IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

BRISTOL DISTRICT REGISTRY

Application Reference: KB-2026-BRS-000052

Order / Hearing Notice Reference: KA-2025-BRS-000045 – disputed procedural allocation

Miss E

Applicant / Defendant

- and -

MARK JOHN MAYO

Respondent / Claimant

FORMAL RESPONSE TO THE ORDER OF HHJ BLOHM KC DATED 19 AUGUST 2026

Continuing procedural and evidential irregularities; request for independent scrutiny

10 September 2026

A. BACKGROUND AND PURPOSE

1. I write following receipt on 20 August 2026 of the Order made by HHJ Blohm KC on 19 August 2026. I have taken time before responding because the Order, when placed against the documented history of my earlier appeal and my separate High Court application concerning Writ of Control WC000101/2026, raises matters which I regard as exceptionally serious.

2. I did not respond to the Order immediately because I was genuinely uncertain how properly to respond to a procedural position which had by then become extraordinary. I had repeatedly used the prescribed court processes, filed applications and appeals in good faith, supplied evidence and sought elementary disclosure, yet the matters were repeatedly delayed, recast or left undetermined. The Order of 19 August, and in particular the refusal of disclosure of the underlying N260, caused me to consider carefully whether continuing simply to submit further material into the same procedural route could provide any effective remedy.

3. After consideration, my position is that I intend to appeal the Order of 19 August 2026 and preserve all appellate rights, while pursuing an independent route through London. The Order itself has been issued under a procedural reference which I dispute and combines matters arising from my separate High Court application with the earlier appeal file. Any short delay in filing the next appellate step arises from that exceptional procedural history, the seriousness of the matters raised, and the need to determine how an effective appeal can be pursued outside the same Bristol allocation which is itself the subject of my objection. To the extent that an extension of time is required, I will seek it on that basis.

4. I have repeatedly attempted to use the procedures provided by the courts in good faith: I appealed a disputed costs order; I applied separately to the High Court for a stay of the Writ; I sought disclosure of the documents relied upon for enforcement; I supplied witness evidence and a draft order; and I repeatedly requested elementary underlying documents which should be capable of straightforward production.

5. Those steps have not resulted in the matters being determined through the ordinary procedural routes in which I lodged them. My earlier appeal remained without substantive determination for more than four months. My separate High Court application of 10 April 2026, accepted under **KB-2026-BRS-000052**, was subsequently dealt with under the reference of that earlier appeal, **KA-2025-BRS-000045**, notwithstanding that the earlier appeal had already been withdrawn and subsequently treated as dismissed. The fundamental disclosure relief in my April application was not determined before trial.

6. The result is that the trial has now concluded and I am still being required to deal with enforcement issues which I attempted to have judicially examined months before trial. No adequate explanation has been given for that delay or for the failure to determine my applications upon the terms and through the procedural routes in which they were filed.

7. The Order of 19 August has substantially increased rather than resolved those concerns. Most seriously, paragraph 3 expressly refuses my application for disclosure of the N260s underlying the costs orders said to be capable of challenge.

8. In relation to the order dated 21 March 2025, the relevant N260 has never been produced to me. Mr Mayo stated before Master Dagnall that his solicitor had sent it on **17 March 2025**. Master Dagnall raised its production at the hearing. I have repeatedly requested it from Mr Mayo, Mr Cornwell and the Court. I have also repeatedly requested the email by which it was allegedly transmitted. Neither has been produced.

9. This is not a peripheral request. The N260 is the primary costs document said to underlie a summary costs assessment which has subsequently been the subject of repeated enforcement action against me. If the document and transmission exist as asserted, their production should be straightforward. If they cannot be produced, that raises an obvious and serious evidential question which must be confronted, including as to the accuracy of the account previously given to Master Dagnall.

10. Against that background, I regard the refusal simply to order disclosure of that fundamental document as profoundly troubling. The refusal does not determine whether the N260 exists, what it contained, whether it was filed, whether it was served upon me, or what material was actually before the Court when the costs were assessed. It merely prevents me from obtaining the evidence necessary to answer those questions while enforcement remains in issue.

