3,250.00	£650.00
24 Nov 2024	corrections to the judgment	£2,600.00	£520.00

Note: Items marked '*' are previously unbilled

Payment by bank transfer:
Mr C W L Willson (Natwest) Sort Code:54-21-23
Account:24651621
Please forward a remittance advice detailing the case ref. no. and amount to finance@southsquare.com
Unless expressly agreed otherwise, members of Chambers are only able to accept payment from the instructing law firm and cannot accept any payments from the lay client directly

OUTSTANDING FEES
OUTSTANDING VAT
TOTAL OUTSTANDING

Previously Rendered: 28 Nov 2024

VALID ONLY WHEN RECEIPTED

PLEASE QUOTE CASE REFERENCE NO. ON ALL CORRESPONDENCE

South Square and its members are regulated by the Bar Standard Board

Professional Fees of Mr. Angus Groom

VAT Registration No: 475574648

Signature Litigation LLP
138 Fetter Lane
London
EC4A1BT
United Kingdom

SOUTH SQUARE

Barristers

3-4 South Square
Gray's Inn
London
WC1R 5HP

Tel : 020 7696 9900

Fax : 020 7696 9911

DX : 338 (Chancery Lane)

All BACS payments must include the case number in the reference. Please send remittance advice to finance@southsquare.com

Solicitor Ref No. Paul Brehony

Date 28 November 2024

Case Ref No. 106479

ALTRAD GROUP - OCTOBER 2024

Date	Description	Fees	VAT
01 Oct 2024	Reading in with draft hearing bundle; intro call with counsel team discussing legal issues for trial; drafting list of legal issues for counsel; legal research on US receivers. 8.1 hours	£1,417.50	
02 Oct 2024	Legal research and drafting note for trial skeleton on the law of receiverships 8.5 hours	£1,487.50	
03 Oct 2024	legal research on in personam jurisdiction; communications with counsel team and solicitors; reading Exhibit 3 hours	£525.00	
04 Oct 2024	legal research on the nature of in personam orders; legal research on jurisdiction to make in personam orders; update and discussion call with counsel team; call with counsel team and research on whether claims could be brought by US claimants in the English court. 4 hours	£700.00	
07 Oct 2024	legal research on in personam claims	£175.00	

Note: Items marked '*' are previously unbilled

Payment by bank transfer: Angus Groom (Lloyds Bank) Sort Code:30-99-85 Account:61917760 Please forward a remittance advice detailing the case ref. no. and amount to finance@southsquare.com Unless expressly agreed otherwise, members of Chambers are only able to accept payment from the instructing law firm and cannot accept any payments from the lay client directly	OUTSTANDING FEES	C/Fwd
	OUTSTANDING VAT	C/Fwd
	TOTAL OUTSTANDING	C/Fwd

Previously Rendered: 09 Oct 2024, 30 Oct 2024

VALID ONLY WHEN RECEIPTED

PLEASE QUOTE CASE REFERENCE NO. ON ALL CORRESPONDENCE

South Square and its members are regulated by the Bar Standard Board

Professional Fees of Mr. Angus Groom

VAT Registration No: 475574648

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London
EC4A 1BT
United Kingdom

SOUTH SQUARE

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Gray's Inn
London
WC1R 5HP

Tel : 020 7696 9900

Fax : 020 7696 9911

DX : 338 (Chancery Lane)

All BACS payments must include the case number in the reference. Please send remittance advice to finance@southsquare.com

Solicitor Ref No. Paul Brehony

Date 28 November 2024

Case Ref No. 106479

ALTRAD GROUP - OCTOBER 2024

Date	Description	Fees	VAT
08 Oct 2024	1 hours legal research on personal judgments; legal research on conflict of law issued related to piercing the corporate veil.	£1,137.50	
09 Oct 2024	6.5 hours Reading adams v cape; writing legal note on relevant conclusions and applicability to our case; discussions with counsel team following hearing on issues and next steps; legal research on issue estoppel	£1,225.00	
10 Oct 2024	7hrs Brief Stage Payment Legal research and drafting legal note on the characterisation of the south carolina order, on personal jurisdiction in private international law, on the impact of lack of jurisdiction, on the application of these rules to insolvency orders; circulation to counsel team.	£55,000.00	
11 Oct 2024	legal research and drafting note for counsel team on issue estoppel and related issues as applicable to CIHL/Cape's reliance on Adams v Cape.		

Note: Items marked '*' are previously unbilled

Payment by bank transfer: Angus Groom (Lloyds Bank) Sort Code:30-99-85 Account:61917760 Please forward a remittance advice detailing the case ref. no. and amount to finance@southsquare.com Unless expressly agreed otherwise, members of Chambers are only able to accept payment from the instructing law firm and cannot accept any payments from the lay client directly	OUTSTANDING FEES	C/Fwd
	OUTSTANDING VAT	C/Fwd
	TOTAL OUTSTANDING	C/Fwd

Previously Rendered: 09 Oct 2024, 30 Oct 2024

VALID ONLY WHEN RECEIPTED

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South Square and its members are regulated by the Bar Standard Board

Professional Fees of Mr. Angus Groom

VAT Registration No: 475574648

Signature Litigation LLP
138 Fetter Lane
London
EC4A 1BT
United Kingdom

SOUTH SQUARE

Barristers

3-4 South Square
Gray's Inn
London
WC1R 5HP

Tel : 020 7696 9900
Fax : 020 7696 9911
DX : 338 (Chancery Lane)

All BACS payments must include the case number in the reference. Please send remittance advice to finance@southsquare.com

Solicitor Ref No. Paul Brehony

Date 28 November 2024

Case Ref No. 106479

ALTRAD GROUP - OCTOBER 2024

Date	Description	Fees	VAT
14 Oct 2024	Legal research on estoppel and abuse of process, legal research on receivership orders, reading appeals and other SC documents; drafting notes for skeleton		
15 Oct 2024	Legal research on judicial estoppel and application of the US proceedings; legal research on PIL issues and drafting note for counsel team for skeleton;		
16 Oct 2024	Legal research and skeleton note drafting on PIL, on tort claim, discussions with counsel team; call with solicitors and client; and research and drafting on injunctions including anti-suit.		
17 Oct 2024	Drafting legal research note and skeleton argument content on injunctions and related principles; further research and drafting on the tort claim and on in personam and in rem jurisdiction.		
18 Oct 2024	Research and drafting legal note on situs of chose in action as applicable to the question of whether the Claimants have any litigation claims that could be said to be "assets in the jurisdiction" of South Carolina; Drafting submissions on injunctions and on tort; call with Counsel team; review of first draft of skeleton argument.		

