

Marc Horn
c/o 6 Mersey Road
Aigburth
Liverpool
L17 6 AD
17 April 2018

The Court Manager
High Court of Justice
7 Rolls Building
Fetter Lane
London
EC4A 1NL

by HM Courts & Tribunals E-Filing Service

Dear Sir,

**In the High Court of Justice Chancery Division Claim Number HC-2017-02125
APPOLOGY FOR ERROR**

Ineos have brought to my attention an error in my Statement of Truth of my date of notice.

By way of evidence that the error was an honest mistake without malice or ill intent, I enclose my Apology for the Error and my Response to their letter of the 16 April 2018, which details the error which is not material to my defence.

Additionally I have proposed a means of alternative dispute resolution prior to making any applications to the Court.

Yours sincerely,



Marc.

Marc Horn
c/o 6 Mersey Road
Aigburth
Liverpool
L17 6 AD
17 April 2018

FAO: David Owen Christopher Talfan Davies
Fieldfisher
Riverbank House
2 Swan Lane
London EC4R 3TT

By email.

Your Ref: FH1/OTD/64340-00002/700322122 v2

Dear David,

**In the High Court of Justice Chancery Division Claim Number HC-2017-02125
APOLOGY FOR ERROR and Response to your above referenced letter.**

This apology is attached to my apology to the Court.

APOLOGY FOR ERROR:

1. Further to your letter 16 April 2018 in regards your 3 and 4th paragraphs I thank you for pointing out this error which is an honest mistake without malice or ill intent.
2. The 22 March 2018 (actually having check some time after 19:21 on 21 March 2018) was when I noticed the outcome of the December appeal and having just completed a claim defence workshop had the courage to put it into action. I offer the following by way of explanation.

The circumstances that resulted in this error were as follows;

You are well aware of most of this as you have thoroughly gone through my facebook account (which is open to the public as I have nothing to hide) to have found my error.

- 1 - I did not know what the outcome was of the December hearing.
- 2 - I did not know what to do in November and was testing out my knowledge at the time in an effort to reduce the unconscionable thought crime detentions at Kirby Misperton which are documented in my Notice of Liability to the North Yorkshire Police (the link is in my defence to the Notice and the Evidence of the unlawful, illegal and unconscionable actions of the police).
- 3 - Again, as you are well aware from scouring my facebook account I have spent most of my time researching, which resulted in me putting in a litigant in person claim against a development company that appears to be trying to defraud me of a substantial part of my small pension fund, which was submitted on the 15 March

2018 following a two weekend workshop in making claims and defending claims during March which is when I was introduced to the CPR rules.

4 - On the evening of 21 March 2018 in response to a post on the Kirby Misperton FB page that confirmed the outcome of the December injunction, I was suggested to do a search for "Ineos injunction" on google after I saw the post of 19:21.

5 - I confirmed that I finished downloading them at 21:15.

6 - The next day, the 22 March 2018 I started putting my defence together and started posting drafts for help from the 23 March 2018 in that group.

7 - As you correctly state under your heading UKOG Application both my defences were done concurrently and were pretty much copy paste jobs.

8 - As you can see under in my defence, 6. Costs I had a commitment and was running out of time. I attached my evidence below.

Annex 1: Fedex picked up the 2 defences in one envelope at 6:15pm

Annex 2: They were delivered and signed for by the court and as you can see it is the same tracking number 806473203262.

Annex 3: My flight booking made on the 24 March 2018 for departure on the 26 March 2018 shortly after the Fedex pickup at 23:20. (less 30 min to get to airport plus 2 hour check in time is where I derived the 3 hours from explained in 6 Costs.)

9. Yes I knew that there was a defence but I did not know what happened and only found that out on the evening of the 21 March 2018.

10. Additionally due to my time pressure and as a litigant in person as I do not have the resources to triple check everything, I accept there will be some errors as it is human to err, and again thank you for pointing this out, and should there be others would appreciate the same.

11. The error does not materially affect that my defence was not filed within the time required in CPR rules, which are procedural and at law nor when balanced against the unconscionability of your claim in Equity.

