

Mark Anthony Taylor
Kalamata
Billington Lane
Derrington
Stafford
ST18 9LR
Phone: 01785 248865
14th August 2017

Re: B40BM021, Taylor vs Jain et. al.

Application for recusal of Judge Martin McKenna &
Strike-Out of his last Court Order

Dear Sir,

Martin McKenna's last court order gave me permission to apply to have it varied or struck out according to standard CPR rules.

- i) I would ask McKenna to recuse himself from all involvement with the lawsuit. Nor should Charles Haddon-Cave involve himself. An explanation is below.
- ii) I would ask the acting judge to strike out McKenna's order completely. FOIA correspondence below shows that Barclays has used a **paedophile ring** to corrupt Parliament and law enforcement in these matters and elsewhere. (Pages 4 onwards)
- iii) Courts should be liaising with police to prosecute Deutsche Bank et al for fraud and perjury irrespective of the application for summary judgement.
- iv) Defendants were given until the 21st of August 2017 to file a witness statement. There is no reason why this date should not stand. Defendants should not assume they have struck-out the order and that it will not be countermanded.

Documents were forwarded on to the courts on the 14th August 2017 as evidence in these matters to birmingham.mercantile@hmcts.gsi.gov.uk

In defence of (i)

1. The court should have correspondence between myself and McKenna that preceded my attempt to re-open litigation this July. In the case that it does not I will forward those emails back to the court, so that it can peruse the contents and verify the security credentials transmitted in them - in any case the timestamps should allow the court to check its email history and retrieve the originals.
2. McKenna was asked by me in the Summer of 2016 to review the lawsuit. **This was before Deutsche Bank incriminated HSBC and UBS.** I addressed a letter directly to McKenna, and he bounced it back, claiming that it should be addressed to the

Designated Mercantile Judge of Birmingham. Court officials confirmed that he was the very man. This was an utterly vexatious and contemptible response to a polite and reasonable request. When I re-sent the letter with amendments, he then went on to demand a court fee. It was transparent that he did not have the slightest concern that defendants had told outright lies to the High Court and I would not get a fair hearing. I sent a letter of complaint to the Lord Chancellor and a number of other officials, and CCed him on it, so that he had the opportunity to defend his conduct. He never did. McKenna's misfeasance helped defendants with their ongoing frauds, his court order hides his own failings in the lawsuit - he was in charge of the CRO, he should have understood the issues. Had he acted earlier, we could have caught the other defendants for their ongoing frauds in the lawsuit and protected counterparties from losses worldwide.

3. Any reasonable person would infer McKenna wants revenge for what I wrote about him.
4. Deutsche Bank's perjury undermines the credibility of Sir Ian Burnett as the next Lord Chief Justice, since Burnett has two court orders signed with his name and stamped with the Court of Appeal seal that deems gold and silver rigging allegations as 'totally without merit.' McKenna would therefore presume to have done Burnett a great favour by covering up Burnett's failures in office. We can assume he would want Burnett to promote him for that favour. He thus has more than one selfish reason for ignoring basic CPR rules and sensible precedent.
5. McKenna never mentioned the letter of complaint to Judge Worster, whose order he overturned, did he?
6. The fact McKenna went to some trouble to enumerate a number of judgements in the claim, but neglected to review Deutsche Bank's confession and disclosures tells us McKenna is not fit for office.

In defence of (ii)

- 1) McKenna stated a number of judgements in the history of the claim, which he used to justify the finality of Burnett's decision. **ALL of these judgements preceded Deutsche Bank's settlement and incriminating disclosures in New York that prove perjury.** So there is not one order/verdict that stands up to scrutiny, given what we know now, thus all orders are **systematically** undermined by fraud. **Fraud unravels all.** It does not matter how many judges have shown authoritative judgement when it is proven defendants committed perjury and undermined the basis on which judgements are made. McKenna's bare order is more a petition that the lawsuit is too politically embarrassing - than a contest of the facts. Quite obviously the more judgements that ignore

the basic facts, the more the final humiliation for the judiciary.