Note: Items marked '*' are previously unbilled

Payment by bank transfer: Angus Groom (Lloyds Bank) Sort Code:30-99-85 Account:61917760	OUTSTANDING FEES	C/Fwd
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	TOTAL OUTSTANDING	C/Fwd

Previously Rendered: 09 Oct 2024, 30 Oct 2024

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United Kingdom

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All BACS payments must include the case number in the reference. Please send remittance advice to finance@southsquare.com

Solicitor Ref No. Paul Brehony

Date 28 November 2024

Case Ref No. 106479

ALTRAD GROUP - OCTOBER 2024

Date	Description	Fees	VAT
19 Oct 2024	Additional skeleton argument research and drafting on injunctions.		
20 Oct 2024	Additional skeleton argument research and drafting on injunctions; further discussions with counsel team.		
21 Oct 2024	Legal research; call with counsel on in personam v in rem; analysis of provisional US law evidence; call with counsel on questions for US law expert.		
22 Oct 2024	Discussions and analysis of US expert evidence; emails with counsel team of issues from US evidence and on changes to skeleton; catch up call with counsel team; preparing content for second draft of skeleton; arranging future call		
23 Oct 2024	Call with counsel team on amendments to skeleton; drafting amendments to skeleton and legal research for additional sections.		
24 Oct 2024	Various additional drafting in skeleton including incorporating comments from other members of the Counsel team, analysis of various SC law materials, and new research and drafting.		

Note: Items marked '*' are previously unbilled

Payment by bank transfer:	OUTSTANDING FEES	C/Fwd
Angus Groom (Lloyds Bank) Sort Code:30-99-85	OUTSTANDING VAT	C/Fwd
Account:61917760	TOTAL OUTSTANDING	C/Fwd
Please forward a remittance advice detailing the case ref. no. and amount to finance@southsquare.com		
Unless expressly agreed otherwise, members of Chambers are only able to accept payment from the instructing law firm and cannot accept any payments from the lay client directly		

Previously Rendered: 09 Oct 2024, 30 Oct 2024

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London
EC4A 1BT
United Kingdom

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3-4 South Square
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WC1R 5HP

Tel : 020 7696 9900

Fax : 020 7696 9911

DX : 338 (Chancery Lane)

All BACS payments must include the case number in the reference. Please send remittance advice to finance@southsquare.com

Solicitor Ref No. Paul Brehony

Date 28 November 2024

Case Ref No. 106479

ALTRAD GROUP - OCTOBER 2024

Date	Description	Fees	VAT
25 Oct 2024	Various drafting of second version of skeleton, taking into account new US law advice and materials, Louise' comments, and further additions from senior counsel. Call with counsel on strategy and drafting.		
27 Oct 2024	Review and analysis of draft South Carolina Law expert evidence.		
28 Oct 2024	Review of expert evidence, calls with counsel team; redrafting skeleton argument sections on the Receivership Order, on situs, and on the injunctions.		
29 Oct 2024	Review of expert evidence; calls and discussions with counsel team; redrafting skeleton.		
30 Oct 2024	Research and discussions with counsel team; drafting skeleton.		
31 Oct 2024	<i>PAYMENT RECEIVED WITH THANKS (via BACS) (Total £6667.50, Inv 2)</i>	-£6,667.50	
06 Nov 2024	research and discussions with counsel; drafting skeleton <i>PAYMENT RECEIVED WITH THANKS via BACS (Total £27500.00, Inv 3)</i>	-£27,500.00	

Note: Items marked '*' are previously unbilled

Payment by bank transfer: Angus Groom (Lloyds Bank) Sort Code:30-99-85 Account:61917760	OUTSTANDING FEES	£27,500.00
Please forward a remittance advice detailing the case ref. no. and amount to finance@southsquare.com	OUTSTANDING VAT	£0.00
Unless expressly agreed otherwise, members of Chambers are only able to accept payment from the instructing law firm and cannot accept any payments from the lay client directly	TOTAL OUTSTANDING	£27,500.00

Previously Rendered: 09 Oct 2024, 30 Oct 2024

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Professional Fees of Mr. Angus Groom

VAT Registration No: 475574648

Signature Litigation LLP
138 Fetter Lane
London
EC4A1BT
United Kingdom

SOUTH SQUARE

Barristers

3-4 South Square
Gray's Inn
London
WC1R 5HP

Tel : 020 7696 9900

Fax : 020 7696 9911

DX : 338 (Chancery Lane)

All BACS payments must include the case number in the reference. Please send remittance advice to finance@southsquare.com

Solicitor Ref No. Paul Brehony

Date 30 December 2024

Case Ref No. 106546

ALTRAD GROUP - NOVEMBER 2024

Date	Description	Fees	VAT
01 Nov 2024	research and discussions with counsel team; drafting skeleton;		
	drafting skeleton for expert evidence application.		
02 Nov 2024	drafting skeleton for expert evidence application.		
03 Nov 2024	drafting skeleton for expert evidence application.		
04 Nov 2024	Review of updated materials over the weekend; review of latest skeleton draft; legal research and drafting on issues of comity; prep for expert evidence application.		
05 Nov 2024	Skeleton argument drafting and hearing preparation.		
06 Nov 2024	Skeleton argument drafting and hearing preparation		
07 Nov 2024	Skeleton argument drafting and hearing preparation.		
08 Nov 2024	Finalising skeleton argument; hearing preparation and speaking notes.		
09 Nov 2024	Hearing preparation and speaking notes.		
10 Nov 2024	Hearing preparation and speaking notes		
11 Nov 2024	Hearing preparation and speaking notes		
12 Nov 2024	Day 1 of trial; trial preparation and evening work to prepare for next day		

Note: Items marked "*" are previously unbilled

Payment by bank transfer:	OUTSTANDING FEES	C/Fwd
Angus Groom (Lloyds Bank) Sort Code:30-99-85	OUTSTANDING VAT	C/Fwd
Account:61917760	TOTAL OUTSTANDING	C/Fwd
Please forward a remittance advice detailing the case ref. no. and amount to finance@southsquare.com		
Unless expressly agreed otherwise, members of Chambers are only able to accept payment from the instructing law firm and cannot accept any payments from the lay client directly		

Previously Rendered: 28 Nov 2024

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Professional Fees of Mr. Angus Groom

VAT Registration No: 475574648

Signature Litigation LLP
138 Fetter Lane
London
EC4A1BT
United Kingdom

SOUTH SQUARE

Barristers

3-4 South Square
Gray's Inn
London
WC1R 5HP

Tel : 020 7696 9900
Fax : 020 7696 9911
DX : 338 (Chancery Lane)

All BACS payments must include the case number in the reference. Please send remittance advice to finance@southsquare.com

Solicitor Ref No. Paul Brechony

Date 30 December 2024

Case Ref No. 106546

ALTRAD GROUP - NOVEMBER 2024

Date	Description	Fees	VAT
13 Nov 2024	Refresher - Day 2 of trial	£2,100.00	£420.00
14 Nov 2024	Refresher - Day 3 of trial	£2,100.00	£420.00
18 Nov 2024	Next steps after hearing and possible follow-on claim.	£350.00	£70.00
19 Nov 2024	Post hearing next-steps call; drafting question for Jersey experts	£350.00	£70.00
22 Nov 2024	Reading draft judgment; updating draft order; attending judgment hand down; finalising draft order.	£875.00	£175.00
23 Nov 2024	Draft judgment corrections and analysis	£437.50	£87.50
24 Nov 2024	Draft judgment corrections and analysis	£525.00	£105.00

Note: Items marked '*' are previously unbilled

Payment by bank transfer: Angus Groom (Lloyds Bank) Sort Code:30-99-85 Account:61917760	OUTSTANDING FEES	£6,737.50
Please forward a remittance advice detailing the case ref. no. and amount to finance@southsquare.com Unless expressly agreed otherwise, members of Chambers are only able to accept payment from the instructing law firm and cannot accept any payments from the lay client directly	OUTSTANDING VAT	£1,347.50
	TOTAL OUTSTANDING	£8,085.00

Previously Rendered: 28 Nov 2024

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Section B.2
Experts
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BILLY WILKINS LAW, LLC

IRS #99-3682120
Ms. Claire Colonnese
Signature Litigation LLP
138 Fetter Lane
London ECA 1BT

Re: Expert Report

Approved:
Date:
Client: 5346.1
Nominal:
Posted: HS
Date: 24/10/2024
Paid:

Invoice Date: October 18, 2024
Invoice No.: 24-011

FOR PROFESSIONAL SERVICES RENDERED
OCTOBER 2024

NON-REFUNDABLE RETAINER..... \$ 30,000.00

ALL BILLS ARE DUE AND PAYABLE IN FULL UPON RECEIPT.