11. There are now layers of unresolved procedural and evidential irregularity: the prolonged non-determination of my earlier appeal; the reassignment of my separately filed High Court application to the reference of that earlier appeal; the failure to determine the April disclosure request before trial; the missing N260 and alleged email transmission; the separate unproduced CE-File filing and fee evidence; the irregularities identified in relation to the N293A and its seal; materially differing accounts concerning the issue of the Writ; and now an Order expressly refusing disclosure which would permit fundamental aspects of that history to be verified.

12. I no longer regard it as sufficient simply to treat each of these events as an isolated administrative error. Taken cumulatively, they raise serious questions concerning procedural fairness, candour, apparent impartiality and the integrity of the process by which costs and enforcement have been pursued against me.

13. I have a right to have applications and appeals determined fairly, independently and upon the evidence actually before the Court. I also have a right to know and answer the documents relied upon when coercive enforcement is pursued against me. That is not an exceptional demand; it is elementary to procedural fairness.

14. My objection to the continued involvement of HHJ Blohm KC therefore goes beyond disagreement with an adverse decision. It concerns the documented manner in which my applications and appeal have been delayed, recast or left undetermined, followed now by the express refusal of disclosure of a document fundamental to the enforcement dispute.

15. I intend separately to place the relevant conduct and documentary history before the appropriate judicial-conduct authorities. That is a separate matter and is not raised as a means of influencing any judicial decision. This document is concerned with ensuring that the procedural and evidential history is accurately recorded and capable of independent scrutiny.

16. I preserve all rights of appeal and all other available remedies. Nothing in this response should be treated as waiver of any right to challenge the Order, the procedural route by which this application has been dealt with, the underlying enforcement, or the costs said to be due.

17. I therefore address the Order of 19 August 2026 paragraph by paragraph below. I identify the factual inaccuracies, unresolved evidential matters and procedural difficulties which, in my position, render the Order unsafe as a basis for further enforcement and reinforce the need for independent consideration outside the present Bristol allocation.

B. PRELIMINARY IRREGULARITIES ON THE FACE AND DISTRIBUTION OF THE ORDER

B1. The Order is issued under the wrong procedural reference

The Order is headed **“Appeal No: KA-2025-BRS-000045”**. That is the reference of my earlier appeal, which had already been withdrawn and subsequently treated as dismissed. It is not the reference under which my separate High Court application concerning Writ of Control WC000101/2026 was filed and accepted.

My application of 10 April 2026 was filed through the High Court process and assigned **KB-2026-BRS-000052**. I repeatedly objected before the hearing to that separate application being recast or absorbed into the earlier appeal file.

The fact that the resulting Order nevertheless continues to use the dismissed appeal reference illustrates precisely the procedural problem which I had put before the Court. Rather than determining the application upon its own High Court footing, the Order perpetuates the very reassignment to which I objected.

I require an explanation as to why a separately filed High Court application carrying its own reference was determined and issued under the reference of an earlier appeal which was no longer live.

B2. Confusion as to the parties, service and participation in the proceedings

The administration of this matter continues to display serious confusion as to who is actually participating in these enforcement proceedings and in what capacity.

The Writ of Control proceedings have directly involved **Mr Mayo, myself and Ms Claire Sandbrook as the HCEO responsible for the enforcement**. Those were the persons directly involved in the proceedings before Master Dagnall. Ms Sandbrook’s formal status is distinct from that of the named claimant and defendant, but her role is plainly material because the Court has required evidence from her concerning the enforcement process.

Mr Cornwell, by contrast, has repeatedly distanced himself from the Writ of Control proceedings, and Mr Mayo has repeatedly stated that he is acting for himself in relation to the enforcement.

The Order of 19 August identifies **Miss E as Applicant/Defendant and Mark Mayo as Respondent/Claimant**, and records that the Court heard the Applicant and Respondent in person. It also expressly requires availability to be provided for **Ms Sandbrook** and grants her permission to attend the next hearing remotely to give oral evidence.

Yet the electronic notification by which the Order was sent to me was addressed only to **me, “solicitors” and “lcornwell”**. On the recipient information supplied to me, **Mr Mayo was not included and Ms Sandbrook was not included**.

That requires a clear explanation. If Mr Mayo remains the Respondent and has maintained that he is acting in person in the Writ proceedings, why was the Order apparently not sent to him? If Ms Sandbrook is sufficiently involved that the Order expressly regulates her availability and oral evidence, how and when was the Order communicated to her?

