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**Research Questions**

Mr John Rogers SC
Law Library

Sent by Email: john.rogers@lawlibrary.ie

**Re: Your Representation of Ms Lorraine Morris who raised Protected Disclosures during the Banking Inquiry**

Dear John

We are currently researching your role in representing Ms Lorraine Morris who raised a series of extensive Protected Disclosures during the Banking Inquiry - as part of our research for a documentary. We understand that your representation of the Plaintiff commenced in or around September 2015 and extended for almost eight years until Friday, 2 June 2023.

Our research is being conducted on behalf of a production company and a number of pressing matters have come to our attention. We are very keen to understand the complexities of this case generally and particularly from a legal perspective.

We have also been interviewing numerous victims of various banking frauds, in particular those who were fraudulently sold derivatives by Ulster Bank and we have also engaged with those who have lost family members due to suicide, following the loss of their assets.

We have reviewed all papers available and listened to recordings made available to us by the Plaintiff over a considerable period of time, and we have interviewed her at length and spoken with her brother and her partner, who attended at various meetings at which you were present and we understand sent certain memos to your attention.

To assist us in our research, we would appreciate your answers and insights on the following questions, and we are trying to categorise and keep in a linear sequence. The questions below are non-exclusive.

## A. Meetings with the Plaintiff in Person and Phone Calls

You referred to the Plaintiff as a person with a strong legal mind and who was independent of judgment in a meeting in October 2022. So it is fair to say that you held the opposite view of the Plaintiff to that as was reported by Mr Allen in the Senan Allen Report and repeatedly encouraged her to return to practise law and that you had "no concerns whatsoever" about this.

You had conducted several meetings with the Plaintiff in 2015 and 2016 in person, without the presence of her Solicitor, Mr Felim O'Reilly. You regularly called her and you appear to have been instrumental in her move to England.

You were obviosuly aware that the Plaintiff's Protected Disclosures were accurate. Ms Morris will say that former Senator / TD Mr Marc MacSharry had alluded to you confirming to him in a meeting that the Protected Disclosures raised were very serious allegations and that if found to be truthful, they would "**collapse the Banking Inquiry".**

You were also made aware that the former Governor of the Central Bank of Ireland, Patrick Honohan had deemed the Plaintiff's Protected Disclosures to be credible following Ms Morris' in-person meeting with him that took place on 17 October 2015.

You were also aware that two of the Plaintiff's Protected Disclosures had already been externally substantiated prior to the issuance of any proceedings against the State, which eventually happened in 2018.

For the record, the two of Ms Morris' Protected Disclosures that were substantiated related to:

(i) the withholding of/ interference with, evidence by the CBI - Frank Browne provided testimony to the Joint Committee which corrroborated Ms Morris in September 2015, although its publication was seriously delayed by the Joint Committee; and

(ii) the fact that the Inquiry Report would not be fit for purpose, which was substantiated on several dates in various newspaper reports between in late 2015 and early 2016.

According to Ms Morris, you deemed former Governor Honohan's communications about Ms Morris' Protected Disclosures as being credible as very significant and that they would and should be raised in the litigation as Ms Morris' "**trump card**".

We note that former Governor Honohan alluded to the questioning of bankers in the Banking Inquiry as being less than adequate and this lends further credibility to Ms Morris' Protected Disclosures.

Perhaps you might confirm whether our understanding of the above information is correct.

Some questions that have arisen are - why did you abruptly state that the Plaintiff could no longer meet you in person later on in the proceedings? What precisely had changed?

**B. Request to Change Solicitor**

You might recall that the Plaintiff wished to change her solicitor in the early stages of the litigation, as she believed that neither Mr Felim O'Reilly nor Ms Ciara O'Reilly added any value to the litigation.

You wholeheartedly agreed with the Plaintiff that the O'Reilly Solicitors did not add any real value, but you somehow declined her request on the basis that you claimed you could

"*control Felim*".

The Plaintiff took this to mean that you would be ensuring that the case was appropriately advanced.

