

Claim No: 3SA90091

IN THE HIGH COURT OF JUSTICE

QUEEN' S BENCH DIVISION

SWANSEA DISTRICT REGISTRY

BETWEEN:

MR STEPHANE (AKA STEVE) PARIS

MS ANGEL GARDEN

Claimants

-and-

DR ANDREW LEWIS

MRS MELANIE BYNG

Defendants

Witness Statements and attachments in support of Application to re-amend the Particulars of Claim.

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page 11 - Sample evidence from the Defendants' Disclosures

This is a Witness Statement in support of the application by Claimants Stephane Paris and Angel Garden, writers and film-makers of 9 Long Bryngwyn, Sketty, Swansea SA2 0TX, in support of our Application to re-amend the Particulars.

We make this witness statement as follows.

1. The original PoC contained two claims under the PHA against both the Defendants and Professor Byng who is now out of the case due to lack of concrete evidence against him at the time.
2. On bringing the claim, and due to the deliberately covert and proxy nature of this harassment, the concrete evidence of it, as distinct from the Claimants own accurate published accounts, was not visible when the case was started, and on seeking representation we received advice to amend those claims due to the lack of concrete evidence, in spite of our wishes.
3. Nevertheless the Defendants themselves knew full well of their own course of conduct when they threatened Strike-Outs and then took large sums off the Claimants to amend those claims solely due to the lack of concrete evidence and which wouldn't have been the case were it not for the covert nature of the harassment. This includes thousands paid to the 2nd Defendant's husband, a mental health professor, in spite of him turning out to be the origin of the ongoing and widely circulated mental health smears which originated in his fake "clinical diagnosis" of "borderline personality disorder" of the second Claimant who met him once, when facing the imminent and sudden death of my mother, and who has never consulted with him. This lie was fabricated to obfuscate the true origin of the 2nd Defendant's targeting of the

Claimants as detailed in the original POC. **(Appendix A)**

4. Disclosure shows this mental health smear has been widely spread about in various ways to undermine the integrity of the Claimants family and every aspect of their lives:
(Appendix B)

5. These harassment claims were brought after the Claimants and their family had been subjected to a years long course of conduct of open, covert and proxy harassment by both defamation and concealment, covert misrepresentations, including mental health smearing and the imputation of dangerous criminality as well as disability abuse and privacy invasions and substantial stalking as revealed in the disclosure, and evidenced herein **in all the Appendices**, which are here cross referenced also with the original claims under the PHA.

6. All this was organised to remove the Claimants from a supposedly democratic platform of shared interests in children's wellbeing **(Appendix C, E)** and to sabotage, degrade and ultimately conceal entirely the Claimants' family's landmark Human Rights settlement, by publicly misrepresenting it without right of reply, as being of no consequence, or, as the 1st Defendant, not acknowledge its existence at all, as in the blog post complained of in Paragraph 6 of the Amended POC, and covertly putting it about that the claimants themselves were dangerous weirdos in order to justify their exclusion from any democratic participation **(Appendix F)**

7. The Claimants were out of UK jurisdiction for much of this period, being in New Zealand, and so could address neither the harassment nor the defamation except by

entreaty and publication, apart from by relocating their family to this country. While the only motivation publicly allowed to the Claimants for their objection to degrading treatment by the Defendants was "harassment", **(Appendix G)** the disclosure shows 2nd Defendant particularly was particularly aware that her course of conduct was facilitated by the claimants' absence from jurisdiction. **(Appendix H)**

8. By relocating, and having brought this case, the Defendants' disclosure has proven the case of harassment in the original POC, and in fact the disclosures have surpassed the Claimants' accurate published accounts, revealing a far-reaching campaign of stalking and harassment fomented by the Defendants and provably also now stretching way beyond them through their networks into press agencies and organisations including the BBC, The Guardian, and the British Humanist Association. **(Appendix I)**

9. The disclosures are also replete with further defamation, which moreover has been circulated far and wide according to the disclosures **(Appendix B, C)**, and there is far too much wide defamation to contemplate the expense and stress of bringing them as Heads of Claim in Defamation and the disclosure demonstrates how the defamation itself is a tactic that is part of of the extensive harassment in this case as there is no right of reply to deliberate misrepresentations and both Defendants' disclosures show that far from being concerned or bothered about the Claimants distressed publications about the harassment, mobbing, and gang stalking they were subjected to, as claimed in the Defence, the Defendants found it funny and enjoyed provoking the Claimants. **(Appendix D)**

10. Following Disclosure, and before we had had a chance to recover from the impact of learning of the true extent of such concerted and intense gang stalking behaviour, the Defendants immediately suggested mediation in the middle of October 2014 and, settlement negotiations having very recently eventually failed, this Hearing is the first chance the Claimants have had to address the matter as since then we have been sincerely trying to settle.
11. Paragraph 21 of the amended particulars of claim States that "unless restrained, the Defendants and each of them will further publish or cause to be published the words complained of or similar words defamatory of the claimants" and this has been proven even during the last several weeks as we are blocked defamed and mobbed continually with the Defendants' hands clearly visible at work, both in the immediate deletion of our information, followed by blocking by a third party when the 2nd Defendant was included in a tweet with us by that party concerning shared interests, and in the recent public mauling of the 2nd claimant by another third party on a totally unconnected platform using intimidating claims to have met and spoken to her, to justify his allegations of harassment and of being a stalker online and "irl" (in real life), which is how the act of paying to attend a public meeting has been characterised by the Defendants. The mental health smearing that the same third party has previously specifically been attributed to the "evidence-based skeptic" 1st Defendant, which was also in the original particulars of claim **(Appendix K)**
12. These incidents cited above are recent, and ongoing, and it hardly seems as if the Defendants need to do much any more themselves as **"Everyone who needed to**

know has been informed"" (Appendix C), according to the 2nd Defendant.