Conversely, why was the Order sent to **Mr Cornwell and Seldons Solicitors** when Mr Cornwell did not attend the hearing and both he and Mr Mayo have previously sought to maintain that Mr Cornwell is not acting in relation to the Writ of Control?

This inconsistency is particularly striking because Mr Mayo nevertheless relied at the 19 August hearing upon a further N260 prepared by Mr Cornwell. The position therefore requires clarity: **is Mr Mayo acting in person in these enforcement proceedings, or are Seldons and Mr Cornwell acting for him in relation to some or all aspects of them?** The Court and the parties should not be left with different positions depending upon which document or hearing is being considered.

There is also an earlier unexplained issue concerning Ms Sandbrook’s attendance on 19 August. The Hearing Notice served upon me did not identify Ms Sandbrook as a recipient, yet she nevertheless attended the hearing. Bristol Specialist is therefore asked to confirm **when, how and by whom Ms Sandbrook was notified of that hearing**, and to provide the relevant communication or service record.

It is now more than three weeks since the Order was made. On the material supplied to me, the Order appears to have been sent to persons who were not the named Respondent while not being sent to the Respondent himself or to the HCEO whose further participation the Order expressly regulates.

I therefore require Bristol Specialist to provide the **complete distribution/service record** for the Notice of Hearing for 19 August 2026 and the Order dated 19 August 2026, showing every person to whom each document was sent, the date and time of transmission, and the email address used.

This is not a trivial administrative point. It goes directly to confidence in the administration of proceedings already affected by repeated errors concerning the case reference, procedural route and identity of those involved. If Bristol Specialist cannot reliably identify and communicate with the correct persons in a single enforcement matter, it is reasonable for me to question how further proceedings under the same administrative arrangements can be conducted accurately and fairly.

C. PARAGRAPH-BY-PARAGRAPH ANALYSIS OF THE ORDER

Order paragraph 1 — Purported refusal of an application for recusal which I did not make

> *"The application that HHJ Blohm KC recuse himself from the case be refused;"*

I did **not** file a standalone application in those terms. I objected to HHJ Blohm KC continuing to determine my matters and requested independent consideration by another judge, for reasons which I had set out in writing. My Skeleton Argument expressly recorded that objection and made clear that my participation in the hearing did not waive it.

HHJ Blohm KC is therefore requested to identify precisely **what application** paragraph 1 purports to determine, when that application is said to have been made, and where it appears in the papers.

If my written objection to his continued involvement was treated by the Court as an application for recusal, then the Order should identify that basis and the reasons for refusing it. None are stated in the Order.

More fundamentally, my objection was not based simply upon an adverse decision. It arose from the prolonged non-determination of my earlier appeal, the removal of my separately filed High Court application from its proper procedural route, the failure to determine its fundamental disclosure relief before trial, and the repeated recasting of my filings. Those matters went directly to the appearance of impartiality.

The relevant objective test is that stated in **Porter v Magill [2001] UKHL 67; [2002] 2 AC 357 at [103]**: whether the fair-minded and informed observer, having considered the facts, would conclude that there was a real possibility of bias.

The Order does not address that test or explain how my documented objection was evaluated against it.

I therefore require an explanation not merely of why HHJ Blohm declined to step aside, but **why he has continued to retain personal conduct of matters in which his own previous handling is itself the subject of my objection**. A judge has no personal interest in retaining a particular litigant's case. Continued reservation to the same judge, notwithstanding a documented objection to apparent partiality, requires a clear judicial explanation.

My position is no longer merely that HHJ Blohm should step aside from one hearing. I contend that the accumulated history now requires **independent judicial scrutiny outside his control**, and I will place that history before the appropriate appellate and judicial-conduct authorities.

Order paragraph 2 — Purported refusal of transfer to London

> *"The application for transfer of the case to the Royal Courts of Justice, London be refused;"*

The wording is materially unclear.

My formal transfer request concerned independent consideration in London because of the documented handling of my previous appeal and the Writ application at Bristol. The request sought transfer away from the present Bristol appellate allocation.