(a) Today, the Plaintiff believes that Mr O'Reilly was the perfect candidate for you in your representation scheme, as you did indeed exert tight control over him such that, according to the Plaintiff, at one point, when you walked out of a meeting on February 10, 2023, Mr O'Reilly admitted that he knew he was required to follow the Plaintiff's instructions, yet still he did not like to do anything without your specific approval. Please comment on whether this was the precise reason that you wished to retain the O'Reillys as the solicitors in this action.

(b) Was Mr O'Reilly being led blindly by you, but nevertheless was himself engaged in professional misconduct, professional negligence and arguably the tort of abuse of process. Do you have any comment?

**C. Unusual Delays in Drafting Personal Injury (PI) Summons**

(a) Please explain why the Personal Injury Summons took over two years for you and your Junior Counsel to draft. Our research suggests that this is usually a six-to-nine-month process – a number of your own Bar Council colleagues have stated that it is highly unusual for the drafting of a PI Summons to take so much time.

(b) Events arose in September 2015, yet the PI Summons was not issued until 2018. Please explain.

(c) Were you and your Junior Counsel, Ms Shelley Horan SC (then BL) under external influence to delay the drafting of the PI Summons as the timing was very sensitive in terms of the ongoing engineered defaults by banks and the related asset stripping?

(d) Also, due to the timing of Ulster Bank's planned departure from the Irish market and its need to conceal the fraudulent activities that had been covered up in the Banking Inquiry, as well as the liquidity shortfalls that all Irish banks had been actively concealing, did this cause you and Ms Horan to delay the drafting further?

(e) We note that Mr Justice Senan Allen had identified the Plaintiff as female in the Senan Allen Report (as well as a trained lawyer and a qualified solicitor) however, this fact was not included in the PI Summons, despite you and Ms Horan spending over two years in the possession of the Report. Ms Morris had indicated no desire to reread the report having drafted her formal response to it. We, as researchers, saw it clearly on our **first reading** of the Senan Allen Report.

How is it possible that two supposedly eminent counsel omitted such an important reference as this, or was it deliberately omitted to provide a degree of assistance to Mr Justice Senan Allen, while giving Ms Morris the false impression that she was not inappropriately identified?

## D. Ms Shelley Horan's Undisclosed Conflict of Interest

Were you aware that Ms Shelley Horan SC (then BL) was in attendance at a Fine Gael fundraiser with her husband in 2019 at a time when you both refused to allow the Plaintiff to pursue discovery, yet both **indicating falsely** that all would be resolved by the mediation that had hastily been offered in July 2019, but somehow did not take place until May 2022?

## E. Were you subject to professional or personal conflicts of interest?

(a) It has come to our attention that you suggested Mr Dermot Gleeson SC, ex-chairman of AIB plc as an alternative mediator in this case. Why would this have been suitable given he had testified in the Banking Inqiury and the Plaintiff would say now, Gleeson gave fabricated testimony as well as testifying by omission.
(b) Did Mr Gleeson SC ever run a mediation practice?
(c) Why did you refuse the Plaintiff when she requested a mediator from overseas, given the sensitivities of the matters to the jurisdiction of Ireland?
(d) Was this because there was a real concern that an unconflicted and uncontrolled mediator might challenge the State's falsehoods and upend the fabricated Senan Allen Report?

## F. Refusal to Strike Out Defence

(a) Why did you and Mr O'Reilly **refuse to follow the Plaintiff's instructions first to strike out the Defence**? Striking out the Defence appears to all lawyers that Ms Morris consulted with to have been the obvious course of action here. **Why was this course of action not pursued** given your own knowledge that the Protected Disclosures were one hundred per cent accurate, that two Protected Disclosures were already substantiated plus your knowledge of Honohan's pronouncements in October 2015?

(b) Why was the Affidavit of Verification of Mr Peter Finnegan that accompanies the Defence concealed from the Plainiff for so many years? The Plaintiff only received it this year – six years after it's filing.

(c) Was this because you and Ms Horan knew that the Plaintiff would immediately call Mr Peter Finnegan out on his **perjury in the Affidavit**?

(d) Were you more concerned about the reputation of your learned colleagues' being tarnished, as you had alluded to in other meetings in the presence of the Plaintiff's brother?

## G. Delays to Mediation

(a) Why did you allow 34 months to pass, almost three years, from the time mediation was proposed until it actually took place?

(b) Did you take any actions personally to advance the mediation?