Additionally I would draw your attention to **Senior Courts Act 1981, 49 Concurrent administration of law and equity.**

(1) Subject to the provisions of this or any other Act, every court exercising jurisdiction in England or Wales in any civil cause or matter shall continue to administer law and equity on the basis that, wherever there is any conflict or variance between the rules of equity and the rules of the common law with reference to the same matter, **the rules of equity shall prevail.**

and

(3) Nothing in this Act shall affect the power of the Court of Appeal or the High Court to stay any proceedings before it, where it thinks fit to do so, either of its own motion or on the **application of any person, whether or not a party to the proceedings**

12. In Equity I stand by my requested redress in my defence which is to correct all misinformation. Within the next 3 hours I undertake to:

- a) Posting a link to this apology and response in the biggest font size to span the screen upto a maximum 7 times bigger font size at the top of my websites Ineos claim so that it is the first thing visitors will see and be the first thing in their minds if they choose to continue
- b) Additionally I will be posting it on the Kirby Misperton Group in the biggest font possible linking to this apology and response.
- c) If it has been posted or copied elsewhere can you please let me know so that my apology and correction can be accordingly made available for the harm my error may have caused.

Disclosure of Documents to Defendants and Duty of Confidentiality.

1. As you see in my defence a large part of the problem of our justice system is assumption and presumption! Attached is your unconditional offer of access to the documents you refer to which I accepted (Annex 4).
2. I questioned this at the time as you are well aware from scouring my FB account as there was a no-reply sender address. The general feeling of the interaction was that I was no exception as you were mailing others, with the intent of notifying them of your Injunction, which was the point you made by your actions of scouring through my facebook account in such detail to find my error.
3. At this point in time I do not need access to them. I did register, however do not recall, but believe I did not download any files. Can you please confirm and if I did please let me know the file names so that I can search and delete them from my computer and give you an undertaking that I will not disclose any information therein.
4. Additionally please delete my access, and should I get some volunteers who feel your actions conscionable to go through the documents to find errors as you have done in my facebook account. I will request access again under the terms you have stated.
5. Your actions of giving unconditional access and thereafter attaching conditions is not an honourable action and can only be seen to be acting with unclean hands.

Breach of Injunction

1. Noted. I have detailed my position of this in my defence.

Liability for Costs

1. I have submitted a point by point defence.
2. At this stage there is no need for Court proceedings as the first step is clarification of what is not clear, followed by a point by point rebuttal of my truths to see if the matter can be resolved without referring it to the Court.

3. It took me with my level of knowledge 4 days to put together my defence .Yes it may not be perfect but it is substance over procedure, and I am doing this due to the serious consequences that may result from such a precedence should this injunction stand. As you are experts in law there is no reason a point by point rebuttal cannot be done within a lesser time frame than my defence took me, however as I am not aware of your workload would suggest 7 days is a reasonable amount of time based upon the resources you have proven to be available to spend going through my facebook account.

5. This would then only leave unrebutted truths for the Court to make judgement upon if required, thereby saving us both considerable time and expense.

UKOG Application

1. Paragraph 1: Correct.

2. Paragraph 2: Noted. Thank you for the information. I await the outcome of the defendants application. That gives us time to proceed as suggested under Liability for Costs above.

3. Paragraph 3: I have suggested an interim procedure in Liability for Costs above which can commence immediately in parallel to my UKOG defence, and I will consider my options based upon your response to my suggested attempt to settle out of court.

Independent Legal Advice

1. Noted. My experience recently has lead to my total loss of confidence in the legal system even with highly recommended and expensive legal advice!

Proposed Alternative Dispute Resolution

Under **Liability for Costs** I have outlined a proposed alternative dispute resolution.

I details as follows;

1. The overriding principal is "Truth is Sovereign" and in order to resolve our dispute we must intend to establish the facts and adjust our Truth as we gain further knowledge.

2. Within 7 days you respond to my defence on a point by point basis;

1. Any clarification you need as I do not speak legalese, but have an O Level in English.
2. A rebuttal of points not requiring further clarification.
3. An acknowledgement as fact of unrebutted points.

3. I will clarify and respond to rebuttals on a point by point basis within 7 days.
THIS MAKES A 14 DAY CYCLE.

4. We follow this clarification / rebuttal / acknowledgement response 14 day cycle 3 times which will leave a short list in dispute.