Practice Direction 52B paragraph 2.3 provides that appeals to the High Court may be transferred between appeal centres by direction of the President of the King's Bench Division, the Chancellor of the High Court, or their respective nominee; a party seeking transfer may do so by letter addressed to the appropriate office-holder.

I therefore require the Court to clarify: **(a)** what particular transfer request paragraph 2 purports to determine; **(b)** whether HHJ Blohm KC purported to determine my request under PD52B paragraph 2.3; **(c)** if so, whether he was acting as a nominee of the President of the King's Bench Division; and **(d)** what reasons were given for refusing transfer.

No reasons appear in the Order.

That absence is particularly serious because the **very basis of my transfer request was my loss of confidence in the handling of my matters by HHJ Blohm KC and Bristol**. It is inherently troubling for the judge whose continued involvement forms a central part of the transfer request simply to record that transfer is "refused", without identifying the route, authority or reasons by which he determined it.

I do not accept that paragraph 2 finally disposes of my request for independent consideration in London. I preserve my right to pursue that request through the appropriate London appellate route.

The sequence reinforces my concern that HHJ Blohm KC has effectively become a gatekeeper to appellate scrutiny of decisions and procedural handling which involve his own conduct. That is precisely the situation in which independence and the appearance of independence become paramount.

Order paragraph 3 — Refusal of disclosure of the N260

> *"The applicant's application for disclosure of the forms N260 underlying the costs orders the subject of potential challenge be refused;"*

Paragraph 3 is the most serious provision in the Order. HHJ Blohm KC is called upon to give a proper explanation for that refusal.

The N260 is not an irrelevant or collateral document. **Practice Direction 44 paragraph 9.5** requires a party who intends to claim costs on summary assessment to prepare a signed written statement of those costs following Form N260 as closely as possible. Paragraph **9.5(4)(b)** requires that, for hearings other than a fast-track trial, the statement be filed at court and served upon the party against whom costs are sought not less than 24 hours before the hearing. Paragraph **9.6** provides that failure without reasonable excuse to comply with paragraph 9.5 is to be taken into account by the Court when deciding what costs order to make.

In this case, no N260 supporting the £3,500 assessment associated with the order of 21 March 2025 has ever been produced to me.

At the hearing before Master Dagnall, Mr Mayo stated that his solicitor had sent the relevant N260 on **17 March 2025**. That date was itself seven days **after** the hearing of 10 March 2025 at which the costs were assessed. When I challenged Mr Mayo to produce it, Master Dagnall suggested that it simply be sent to me again. Mr Mayo stated that his solicitors could provide it. Mr Cornwell subsequently refused to provide or re-send it.

More than a year later, neither the N260 nor the email by which it was allegedly transmitted has been produced.

If that email and attachment exist, their production should be elementary.

The question therefore remains unavoidable: **what was actually before the Court on 10 March 2025, what costs were claimed, and upon what evidential basis was the figure summarily assessed?**

Paragraph 3 does not answer any of those questions. It simply refuses the disclosure which would answer them.

That refusal is profoundly troubling because this is not an academic dispute. The resulting £1,750 liability has already been the subject of repeated coercive enforcement, including a Third Party Debt Order, while the underlying costs document remains undisclosed.

There is also an important parallel with the earlier CE-File costs issue. I previously requested the CE-File submission/acceptance record and proof of payment supporting an asserted £300 application fee. Those records were not produced. I raised the matter directly with HHJ Blohm KC when he indicated that he could see the relevant filing, asked for it to be provided, and it still was not produced.

I therefore now have two separate examples in which disputed costs have been allowed to stand while straightforward documentary evidence capable of verifying the claimed costs has remained undisclosed.

That pattern raises questions going beyond ordinary procedural error.

I regard the continued withholding of the N260, followed by an express judicial refusal to order its disclosure, as raising a **serious question of evidential integrity and judicial conduct**. Taken together with the separate missing CE-File filing and fee evidence, I consider the cumulative circumstances to raise serious questions of apparent partiality and possible improper protection of the Claimant's costs position, and to be sufficiently serious to warrant independent investigation, **including investigation of whether any improper conduct or corruption has occurred**.