(c) Do you have any evidence of your actions?

(d) Why do you think the Mediator, Turlough O'Donnell did not see fit to attend the mediation planning call that Hayes Solicitors scheduled for 24 January 2022?

(e) Why did the planning call go ahead with Hayes Solicitors in charge without the Mediator present and unbeknownst to the Plaintiff?

(f) Do you think it is appropriate that a planning call for mediation proceeded and was directed by Hayes Solicitors without O'Donnell present?

(g) What happened in January 2022 during the call that took place between you and Hayes Solicitors?

(h) Do you have any notes that you wish to share from that meeting?

(i) Why was no information on that meeting or its agenda ever shared with the Plaintiff?

(j) Why was the Plaintiff not told about the planning meeting nor the crucial fact that **the Mediator, O'Donnell had failed to show up**?

(k) O'Donnell casually said in an email to Hayes that he was sorry for not showing up at the planning call and gave no explanation for his absence. O'Donnell did not think it unusual that a mediation meeting had proceeded without him. Why?

(l) O'Donnell then issued some directions none of which were shared with the Plaintiff. Why was the Plaintiff not permitted to see O'Donnell's directions?

(m) The mediation was finally scheduled for 28 March 2022, but only when the Plaintiff had to place an inordinate amount of pressure on Felim O'Reilly and gave a deadline as a sort of an ultimatum – of the end of the first quarter 2022?

(n) In his original directions, O'Donnell originally gave the Plaintiff a right of reply of 17 days between his direction to the Defendant to have papers in by 11 March 2022? Again, why was the Plaintiff denied the right to see these directions? Why did your client only receive the position paper, with significant falsehoods based on our review, on 13 May 2022 in advance of the Monday, 16 May meeting with no time to respond. Why did you allow this to occur?

(o) Was there ever any real intention of proceeding with mediation on 28 March 2022?

(p) Why did the draft Mediation Agreement sent to both solicitors by O'Donnell on **24 February 2022** never reach the Plaintiff for her review? Why was it withheld from her until the end of the meeting on May 16, 2022?

(q) Why was it so important that the Mediation Agreement contained a provision that no notes would be taken?

## H. False COVID story to Postponse Mediation on 28 March 2022

(a) Prior to 28 March 2022, the Plaintiff received a call from Felim O'Reilly, Solicitor stating that the mediation conference had to be cancelled as you had contracted COVID. Is this correct?

(b) Mr O'Reilly wrote to Hayes solicitors and confimed that you were ill.

(c) However, you later said that you did not have COVID and in fact Hayes solicitors mentioned in writing that you had in fact had a diary clash instead.

(d) Who decided that Mr Felim O'Reilly should circulate a false story about you suffering from COVID to defer the mediation conference further into May 2022?

(e) Why would Hayes Solicitors become involved in confirming in writing that you – the opposing counsel - had a diary clash? This is a very serious red flag in our opinion.

(f) Did you agree to collude with Hayes Solicitors to delay the mediation until Ulster Bank had approval to leave the market?

**I. Offers of "a hell of a lot of money"**

(a) Why did you suggest to the Plaintiff prior to the mediation and in the presence of her brother that she was getting on in years and could make "*a hell of a lot of money*" if she agreed to leave the Senan Allen Report undisturbed on the official government record?

(b) Would you not consider that conspiring with a litigant to keep a known fabricated report on the official government record about her, as a breach of your own duties and obligations, as well as a request of the Plaintiff to breach her own duties and obligations?

(c) Why would you personally wish to become involved in propping up an official report that is fabricated given your duties to the wider public interest?

(d) Do you believe that it was ethical on your part to suggest that the Plaintiff would be drawn into the cover up of potentially the biggest financial and legal scandal in Ireland's history?

(e) Will you acknowledge today that indeed the Plaintiff's instructions were that the Senan Allen Report **was to be addressed and you did your utmost to ignore these instructions?**

(f) Was it not clear and obvious to you that you needed to address the Senan Allen Report considering the external substantiation of the Protected Disclosures and the fact that former Governor Honohan had also stated that they were accurate?

(g) Did you ever receive advice from your former colleagues in the Department of Justice to keep the fabricated Senan Allen Report on the record at all costs?