5. We can then both reconsider our position and submit or request court direction if needed.

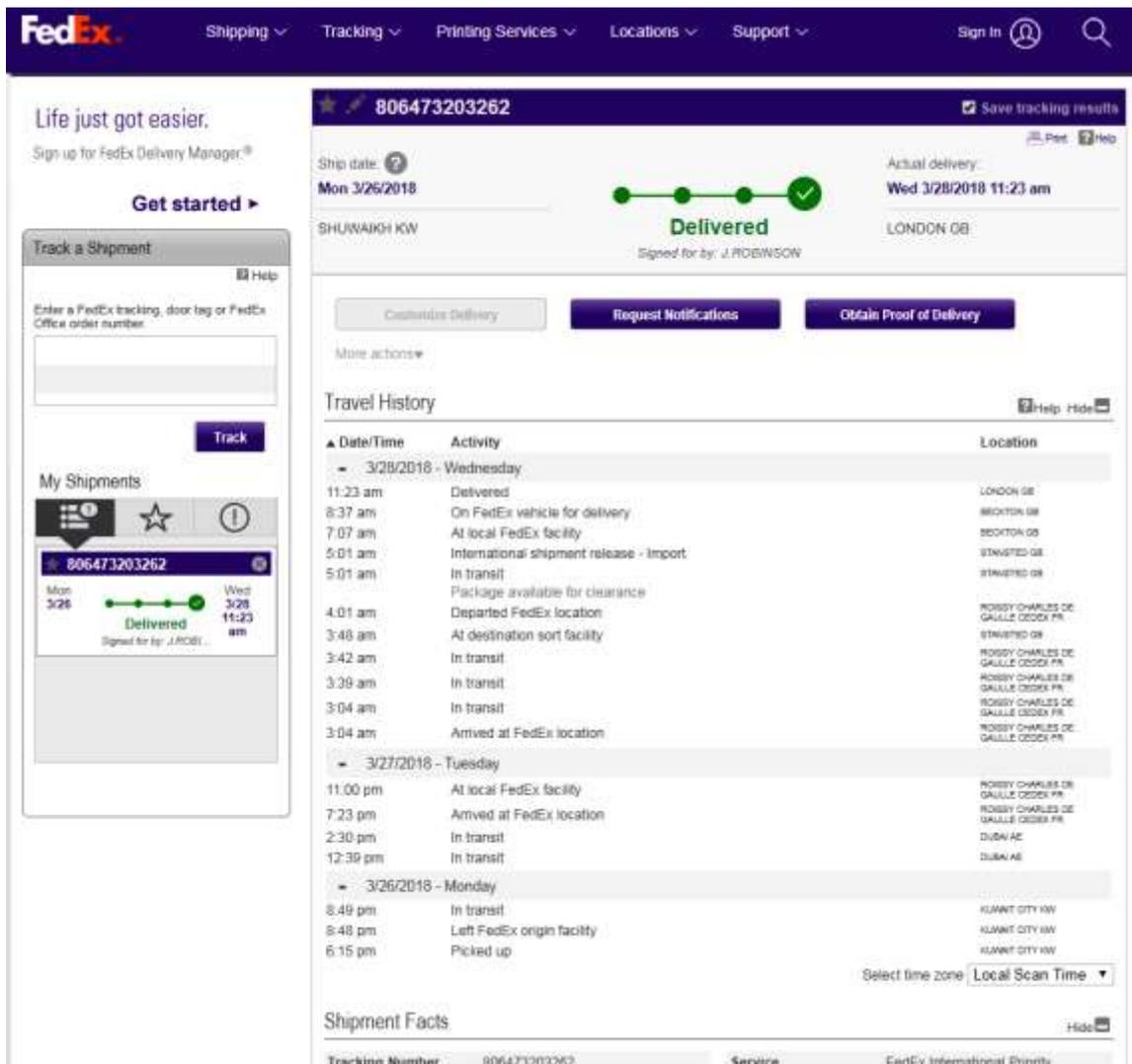
Finally I note your firm is sending out correspondence signed by Fieldfisher. You are the legal representative according to the claim form and not Fieldfisher. As legal representative you are personally liable as I am. Further correspondence is to be signed (e signature is fine by me) and you must be named as otherwise the correspondence has no lawful standing.

Regards,



Marc.

Annex 1: Proof the Defence was collected at 6:15pm on the 26 March 2018.



FedEx Shipping Tracking Printing Services Locations Support Sign In

Life just got easier.
Sign up for FedEx Delivery Manager®

Get started >

Track a Shipment
Enter a FedEx tracking, door tag or FedEx Office order number

Track

My Shipments

806473203262
Mon 3/26 Delivered Wed 3/28 11:23 am
Signed for by: J.ROBINSON

806473203262 Save tracking results

Ship date: Mon 3/26/2018
Actual delivery: Wed 3/28/2018 11:23 am
SHUWAIGH KW LONDON GB
Signed for by: J.ROBINSON