I make that statement as a matter requiring independent investigation; I do not purport in this document to make a criminal finding. But I will not dilute the seriousness of what has occurred. Money has been pursued from me through coercive enforcement while the primary costs document said to justify part of that enforcement has never been shown to me, despite repeated requests and despite Mr Mayo having told a High Court Master that it existed and had been sent.

The practical effect is indistinguishable from permitting money to be taken from a party **without disclosure of the documentary basis upon which the entitlement is asserted**. I regard that as intolerable in any justice system.

If the N260 exists, it should now be produced. If it does not exist, or does not support the costs asserted, that raises still more serious questions concerning the accuracy of the representations previously made to the Court and the legitimacy of the enforcement subsequently pursued.

I therefore require HHJ Blohm KC to state his reasons for refusing disclosure and to identify what material he relied upon in concluding that disclosure of the N260 was unnecessary or should be refused.

Order paragraph 4 — Further adjournment, further procedural reassignment and continued reservation to HHJ Blohm KC

> *"The issue as to the validity of the warrant of control obtained by the Respondent be adjourned to a further hearing on a date to be fixed on the first available date after 2 September 2026 to be held in the Barnstaple County Court under claim L00BP152 by MS Teams reserved to HHJ Blohm KC with a time estimate of 60 minutes."*

There is an immediate error in that formulation. The enforcement instrument in issue is **Writ of Control WC000101/2026**, not a "warrant of control". The earlier High Court proceedings, Master Dagnall's Order and the HCEO's own evidence all expressly identify it as a **Writ of Control**.

That distinction should be corrected. In proceedings already affected by repeated errors concerning case references and procedural allocation, the Court should accurately identify the very enforcement instrument whose validity it proposes to determine.

I also object to the unexplained succession of further hearings caused by the failure to determine my application when it was originally filed.

Master Dagnall had already stayed enforcement of the Writ until further order and directed specific evidence from Mr Mayo and the HCEO concerning how the enforcement sum was calculated, whether the Writ in Part 3 of the N293A had been issued, from what District Registry, and why a further Writ had been sought from Central Office.

At the 10 March hearing, Ms Sandbrook gave oral evidence. In my subsequent contemporaneous correspondence I recorded that she accepted that the Writ should not have been issued from Central Office and attributed that error to her office. Her written accounts had themselves differed materially concerning the origin and preparation of the enforcement documentation.

Following that hearing, I filed my separate High Court application on 10 April 2026 precisely so that the remaining issues could be determined, first obtaining the underlying documentation necessary for me to formulate my substantive response. That application was accepted under **KB-2026-BRS-000052**. My subsequent evidence expressly recorded that the disclosure relief had still not been dealt with and that my application had instead been moved onto the earlier appeal file.

That application was then left undetermined until after trial. A further hearing took place on 19 August. The disclosure I required in order properly to address the enforcement was refused. HHJ Blohm KC has now directed **yet another hearing**.

This sequence has generated repeated work, hearings and costs which should not have been necessary. I had already invoked the High Court process and asked months earlier for the documents required to determine the matter fairly.

The Order also creates yet another change in procedural identity. My application was filed under **KB-2026-BRS-000052**. It was then heard and ordered under the old appeal reference **KA-2025-BRS-000045**. Paragraph 4 now directs the matter to a future hearing "in the Barnstaple County Court under claim L00BP152".

I require a clear explanation of the jurisdictional and administrative basis for that sequence of reallocation. I do not accept that a separately filed High Court application may simply move from its own KB reference, to a dismissed appeal reference, and then to a County Court listing without an explanation of what jurisdiction is being exercised and why.

Most seriously, the future hearing is again **reserved to HHJ Blohm KC**, despite my sustained objection to his continued involvement and my request for independent determination.

I therefore require HHJ Blohm KC to explain why he considers it necessary that this matter remain reserved personally to him. My objection concerns his own previous handling of the proceedings. Continued reservation of the matter to the very judge whose handling forms part of that objection only intensifies the appearance-of-impartiality issue.

I dispute the procedural basis and necessity of paragraph 4 and preserve my right to seek its variation, stay or appellate review. I continue to seek independent determination through London.

Order paragraph 5 — Availability direction and apparent failure to serve the persons affected

> *“The parties shall notify their dates of unavailability for themselves and Ms Sandbrook for the period 2 September to 4 November 2026 to the court by 4pm 26 August 2026.”*

The Order required action by the parties concerning not only their own availability but also Ms Sandbrook’s availability.