**J. Hostility towards Supportive Witnesses**

(a) Why did you become hostile towards the Plaintiff on 30 June 2022 because Mr Sugarman publicly supported her on X (formerly known as Twitter)?

(b) Why would or should the Plaintiff be told by you in a hostile manner that she would "*have to answer questions*" about Mr Sugarman's support?

(c) The Plaintiff will say that you seemed to believe that Mr Sugarman had no right to write to contact "*high-ranking officials*"? Why is this? Fundamentally, we cannot understand this approach and we are willing to consider your response as there is no logic to your suggestion that a Plaintiff such as Ms Morris would have to answer any questions whatsoever about a witness coming forward to support her?

(d) Are you suggesting somehow that the Plaintiff and Mr Sugarman should not have held discussions in relation to events that occurred leading up to and since the Banking Inquiry as perhaps the Plaintiff might learn more about the liquidity shortfalls, the resulting fraudulent activities and the attempt at a cover up? Why would you take this approach if acting in the Plaintiff's best interests?

(e) Why was it considered negative in your view that the Plaintiff received external support from someone who knew that the Irish banks had liquidity and solvency issues in 2007? We all came to the same conclusion when reading the file on this and the following topics and will leave it to others in the team to arrive at their own conclusions.

## J. Your Knowledge about the Plaintiff's X Account being Monitored

In our review of notes taken in respect of an October 2022 meeting, you said that the Plaintiff's X account and posts were being monitored since May and her "*tone had changed*".

(a) Who advised you that the Plaintiff's X account was being monitored?

(b) Were you in regular contact with Hayes Solicitors and with the Defendant and/or the State Claims Agency?

(c) Had you yourself asked someone to monitor the Plaintiff's X account? This is very fascinating as based on our research, the Plaintiff only created an X account **after the faux mediation** had concluded and had come to realise having spoken to multiple fraud victims and in her own words:

> "*that the whole thing was a set up*".

(d) How then could Ms Morris' tone have changed since May 2022, since that was when the X account was set up? Please comment.

## K. Plaintiff's Surveillance

(a) Why did you not take action or give the Plaintiff advice when she raised concerns about surveillance?

(b) Did it suit the agreed predetermined outcome, according to the Plaintiff, that the Plaintiff was to be unnerved, harrassed and intimidated by surveillance?

(c) Are you in any way concerned by the knowledge that the Plaintiff is still under surveillance and is having her communications intercepted?

(d) Are you concerned that many of the Plaintiff's conversations now are between her and individuals and their families who have been decimated by the actions of Ulster Bank and other Irish banks?

**L. Senan Allen Report**

(a) What is your view of Mr Pearse Doherty TD's email during the Inquiry in April 2015 in which he effectively said that the Joint Committee had no insight into the Central Bank documentation - meaning everything is redacted (covered up) – and how this set Mr Allen off in a rage from our review of the transcripts?

According to transcripts, Allen was more focused on how the Plaintiff received the email proving her recollection was correct, instead of any concerns regarding the content which support the Plaintiff. Please comment.

Would you agree that Mr Doherty's email was very supportive towards the Plaintiff and was contrary to Mr Allen's pre-determined goal

**M. Your Instructions that the Plaintiff not engage or speak with "other whistleblowers" and your determined focus on Plaintiff not removing her limited anonymity to the wider public**

(a) In the October 2022 meeting referenced above, specifically why did you tell the Plaintiff not to engage with other whistleblowers?

(b) Were you concerned that the Plaintiff would learn of the true extent of the criminal activities of the banks?

(c) We have reviewed correspondence that was sent to you from her partner on September 11, 2024, about what the Plaintiff has learned since she disregarded your advice not to talk to other whistleblowers. You were provided with an opportunity to respond. Did you ever respond as we did not see any evidence of a response in the file we reviewed as the list of what she learned by ignoring your advice is comprehensive. Do you have any comment on the contents of that memo or the one that was sent to you on 2 June 2023 about your failure and reluctance from his review of the file to look for any leverage to progress the Plaintiff's case?

