

I, Mark Anthony Taylor, The Claimant
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4 March 2015
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In the County Court of Stafford, Claim No. **A07YQ334**

Between

Mark Anthony Taylor
The Claimant

And

1. Anshu Jain (Co-CEO of Deutsche Bank), 1 Great Winchester Street, EC2N 2DB, LONDON
 2. Deutsche Bank AG, 1 Great Winchester Street, EC2N 2DB, LONDON
 3. HSBC Plc, Retail Unit 8 Canary Wharf, Canada Place, London E14 5AH
 4. Barclays Bank Plc, 1 Churchill Place, Canary Wharf, London, E14 5HP
 5. UBS AG, 1 Finsbury Avenue, London, EC2M 2PP
 6. JP Morgan Chase, 25 Bank Sheet, London, E14 5JP
 7. Citigroup, 25 Canada Square, Canary Wharf, London E14 5LB
 8. Royal Bank Of Scotland Group, Head Office, 250 Bishopsgate, London, EC2M 3AA
- The Defendants

Application For Immediate Judgement

I beg the court to find against the defendants for these reasons:

1. The defendants have filed documents to satisfy CPR 15.2 rule that they file a defence, but these documents are so blatantly deficient that they could not possibly serve as legal defences and so the defendants have let the deadline for a defence expire.
 - a) UBS have explicitly stated they have no defence (Pt 8 of their defence).
 - b) HSBC fails altogether.
 - c) All defendants fail to satisfy CPR 16.5 against almost every point.
2. The defendants have had 28 days to formulate a defence. They used all 28 days up and returned with a request for strike-out with no back-up defence. The correct course of action was to ask for a strike-out and a request for a stay on the defence period until the strike-out was confirmed or denied. This course was not used.
3. There is no point-by-point analysis of the particulars of claim and no blanket denial. The number of implicit admissions (for lack of denial) implies admission of all essential allegations and admission of the full level of damages claimed.
4. There is no explicit denial of wrongdoing.
5. There is no explicit denial of precious metal price market manipulation.
6. There is no explicit denial by HSBC for two allegations of perjury and conspiracy to pervert the course of justice.
7. Deutsche Bank ('DB') have provided no evidence that its internal audit is other than a work of fiction.
8. There is no denial that the internal audit was fake.
9. There is no denial that the internal audit was faked to hide precious metal price

- manipulation.
10. DB failed to provide the other defendants with receipts for sales and purchases of precious metals when all defendants were given permission to ask DB for them.
 11. The strike-out rests on a generic accusation of lack of 'cause of action' without addressing the particulars of the claim in detail. It is not acceptable to deny a conclusion while ignoring the points that led to the conclusion. It is not a legal or material strike-out argument and so constitutes an abuse of process.
 12. The defendants also petitions the court to strike-out the claim for the reason that my political beliefs of the banking system are unacceptable. The court does not have the freedom to lawfully discriminate against me for my beliefs, and this would constitute a Human Rights violation, particularly Article 6 of the *European Convention of Human Rights*. The strike-out evidence is thus inadmissible in a court of law, and the petition wholly unlawful and prejudicial.
 13. A number of defendants petition the court to strike-out on the ground that they have no contractual relationship with me. But this is to mislead the court into applying *breach of contract* criteria, when in fact, as is seen in the summary of the claim form and section 7 of the particulars of claim, the claim is for *breach of statutory duty*, and so contractual relationships are irrelevant and their emphasis thus prejudicial, therefore should be inadmissible. There is no paragraph in competition laws that limits liability to contracted parties for violation of its prohibitions.
 14. There was no denial that as a competitor, I was financially damaged by anti-competitive practices.
 15. There is no defence but strike-out and the strike-out reasons are all unlawful, prejudicial and would bring the courts into disrepute.

Summary

The documents that pose as a defence are not a legal defence, and so no legal defence was posted by the deadline.

I, Mark Anthony Taylor, the Claimant, believe all the assertions in this document are true, and appropriate.

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