By ACH

First Reliance Bank

Routing: 053208008

Account: 16220000544

billy@billywilkinslaw.com

212 East Park Avenue, Greenville, South Carolina 29601
(864) 616-9866 / www.billywilkinslaw.com



Your invoice

Invoice to: Signature Litigation LLP 138 Fetter Lane London EC4A 1BT	FAO: Josh Wong Our reference: 502754.00003	Invoice number: 1035459 GST number: 0123569	Invoice date: 26 November 2024
--	---	--	-----------------------------------

Jersey law advice to Cape plc and Cape Intermediate Holdings Limited

Description	Value	GST%
To our professional fees to 21 November 2024.		
Professional Fees	8,680.00	0.0
Net Total	8,680.00	
GST	0.00	
Gross Total	£8,680.00	

To contact us

Ogier (Jersey) LLP
44 Esplanade
St Helier
JE4 9WG
Jersey

T +44 1534 514000
F +44 1534 514444

For queries in relation to your invoice please contact:

Ralph Spencer-Tucker
E Ralph.Spencer-Tucker@ogier.com
T +44 1534 514375

To make a payment

Standard payment terms of 21 days apply unless otherwise agreed

Payment by wire transfer to: HSBC Bank plc, Regional & Commercial Centre,
PO Box 14, St Helier, JE4 8NJ

Account Name: Ogier
Swift Code: MIDLGB22
Sort Code: 40-25-34
Account No: 41132989
IBAN: GB13MIDL40253441132989
Invoice No: 1035459

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Your invoice

Our Ref: 502754.00003	Invoice Number: 1035459	GST number: 0123569
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Jersey law advice to Cape plc and Cape Intermediate Holdings Limited

Fee Earner	Time (units)
Danielle Newton	2.6
James Angus	4.2
Judith Hughes	3.2
Ralph Spencer-Tucker	6.4
Total	16.4



Your invoice

Our Ref:
502754.00003

Invoice Number:
1035459

GST number:
0123569

Jersey law advice to Cape plc and Cape Intermediate Holdings Limited

Date	Fee Earner	Description	Time (units)
19/11/2024	Judith Hughes	Reviewing instructions and considering questions	0.3
19/11/2024	Ralph Spencer-Tucker	Review instructions and initial review of relevant case law.	0.5
20/11/2024	Danielle Newton	Research project - case law and guidance on Jersey following English company law	2.3
20/11/2024	Danielle Newton	Pull together zip file of all authorities for review for opinion	0.3
20/11/2024	James Angus	Work on expert opinion and sign off.	3.5
20/11/2024	Judith Hughes	Research into jurisdictional queries re questions 7.4 and 7.5	2.3
20/11/2024	Judith Hughes	Drafting note with comments on questions 7.4 and 7.5	0.3
20/11/2024	Judith Hughes	Review of emails in from Signature and documents provided	0.3
20/11/2024	Ralph Spencer-Tucker	Call with Signature team, reviewing relevant case law, work on advice, discussion with JWA, emails with client.	5.1
21/11/2024	James Angus	Final review and execution of expert opinion.	0.7
21/11/2024	Ralph Spencer-Tucker	Review responses, liaising with JWA, amends to document, finalising and sending to Signature.	0.8
			16.4

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Anthony Proietta & Associates
300 Pettigru St. Ste 203
Greenville, SC 29601

INVOICE: 11900677
Issued: Oct 1, 2024
Sent to: claire.colonnese@signaturelitigation.com

Signature Litigation LLP

138 Fetter Ln.
London EC4A1BT

PAY TO:
Anthony Proietta & Associates
300 Pettigru St. Ste 203
Greenville, SC 29601

Case: BL-2024-001337	Plaintiff / Petitioner: Cape Intermediate Holdings Limited, et al
Job: 11900677	Defendant / Respondent: Peter D. Protopapas

Item	Description	Cost	Quantity	Total
Copies	printing pages	\$103.58	1	\$103.58
RUSH	rush	\$50.00	1	\$50.00
serve Columbia	routine serve columbia Peter D. Protopapas	\$100.00	1	\$100.00

Thanks for your business. Please pay the "Balance Due" within 21 days.	Total: \$253.58
Thank You	Amount Paid: (\$0.00)
Ashleigh Andrews	Balance Due: \$253.58

Anthony Proietta & Associates • 300 Pettigru St. Ste 203, Greenville, SC 29601

Call: 864-271-7901 • Email: info@proiettapi.com • Visit: www.proiettapi.com

Anthony Proietta & Associates
300 Pettigru St. Ste 203
Greenville, SC 29601

INVOICE: 11932427
Issued: Oct 8, 2024
Sent to: claire.colonnese@signaturelitigation.com

Signature Litigation LLP

138 Fetter Ln.
London EC4A1BT

PAY TO:
Anthony Proietta & Associates
300 Pettigru St. Ste 203
Greenville, SC 29601

Case: BL-2024-001337 Job: 11932427	Plaintiff / Petitioner: Cape Intermediate Holdings Limited, et al Defendant / Respondent: Peter D. Protopapas
---------------------------------------	--

Item	Description	Cost	Quantity	Total
RUSH	rush	\$50.00	1	\$50.00
serve Columbia	routine serve columbia service on Peter Protopapas on Sept. 25, 2024	\$100.00	1	\$100.00

Thanks for your business. Please pay the "Balance Due" within 21 days.	Total: \$150.00
Thank You	Amount Paid: (\$0.00)
Ashleigh Andrews	Balance Due: \$150.00

Anthony Proietta & Associates • 300 Pettigru St. Ste 203, Greenville, SC 29601

Call: 864-271-7901 • Email: info@proiettapi.com • Visit: www.proiettapi.com

Anthony Proietta & Associates
300 Pettigru St. Ste 203
Greenville, SC 29601

INVOICE: 11948113
Issued: Oct 8, 2024
Sent to: claire.colonnese@signaturelitigation.com

Signature Litigation LLP

138 Fetter Ln.
London EC4A1BT

PAY TO:
Anthony Proietta & Associates
300 Pettigru St. Ste 203
Greenville, SC 29601

Case: BL-2024-001337	Plaintiff / Petitioner: Cape Intermediate Holdings Limited, et al
Job: 11948113	Defendant / Respondent: Peter D. Protopapas