13. We therefore re-submit these claims, and ask for the order that the PoC may be re-amended to re-include them.
14. We also request that the confidentiality on the significant gang-stalking, and proxy and covert harassment in the Defendants' disclosures be waived.
15. Noting the costs order that was made on the Defendants' behalf on amendment of the claims, we also therefore request an alternative costs order that the Defendants themselves should bear the costs of this re-amendment, or the costs be in the case, or parties bear their own costs, for otherwise we would be asked to pay twice, entirely due to the covert and proxy nature of the harassment. As it has already been claimed that very large sums had been spent examining the claims, due to the "professional" status of these Defendants occasioning a substantial and immediate costs order, then if that was true at that time, the work on these harassment claims has already been done.
16. If that is true, why wasn't the fact that this professionalism had in fact been used to dishonestly pass someone off as mentally ill, been discovered and dealt with properly then?
17. Although we will bring a draft order to the hearing, as LIPs, we would appreciate the judge's help in ensuring it's suitability and compliance.

CLAIMS UNDER THE PROTECTION FROM HARASSMENT ACT 1997 FROM THE ORIGINAL POC, HERE CROSS REFERENCED WITH THE EVIDENCE FROM THE DISCLOSURE

36. The First Claim under the PHA to only the 2nd and 3rd Defendants [professor Byng has been removed]

- a) That the 2nd Defendant has followed a course of conduct by their actions and inactions over a long period of time, which amount to harassment by:
- i) attempting to conceal her fraudulent misrepresentations to the Claimants
(APPENDIX A)
 - ii) refusing to address any results of those misrepresentations, while making further covert misrepresentations about those circumstances instead, **(APPENDIX A,B)** and overtly publicly smearing the mental health of the Claimants, as well as vituperating, threatening and shunning them, including on shared interests and encouraging others to do so **(APPENDIX B, C)** while simultaneously seeking a platform for themselves including in the National Press on the subject of the shared interests with the Claimants **(APPENDIX E)** and on the basis of the 3rd Defendant's position as a Senior Mental Health Lecturer and that their actions and inactions comprise a course of conduct that they knew, or ought to have known would cause extreme anxiety, distress, alarm and mental and emotional anguish to the Claimants and as such amounts to substantial harassment of both the Claimants and their children under Section 3 of the Act.

[b) loss and damage]

37. Second Claim under the PHA 1997 to only the 1st Defendant

- a) In his continual course of interfering with the established legitimate interests and agency of the Claimants with regard to unchecked bullying in Steiner, and instead deliberately fomenting the personal campaign which he knew had its roots in his friends' desire to hide the fact of their misrepresentations **(Appendix C)** including by at all times
- i) Framing any and all expressions of protest, distress and anxiety by the Claimants, whether general or to individuals, as personal harassment of himself, of the 1st Defendant, and of other skeptics, and having so framed it, then using their clearly expressed distress as his justification for course of conduct towards the Claimants. **(APPENDIX F)**
- ii) openly preferring and encouraging others to prefer people and sites harassing and defaming the Claimants, including the 2nd Defendant. **(APPENDIX C APPENDIX F covert and proxy harassment)**
- iii) blocking the claimants from any democratic participation while continuing to advertise a "good spirit of debate", on his Quackometer Blog or anywhere else, no matter how relevant their input might be to the subject, whilst seeking a newsworthy platform for himself under his labels **(APPENDIX J)**

- iv) inciting organisations to ban the Claimants from attending supposedly public meetings by himself threatening not to attend if they are allowed in, and framing all their attempts to follow pre- action protocol to try and resolve matters as a personal “threat”. **(APPENDIX F)**
- v) deliberately publishing rumour and hearsay, but not the facts of the matter, which he could reasonably be expected to know.
- vi) covertly threatening to block and blocking others from mentioning the Claimants’ case or their success, in a “good spirit of debate” and representing any such attempt to inform about their agency as “sock/meat puppetry”,
- vii) counselling the Claimants to publish on their own platforms, and then continually framing all instances of them doing so as personal harassment and stalking of himself. **(Appendix F - DELIBERATE provocation)**
- viii) refusing to submit the issues to any fair and impartial examination whatsoever, **(Appendix F)** or to publish facts and ignoring all pleas for resolution, including offers to mediate, but continually and contemptuously provoking the Claimants towards legal action before he will publish any verifiable facts about the settlement, **(Appendix D)** including the fact that, due to the reasonableness of the Claimants, and the willingness of themselves and their children to settle matters with the Steiner School without pushing towards legal action, they may not now prove the discrimination through the Human Rights Tribunal, in spite of his harassment and devaluation of the practical agency they have achieved, the 1st Defendant has followed a course of conduct towards the Claimants, that he knew or should have known would cause the Claimants distress, anxiety, alarm and mental anguish and could reasonably be foreseen to interfere with the Claimants’ including their

children's, legitimate interest in promoting agency for unchecked bullying in Steiner Education.