(d) If someone is challenging your failure over eight (8) years managing a case, **to look for any leverage**, especially after taking two years to write a Personal Injury Summons and another wasted 34 months for the faux mediation (5 years lost there under your case management) and you did not respond to that statement - is that because **you agree with their statement that you did not look for any leverage** or were you instead following instructions that were emanating from the State or indeed from Hayes Solicitors on behalf of the State?

(e) Why did it matter to you so much that the Plaintiff would not come forward to remove what remained of her anonymity, considering her career had been destroyed by Allen in any event?

(f) Was this a primary goal of the Defendant and you had agreed with them that at all costs you would achieve it?

(g) The Plaintiff says that on receipt of the contrived Mediation position paper of the Defendant – laden with falsehoods; she indicated that she stated to you that the Defendant simply used it to further retaliate against her and that she believed that she would have to remove her anonymity in relation to the wider public. **With this statement, the Plaintiff will say that you entered into absolute utter panic mode.** Why did this cause you to panic to such an extent – the conversation was witnessed by the Plaintiff's old school friend, as you were on speaker phone? That friend had perviously written to you to share Ms Morris' state of mind having received the position paper that was populated with falsehoods.

(h) Were you more concerned about your colleagues at the Bar and on the bench, and the uncovering of the rampant fraudulent activities that had been and are ongoing, than restoring your client's reputation and seeking appropriate compensation for the deliberate destruction of her career?

**N. Your Own Reference to Collusive Representation**

From our review of notes of the 22 June 2023 meeting, you stated:

"*you probably think I am working with the other side*"

and not one person, including the Plaintiff's partner commented.

(a) Why did you not immediately (or since) refute your own statement?

(b) Can you state categorically whether you were receiving direction from the Defendant, Hayes Solicitors or indeed the Attorney General or can you now deny categorically that this was occurring?

(c) Would you be willing to voluntarily share phone and email records of calls received and made by you during the course of the litigation to resolve this matter?

## O. Ulster Bank Ireland's Activities

Further research by the Plaintiff shows that the current Attorney General himself was routinely acting for Ulster Bank during the period in which it was unlawfully repossessing assets and that Judge Senan Allen played what some describe as an active role from the High Court Bench, prior to his elevation to the Court of Appeal?

(a) Is this something about which you are aware and to which you are willing to turn a blind eye as "*Father of the Bar*", bearing in mind that there is a significant loss of life associated with these unlawful repossessions and pursuit of assets?

(b) You have been observed by the family of victims of the Ulster Bank frauds bowing to Mr Rossa Fanning (former SC for Ulster Bank), the current Attorney General in the Round Hall. Might you explain as to what lies behind this "bowing to the Attorney General ritual"?

## P. Hidden Witnesses

(a) Why did you fail to comment in relation to Mr O'Reilly's falsehoods in the 22 June 2023 meeting, when he said over ten (10) times from our research that he never spoke with or met with Mr XXXXXX X XXXXXX, who had offered to come forward to provide support for Ms Morris?

(b) Did you instruct Mr O'Reilly to disregard all witnesses in order that the Plaintiff would be left with an impression that her case was weaker, despite the substantiation of the Protected Disclosures and the corroboration of the former Governor of the Central Bank?

(c) Did you have any follow up conversations with Mr O'Reilly regarding his falsehoods when Mr XXXXXX X XXXXXX produced a sworn affidavit outlining in precise detail his telephone call and in person meeting with Mr O'Reilly in his offices?

(d) Why did you and Mr O'Reilly deliberately ignore witnesses like Mr O'Hanlon, Mr Sugarman and Mr Mohan who approached to give testimony that supported the Protected Disclosures regarding the Central Bank and regulatory capture?

(e) Did you ever provide instructions to Mr O'Reilly after the October 2022 meeting to contact potential witnesses discussed in that meeting, seven years after the Banking Inquiry?

(e) To your knowledge, did Mr O'Reilly contact any of those witnesses discussed in that October 2022 meeting and take statements?