Yet the electronic notification through which I received the Order appears to have been sent only to **me, Mr Cornwell and Seldons Solicitors**. Mr Mayo — the Respondent expressly named in the Order — does not appear in the recipient information supplied to me. Nor does Ms Sandbrook.

That creates an obvious procedural question: **how were Mr Mayo and Ms Sandbrook expected to comply with, or participate in compliance with, paragraph 5 if the Court itself did not communicate the Order to them through the same transmission?**

If either was separately served or notified, Bristol Specialist should now produce the relevant service or transmission record.

This is especially important in relation to Ms Sandbrook because she had also attended the hearing on 19 August although the Hearing Notice supplied to me did not show her as a recipient. Bristol Specialist is therefore required to identify how and when she was notified of that hearing and to provide the relevant communication.

I do not accept that any failure to comply with the 26 August deadline can properly be relied upon against any person unless the Court can first establish when and how that person was served with or notified of the Order.

Order paragraph 6 — Further evidence

> *“Any party seeking to adduce further evidence shall serve the same on the other party and file it with the court no later than seven days before the date listed for the hearing;”*

There is nothing objectionable in principle about requiring reciprocal service of evidence. What is objectionable is that **the Court’s own distribution of the Order appears not to have reflected the named Respondent and the HCEO whose evidence is contemplated**.

The Court cannot sensibly insist upon transparent service by litigants while its own administrative process apparently omits the named Respondent from the transmission of the Order and communicates instead with a solicitor whose involvement in the Writ proceedings has repeatedly been presented as limited or absent.

Before requiring further evidence from me, I require the underlying documents which I have sought since April and which are necessary to enable me to prepare that evidence fairly.

Order paragraph 7 — Ms Sandbrook’s remote evidence

> *“Permission is granted for Ms Sandbrook to attend remotely to give oral evidence;”*

Paragraph 7 is **internally unclear**. Paragraph 4 has already directed that the further hearing itself is to take place **“by MS Teams”**.

If the entire hearing is being conducted by Microsoft Teams, the separate grant of permission for Ms Sandbrook to “attend remotely” appears redundant. If the intention is instead that some participants attend physically at Barnstaple while Ms Sandbrook alone participates remotely, the Order does not say so and should be clarified.

This is another example of drafting which leaves the litigant having to infer what the Court actually intends.

More importantly, if Ms Sandbrook is to give further oral evidence, **all documentary material upon which that evidence is based must first be disclosed to me**. I cannot fairly question or respond to an HCEO concerning the validity of enforcement while the Court simultaneously refuses me the underlying documentation relied upon to obtain that enforcement.

Order paragraph 8 — Costs reserved

> *"The costs of this hearing are reserved."*

I place on record that I **completely dispute any suggestion that the costs generated by this procedural history should ultimately be imposed upon me**.

I filed my application through the High Court route. I paid the application fee. I sought the necessary disclosure months before trial. That disclosure was not determined. The application was moved between procedural references, was not heard before trial, and is now being subjected to yet another hearing while the underlying evidence remains undisclosed.

The resulting multiplication of hearings and costs was not caused by any failure on my part to invoke the proper process.

I therefore reserve my own position as to costs and contend that costs generated by administrative or procedural failures for which I am not responsible must **not be shifted onto me**.

I also reserve my right to seek recovery of my own properly recoverable costs arising from unnecessary additional work and hearings caused by this procedural history.

D. REQUESTS TO BRISTOL DISTRICT REGISTRY AND THE APPROPRIATE APPELLATE AUTHORITY

For clarity, the requests below are directed to Bristol District Registry insofar as they concern correction of the record, service, disclosure and administration, and to the appropriate appellate authority insofar as they concern appeal, transfer and independent judicial consideration. This response does not itself replace the Appellant's Notice which I intend to file.