[b) loss and damage]

APPENDICES

Appendix A

Tab 184 - 28.1.2013 - 2nd defendant: "her 'disability' is annoying but not that bad - in fact she told me she had to ham it up to get her disability parking permit"

Tab 104 -29.3.2012 - the 2nd defendant: "She can't mention me because I haven't written anything she can point to"

Tab 112 - 8.5.2012 - 2nd defendant: "Joe says she's not walking impaired, she's just fat."

Tab 35 - 22.9.2011 2nd defendant: "let's assume that the mother is real"

Tab 206 - 6.7.2013 2nd defendant: "All because a 17 yr old boy didn't want to be used as a scivvy."

Tab 28 - 30.8.2011 The 2nd Defendant: "Steve then fleeced Joe (he is 17) for the price of her changed flight - taking his euros away from him just before he got on the plane. [...] I did not breathe until I knew my child was on that plane, I was so scared they'd do something else. It's hard to forget that sensation. [...] I cannot get over what they expected from him, as if he were some kind of servant. [...] Just before he left he was on Skype (from his room on his computer) telling me they'd said Steve would take him to the airport if he cleaned their house - imagine - if he cleaned their house. Dear Dog. "

Tab 30 - 3.9.2011 The 2nd Defendant: "Even his [the 1st Claimant's] parents won't speak to either of them anymore, so upset are they about what's happening to the children. [...]"

He [the 1st Claimant] must think if only Thetis [the 2nd Defendant] would make an appearance, or the events in France are mentioned he can defend himself and suggest I'm over-reacting, and that since I haven't answered any of their emails I clearly would rather wreck their project than discuss it sensibly and that this would be the right 'etiquette'. [...] But I don't care about them enough to answer their emails. I blocked her the minute I knew Joe was on the plane home. I unfollowed because they tried to direct message me. I don't ever want to talk to them again. Not because what they did was terrible, though it was pretty shitty, but because they're entirely untrustworthy and mendacious and manipulative and above all, selfish."

Tab 31 - 4.9.2011 The 2nd Defendant: "Her emails go straight into my trash, I have no intention of reading anything."

Tab 75 - 31.1.2012 the 2nd defendant: " At the airport, Steve fleeced Joe for all the money he had on him."

Tab 75 - 31.1.2012 the 2nd defendant: "because she was making it very clear that she expects ex-Steiner parents to use their own identities to 'whistle-blow' re bad experiences at Steiner schools. If not, she feels pressure should be brought to bear on these families to 'come clean'. "

Tab 75 - 31.1.2012 the 2nd defendant: "Angel even accuses me of 'grooming' her daughter (who I didn't even meet) presumably because I suggested Sands as a possibility and then withdrew my support."

Appendix B

Tab 85 - 19.2.2012 - 2nd defendant "In fact I'd love to hear she's been run over by a train, or that an elephant had fallen out of a tree onto her head (it would have to be something large) or that a tribe of Patagonian Indians had whittled her skull into a canoe. Vile loon."

Tab 131 - 9.6.2012 - 2nd defendant "I am happy to give her a hole in the head anytime"

Tab 47 - 13.10.2011 - The 2nd Defendant: "Both are paranoid but she is delusional. [...]
At the end of this is his [The 2nd Defendant's husband] clinical judgement, which she seems to have forgotten.

Tab 47 - 14.10.2011 - the 2nd defendant - "I have a few ideas which kept R [the 2nd defendant's husband] and I laughing last night. Including the idea that HE should have spotted that she has a flaming borderline personality disorder, and was deficient in not spotting this at the first mention of her name."

Tab 47 - 14.10.2011 - The 2nd Defendant : "borderline - they threaten suicide too, and she may have threatened other things, which is why Steve may not want to risk leaving the children with her if he's ever thought of escaping."

Tab 48 - 12.10.2011 - 2nd Defendant (to Allan Beavis) "She is clearly mad."

Tab 58 - 5.11.2011 - the 2nd defendant: "he has to support her. Otherwise he would lose his children. If the diagnosis is accurate she might even have made threats to hurt them. Or herself. Or him."

Tab 69 - 12.1.2012 - the 2nd Defendant (to Sam): "Angel has a borderline personality disorder. This is a clinical judgement, not a personal opinion."

Tab 75 - 31.1.2012 - the 2nd Defendant (to the 1st Defendant): "While Joe was away my husband Richard had had a long phone conversation with Angel about her mother's cancer treatment, from which he'd drawn a few conclusions. Richard is a GP & academic & an expert in primary care mental health, including personality disorder."