**Q. MX XXXXXXX XXXXXXX, Solicitor**

(a) MX XXXXXXX in hXX 12 January 2024 email was very harsh in hXX comments on you and Mr O'Reilly's failure to contact any witnesses: for example:

> *"Turning to what I have digested from your files, there is no question whatsoever that you were entirely misled and misinformed by your former Solicitor regarding the letter dated the 15th December 2022 setting out the details of the appointment to attend the Defendant's vocational assessor, Mr Leonard last April.*
>
> *In relation to the contacting of witnesses, I agree your former Solicitor was less than proactive and his interactions could have, and should have, been more probative in respect of procuring useful witness statements".*

(b) *MX XXXXXXX had similar comments on the mediation as you will see below, including the "inordinate time"*

> *"You will further note from the papers, the inordinate amount of time and effort it took to set up the mediation incidentally requested by the defendant which eventually took place in May 2022 with Turlough O'Donnell SC as mediator."*

(c) Why do you think MX XXXXXXX is blaming Mr O'Reilly for the delays when he frequently said that he refused to do anything without your instructions?

**R. General Questions**

(a) In another case we are researching now, it took only four months to set up mediation - and that took a month longer than originally proposed due to the Plaintiff being in transit on the first proposed date - and you allowed 34 months to pass, that your peers all agree was an "inordinate delay". Why?

(b) Did you ever have any contact or discussions with the Chief Justice of the Supreme Court, Mr Dónal O'Donnell about this case either before or after mediation?

(c) We have listened to a telephone recording in which Mr O'Reilly, Solicitor falsely tells Mr XXX XXXXX that the Plaintiff was engaged in a defamation action. Why do you believe that Mr O'Reilly would deliberately lie to an individual(s) who wished to support the Plaintiff? Again, had you told Mr O'Reilly not to engage with any witnesses?

(d) Did you instruct Mr O'Reilly to hide the request for vocational assessment that arrived from Hayes Solicitors for a further three months?

(e) Why do you believe Mr O'Reilly would deliberately conceal the letter?

(f) Was this done to deliberately orchestrate further delays or to create some contrivance that Ms Morris was non co-operative?

**S. GDPR Compliance**

In an attempt to comply with GDPR, it appears that you sent your file to Mr O'Reilly and not to the Plaintiff who is the data subject.

(a) Why did you send your GDPR file to Mr O'Reilly's office and not to the Plaintiff directly given she is the data subject?
(b) Mr O'Reilly in writing refused to comply with GDPR. Did you know that Mr O'Reilly was refusing to comply with GDPR when you sent the files to his office, knowing then all files would remain there. Please comment.
(c) How can a Senior Counsel support the failure to comply with GDPR in such a significant case – this is ongoing?

**T. MX XXXXXXX on Messrs FHOR**

(a) In correspondence dated 12 January 2024, curiously MX XXXXXXX XXXXXXX was quite scathing about the performance of Mr O'Reilly, but this occurred after hxx trusted counsel, Senior Counsel, (name intentionally omitted) stated to her in November 2023, that "*obviously we cannot use Mr Rogers*". Why was it being considered at all that you might re-enter this case?

(b) The SC seemed to understand that you were controlling Mr O'Reilly and collectively not advancing the case in a professional manner. Why do you believe Mx XXXXXXX would suddenly ignore one of her trusted counsel and claim that you had "advised well", despite what we have outlined herein? In your opinion, was MX XXXXXXX under the influence of colleagues at the Bar or indeed from Hayes Solicitors or the State?

(c) In a November 2023 meeting, MX XXXXXXX did raise concerns about anything they do affecting relationships in the "Law Library". Yet again, more concerned about legal relationships (as evidenced by hXX actions only five days after briefing counsel on 12 January 2024 and subsequent actions of hXX barrister who lied before Mr Justice Coffey - than assertively advancing the case). Please feel free to comment.

(d) MX XXXXXXX in an email dated on that same day, 12 January 2024 was quite scathing in her commentary on Judge Senan Allen and his treatment of the Plaintiff as evidenced in the following extracts:

"*I should note our Client was required to attend with said learned Judge on five separate days over the month of August 2015 during which she was mercilessly interrogated, insulted and berated as a person and professionally. Instead of "investigating" our Client's her Protected Disclosure in a fair and* *impartial manner, the learned Judge chose to go on the attack and against the odds our Client managed to withstand this to her credit and hold her own.*

*In addition to the "coach and four" the learned Judge - with pre-determination – put through the principles of fair procedures, audi alteram partem and due process, the learned Judge seemingly, willfully breached our Client's fundamental right to anonymity under the Protected Disclosures Act, 2014 by identifying her in his redacted Report of October 2015. In my respectful this is indefensible."*

e) Yet according to the Plaintiff from referring to her notes and other items we reviewed and as referenced above, you seemed more interested in protecting Judge Senan Allen's reputation, than repairing the reputation of your client whose career had been destroyed. Might you explain and in particular in light of the Ulster Bank frauds referenced above?