- **Correct procedural identification:** confirm the proper reference and jurisdictional footing of my 10 April 2026 High Court application, and explain why it has been dealt with under KA-2025-BRS-000045 and then directed to Barnstaple under L00BP152.
- **Service and representation:** provide the complete distribution/service records for the 19 August Hearing Notice and Order, and clarify whether Mr Mayo is acting in person or represented by Seldons/Mr Cornwell for any part of the Writ proceedings.
- **Paragraphs 1 and 2:** identify the application said to have sought recusal; give reasons for refusing my request for independent judicial consideration; and identify the authority/capacity in which the transfer request was determined, including whether HHJ Blohm KC was acting as the President of the King's Bench Division's nominee for PD52B paragraph 2.3 purposes.
- **Paragraph 3:** give reasons for refusing disclosure of the N260 and identify the material relied upon in doing so; and address the continuing absence of the alleged 17 March 2025 email and attachment.
- **Paragraphs 4 to 7:** correct "warrant of control" to Writ of Control, clarify the jurisdictional basis of the proposed Barnstaple listing, clarify the intended attendance arrangements, and explain why the matter remains reserved to HHJ Blohm KC notwithstanding my objection.
- **Existing stay and legitimacy of enforcement:** I further maintain that the stay of enforcement of Writ of Control WC000101/2026 ordered by Master Dagnall remains in force, the Order of 19 August 2026 not having expressly lifted it. However, my position does not rest merely upon the existence of that stay. In light of the unresolved irregularities surrounding the Writ, the continuing non-production of the underlying N260 and alleged transmission, and HHJ Blohm KC's subsequent refusal to order disclosure of that fundamental document, I do not accept the Writ or the enforcement founded upon it as legitimate. The evidential basis of the enforcement has never been properly established or disclosed to me. In those circumstances, any attempt to resume enforcement without first resolving those matters would, in my position, be procedurally improper, illegitimate and fundamentally lacking in evidential integrity.

- **Serious questions of dishonesty:** the circumstances have now reached the stage where I consider that serious questions of dishonesty arise in relation to the costs and enforcement process. Those questions cannot properly be answered by permitting further enforcement while refusing disclosure of the very documentation capable of establishing what occurred.
- **Independent consideration:** ensure that my continuing request for transfer and independent appellate consideration in London, and my objection to further substantive determination by HHJ Blohm KC, are placed before the appropriate judicial decision-maker.

E. CONCLUSION — LOSS OF CONFIDENCE, INDEPENDENT SCRUTINY AND THE POINT AT WHICH ENOUGH IS ENOUGH

There has to come a point at which a litigant is entitled to say that **repeated procedural error, repeated non-determination, repeated unexplained refusal of elementary disclosure and repeated additional hearings cannot simply be normalised by generating yet another hearing**.

That point has now been reached.

My concern is not founded upon one adverse ruling. It arises from the accumulated history: my earlier appeal was left without substantive progression for months; my separately filed High Court application was removed from the procedural route in which it had been lodged; the disclosure relief sought in that application was not determined before trial; the same application was then dealt with under the reference of an earlier appeal; and the Order of 19 August now moves the matter yet again, this time to Barnstaple under L00BP152 and reserved once more to HHJ Blohm KC.

At the same time, the Court has afforded Mr Mayo and Mr Cornwell a degree of procedural latitude which stands in stark contrast to the treatment of my own applications. Mr Mayo has maintained that he is acting in person in relation to the Writ, while Mr Cornwell has distanced himself from the enforcement proceedings, yet Mr Cornwell has continued to prepare costs material relied upon by Mr Mayo. The Order was then apparently transmitted to me, Mr

Cornwell and Seldons rather than to the Respondent named upon its face, while Ms Sandbrook — whose future attendance and evidence the Order expressly regulates — was likewise not shown among the recipients available to me.

That position requires transparency. **Mr Mayo and Mr Cornwell cannot be permitted to move between "acting in person" and solicitor involvement whenever convenient while the Court itself communicates on an apparently different basis.** Either Mr Cornwell and Seldons are acting in this enforcement matter, or they are not. The Court should identify the position clearly.

Paragraph 7 is also **internally unclear**. Paragraph 4 states that the further hearing is to take place by Microsoft Teams, yet paragraph 7 separately grants Ms Sandbrook permission to "attend remotely". If the hearing is wholly remote, the latter provision appears redundant. If it is intended that other participants attend physically while Ms Sandbrook alone attends remotely, the Order does not say so.