Item	Description	Cost	Quantity	Total
RUSH	rush	\$50.00	1	\$50.00
serve Columbia	routine serve columbia Service on Peter Protopapas on Oct 8 @ 2:00 PM	\$100.00	1	\$100.00

Thanks for your business. Please pay the "Balance Due" within 21 days.	Total: \$150.00
Thank You	Amount Paid: (\$0.00)
Ashleigh Andrews	Balance Due: \$150.00

Anthony Proietta & Associates • 300 Pettigru St, Ste 203, Greenville, SC 29601

Call: 864-271-7901 • Email: info@proiettapi.com • Visit: www.proiettapi.com

Anthony Proietta & Associates
300 Pettigru St. Ste 203
Greenville, SC 29601

INVOICE: 12116542
Issued: Nov 5, 2024
Sent to: claire.colonese@signaturelitigation.com

sig

138 Fetter Ln.
London EC4A1BT

PAY TO:
Anthony Proietta & Associates
300 Pettigru St. Ste 203
Greenville, SC 29601

Case: BL-2024-001337	Plaintiff / Petitioner: Cape Intermediate Holdings Limited, et al
Job: 12116542	Defendant / Respondent: Peter D. Protopapas

Item	Description	Cost	Quantity	Total
Copies	printing pages at store	\$88.00	1	\$88.00
RUSH	rush	\$50.00	1	\$50.00
serve Columbia	routine serve columbia on Peter Protopapas on Nov 1 @ 3:50 PM	\$100.00	1	\$100.00

Thanks for your business. Please pay the "Balance Due" within 21 days.	Total: \$238.00
Thank You	Amount Paid: (\$0.00)
Ashleigh Andrews	Balance Due: \$238.00

Anthony Proietta & Associates • 300 Pettigru St. Ste 203, Greenville, SC 29601

Call: 864-271-7901 • Email: info@proiettapi.com • Visit: www.proiettapi.com

Anthony Proietta & Associates
300 Pettigru St. Ste 203
Greenville, SC 29601

INVOICE: 12142546
Issued: Nov 8, 2024
Sent to: claire.colonnese@signaturelitigation.com

sig

138 Fetter Ln.
London EC4A1BT

PAY TO:
Anthony Proietta & Associates
300 Pettigru St. Ste 203
Greenville, SC 29601

Case: BL-2024-001337 Job: 12142546	Plaintiff / Petitioner: Cape Intermediate Holdings Limited, et al Defendant / Respondent: Peter D. Protopapas
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Item	Description	Cost	Quantity	Total
serve Columbia	routine serve columbia Peter Protopapas on Sept. 16 at 9:26 AM	\$100.00	1	\$100.00
RUSH	rush	\$50.00	1	\$50.00

Thanks for your business. Please pay the "Balance Due" within 21 days.	Total: \$150.00
Thank You	Amount Paid: (\$0.00)
Ashleigh Andrews	Balance Due: \$150.00

Anthony Proietta & Associates • 300 Pettigru St. Ste 203, Greenville, SC 29601

Call: 864-271-7901 • Email: info@proiettapi.com • Visit: www.proiettapi.com

Invoice

Client Address

Delivery Address

WINSTON & STRAWN LONDON LLP
 CITYPOINT
 ONE ROPEMAKER STREET
 LONDON
 EC2Y 9AW

Date 17/09/24 Invoice Number D1475588 Account Number 86121 Device ID No Page 1

Description	Qty	Unit	Unit Price (£)	Net Amount (£)	VAT
REQ TRI NGA KUNOVI KU					
A4 B&W PRINT	6456		0.09	581.04	1
A4 COLOUR PRINT	10809		0.21	2269.89	1
STANDARD DIVIDERS	609		0.13	79.17	1
PRINTED DIVIDERS	30		0.21	6.30	1
LEVER ARCH A4	30		3.00	90.00	1
COVERS & SPINES	30		0.80	24.00	1
STUDIO TIME	2		30.00	60.00	1

Your Reference 019867.00001

Total Net Amount	3110.40
Total VAT Amount	622.08
Invoice Total	£ 3732.48

VAT Analysis			
Code	Rate	Goods Amount	VAT
1	20.00%	3110.40	622.08

PAYMENT DUE BY 17/10/2024

If you have a question on your bill or want to submit meter readings please contact the relevant team below who will be pleased to assist

Telephone: 0345 300 9955 Opt 1, Opt 2, then...

Payment Enquiry Opt 1 creditcontrol@apogeeecorp.com
 Submit meter readings Opt 2 billingadmin@apogeeecorp.com
 Invoice Enquiry Opt 3 invoicequeries@apogeeecorp.com

PAYMENT DETAILS

BACS Payment to
 Barclays Bank plc
 Sort code 20-24-98
 Account No 60389757

Lines are open from 8.30am to 5pm Monday to Friday

Remittance to : remittancelincoln@apogeeecorp.com

Invoice



Account: SIG005
Invoice No: EINV42981
Date: 10/31/2024

Invoice To:
Signature Litigation LLP
Eleanor Walker
138 Fetter Lane London
EC4A 1BT

EPIQ Europe Limited
Salesforce Tower
110 Bishopsgate
Part 15th Floor
London
EC2N 4AY

VAT Reg: GB608 8773 03
Company Reg: 2656370

Case: 267207
Reference: Lit Rolls Hearing

Billing Queries: ukbilling@epiqglobal.co.uk
Credit Control: crreceivables@epiqglobal.com

Description	Quantity	Price	Value
09-10-24 Court Reporting Services	1	750.00	750.00

This is blank section for
inputting comments

VAT: (20.0%)	GBP 150.00
Invoice Total :	GBP 900.00

Invoices are payable within 28 days from date of invoice. Interest will be charged at a rate of 4% per calendar month if unpaid.
Please make cheques payable to Epiq Europe Ltd
Account Number: 90744921 Sort Code: 40-11-58
Swift Code/BIC: HBUKGB4B IBAN: GB49HBUK40115890744921
Please reference invoice number(s) on your payment

Invoice	Case ID	Case Name	Sold To	Job Date	Service Item	Units	Rate	Split	Amount	Curr
EINV42981	267207	Lit Rolls Hearing	Signature Litigation LLP (SIG005)	09-10-24	Attendance - Short Sitting (<2.5 hours)	1.00	750.00		750.00	GBP
EINV42981	267207	Lit Rolls Hearing	Signature Litigation LLP (SIG005)	09-10-24	Transcript free e-mail for jud/arbitrato	1.00	-		-	GBP
EINV42981	267207	Lit Rolls Hearing	Signature Litigation LLP (SIG005)	09-10-24	Transcript - First copy free	1.00	-		-	GBP

Invoice



Account: SIG005
Invoice No: EINV43630
Date: 11/30/2024

Invoice To:
Signature Litigation LLP
138 Fetter Lane
London
EC4A 1BT
Eleanor Walker

EPIQ Europe Limited
Salesforce Tower
110 Bishopsgate
Part 15th Floor
London
EC2N 4AY

VAT Reg: GB608 8773 03
Company Reg: 2656370

Case: 268341
Reference: Lit: Cape Intermediate Holdings Limited and another v Protapas