(f) MX XXXXXXX, was at least as of 12 January 2024 open about Allen's nefarious role in destroying your former client's reputation, but you appeared intent on protecting Allen's reputation. If you were to follow your former client's instructions to upend the Allen Report, would that not automatically have damaged Mr Allen's reputation? Please comment.

(g) Based on our research that is entirely separate to this case, you have been identified as a "secret guider and fixer among SCs in the courts" even on cases you are not involved in or should have no involvement in, you are influencing strategy and not as an advisor but as a fixer. The Plaintiff has never mentioned this concept to us, but others in our research about activities in the courts have mentioned it. Please comment.

(h) Have you ever conducted any conversations with MX XXXXXXX XXXXXXX, Mr XXXX XXXXXX BL or Richard Kean, SC about this case?

(i) Did you ever have a conservation with Mr Felix McTiernan, Solicitor about this case?

(j) When the Plaintiff had one conversation with Mr McTiernan, you were still the Senior Counsel on record. Why do you believe Mr McTiernan told Ms Morris that she had "no evidence" and abruptly dismissed her, having failed to disclose his connections with various Government Departments?

(k) Did Mr McTiernan contact you by telephone or meet you in person and is this the real reason you sought to remove yourself from the case before you were replaced? By removing yourself, could you then try to paint a narrative about the Plaintiff after your own deliberate failures to advance the case?

(l) From our review of notes maintained by the Plaintiff, Mr McTiernan seemed to be unusually "well informed" on the existence of evidence having only read the PI Summons, so it appears clear to us that he was inappropriately speaking with someone in breach of his ethical obligations. Do you agree with this assessment?

(m) According to the Plaintiff's notes that we reviewed, Mr McTiernan then proceeded to call the non-engaged Mr David Byrne, BL to essentially "brief him against Ms Morris" and Mr Byrne BL then passed this briefing message on to Mr John Barrett who said that he was told by Mr Byrne BL that Ms Morris "had no evidence". Why was this happening in your opinion?

(n) Mr McTiernan also represented another whistleblower, against the state (civil service), and as an aside you may have formerly represented him too, instructed by Mr McTiernan. It appears that this whistleblower terminated your representation and later terminated Mr McTiernan's representation. In your opinion, does this raise the question of potential active collusion on cases against the State? Would you like to comment?

(o) In summary, there have been many detailed questions posed around the management of this case. We hope to shed light upon them all, to the very best of the documentary teams' ability:

- Two years plus to prepare and submit a PI Summons;
- Omitted clearly pleading that Allen identified the Plaintiff as female in breach of the Protected Disclosures Act 2014;
- Your direction of the Plaintiff away from any judicial review and defamation cases on the basis that the case would be resolved by mediation that you deflty delayed;
- Junior Counsel, Shelley Horan BL at the time the Plaintiff requested Discovery, was attending a paid fund raiser for Fine Gael;
- Mr Dermot Gleeson SC, ex Chairman of AIB plc is proposed by you as a mediator having never had a mediation practice and having given questionable evidence at the Banking Inquiry, about which Ms Morris had made Protected Disclosures that had been substantiated. Why did you propose Gleeson? How could this be considered appropriate?
- Thirty-four (34) months to sit down for mediation after it was first proposed;
- Your refusal to proceed with discovery in parallel with the wait for mediation;
- Felim O'Reilly did not take a statement from Jonathan Sugarman. Was that upon your direction?
- The Plaintiff was exposed to significant anger from you when Jonathan Sugarman supported her publicly. Why?
- Did State reperesentatives alert you and tell you to get your client in check or under control?
- Why did you say that Jonathan Sugaman should not be writing to "high-ranking officials"? This seems to us to be utterly bizarre.
- The Plaintiff's legal team held a mediation planning meeting with Hayes Solicitors leading up to the mediation without the mediator present. Why?
- Will you share your notes in relation to this meeting?
- Why was O'Donnell not present if he was going to be conducting the mediation?

