

IN THE BIRMINGHAM DISTRICT REGISTRY
MERCANTILE LIST

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) JPMORGAN CHASE BANK, N.A.**
- (7) CITIGROUP**
- (8) ROYAL BANK OF SCOTLAND GROUP PLC**

Defendants

**SECOND DEFENDANT'S RESPONSE TO THE NOTICE TO ADMIT DATED 9
JUNE 2015**

1. This is the Second Defendant's Response to the Notice to admit facts dated 9 June 2015. References to numbered paragraphs are references to the numbered paragraphs of the Notice to Admit.
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. No admissions are made as to paragraph 1 (the Claimant not having provided the articles to which reference is made).

4. As to paragraph 2, the fines imposed by the FCA in relation to LIBOR manipulation are a matter of public record.
5. The relevance of both paragraphs 1 and 2, which concern LIBOR and not precious metals, is not understood and is denied.
6. As to paragraph 3, the FCA's findings are a matter of public record. The relevance of those findings to the present claim is denied.
7. As to paragraph 4, the Second Defendant's position regarding the claim is set out in the First Witness Statement of Ms Slatter.
8. As to paragraph 5, the Second Defendant has received requests for information from certain regulatory and law enforcement authorities who are investigating Forex and precious metals.

Statement of Truth

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

Signed: 

JAMES GARDNER

Position: PARTNER, LINKLATER LLP

Date 25 JUNE 2015

Claim No. A07YQ334

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RESPONSE TO NOTICE TO ADMIT