Tab 80 - 13.2.2012 - the 2nd defendant (to David Colquhoun): "Her name is 'Angel Garden' and she has called herself an astrologer [... She's] more than a bit nuts"

Tab 85 - 19.2.2012 - the 2nd defendant "'She's a psychopath!' which is manifestly true in at least the colloquial sense where these things matter."

Tab 119 - 10.5.2012 - "Andy Lewis and I both think it's a borderline personality disorder. Richard tends to like to actually having a consultation with a person before making that kind of assessment, but he didn't disagree. On the other hand, that IS her disablement, not the foot. The foot is real, but it isn't that bad."

Tab 136 - 27.6.2012 - 2nd defendant "he [1st Claimant] can't leave, she'd try to kill him. She's twice his size (width wise) and might eat her own young if provoked."

Tab 136 - 28.6.2012 - 2nd defendant "She's really ill y'know. The children are in deep shit."

Tab 144 - 15.9.2012 - 2nd defendant "I do not know where i have called his mental health into question, apart from describing his marriage as a 'folie a deux', but I'm very happy to give him an informal diagnosis any time he asks. If he wants one from my husband (a s'senior mental health academic') he will have to be a lot more entertaining."

Tab 206 - 6.7.2013 - 2nd defendant "I think he [2nd defendant's husband] made that analysis in his spare time"

Tab 206 - 21.7,2013 - 2nd defendant "They're pathologically pathological"

Tab 207 - 16.7.2013 - Jo Torres: "I've been extensively briefed on Angel and Steve via Melanie. [...] Mike, my other half, was a bouncer for years so is well versed in efficient removal of crazies."

Tab 227 - 8.11.2013 - 2nd defendant (to Alan Hennes and Maria Maclaughlan) "are so grateful to both of you for being so stalwart and loyal to the cause of decency. Angel is madder than the maddest madwoman in the kingdom of mad people, also persistent. If we thought making some sort of statement would help we'd do so, but it would only make her worse. At least when someone googles her the thinkhumanism site appears - she can't erase it. I hoped her pursuit of Andy would bankrupt her, not sure if she hasn't stopped (great for him if she has). Money is what she wants. But thank you, thank you, than you Maria. Mx"

Appendix C

Tab 31 - 4.9.2011 - The 2nd Defendant: " in fact we feel we have to talk to Sands. They're used to odd parents, but not litigious, possibly dangerous ones."

Tab 32 - 11.9.2011 - The 2nd Defendant (to Mike Collins): "It's not a good idea in our view to encourage Steiner parents to view their sites or get involved with any possible (but frankly unlikely) documentary. [...] They [...] are potentially litigious and certainly capable of dishonest or misrepresentation."

Tab 47 - 13.10.2011 - 2nd Defendant: "I will ask someone from the LSN [Local Schools Network website] to be on their guard."

Tab 48 - 12.10.2011 - 2nd Defendant (to Allan Beavis) "She is clearly mad."

Tab 52 - 14.10.2011 - 2nd Defendant: "Will have to continue warning journos (Guardian etc)."

Tab 54 - 17.10.2011 - 2nd Defendant: "Just as long as she isn't gathering significant followers, if one of the major UK papers is following her account I might have to warn other journalists - the LSN already know"

Tab 56 - 23.10.2011 - 2nd Defendant "I wrote to Roger [Rowlings] and said I felt confident he would exercise discretion."

Tab 67 - 22.11.2012 - 1st Defendant (to Killie Sturgess) "I thought I had better warn you, if it has not already happened, that you may be contacted by Angel Garden or Steve Paris, who have a vendetta against me [...] It has been going on for months. I am not the only person who has been subject to their bizarre behaviour. They are best not engaged with. They appear not to be able to function unless they can see themselves as victims of censorship and 'hate attacks'."

Tab 69 - 12.1.2012 - the 2nd Defendant (to Sam): "Angel has a borderline personality disorder. This is a clinical judgement, not a personal opinion."

Tab 73 - 26.1.2012 - 2nd Defendant (to Francis Gilbert): "My husband Richard and I met this woman and her partner Steve last summer, they'd been in NZ but were in England visiting a sick relative. [...] A couple of incidents (which had little to do with their project) convinced us that she is unstable and we withdrew from contact."

Tab 75 - 31.1.2012 - the 2nd Defendant (to the 1st Defendant): "if you're about to write about the Steiner Academy Frome, you'll need to know about a couple of malevolent trolls, Angel Garden and Steve Paris, who may try to use the comments"

Tab 80 - 13.2.2012 - the 2nd defendant (to David Colquhoun): "Her name is 'Angel Garden' and she has called herself an astrologer [... She's] more than a bit nuts"

Tab 85 - 19.2.2012 - the 2nd Defendant "I just wrote to Dan [Dugan] and said that their working methods are unethical and they are untrustworthy, and that anything else is a distraction."

Tab 85 - 19.2.2012 - the 2nd Defendant: "Just remember - there are lots of people who know about this now and they will tell each other."

Tab 96 - 7.3.2012 - Graham Strouts: "Confused - her [the 2nd Claimant] claims about being expelled from the school would support Andy's (and yours) posts? let me know what's happening.