- 2) The court order to which defendants objected was of HHJ Worster's volition - who was in a position to have studied my court application in detail, along with its history, and would have seen defendants' claim the decision was finalized by Burnett. HHJ Worster made a wise and virtuous order, to force defendants to either admit or deny committing perjury in writing.
- 3) Why is McKenna suddenly jumping in on HHJ Worster's order at the last moment? Two mistakes on McKenna's intervention are evident, a date 2917, and a spelling mistake, *abuce* instead of *abuse*. This tells of a court order written in haste, that was not second checked, and corroborates that McKenna never did an honest job at reviewing the evidence of perjury. It proves overwhelming bias.
- 4) Deutsche Bank's disclosures are still forthcoming, and we can expect more banks to be forced to settle or confess very soon. Does McKenna think he can bury the truth? The general public knows that banks get away with fraud because corrupt judges and corrupt police officers ignore the Law. **Every time there is a new disclosure there is new material for a strike-out, and new reason to accuse judges of letting defendants get away with ongoing frauds.**
- 5) McKenna's judgement, that this was an abuse of procedure, is entirely without merit - it is covered by precedent again and again and again. There is no finality to civil procedure when defendants win by fraud and perjury. There is nothing in Law that cannot be overturned when the premises are shown to be in error. An argument that asserts the validity of its own premises is itself in error when those premises are shown to be in error.
- 6) We know from the FOIA request to Parliament (attached), and the failure of MPs to respond to the letter previously CCed to the court, **that MPs lied about the appointment of Jes Staley, CEO of Barclays, to the Daily Mail.** They knew he had won his position by lobbying from convicted child trafficker & paedophile Jeffrey Epstein. They knew Staley donated to the Clinton Foundation, and did so **after** it emerged Bill Clinton lobbied to get child kidnappers in Haiti a reduced sentence. They knew Staley is an executive of the Robin Hood Foundation, that finances legal costs for immigrants from Haiti into the USA. This causes child abandonment, which Haitian child traffickers can capitalize upon. There is thus every reason to assume Staley, executive of JP Morgan at the time they were served by me in 2015, and now executive of Barclays - who I believe to be incriminated

by Deutsche Bank in their latest disclosures, is an ambassador for a global paedophile network. The fact that MPs lied to the Daily Mail to cover that up implies he and Epstein's ring are in a position to blackmail government and the judiciary.

- 7) In a letter to me addressed from Barclays, in a response to a letter from me to Jes Staley, they said that they would petition to have my claim struck out (on the basis of the finality of Burnett's decision) and invoke a restraining order. **So we can figure that Staley is using his Epstein paedophile connections to lobby for a restraining order in this matter and to have the claim quashed against all precedent.**
- 8) McKenna's order reads more like a response to Barclay's letter than it does to that of Deutsche Bank's. McKenna, for example, never mentioned Rt Hon Jeremy Lefroy's letter of commendation for the merits of the claim.
- 9) Perhaps McKenna needs to follow Simon Brown's example, and retire ten years early.

I believe everything in this witness statement and application is true.

Mark Anthony Taylor

FOIA Request To Parliament & Response

Copied from https://www.whatdotheyknow.com/request/id_like_a_transcript_or_recordin

(This correspondence provides proof MPs never challenged Jes Staley's appointment to Barclays as CEO contrary to what they told the Daily Mail)

Dear House of Commons,

In the late Autumn of 2015 Jes Staley became CEO of Barclays. The Daily Mail on the 28th October 2015 reports the Treasury Select Committee were due to grill Staley on his connections to Jeffrey Epstein. So I would like to know the Q&A, in transcript or recorded form of that session, if it existed.

Yours faithfully,

Mark Taylor

Dear Mr Taylor,

Freedom of Information request F17-296

Thank you for your request for information as copied below. You asked for a copy of a Question and Answer session transcript, which was due to take place between the Treasury Select Committee and Jes Staley, CEO of Barclays in Autumn 2015.

This information is not held by the House of Commons. The Treasury Committee did not hold an evidence session with Jes Staley, therefore transcripts of the event do not exist.

You may, if dissatisfied with the handling of your request, complain to the House of Commons. Alternatively, if you are dissatisfied with the outcome of your request you may ask the House of Commons to conduct an internal review of any decision regarding your request. Complaints or requests for internal review should be addressed to: Information Rights and Information Security Service, Research and Information Team, House of Commons, London SW1A 0AA or [1][House of Commons request email]. Please ensure that you specify the full reasons for your complaint or internal review along with any arguments or points that you wish to make.

If you remain dissatisfied, you may appeal to the Information Commissioner at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, [2]www.ico.gov.uk.

Yours sincerely,

Lauren

Lauren Puckey | IRIS Officer
Information Rights and Information Security (IRIS) Service | House of
Commons

Tel: 0207 219 4025 | Text Relay: 18001 219 4025 | Fifth Floor, 14 Tothill
St, London SW1H 9NB

**Copy of Daily Mail article, in which MPs claimed to intend to cross-examine Jes Staley
(contrary to the FOIA result above)**

New Barclays boss to be grilled by MPs over his links to Andrew's paedophile pal after convicted sex offender backed him for the job in 2012

- Jes Staley apparently chosen to replace ousted CEO Antony Jenkins
 - But he was secretly backed for job three years ago by Jeffery Epstein
 - Duke of York's friend and disgraced financier was imprisoned in 2008
 - Mr Staley now set to be hauled in front of Treasury Select Committee
- By Hugo Duncan, Economics Correspondent for the Daily Mail
PUBLISHED: 00:29, 26 October 2015 | UPDATED: 00:46, 26 October 2015

The new boss of Barclays faces a grilling from MPs over his links to a notorious paedophile friend of Prince Andrew.