Billing Queries: ukbilling@epiqglobal.co.uk
Credit Control: crreceivables@epiqglobal.com

Description	Quantity	Price	Value
12-11-24 Court Reporting Services	1	2,940.00	2,940.00

This is blank section for
inputting comments

VAT: (20.0%)	GBP 588.00
Invoice Total :	GBP 3,528.00

Invoices are payable within 28 days from date of invoice. Interest will be charged at a rate of 4% per calendar month if unpaid.
Please make cheques payable to Epiq Europe Ltd
Account Number: 90744921 Sort Code: 40-11-58
Swift Code/BIC: HBUKGB4B IBAN: GB49HBUK40115890744921
Please reference invoice number(s) on your payment

Invoice Num	Case ID	Case Name	Sold To	Job Date	Service Rem	Units	Rate	Splt	Amount	Curr
EINV43630	268341	Lit: Cape Intermediate Holdings Limited and another v Protopoulos	Signature Litgation LLP (SIG005)	12-11-24	Attendance - Daily Only	1.00	980.00		980.00	GBP
EINV43630	268341	Lit: Cape Intermediate Holdings Limited and another v Protopoulos	Signature Litgation LLP (SIG005)	12-11-24	Transcript free e-mail for jud/arb/trato	1.00	-		-	GBP
EINV43630	268341	Lit: Cape Intermediate Holdings Limited and another v Protopoulos	Signature Litgation LLP (SIG005)	12-11-24	Transcript - First copy free	1.00	-		-	GBP
EINV43630	268341	Lit: Cape Intermediate Holdings Limited and another v Protopoulos	Signature Litgation LLP (SIG005)	13-11-24	Attendance - Daily Only	1.00	980.00		980.00	GBP
EINV43630	268341	Lit: Cape Intermediate Holdings Limited and another v Protopoulos	Signature Litgation LLP (SIG005)	13-11-24	Transcript free e-mail for jud/arb/trato	1.00	-		-	GBP
EINV43630	268341	Lit: Cape Intermediate Holdings Limited and another v Protopoulos	Signature Litgation LLP (SIG005)	13-11-24	Transcript - First copy free	1.00	-		-	GBP
EINV43630	268341	Lit: Cape Intermediate Holdings Limited and another v Protopoulos	Signature Litgation LLP (SIG005)	14-11-24	Attendance - Daily Only	1.00	980.00		980.00	GBP
EINV43630	268341	Lit: Cape Intermediate Holdings Limited and another v Protopoulos	Signature Litgation LLP (SIG005)	14-11-24	Transcript free e-mail for jud/arb/trato	1.00	-		-	GBP
EINV43630	268341	Lit: Cape Intermediate Holdings Limited and another v Protopoulos	Signature Litgation LLP (SIG005)	14-11-24	Transcript - First copy free	1.00	-		-	GBP

E-Filing Submission Confirmation

The following electronic filing(s) were successfully submitted. Please keep a copy of this confirmation for your records.

Submitted Number 1486601725874379667
Submitted Date 09-09-2024 10:33 AM

Filings Submitted:

Court	Case Number	Matter/Ref. Number	Filing Type(s)	Documents	Fees
Business List (ChD)			Filing - Claim Form (Part 8)	10	£ 626.00
			Application to a Judge - Application for Certificate/registration of Judgment/Order for use abroad	6	£ 78.00
<u>Total</u>					<u>£ 704.00</u>



Company: SIGNATURE LITIGATION LLP Address: 138 FETTER LANE LONDON EC4A 1BT For the attention of: Accounts Payable	Correspondence Address: Banking & DD Management PO Box 3166 Cardiff CF30 0FH Tel. No. 01633 652125
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Invoice Number	Invoice Date & Tax Point
1068473	01 October 2024

Date	Description	Quantity	Amount £	VAT Rate %	VAT Amount £
23/09/2024	FACCT-RBF-0000566788 Business Application to a Master Part 8 Claim-BL-2024-0013 37-PB/JW/GB/CC 33771727103319865	1	119.00	0.00	0.00

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**HM Courts
& Tribunals
Service**

21 NOV 2024

Invoice

Shared Services Connected Limited
PO Box 781
Phoenix House, Newport
Gwent, NP20 9BB
Phone: +44 (0) 345 241 5351
Email: moj-O2C-CM@gov.sscl.com



Vat No: GB 888 8180 55

Billed To: Attn: Eleanor Walker SIGNATURE LITIGATION LLP 138 FETTER LANE, LONDON EC4A 1BT					Invoice No: 2550010 Invoice Date: 18 Nov 2024 Payment Terms: 30 NET Customer No: 362542 Bill to Location: EC4A 1BT PO Number: N/A Due Date/Amount: 18 Dec 2024 - £594.00		
Line No	Description	VAT %	QTY	UOM	Unit Price	Line Amount	Total
001	Hiring of Court facilities - REF: 5346.1	20.00	3		165.00	495.00	594.00
Additional Information						Sub Total	495.00
ROLLS BUILDING HIRE OF CONSULTATION ROOM 9 FOR 3 DAYS FROM 12 NOV 24 TO 14 NOV 24 @ £165 + VAT PER DAY						VAT	99.00
						Total	594.00
Remittance Information							
<p>We would like to send your invoices and other related correspondence to you via email in future. If you would like to take advantage of this, please send your email address, Customer No and Bill to Location to O2C.mail@gov.sscl.com. We advise providing a functional mailbox to ensure you continue to receive emails in the event of staff absence or changes. Non receipt of an electronic invoice is not a reason for non-payment and further action may be taken in the event on non-payment.</p> <p>All Amounts are in GBP £ unless otherwise stated. Cheques should be sent to the above address with your customer account and invoice number on the reverse. Notification of your payment should be sent to the address above or emailed to moj-O2C-banking@gov.sscl.com</p> <p>Electronic Banking Information: - Bank Name: NATWEST - Sort Code: 60-70-80 - Account Number: 10001646 - Payee Name: HM Courts & Tribunal Service - Swift / BIC Code: NWBKGB2L</p>							

INVOICE AUTHORIZATION	
Account No:	Client
Date:	Reason
	Reference
ACCOUNTS USE	
Posted by:	Paid:
Date:	



London Legal & Imaging Solutions
Victoria House, 1 Leonhard Circus, London EC2A 4DQ

Accounts.Receivable@london-legal.co.uk
www.london-legal.co.uk

Accounts Payable
Signature Litigation LLP
138 Fetter Lane
London
EC4A 1BT

Invoice Number	101423
Invoice Date	08/10/2024
Customer Reference	FID13618

Invoice

Page 1

Quantity	Details	Unit Price	Net Amount	VAT Rate	VAT
5.581	Digital Print A4/A5 B&W	£0.13	£725.53	20.00%	£145.11
244	Plain or Pre-printed Tab Dividers	£0.15	£36.60	20.00%	£7.32
14	Cover & Spine Inserts/Labels	£1.50	£21.00	20.00%	£4.20
14	Acetate	£0.50	£7.00	20.00%	£1.40
14	160-250gsm Card A4	£0.30	£4.20	20.00%	£0.84
14	A4 Lever Arch Binder	£3.95	£55.30	20.00%	£11.06
1	Delivery to Office Address- Business Hours	£12.50	£12.50	20.00%	£2.50
2	Courier/Carriage Costs to Chambers	£15.00	£30.00	20.00%	£6.00