2nd Defendant: "I think they were expelled because of their behaviour, that it had little to do with the children and even less to do with Steiner ed. They've been hounding Andy and sending him long emails with various threats and comments about Alicia, me etc. He doesn't let them post because they wanted to attack us on his blog"

Tab 100 - 14.3.2012 - 1st Defendant (to John Stumbles) " The poster saw the delay as evidence of some sort of conspiracy and posted blogs and tweets telling the world that I was not to be trusted. I wrote to them when I realised what had happened and explained the situation. I sort of expected the posts to come down and an apology - but the intensity appeared to increase.

At that point I wrote one more time, explaining that this would be my last communication and that my issue was not necessarily what they wrote (but I was in my rights to prevent my blog being used as a stage to attack other people or to carry on disputes that have happened elsewhere) but their subsequent behaviour. They appear to find it difficult to grasp that they do not have an automatic right to use my blog as a platform for whatever they want and that I should engage with them when they show no sense of good grace. Difficult to understand their behaviour. Not sure if it is pure trolling, but in any case, I would rather my Steiner post comments area was used to discuss the post and not deal with angry incoherent people. "

Tab 102 - 26.3.2012 - 2nd Defendant [about conversation with Alan Beavis?] "I pointed out that our objection was to her wanting to 'out' parents, and that she was untrustworthy, which is why WC couldn't promote her work. I also said that I didn't feel her account of events in NZ was to be trusted"

Tab 104 - 29.3.2012 - 2nd defendant "journalism is a small world though. Angel has freaked out Francis Gilbert and Fiona Millar at the LSN. Both write for the Guardian. There was a big Guardian open festival last weekend, with lots of journos meeting and discussing and debating. So who knows what got about. "

Tab 108 - 27.4.2012 - 2nd Defendant [to Mark Haynes]: "I think you will have to say something to Jeevan [Guardian Journalist] about Angel - he's following amonnewsmedia on twitter. I would do it myself were I in contact with him but then I would first have to explain who I am etc., Sam and I have talked about the best way to approach this. We think if you could say that those of us involved in talking to the BHA atm do not endorse her activities, and possibly, that she has expressed herself in a way that suggests she is untrustworthy, particularly with reference to Steiner parents who may be vulnerable and who may not want their identities or personal details revealed."

Tab 110 - 2.5.2012 - 2nd Defendant: "Melissa is part of the LSN and already knows about Angel"

Tab 110 - 2.5.2012 - 2nd Defendant: "sooner or later I won't be able to stop it and then I'll have to say something publicly to distance myself. "

Tab 112 - 3.5.2012 - 2nd defendant: "Andy Lewis [1st defendant] of the Quackometer of course they made their own nasty video about, and he knows most of the big-hitters so he has put out a warning. "

Tab 112 - 7.5.2012 - 2nd defendant "she must know I'm talking to people in private (on twitter)."

Tab 121 - 12.5.2012 - 2nd Defendant "Everyone who needed to know has been informed"

Tab 123 - 13.5.2012 - 2nd defendant ""I've done my very best on Twitter - so many people to write to...I've tried to stop people tweeting their stuff but I don't know everyone. "

Tab 123 - 13.5.2012 - 2nd defendant "I can only see Good Schools Guide tweeting it - I've spoken to her (she was mortified when she realised who it was)"

Tab 123 - 13.5.2012 - 2nd defendant "sent your post to several people who asked if they should be concerned. So there, it was useful."

Tab 138 - 30.7.2012 - 2nd defendant (to Matthew Ford) "I advise you to steer clear of Angel Garden and Steve Paris, presently of NZ whose videos appear on the web. They're unreliable witnesses, to put it mildly"

Tab 139 - 26.8.2012 - 2nd defendant "I wrote to Ben Woolvin, who as far as I know is making the prog, and included DC in my email. Apart from that if they don't cotton on what a green inker Angel is within 5 minutes, they shouldn't be working for the BBC. Not

that this is any proof of quality. One of these days someone will tell Steve I've warned them about him, and they'll try to sue me for libel. I used the word 'unreliable'."

Tab 140 - 26.8.2012 - 2nd defendant (to Ben Woolvin and David Colquhoun "Ben - a researcher for this programme is now in touch with an individual called Steve Paris via twitter. A warning that he is unreliable (and that they have in no way conducted 'years of research'). David is well aware of their presence online."

Tab 143 - 1.9.2012 - 2nd defendant "I'm certain they'd threaten me with libel if they had evidence I'd warned anyone. "

Tab 143 - 11.9.2012 - Alicia Hamberg "I had got a message from Grégoire on facebook I hadn't seen [...] He thanked me for the warning. I think I confirmed something he suspected."

Tab 148 - 28.9.2012 - Alicia Hamberg " I had to warn a couple of others about them last night - one of them had found that translation and I had to say something. "

Tab 176 - 21.1.2013 - 1st Defendant (to Lewis Skeptics) ""they are dangerous serial stalkers and I try to avoid all encouragement""

Tab 180 - 23.1.2013 - 2nd defendant (to Maura Kwaten) "Angel and Steve demanded that parents come forward and spilled the beans, mostly because it would have given them material for their documentary. They really care absolutely nothing for anyone who isn't useful to them."

