

Claim No. B40BM021
(formerly Claim No. A07YQ334 in the County Court at Birmingham)

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
BIRMINGHAM DISTRICT REGISTRY

BETWEEN:

MARK ANTHONY TAYLOR

Claimant

-and-

- (1) ANSHU JAIN (CO-CEO OF DEUTSCHE BANK)**
- (2) DEUTSCHE BANK AG**
- (3) HSBC PLC**
- (4) BARCLAYS BANK PLC**
- (5) USB AG**
- (6) JP MORGAN CHASE**
- (7) CITIGROUP**
- (8) ROYAL BANK OF SCOTLAND GROUP PLC**

Defendants

**SECOND DEFENDANT'S RESPONSE TO CLAIMANT'S NOTICE TO ADMIT
DATED 16 APRIL 2015**

1. This is the Second Defendant's Response to the Notice to admit facts dated 16 April 2015 (the "Notice to Admit"). References to numbered paragraphs are references to the numbered paragraphs of the Notice to Admit. The Second Defendant adopts the abbreviations used in the Notice to Admit for convenience only and without making any admissions thereby.
2. This Response is served without prejudice to the First and Second Defendants' position that, for the reasons set out in their application dated 24 February 2015, the Claim should be struck out and/or summary judgment should be granted in favour of the First and Second Defendants.
3. As to paragraph 1, on or around 29 March 2015 the DFSA fined the Dubai branch of the Second Defendant in relation to its client take-on processes. An announcement

regarding the DFSA Report can be found at the website address set out in paragraph 1. That announcement had a hyperlink to the DFSA Decision Notice dated 29 March 2015. The Claimant's characterisation of the findings contained in the Decision Notice (which are a matter of public record) is denied. Further, the relevance of the DFSA Decision Notice is not understood and is denied: the DFSA investigation did not involve allegations of precious metals price manipulation, or any allegations that have any conceivable connection with the allegations made by Mr Taylor.

4. As set out in the First Witness Statement of Emma Slatter dated 24 February 2015, paragraph 2 is denied and there are no grounds for the allegation.

Statement of Truth

The Second Defendant believes that the facts stated in this Response to the Notice to Admit are true.

Signed:



Date

JAMES GARDNER
PARTNER, LINKLATERS LLP

18 MAY 2015

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