BACS/CHAPS transfer	
Account Name:	Corby Imaging Ltd
Account Number:	64910568
Sort Code:	30-94-41
BIC/SWIFT:	LOYDGB21084
IBAN:	GB29LOYD30944164910568
Corby Imaging Ltd t/a London Legal & Imaging Solutions	

Total Net Amount	£892.13
Total VAT Amount	£178.43
Invoice Total	£1,070.56

Terms: Net 30 days
VAT registration no. 458 1677 57

From: Walker, Eleanor <eleanor.walker@signaturelitigation.com>
Sent: 07 October 2024 21:50
To: LL Printroom
Cc: SL Cape; Colonnese, Claire
Subject: Re: Enquiry regarding production of hard copy bundles for tomorrow [SIG-LIT-LIT.FID13618]
Attachments: BL-2024-001337 Bundle for Hearing on 9 October.pdf; BL-2024-001337 Core Bundle (updated).pdf

Good evening,

We are enquiring into the production of hard copy bundles for tomorrow **by 8.30am**. The documents are attached.

The specifications for the bundles are below:

1. 4 x hard copy bundles. Each bundle (Bundle for Hearing Bundle and the Core Bundle) will need to include the documents listed in the index. Please ensure that the Bundle follows the index.
(1 x single sided and 3 x double sided)
2. Ring binders:

For 1 x **single sided set** (for the court): Each ring binder should contain approx. 300 pages each. Please therefore split the document titled 'Bundle for Hearing on 9 October 2024' into the following sections:

- volume 1 to run from 1 to 3 (up to page 300);
- volume 2 is to run from tab 3 (remaining pages) to tab 9;
- volume 3 is to run from tab 10 (section C) to tab 13 (up to 300 pages);
- volume 4 is then tab 13 (remaining) to tab 20.

Please note that tab 21 is not included in this document provided to and does not need to be printed and has not been provided to you.

The 3 x **double sided sets** should contain approx. 600 pages. Please split this into two volumes only in the following: Section A to B (tabs 1-9) and then Section C to D (tab 10-20). The Core Bundle does not need to be split into volumes as this is only 160 pages.

3. For the documents in both Bundles these can be Black and White.
4. Numbered and lettered tabs are required as seen in the index. Please ensure the numbers and letters follow the index.
5. Front sheet and Spines for each folder (attached). Please can the Spines and front sheets be amended to cover how many volumes there are in each set ie. Volume 1 of 2, Volume 2 of 2.

Delivery addresses:

- 1) 1 x single sided set and 1 x double sided set to be provided to our office (138 Fetter Lane, London, EC4A 1BT) to be delivered **by 8.30am tomorrow**;
- 2) 1 x double sided set to be provided to: Fountain Court Temple, City of London, EC4Y 9DH, Marked for the attention of Derrick Dale (to be delivered **after 9am**).



London Legal & Imaging Solutions
Victoria House, 1 Leonard Circus, London EC2A 4DQ

Accounts.Receivable@london-legal.co.uk
www.london-legal.co.uk

Accounts Payable
Signature Litigation LLP
138 Fetter Lane
London
EC4A 1BT

Invoice Number	101555
Invoice Date	08/11/2024
Customer Reference	FID60017

Invoice

Page 1

Quantity	Details	Unit Price	Net Amount	VAT Rate	VAT
14,375	Digital Print A4/A5 B&W	£0.13	£1,868.75	20.00%	£373.75
400	Plain or Pre-printed Tab Dividers	£0.15	£60.00	20.00%	£12.00
18	Acetate	£0.50	£9.00	20.00%	£1.80
18	160-250gsm Card A4	£0.30	£5.40	20.00%	£1.08
24	Cover & Spine Inserts/Labels	£1.50	£36.00	20.00%	£7.20
24	A4 Lever Arch Binder	£3.95	£94.80	20.00%	£18.96
1	Delivery to Office Address- Business Hours	£12.50	£12.50	20.00%	£2.50
2	Courier/Carriage Costs to Chambers	£15.00	£30.00	20.00%	£6.00
1	Courier/Carriage Costs to N1	£17.00	£17.00	20.00%	£3.40

BACS/CHAPS transfer

Account Name: Corby Imaging Ltd
Account Number: 64910568
Sort Code: 30-94-41
BIC/SWIFT: LOYDGB21084
IBAN: GB29LOYD30944164910568

Corby Imaging Ltd t/a London Legal & Imaging Solutions

Total Net Amount	£2,133.45
Total VAT Amount	£426.69
Invoice Total	£2,560.14

Terms: Net 30 days
VAT registration no. 458 1677 57

1

From: Colonnese, Claire <Claire.Colonnese@signaturelitigation.com>
Sent: 08 November 2024 10:29
To: LL Printroom
Cc: Gary Dunster; David Holby; SL Cape
Subject: Printing request - Authorities Bundle (Urgent) [SIG-LIT-LIT.FID60017]
Attachments: CAPE - Draft Spine and Cover to Bundle for Hearing - Authorities Bundle(5409614.1).docx

Hi All

Further to my email last night, we would be grateful if you could arrange for the Authorities Bundle to be printed.

Please can you send me a link so we can upload this.

Bundle specifications for the Bundle titled 'Authorities Bundle':

1. 4x hard copies. Please ensure that the Bundle follows the index (attached).
2. A4 double sided.
3. Lever Arch ring binders
 - Each ring binder should contain only 600 double sided pages each. Black and white.
4. Front sheet and spines for each folder are attached. Please can the Spines and front sheets be amended to cover how many volumes there are in each set ie. Volume 1 of 2, Volume 2 of 2.
5. Tabs as per the index.

Timing:

Please can the bundles be printed ASAP? We need at least one of the sets ready for 2pm. Please can you let me know if that is possible?

Delivery:

Please can you let me know if one set can be delivered in a stowaway/ slot box? If this is not possible, please let me know.

I will get back to you with delivery requirements.

Many thanks
Claire

Claire Colonnese
SENIOR ASSOCIATE

SIGNATURE 

M: +44 (0) 7740 405 419
T: +44 (0)20 3818 3500





London Legal & Imaging Solutions
Victoria House, 1 Leonard Circus, London EC2A 4DQ

Accounts.Receivable@london-legal.co.uk
www.london-legal.co.uk

Accounts Payable
Signature Litigation LLP
138 Fetter Lane
London
EC4A 1BT

Invoice Number	101558
Invoice Date	08/11/2024
Customer Reference	FID60017

Invoice

Page 1

Quantity	Details	Unit Price	Net Amount	VAT Rate	VAT
5,051	Digital Print A4/A5 B&W	£0.13	£656.63	20.00%	£131.33
127	Digital Print A4/A5 Colour	£0.30	£38.10	20.00%	£7.62
124	Plain or Pre-printed Tab Dividers	£0.15	£18.60	20.00%	£3.72
6	Slipsheets	£1.20	£7.20	20.00%	£1.44
13	Acetate	£0.50	£6.50	20.00%	£1.30
13	160-250gsm Card A4	£0.30	£3.90	20.00%	£0.78
13	Cover & Spine Inserts/Labels	£1.50	£19.50	20.00%	£3.90
13	A4 Lever Arch Binder	£3.95	£51.35	20.00%	£10.27
2	Courier/Carriage Costs to Chambers	£15.00	£30.00	20.00%	£6.00
1	Delivery to Office Address - Business Hours	£12.50	£12.50	20.00%	£2.50

BACS/CHAPS transfer

Account Name: Corby Imaging Ltd
Account Number: 64910568
Sort Code: 30-94-41
BIC/SWIFT: LOYDGB21084
IBAN: GB29LOYD30944164910568

Corby Imaging Ltd Pa London Legal & Imaging Solutions

Total Net Amount	£844.28
Total VAT Amount	£168.86
Invoice Total	£1,013.14

Terms: Net 30 days
VAT registration no. 458 1677 57

If you believe this invoice or any part of it to be incorrect you should contact us within ten calendar days. If not, it will be assumed that you are in agreement with it.

