RESEARCH QUESTIONS FOR

by Solicitor of in late 2023 to represent as a GDPR Expert, as he was described by
Without ever meeting with or consulting on the case, BL then represented in Motion to Come Off Record, appearing in the High Court on 11 March 2024 and again on 17 June 2024, before Mr Justice Paul Coffey.
It is not clear whether BL appeared in the High Court having taken instructions directly from or from a Legal Manager employed by a different law firm entitled,
In recent years we have been researching banking and other frauds in Ireland in preparation for an upcoming documentary. Having interviewed extensively and reviewing her paperwork, we have certain questions for you and as a courtesy, we wish to afford you the right of reply. We would be grateful if your response could be forwarded by 27 February 2025 or within two weeks of the date of receipt.
If you wish to be interviewed on camera, that request will be considered by the production company. We confirm that these questions will be shared on a website supporting the documentary film and may or may not be addressed during the making of the film.
General Questions
It is our understanding that you were engaged by solicitors to represent in or around October/November 2023.
1. Please confirm that our understanding is correct and please confirm the date on which you understood that you had been engaged.
No doubt informed you following her consultations with about the various Bank frauds that had been concealed with the assistance of a wholly inadequate Banking Inquiry and facilitated by several bank executives that had provided false testimony to the Joint Committee of Inquiry into the Banking Crisis as well as to the Stormont hearings held in 2010.
Presumably also communicated with you that the Bank frauds in question have resulted in thousands of suicides in Northern Ireland alone up until 2014 but without the number of suicides tracked correctly in the South. SC the detail associated with the Ulster Bank frauds during her consultation and how the frauds had been committed by the Bank executives and expects would have advised you of this in advance of engaging you to work on case.

Is this correct and do you have any further comment?

2.

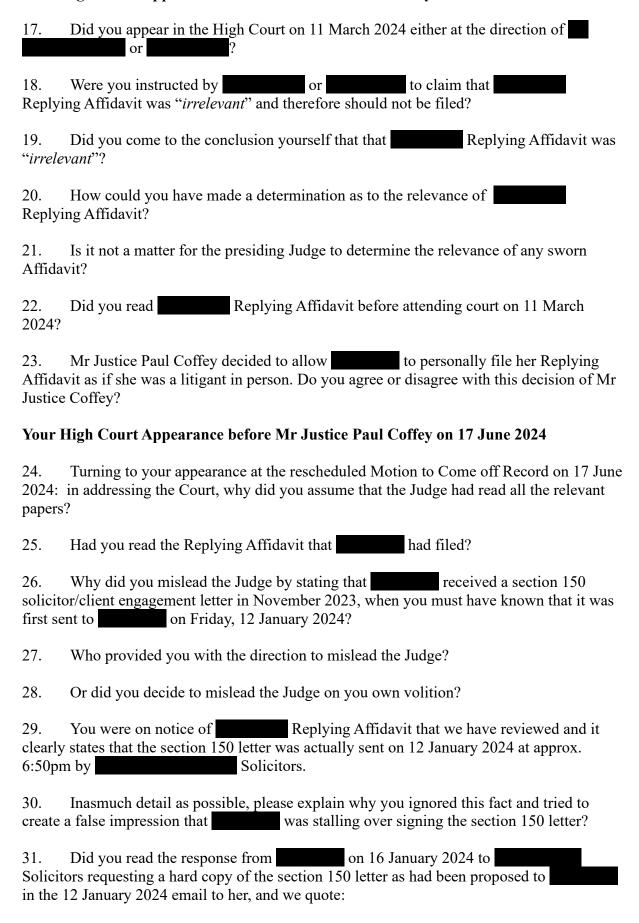
Do you have any confict of interest to declare that was previously not declared at the time engaged you to represent
4. Considering that had instructed to challenge the Report under the GDPR, has confirmed that referred to you as a "GDPR Expert". Please confirm that this is correct.
5. Please confirm the length of experience that you have had with the GDPR.
6. How many cases have you run in which the GDPR featured or was a consideration to warrant designating you as a "GDPR Expert"?
7. conveyed to that you were "honoured and privileged" to work on such a significant case. Please confirm that this is correct.
8. Were you in fact "honoured and privileged" to be selected by this case? Why?
9. Did you and ever consult in person in regard to with a view to rectifying the fabricated Report?
10. If so, when did that consultation take place and would you be willing to say what transpired?
11. Turning to desire to come off record, on what precise date did you first learn about her wish to come off record?
12. Why do you believe that sought to come off record? Note, we have been advised that was leaned upon by an individual representing the State to come off record? Is that correct?
13. In any event, did explain to you and sevent SC why she wished to come off record and did you agree or disagree with her reasoning?
14. The Motion to Come off Record was scheduled for 11 March 2024 and became aware that had included contrived reasons in her Affidavit to come off record which she has succinctly explained to us. drafted a Replying Affidavit that she then sought to file. The staff at the High Court Central Office instructed to send to and request her to file the Replying Affidavit as remained on record for sent the Replying Affidavit to , yet abruptly returned it by a courier to home address. Do you know on what basis refused to file Replying Affidavit?
15. Were you part of a strategy discussion with whereby discussed refusing to file Replying Affidavit?