Tab 189 - 2nd defendant (to Matt Sims) "Matt - be wary of @sjparis and wife (amazonnewsmedia, angelgarden, steinermentary) [link to Andy's posterous blog] I've been a target too (for months). worth looking up the case Arkell v Pressdram (1971) if you want a chuckle"

Tab 190 - 12.4.2013 1st defendant (to Mark Hooper) "Please do not pass anything on to Paris or his wife Angel Garden. They are engaged in a very unpleasant campaign of harassment against a number of people and I want nothing to do with them. I would be grateful if you did not even mention we had had this conversation as I want to do nothing to provoke them into more attacks."

Tab 191 - 30.4.2013 1st defendant (to David James) "Paris and his wife are serial harassers of myself and several other anti-Steiner writers. I do not engage with them at all. They use every contact as a hook to harass. You are part of a very big pattern. They have tried to do things to me and others that would cause considerable problems. I have not disclosed them as I think the best strategy is total disengagement."

Tab 194 - 15.5.2013 1st defendant (to Ben Hardwidge) "They have displayed disturbing and obsessive behaviour and I must treat them as a threat. "

Tab 207 16.7.2013 1st defendant (to Jo Torres) "my Bath talk was disrupted by Angel Garden and Steve Paris. They have been harassing me for over a year and are as mad as cheese."

Tab 207 - 16.7.2013 - Jo Torres: "I've been extensively briefed on Angel and Steve via Melanie.

Tab 211 - 12.9.2013 - 1st defendant (to Kate, editor of Stroud News) "Stege Paris and Angel Garden (who post as AGarden and SParis) are a couple who have been harassing me online and in real life for over a year. After a comment of theirs on my blog was held up in a moderation queue, they have been accusing me of 'censorship' and of smearing them. There are many defamatory things they say in their comments. For example "openly inviting his readers to doubt the word of a child", "deliberately "disappearing" evidence", "having hidden the evidence and framed us for your audience entirely through personal smearing" "advertising concern for children but silencing real children's voices because he wants a platform for himself". The meaning I ascribe to such statements is that I am being accused of being dishonest with my readers, deliberately withholding information and falsely accusing other people for my own personal benefit. These allegations are completely untrue. Because of the querulous and hostile nature of the couple I have decided not to interact with them."

Tab 218 - 4.10.2013 1st defendant (re members of the BHA) "I am rather pleased they are doing this at the moment. yes it is a little bit of a pain convincing Stephen Law that he has to ban them, but Richie is right on the money and will notify the police before the meeting."

Tab 224 - 16.10.2013 1st defendant (to Richy Thompson, Stephen Law, Sara Passmore) "The truth is that I blocked her from commenting on my blog because of her hostile behaviour towards me and how she wanted to use her comments to attack other people. [...] By writing to you, they only have one intention: to cause me problems by intimidating me and those who I deal with [...] her demands for me to give her money to go away against the threat of a defamation case has failed. "

Appendix D

Tab 160 - 8.11.2011 1st defendant (to 2nd defendant) "I have two choices - not sure which is funniest

1) Completely ignore

2) Respond simply by referring to Arkell vs Pressdram

Your insight is, as always, welcome."

Tab 201 - 24.5.2013 2nd defendant "This thread is so hilarious: Think Humanism - View topic - Angel Garden and Steve Paris"

Tab 227 -8/11/2013 2nd defendant "At least when someone googles her the thinkhumanism site appears - she can't erase it. I hoped her pursuit of Andy would bankrupt her, not sure if she hasn't stopped (great for him if she has). Money is what she wants. But thank you, thank you, than you Maria."

Tab 140 - 3.9.2012 - 1st defendant "Getting a full translation of a UK blog with some profile (coughs) would neutralise them. And make them hopping mad."

Tab 112 - 3.5.2012 - 2nd defendant "she isn't going to be happy about what they've done. And yes, Angel will go ballistic. I think it will appear very soon."

Appendix E

Tab 108 - 27.4.2012 - 2nd Defendant [to Mark Haynes]: "I think you will have to say something to Jeevan [Guardian Journalist] about Angel - he's following amonnewsmedia on twitter. I would do it myself were I in contact with him but then I would first have to explain who I am etc., Sam and I have talked about the best way to approach this. We think if you could say that those of us involved in talking to the BHA atm do not endorse her activities, and possibly, that she has expressed herself in a way that suggests she is untrustworthy, particularly with reference to Steiner parents who may be vulnerable and who may not want their identities or personal details revealed."

Tab 110 - 2.5.2012 - 2nd defendant "They have realised it's something about the pedagogy - except that in their case it was more about their own behaviour. i wish someone would point that out to them."

Tab 112 - 3.5.2012 - 2nd defendant "she isn't going to be happy about what they've done. And yes, Angel will go ballistic. I think it will appear very soon."

Tab 140 - 3.9.2012 - 2nd defendant "Andy - yes push on, as if in ignorance of any other translation. As always, ignoring them is best ;)"

Tab 140 - 3.9.2012 - 1st defendant "Getting a full translation of a UK blog with some profile (coughs) would neutralise them. And make them hopping mad."