Jes Staley, a hedge fund manager and former high-flyer at Wall Street giant JPMorgan, is understood to have been chosen as the man to replace ousted Barclays chief executive Antony Jenkins.

But yesterday it emerged that the American was secretly backed for the job in 2012 by convicted sex offender Jeffery Epstein – a friend of the Duke of York who was sentenced to more than a year behind bars in 2008.

Mr Staley now looks set to be hauled in front of the powerful Treasury Select Committee where MPs will quiz him over his plans for Barclays – and his association with disgraced financier Mr Epstein.

Mr Staley denies ever asking Mr Epstein act as his cheerleader for any job and Barclays also said its board was not lobbied by Mr Epstein.

It is thought Mr Epstein was acting on his own initiative.

But one member of the Treasury Select Committee said MPs will want 'clear answers' from Mr Staley over his links with Mr Epstein.

Another said 'it is the sort of thing' that MPs will want to know about if Mr Staley is confirmed as the new Barclays boss.

Friends: Convicted sex offender Jeffery Epstein was sentenced to more than a year behind bars in 2008. He is pictured (right) going for a walk with Prince Andrew (left) through Central Park in New York City in 2011

Barclays has yet to officially announce that Mr Staley has got the job but the appointment is an open secret in the City.

I The **Mail on Sunday** claimed that **Mr Epstein** who was convicted in 2008 after paying a teenage girl for sex – began pushing Mr Staley forward for the Barclays job in 2012. The pair are said to have met in Mr Epstein's plush New York home that year. It followed the departure of then Barclays chief executive Bob Diamond, the high-flying investment banker who took over in 2010 but left under a cloud following the Libor-fixing scandal.

Mr Epstein, who made a fortune from his investment firm J Epstein & Co, was said to have been furious when Mr Staley was overlooked for the job.

The report claimed he described Mr Jenkins, who was then head of the retail division at Barclays, as an 'internal dweeb'.

Gone: Mr Staley, a hedge fund manager and former high-flyer at Wall Street giant JPMorgan, is understood to have been chosen as the man to replace ousted Barclays chief executive Antony Jenkins (pictured)

It was also claimed that George Osborne was blocking Mr Staley's move to Barclays in 2012 and Mr Epstein wanted the get the Chancellor to change his mind.

The Treasury and Bank of England were said to be uncomfortable with another 'casino' banker taking the reins at Barclays following the departure of Mr Diamond.

But Mr Staley looks set to be named chief executive this time around following gruelling interviews with top UK regulators.

Former Barclays chairman Sir David Walker – who was also seen as an obstacle to Mr Staley getting the job in 2012 – has left.

MPs on the Treasury Select Committee have already said they plan to haul Mr Staley before them amid worries the appointment may herald a return to the aggressive culture and focus on investment banking fostered by Mr Diamond.

Last night they said they would also quiz Mr Staley about Mr Epstein.

Labour MP John Mann, a member of the committee, said: 'I'm sure the committee will want him in front of it. I'm sure he would be asked about it. It requires some clear answers.'

Tory MP Mark Garnier, who also sits on the committee, said 'it is the sort of thing' MPs will pick up on when Mr Staley appears before them.

He said MPs will want to know if Mr Staley is 'the right man for the job' and added that 'a small part of that is the company he keeps'.

But Mr Garnier said of greater concern were his plans for the bank.

'You are going back to an investment banker and a hedge fund manager,' he said. 'What does he know about the individuals on the street and the retail customers? That is one of the big question we would want to ask.'

A spokesman for Mr Staley said: 'At no time has Mr Staley asked Mr Epstein to make representations on his behalf regarding any role.'

A Barclays spokesman said: 'Barclays categorically denies it has received any approach from Mr Epstein regarding any candidate for the vacant [chief executive] role.'



**HM Courts
& Tribunals
Service**

Mark Anthony Taylor
Kalamata
Billington Lane
Derrington
Stafford
ST18 9LR

**HM Courts & Tribunals Service
Birmingham District Registry**
Civil Justice Centre
The Priory Courts
33 Bull Street
Birmingham
B4 6DS

DX 701987 BIRMINGHAM 7

T 0121 681 4441

F _____

www.gov.uk

Your ref:

18 August 2016

Dear Sir

Re: Case Number: B40BM021 Mark Anthony Taylor v Anshu Jain (Ceo Of Deutsche Bank)

In reply to your email dated 11 August 2016 I confirm that His Honour Judge McKenna is the Designated Civil Judge at Birmingham.

With regard to your application to revoke the CRO there is no record of such application with the appropriate fee being made at Court. You can not be fee remitted while a CRO is in place.

Yours faithfully,

Mrs Sue Thomas
Diary Managers Section
Ext 0121 681 3181