From: Walker, Eleanor <eleanor.walker@signaturelitigation.com>
Sent: 07 November 2024 16:34
To: LL Printroom
Cc: St Cape; Colonnese, Claire; Bazinas, George
Subject: Re: Bundle enquiry [SIG-LIT-LIT.FID60017]
Attachments: Final Hearing Bundle Sections A and B.pdf; Supplementary Bundle on Adams v Cape.pdf

Good afternoon,

We are enquiring into the production of hard copy bundles. Please find attached:

- Final Hearing Bundle Section A to B;
- the Supplementary Bundle on Adams v Cape.

The Final Hearing Bundle Section C will follow via our FTP site.

Bundle specifications for the Bundle titled 'Final Hearing Bundle Section A to B' and 'Final Hearing Bundle Section C':

1. 3 x hard copies. Please ensure that the Bundle follows the index.
2. A4 double sided.
3. 2 Lever Arch ring binders:
 - Please note that only the documents at tab 10 and 11 of Section C have been provided to you.
 - The document at tab 9 has not been provided to you and does not need to be printed.
 - Each ring binder should contain only 600 double sided pages each. The Bundle titled 'Final Hearing Bundle Section A to B' is less than 600 double sided pages this can be put in one ring binder.
 - For the document titled 'Final Hearing Bundle Section C' please split the document into 300 even pages per binder, save for the last binder which will include approx. 298 pages. This should amount to a total of about 3 ring binders for the Section C Bundle.
4. Numbered and lettered tabs are required as seen in the index. Please ensure the numbers and letters follow the index.
 - i) Final Hearing Bundle Section A to B: Tabs A and B, with subsequent numbering (i.e. 1 to 8 tabs)
 - ii) Final Hearing Bundle Section C: Tab C, with subsequent numbering (i.e. 9 – 11 – even though you are not printing doc number).
5. Black and white.
6. Front sheet and spines for each folder are attached. Please can the Spines and front sheets be amended to cover how many volumes there are in each set ie. Volume 1 of 2, Volume 2 of 2.

Bundle specification for Bundle titled 'Supplementary Bundle on Adams v Cape':

1. 1 x hard copies. Please ensure that the Bundle follows the index.
2. A4 double sided.
3. Lever arch ring binders. 1 ring binder per set.
4. Numbered and lettered tabs are required as seen in the index. Please ensure the numbers and letters follow the index.
5. Colour where colour is in the document.
6. Front sheet and spines for this Bundle are attached.

Delivery (Bundles and addresses)

1. 1 x hard copies set of **Final Hearing Bundle Section A to B'** and **'Final Hearing Bundle Section C'** to be sent to Signature Litigation, 138 Fetter Lane, London, EC4A 1BT. We can accept delivery any time after 8.30am (and as early as possible).
2. 1 x hard copy set of **Final Hearing Bundle Section A to B'** and **'Final Hearing Bundle Section C'**: to be sent to South Square, 3-4 South Square, Gray's Inn, London, WC1R 5HP. For the attention of: Mark Phillips KC. Chambers can accept delivery any time after 8am (and as early as possible).
3. 1 x hard copy set of **Final Hearing Bundle Section A to B'** and **'Final Hearing Bundle Section C'**
AND
1 x hard copy set of **'Supplementary Bundle on Adams v Cape'**
to be sent to Fountain Court, Temple, London, EC4Y 9DH. For the attention of: Derrick Dale KC. Chambers can accept delivery any time after 8am (and as early as possible).

We would be grateful to receive a quote as soon as possible on the basis of the above specifications and the timeline for production as tomorrow, with the files returned to our office (138 Fetter Lane, London, EC4A 1BT).

Should you require any additional information or have any questions, please let me/ Claire (copied in) know (07585383892/0203 818 3546).

Kind regards,
Eleanor

Eleanor Walker
EADALEGAL

SIGNATURE 

M +44 (0)7506 383 892

T +44 (0)20 3818 3600

F +44 (0)20 3818 3674

E. eleanor.walker@signaturelitigation.com



Signature Litigation LLP, 138 Fetter Lane, London EC4A 1BT

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London Legal & Imaging Solutions
Victoria House, 1 Leonard Circus, London EC2A 4DQ

Accounts.Receivable@london-legal.co.uk
www.london-legal.co.uk

Accounts Payable
Signature Litigation LLP
138 Fetter Lane
London
EC4A 1BT

Invoice Number	101574
Invoice Date	11/11/2024
Customer Reference	FID60017

Invoice

Page 1

Quantity	Details	Unit Price	Net Amount	VAT Rate	VAT
612	Digital Print A4/A5 B&W	£0.13	£79.56	20.00%	£15.91
72	Digital Print A3 B&W	£0.20	£14.40	20.00%	£2.88
156	Plain or Pre-printed Tab Dividers	£0.15	£23.40	20.00%	£4.68
6	Slipsheets	£1.20	£7.20	20.00%	£1.44
6	Acetate	£0.50	£3.00	20.00%	£0.60
6	160-250gsm Card A4	£0.30	£1.80	20.00%	£0.36
6	Cover & Spine Inserts/Labels	£1.50	£9.00	20.00%	£1.80
6	A4 Lever Arch Binder	£3.95	£23.70	20.00%	£4.74
1	Delivery to Office Address- Business Hours	£12.50	£12.50	20.00%	£2.50

<u>BACS/CHAPS transfer</u>	
Account Name:	Corby Imaging Ltd
Account Number:	64910568
Sort Code:	30-94-41
BIC/SWIFT:	LOYDGB21084
IBAN:	GB2910YD30944164910568
Corby Imaging Ltd t/a London Legal & Imaging Solutions	

Total Net Amount	£174.56
Total VAT Amount	£34.91
Invoice Total	£209.47

Terms: Net 30 days
VAT registration no. 458 1677 57

From: Colonnese, Claire <Claire.Colonnese@signaturelitigation.com>
Sent: 08 November 2024 18:22
To: Emanoil Mihaylov; LL Printroom
Cc: Gary Dunster; David Holby; SL Cape
Subject: Printing request - Skeleton & Appendices [SIG-LIT-LIT,FID60017]
Attachments: CAPE - Draft Spine and Cover to Bundle for Skeleton & Appendices(5411575.1).docx; APPENDIX D.docx; 20241108 Trial Skeleton Cape v Protopapas (referenced)(5410041).pdf; APPENDIX A.pdf; APPENDIX B (referenced).pdf; APPENDIX C_ Schedule of Factual Findings in Adams v Cape.pdf; 2024.11.08 - Index to Skeleton & Authorities(5412310.1).docx

Hi All

Please can you print the following:

Bundle specifications for the Bundle titled 'Skeleton & Appendices':

1. 6x hard copies. Please ensure that the Bundle follows the index (attached).
2. A4 double sided (with the exception of Appendix C – which needs to be single sided and A3, and folded so that it fits into the file)
3. Lever Arch ring binders
4. Black and white.
5. Front sheet and spines for each folder are attached.
6. Tabs as per the index.