Tab 148 - 28.9.2012 - 2nd defendant "they have a translation too? Bugger. Well, he can't stop them but at least they didn't get any money out of him? so that will piss them off,

and it must have taken a huge amount of time too. The important thing is that they can't copyright it if there are other translations and their is not the only one of the 'official' one.

It may be more readable now but it won't be as accurate in the long run because they don't understand what they're translating, and Roger does."

Tab 148 - 28.9.2012 - Diana Winters "I did see Angel and Steve's translation of Gregoire's article - it looked like a darn good translation, I have to say, though I haven't read but a brief bit; I did have the impressions it was very polished. It is actually a shame we can't work with them on this - a shame that they 'got to' Gregoire a little to soon. I mean it's too bad to have several people duplication efforts with the translation."

Tab 206 - 6.7.2013 - Alicia Hamberg "Anyway, the ICSA is making a fool of themselves when allowing this, which I also said. redacted. He's going to talk to the ICSA people he says. "

Tab 206 - 6.7.2013 - 2nd defendant "Richard is happy to write to this org inclosing their email to the Dean of the Peninsula Medical School, and so on. "

Tab 206 - 6.7.2013 - 2nd defendant "speechless. she told me no one liked her Florence Nightingale one woman show btw, so she seems to be contradicting her previous self analysis. R says she certainly has constructed her own reality. "

Tab 206 - 6.7.2013 - 1st defendant "I saw they were in Venice and wondered what they could be up to. I used to work in Venice and the paranoid part of me thought they might be fishing."

Tab 206 - 6.7.2013 - Alicia Hamberg "I also added that Melanie, I and probably you, Andy, would be available if folks from the ICSA want to contact us. And that there are others too who can testify to what we're saying. "

Tab 206 - 6.7.2013 - 2nd defendant "Exactly our thoughts. Ri is going to write (with his uni email) asking this very question. "

Tab 206 - 6.7.2013 - 1st defendant "Happy to talk to anyone who wants anything checked about them. "

Appendix F

Tab 176 - 21.1.2013 - 1st Defendant (to Lewis Skeptics) "they are dangerous serial stalkers and I try to avoid all encouragement"

Tab 207 - 16.7.2013 1st defendant (to Jo Torres) "I do not want them allowed admittance and will not speak if they are there."

Tab 224 - 16.10.2013 1st defendant (to Richy Thompson, Stephen Law, Sara Passmore)

"The truth is that I blocked her from commenting on my blog because of her hostile behaviour towards me and how she wanted to use her comments to attack other people. [...] By writing to you, they only have one intention: to cause me problems by intimidating me and those who I deal with [...] her demands for me to give her money to go away against the threat of a defamation case has failed. "

Tab 218 - 4.10.2013 1st defendant (re members of the BHA) "I am rather pleased they are doing this at the moment. yes it is a little bit of a pain convincing Stephen Law that he has to ban them, but Richie is right on the money and will notify the police before the meeting."

Appendix G

Tab 190 - 12.4.2013 1st defendant (to Mark Hooper) "Please do not pass anything on to Paris or his wife Angel Garden. They are engaged in a very unpleasant campaign of harassment against a number of people and I want nothing to do with them. I would be grateful if you did not even mention we had had this conversation as I want to do nothing to provoke them into more attacks."

Tab 191 - 30.4.2013 1st defendant (to David James) "Paris and his wife are serial harassers of myself and several other anti-Steiner writers. I do not engage with them at all. They use every contact as a hook to harass. You are part of a very big pattern. They have tried to do things to me and others that would cause considerable problems. I have not disclosed them as I think the best strategy is total disengagement."

Tab 211 - 12.9.2013 - 1st defendant (to Kate, editor of Stroud News) "Stege Paris and Angel Garden (who post as AGarden and SParis) are a couple who have been harassing me online and in real life for over a year. After a comment of theirs on my blog was held up in a moderation queue, they have been accusing me of 'censorship' and of smearing

them. There are many defamatory things they say in their comments. For example “openly inviting his readers to doubt the word of a child”, “deliberately “disappearing” evidence”, “having hidden the evidence and framed us for your audience entirely through personal smearing” “advertising concern for children but silencing real children’s voices because he wants a platform for himself”. The meaning I ascribe to such statements is that I am being accused of being dishonest with my readers, deliberately withholding information and falsely accusing other people for my own personal benefit. These allegations are completely untrue. Because of the querulous and hostile nature of the couple I have decided not to interact with them."

Appendix H

Tab 75 - 31.1.2012 the 2nd defendant : "I think they made a film about her experiences after a prem birth too - I bet they tried to sue the hospital. We can only pity the staff involved. I believe she did win a case against a surgeon who operated on her feet. Me next, possibly ;)"

Tab 76 - 1.2.2012 the 2nd defendant "I imagine Angel coming after me for warning journos off her project and causing the WC to abandon her"

Tab 107 - 21.4.2012 - the 2nd defendant "All they want is the money. The money has always been the point for them- they make their living out of litigation as far as I can see.

Tab 76 - 1.2.2012 the 2nd defendant "I imagine Angel coming after me for warning journos off her project and causing the WC to abandon her"

Tab 104 -29.3.2012 - the 2nd defendant "She can't mention me because I haven't written anything she can point to"

Tab 139 - 26.8.2012 - 2nd defendant "One of these days someone will tell Steve I've warned them about him, and they'll try to sue me for libel. I used the word 'unreliable'."