- Why did O'Donnell not even give an explanation for his absence? Was this because he was well aware of what Hayes Solicitors intended to achieve?
- The Plaintiff's instructions at all times were for the Senan Allen Report to be addressed particularly given all knew it to be a fabricated report, yet all appeared desperately wedded to propping it up;
- O'Donnell even referred to the Plaintiff having been treated scurrilously by Senan Allen, but appeared to willingly disregard the false statements in the Dedendant's position paper and assist the Defendant in propping up the fase report? Why?
- Six months followed before the next meeting in which the Plaintiff in her own words had to "beg for a meeting". This meeting focused on (a) Plaintiff's X account being monitored, (b) that Plaintiff should not talk to other whistleblowers and (c) discussing a list of witnesses;
- Four months then passed before the next meeting
- The Plaintiff issued instructions numerous times to set the case down for trial, but all of these were ignored with suddenly discovery that was not allowed before was being put on the table, 3 years after the Plaintiff asked for it to be pursued; why was the Plaintiff's instuctions routinely ignored?
- FHOR refused to share copies of correspondence requested by the Plaintiff – why?
- In a June 2023 meeting, FHOR lied over ten times about meeting the witness, Mr O'Hanlon. Why?
- In this same June meeting SC asked (rhetorically?), "you probably think I am working for the other side" but then nothing was stated – was this a fishing question?
- October 2023 new solicitor (CMH) requests the Plaintiff's file from FHOR and for some reason, it takes six weeks to deliver – why?
- January 12, 2024 at 6:50pm CMH issues instructions after working from 5:00am to 9:00pm the prior day and attaches s150 letter (for the first time)
- January 16, The Plaintiff acknowledges receipt of the correspondence and requests a "hard copy of the S150".
- January 17, 2024 CMH begins process to "Come off Record" stating that the Plaintiff has changed the direction of the case and falsely stating that the Plaintiff was stalling on signing an engagement letter; why lie?
- A rumour circulates in Dublin that a senior female civil servant in a governmental department leaned upon CMH to withdraw from the litigation, which if true explains CMH's absence from the High Court and is another shocking example of Irish State interference in a litigant's right to access justice. Please comment.
- March 2024 - CMH refuses to file the Plaintiff's Replying Affidavit in which the Plaintiff corrects the false record;
- Mr Justice Paul Coffey permits the Plaintiff to file her Replying Affidavit directly with the Central Office;
- CMH has hired a Solicitor and a barrister and sends both with two other legal employees to court to address her motion to Come off Record, failing to walk across the bridge to address the falsehoods in her Affidavit; Why?
- The barrister lies to the High Court that the Plaintiff received her s150 letter in November 2023 instead of 12 January 2024; Why?

- The barrister is unable to explain why CMH sent the Plaintiff's file back to Messrs FHOR (having criticised them and you); Mr Justice Coffey asks twice – receives no response; Why?
- Marketing manager for CMH, who does not identify himself as such in public, also begins to brief against the Plaintiff and this is shared with her. Why?

## U. FURTHER QUESTIONS

(a) Who exactly was pulling everyone's strings to slow manage this case and keep the banking frauds covered up?

(b) What is the common connection between you, Shelley Horan SC, Messrs FHOR, CMH, Hayes Solicitors , the Attorney General, to whom you bow and the Defendant (Houses of the Oireachtas and / or the State Claims Agency)?

(c) Is someone higher up in the Irish judiciary involved in this charade?

(d) It is quite clear in our opinion and from all our research that no one can clearly state that they were working in the best interests of the Plaintiff - which is a national scandal - not just in respect of the treatment of her but for the thousands who were financially decimated as a result of this cover up and scandal as well as the many families of the ones who lost loved ones to suicide.

We may have further questions. Please note that if you wish to go on camera in the documentary to discuss your role in the failed representation of the Plaintiff, please feel free to let us know and I will share that information with the documentary team who will make the final decision. Any responses to the above questions that you wish to provide, we will happily share on the website. The production team will make the final decisions.

Yours sincerely

Martin O'Cianain