Customize Delivery Request Notifications Obtain Proof of Delivery

More actions

Travel History

Date/Time	Activity	Location
3/28/2018 - Wednesday		
11:23 am	Delivered	LONDON GB
8:37 am	On FedEx vehicle for delivery	BROXTON GB
7:07 am	At local FedEx facility	BROXTON GB
5:01 am	International shipment release - Import	STRAUSFORD GB
5:01 am	In transit	STRAUSFORD GB
Package available for clearance		
4:01 am	Departed FedEx location	ROBSON CHARLES DE GAULLE CDG FR
3:48 am	At destination sort facility	STRAUSFORD GB
3:42 am	In transit	ROBSON CHARLES DE GAULLE CDG FR
3:39 am	In transit	ROBSON CHARLES DE GAULLE CDG FR
3:04 am	In transit	ROBSON CHARLES DE GAULLE CDG FR
3:04 am	Arrived at FedEx location	ROBSON CHARLES DE GAULLE CDG FR
3/27/2018 - Tuesday		
11:00 pm	At local FedEx facility	ROBSON CHARLES DE GAULLE CDG FR
7:23 pm	Arrived at FedEx location	ROBSON CHARLES DE GAULLE CDG FR
2:30 pm	In transit	DUBAI AE
12:39 pm	In transit	DUBAI AE
3/26/2018 - Monday		
8:49 pm	In transit	KUWAIT CITY KW
8:48 pm	Left FedEx origin facility	KUWAIT CITY KW
6:15 pm	Picked up	KUWAIT CITY KW

Select time zone: Local Scan Time

Shipment Facts

Tracking Number: 806473203262 Service: FedEx International Priority

Annex 2: Proof the collected letter was received by the Court was the one collected in Annex 1.



April 16, 2018

Dear Customer:

The following is the proof-of-delivery for tracking number **806473203262**.

Delivery Information:

Status:	Delivered	Delivered to:	Receptionist/Front Desk
Signed for by:	J.ROBINSON	Delivery location:	7 ROLLS BUILDING LONDON EC4A1NL
Service type:	FedEx International Priority	Delivery date:	Mar 28, 2018 11:23
Special Handling:	Deliver Weekday		



Shipping Information:

Tracking number:	806473203262	Ship date:	Mar 26, 2018
		Weight:	1.3 lbs/0.6 kg

Recipient:
COURT MANAGER
HIGH COURT OF JUSTICE
7 ROLLS BUILDING
FETTER LANE
LONDON EC4A1NL GB

Shipper:
MAC HORN
AZIZ BLOCK FACTORIES
NEAR CAREER AIRCONDITIONING.
PEPSI COLA STREET.
SHUWAIKH 99999 KW

Thank you for choosing FedEx.

Annex 3: Proof of Booking made on the 24 March 2018 for the 26 March 2018.

The screenshot shows an email titled "Booking confirmation : QYUPM3" from Qatar Airways. The sender is "QR booking" and the recipient is "maphorn@yahoo.com". The booking reference is QYUPM3 and the status is "Confirmed". The email is addressed to Mr. Marc Anton paul Horn and includes a "Manage booking" link. Below this, there are several promotional offers such as "blacklane Luxury chauffeur drive", "Hotel Hotels", "Excess baggage", "Al Maha Meet & assist service", and "lounges". The flight details section shows an outbound flight from Kuwait (KWI) to Phuket (Phuket) on Monday, 26 March 2018. The departure is at 23:20 from Kuwait International Airport, and the arrival is at 00:45 DOH (+1day) at Doha Hamad International Airport. The flight is operated by Qatar Airways on a Boeing 777-300ER. The class is Economy (N) with a baggage allowance of 30 kg per person.

Booking confirmation : QYUPM3 Yahoo/Inbox

QR booking <qrbooking@qatarairways.com.qa> 24 Mar at 11:27
To: maphorn@yahoo.com

Qatar Airways Privilege Club

Booking confirmation

Booking reference (PNR) - **QYUPM3**
Booking status - **Confirmed**

Dear Mr. Marc Anton paul Horn,
Please use the following options for additional services from Qatar Airways

Manage booking
MANAGE BOOKING

You Might be Interested in

- blacklane**
Luxury chauffeur drive
[Book now](#)
- Hotel Hotels**
Book a room
- Excess baggage**
Excess Baggage
[Purchase now](#)
- Al Maha**
Meet & assist service
[Book Al Maha](#)
- lounges**
Purchase lounge access
[Purchase now](#)

OUTBOUND FLIGHT

Kuwait **Phuket** Monday, 26 March 2018

DEPARTURE		ARRIVAL	CLASS
23:20 KWI Kuwait International Airport Kuwait Terminal: M	1h 25m	00:45 DOH +1day Doha Hamad International Airport Qatar	ECONOMY(N) Baggage allowance 30 kg / person included

Annex 4: Documentation Unconditional Invitation