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Was anyone else involved in such a strategy discussion?

16.

Your High Court Appearance before Mr Justice Paul Coffey on 11 March 2024



please send me a hard copy of the S150" 32. Were you misled as to the dates by either 33. Did you wish to mislead the Judge because you had other information and knew that coming off record were contrived? the reasons for We have interviewed others present in the High Court when left after the Judge indicated his desire to read the papers and we ask why was so angry with you and the two other members of & Co.'s staff during lunch recess on this date? 35. Is it typical or usual for a Solicitor seeking to come off record to instruct another Solicitor and a Barrister as well as send two of her subordinates into the courtroom in seeking to come off record? 36. Why did feel the need to "lawyer up" at this hearing? (present 37. Were you aware that one of subordinates, in the High Court) had previously suggested to that they both approach in regard to setting up a banking fraud practice within 38. had been compelled to attend the High Court, yet she failed to do so, despite her office being 3 minutes from the Four Courts. Why do you believe that failed to appear? 39. had returned file to Messrs without knowledge, consent or authority. Why did take such an action considering she had roundly criticised Messrs and former Counsel in writing? 40. Under whose direction was acting? 41. Mr Justice Coffey repeatedly asked you under whose knowledge, consent and authority was file returned to Messrs and you simply failed to respond? Why? 42. Were you providing cover to the person who had instructed We note that at the conclusion of the hearing, you made an application for legal costs. Who provided you with that direction to make an application for costs or did you do so of your own volition?

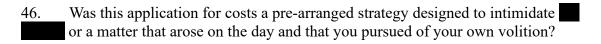
Upon what basis did you believe it was appropriate to make such an application?

Considering no section 150 letter had been signed, why did you seek to apply for

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45.

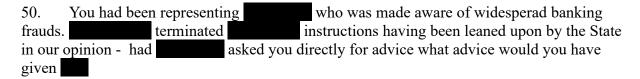
costs?



47. Mr Justice Coffey refused your application for costs and appeared irritated by your application. Would you agree?

Regulatory Considerations

- 48. If a Solicitor or Barrister becomes aware of frauds or crimes, do you believe they have a regulatory obligation to report that fraud?
- 49. Are you aware of the Section 19 Criminal Justice Act 2011 reporting obligation that apply to Solicitors?



Communications

- 51. Are you aware of any communication that has taken place between members of any government department, members of the Irish Civil Service (including the Office of the Parliamentary Legal Adviser) and/or members of the Bar of Ireland, the Law Society of Ireland or the Legal Services Regulatory Authority to or with Ms Haughey/Ms Drennan or you in regard to the representation of Ms Morris and Ms Drennan's representation of Ms Haughey in relation to her breaches of GDPR?
- 52. Are you aware of any communications that have taken place between Ms Haughey and other Solicitors or Counsel or between you and other Solicitors or Counsel that may have unduly influenced Ms Haughey or you, such that a decision to abruptly withdraw legal representation from Ms Morris was taken together with an instruction that this should be executed without speaking with Ms Morris?