Please can these be delivered to Signature's office on Monday morning after 8.30am?

Many thanks
Claire

Claire Colonnese
Ext 546
Room LG.07

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London Legal

London Legal & Imaging Solutions
Victoria House, 1 Leonard Circus, London EC2A 4DQ
Tel: 020 753 070
Accounts.Receivable@london-legal.co.uk
www.london-legal.co.uk

Accounts Payable
Signature Litigation LLP
138 Fetter Lane
London
EC4A 1BT

Invoice Number	101597
Invoice Date	14/11/2024
Customer Reference	FID60017

Invoice

Page 1

Quantity	Details	Unit Price	Net Amount	VAT Rate	VAT
1	Minimum Charge	£85.00	£85.00	20.00%	£17.00
1	Delivery to Office Address- Business Hours	£12.50	£12.50	20.00%	£2.50

BACS/CHAPS transfer

Account Name: Corby Imaging Ltd
Account Number: 60910568
Sort Code: 30-91-41
BIC/SWIFT: LOYDGB21084
IBAN: GB29LOYD30944164910568

Corby Imaging Ltd t/a London Legal & Imaging Solutions

Total Net Amount	£97.50
Total VAT Amount	£19.50
Invoice Total	£117.00

Terms: Net 30 days
VAT registration no. 458 1677 57



Invoice

Invoice No: 389225

Date: 18 December 2024

Opus 2 Reference: 24320D-2

Your Reference: 3546.1

To:

Signature Litigation LLP
138 Fetter Lane
London
EC4A 1BT
United Kingdom

Matter Name: 1) Cape Intermediate Holdings Limited
and 2) Cape Plc (a company
incorporated under the laws of Jersey)
v Peter D Protopapas

Description	Fees
November 2024	
Hearing Services	£895.00
<i>See attached narrative for a detailed breakdown of fees incurred</i>	
	Sub-Total £895.00
	VAT @ 20.00% £179.00
	Total (GBP - British Pound) £1,074.00

Payment Method:

Please remit funds by direct bank transfer, quoting your company name and invoice number, to:

Bank: HSBC Bank PLC
Account Name: Opus 2 International Limited
Account No: 41899066
Sort Code: 40-06-29
IBAN: GB45HBUK40062941899066
SWIFT/BIC: HBUKGB4B

Payment Terms:

Please make payment within 90 days in accordance with the terms of our Agreement. Interest at 1.50% per month will be charged on all amounts exceeding 120 days

Hearing Services

Shared Costs

Date	Description	Quantity	Fee	Sub-Total	Your Share (%)	Your Share
					Sub-Total	£0.00

Party Specific Costs

Date	Description	Quantity	Fee	Sub-Total	Your Share (%)	Your Share
06/11/2024	Full Day Attendance	1	£895.00	£895.00	100.00%	£895.00
					Sub-Total	£895.00

Hearing Services Total : £895.00



Invoice

Invoice No: 389224

Date: 18 December 2024

Opus 2 Reference: 24320D-3

Your Reference: 3546.1

To:

Matter Name: Cape Intermediate Holdings Limited
and Cape Plc v Mr Peter D Protopapas

Signature Litigation
138 Fetter Lane
London
EC4A 1BT
United Kingdom

Description	Fees
November 2024	
Hearing Services	£595.00
<i>See attached narrative for a detailed breakdown of fees incurred</i>	
	Sub-Total £595.00
	VAT @ 20.00% £119.00
	Total (GBP - British Pound) £714.00

Payment Method:

Please remit funds by direct bank transfer, quoting your company name and invoice number, to:

Bank: HSBC Bank PLC
Account Name: Opus 2 International Limited
Account No: 41899066
Sort Code: 40-06-29
IBAN: GB45HBUK40062941899066
SWIFT/BIC: HBUKGB4B

Payment Terms:

Please make payment within 90 days in accordance with the terms of our Agreement. Interest at 1.50% per month will be charged on all amounts exceeding 120 days

Opus 2 International Limited
5th Floor, 5 New Street Square, London, EC4A 3BF
Tel: +44 (0)20 3008 5900
Registered in England No. 05907841
VAT No. 900 4928 44

Hearing Services

Shared Costs

Date	Description	Quantity	Fee	Sub-Total	Your Share (%)	Your Share
					Sub-Total	£0.00

Party Specific Costs

Date	Description	Quantity	Fee	Sub-Total	Your Share (%)	Your Share
22/11/2024	Half-Day Attendance	1	£595.00	£595.00	100.00%	£595.00
					Sub-Total	£595.00

Hearing Services Total : £595.00

Notice of Commencement of assessment of bill of costs

IN THE HIGH COURT OF JUSTICE BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES BUSINESS LIST (ChD)	
Case No.	BL-2024-001337
	(1) CAPE INTERMEDIATE HOLDINGS LIMITED
Claimants	(2) CAPE PLC (a company incorporated under the laws of Jersey)
Defendant	PETER D. PROTOPAPAS

To the Defendant

Following the order of Mr Justice Mann dated 22/11/2024 (copy attached) we have prepared the Bill of Costs for assessment. The Bill totals* £3,814,556.14. If you choose to dispute this bill and your objections are not upheld at the assessment hearing, the full amount payable (including the assessment fee) will be £3,814,556.14 (together with interest (see note below)). We shall also seek the costs of the assessment hearing.

Your Points of Dispute must include:


- details of the items in the Bill of Costs which are disputed
- concise details of the nature and grounds of the dispute for each item and, if you seek a reduction in those items, suggest, where practicable, a reduced figure.

You must serve your Points of Dispute by **Friday 14 March 2025** (insert 21 days from the date of service of this notice) on us at Signature Litigation LLP
138 Fetter Lane
London
EC4A 1BT
United Kingdom

You must also serve copies of your points of dispute on all other parties to the assessment identified below (you do not need to serve your points of dispute on the court).

I certify that I have also served the following person(s) with a copy of this notice and my Bill of Costs:- (give details of persons served).

If we have not received your Points of Dispute by the above date, we will ask the court to issue a default costs certificate for the full amount of the Bill (see above*) plus fixed costs and court fee in the total amount of £3,814,556.14.

Signed


Date 21 February 2025

(Solicitor for the Claimants)

Note: Interest may be added to all High Court judgments and certain county court judgments of £5,000 or more under the Judgments Act 1838 and the County Courts Act 1984.

The court office at

is open between 10 am and 4 pm Monday to Friday. When corresponding with the court, please address forms or letters to the Court Manager and quote the claim number.