More fundamentally, I have now lost confidence in HHJ Blohm KC's ability to determine these matters with the appearance and actuality of independence required of judicial office. The problem is not simply that he has ruled against me. It is the cumulative pattern of delay, recasting, non-determination, refusal of disclosure, continued reservation of matters to himself notwithstanding my objection, and procedural confusion which I have repeatedly documented.

I am particularly concerned by the refusal of disclosure of the N260. That document is capable of establishing, or disproving, fundamental assertions made about costs which have already been pursued against me through coercive enforcement. Mr Mayo said before Master Dagnall that his solicitor had transmitted it; it has never been produced; Mr Cornwell subsequently refused to provide or re-send it; and the Order now refuses disclosure altogether.

Taken together with the separate missing CE-File filing and fee evidence, this goes beyond ordinary administrative untidiness. I consider that the cumulative circumstances raise **serious questions of evidential integrity, apparent partiality and possible improper protection of the Claimant's costs position**, and are sufficiently serious to warrant independent investigation, including investigation of whether any improper conduct or corruption has occurred. I make that statement as a concern requiring investigation; I do not purport to make a criminal finding myself.

What I will not do is continue indefinitely spending substantial time, money and effort producing careful applications, appeals, evidence and submissions only to have them delayed, reassigned, misunderstood or left undetermined, followed by further hearings generated to address matters which should have been resolved months earlier. Compliance with proper court procedure cannot be a one-sided obligation imposed upon the litigant while elementary accuracy, disclosure and transparency remain absent elsewhere in the process.

I am entitled to be treated with the same procedural fairness and respect as every other litigant. I am entitled to have what I actually file read and determined on its actual terms. I am entitled to know the evidence relied upon when money is sought from me by coercive enforcement. And I am entitled to appellate scrutiny which is genuinely independent of the decision-making and procedural handling which I challenge.

I therefore intend to pursue **transfer and appellate consideration through London**. I will place before the London court the underlying applications, appeal papers, orders, correspondence, service records and documentary chronology so that the history can be considered independently and as a whole. My participation in any procedural step meanwhile is not to be treated as acceptance of HHJ Blohm KC's continued involvement or as waiver of my objections.

Judicial office carries duties, not personal authority

A judge is a public judicial office-holder entrusted with significant authority, but that authority is not personal. It must be exercised according to law and according to the standards of judicial office. The Courts and Tribunals Judiciary identifies independence, impartiality and integrity as core principles of judicial conduct, and competence and diligence as prerequisites to the proper performance of judicial office.

The judicial oath is equally clear: a judge undertakes to "do right to all manner of people after the laws and usages of this Realm, without fear or favour, affection or ill will." Those obligations are not optional. Where a documented course of conduct gives rise to serious questions about impartiality, integrity, competence or diligence, the answer cannot be continued personal control of the same matter without independent scrutiny.

Every office carries duties. If the standards essential to that office are no longer being met, it is for the appropriate independent authorities to investigate and determine what action is required. I will therefore ask the judicial-conduct authorities to consider whether the conduct disclosed by the documentary record is compatible with continued judicial office.

I will also prepare a comprehensive report for the **Judicial Conduct Investigations Office and any other appropriate authority**, supported by the documentary record. That report will distinguish between judicial decisions, which are matters for appeal, and conduct matters falling within the jurisdiction of the appropriate disciplinary bodies. I will ask those authorities to consider whether the conduct disclosed by the record is compatible with continued judicial office and whether disciplinary or other action, including removal if legally available and warranted, should follow.

Pending independent appellate consideration, I do not intend voluntarily to continue substantive engagement through the same Bristol route before HHJ Blohm KC beyond steps necessary to comply with any binding order, preserve my rights, and seek any required stay, variation or appellate direction. My substantive challenge will be pursued through London. This is not an abandonment of the proceedings; it is a request that they be dealt with through an independent and procedurally coherent route.

I have not reached that position lightly. I have reached it because the events have accumulated to the point where I no longer regard further unexplained procedural irregularity as something I am required simply to tolerate.

Enough is enough.

The proper course now is independent scrutiny, full disclosure and transparent adjudication outside the procedural control which is itself under challenge.

Miss E

Applicant / Defendant

10 September 2026