Tab 144 - 16.9.2012 I'm certain Angel is poised to go for me like a ferret up a trouser leg.

Appendix I - Covert/Proxy harassment - including threats to others

Tab 103 - 29.3.2012 - the 2nd defendant "skepticat dm me to say how much she enjoyed it."

Tab 104 -29.3.2012 - the 2nd defendant "She can't mention me because I haven't written anything she can point to"

Tab 207 - 16.7.2013 1st defendant (to Jo Torres) "I do not want them allowed admittance and will not speak if they are there."

Tab 224 15.10.2013 Sara Passmore to 2nd Claimant "We understand that you have made a threat of legal action against Andy Lewis, ...and as a consequence he has been advised

legally not to interact with you. As your presence at the event would involve such interaction, Andy has informed us that he cannot be present if you attend."

Tab 224 - 16.10.2013 1st defendant (to Richy Thompson, Sara Passmore, Stephen Law of the BHA): "I do not want to give them more fuel for this misrepresentations by being present at my talk and having the opportunity to disrupt the meeting and its message."

Appendix J

From disclosure:

Tab 206 - 6.7.2013 - 1st defendant "Although I am happy to be convinced that no bullying took place behind the usual moderate rough and tumble of any playground."

[Contrasting public statements of the 1st defendant:

Steiner Schools and Risk Factors for Child Abuse

"The are consistent reports of how Steiner Schools have a laissez faire attitude to problems such as bullying within schools. As I showed in my last post, the role of the school is spiritual midwifery – teachers are there to help children’s spirits incarnate as they grow. Karmic influences need to be worked out and if a child is being bullied then intervention may interfere with the child’s destiny. “

Bill Roache, Karma, Reincarnation and Steiner Schools.

"This worldview has consequences within schools. It is a common complaint that bullying goes unchecked as there is a belief that the bullied and the bullier and reversing roles from previous incarnations and these karmic issues must be worked out by the children."]

Tab 206 - 6.7.2013 - 2nd defendant "Most of the bullying was them I bet. it is the sheer bombast of the woman - the outer aggression hiding the inner emptiness. And the venom of her...and she is slovenly too, says Joe."

Tab 76 - 1.2.2012 - the 2nd defendant: In Steiner you often hear about it. In Edinburgh apparently a child's arm was broken. I'm not sure if that was ever reported, but I was told that the family (who of course complained) were ostracised by the school community.

Tab 90 - 29.2.2012 - the 2nd defendant - The role of karma is well established, and I'm certain it is sometimes played out in the odd decisions Steiner teachers make about children.

Tab 99 - 13.3.2012 - the 2nd defendant "Steiner schools quite often exclude parents, in my experience. But that's by the by - point is that what they want is money."

Tab 119 - 10.5.2012 - Diana Winters "Sadly, it occurs to me that the stories of what happened to her children are probably NOT exaggerated. Which would make the whole thing just incredibly sad. "

Tab 172 - 22.12.2012 - Diana Winters "I supposed the original reports about their daughter being bullied were probably true - they're in accordance with many reports from Steiner schools"

Appendix K

9.11.2014, Susan Godsland, an expert on dyslexia and sceptic who we had never heard of before, retweeted an article we wrote about how a Steiner school dealt with the matter and informed the 2nd defendant of the existence of said article:

“RT @steinermentary: How dyslexia was dealt with at a Swiss Steiner School [link to article] @thetismercurio”

This action prompted Susan Godsland to follow our @steinermentary account on the same day.

10.11.2014, we noticed that her tweet promoting our article had been deleted. We asked her on DM (private message) why this had happened:

“It was kind of you to promote our article on Steiner & dyslexia, but why did you then delete that tweet?”

No answer was given and Susan Godsland blocked us shortly after.

31.12.2014, the 2nd Claimant was having a conversation with @frozenwarning about the Medical Innovation Bill. This conversation spanned from 9.34am to 1.35pm and remained mostly civil.

then, from 1.38pm, the conversation degraded suddenly:

@frozenwarning's writings include:

"Just realised who you are. You're not only not informed, you're an Internet bully, or should I say bullies."

"No I just remembered that you are a stalker."

"You have nothing but disgusting behaviour."

"No, you've been ignorant and bullying for months."

"you know EXACTLY what you are, and none of it is good."

then out of the blue another person came into the conversation, 2.56pm, @flatsquid, wrote (we do not know who this person is in real life):

"She's fucking mental & I don't use the term lightly having the unfortunate experience of talking to her in person."

"She's obsessive, she stalks online & irl, an absolute nutjob & one of the few I've blocked here"

"her boyfriend/husband will probably appear at some point, Mr Parris iirc, block him too, just as mad."

"She dedicates her life to obsessive behaviour, someone else just PM'd me who has her on block too. Disturbing."

back in 10.11.2012, @flatsquid revealed the source of his information about the Claimants came from the 1st Defendant:

"@Skepticat_UK @Amazonnewsmedia @sjparis Andy was right. You're one very troubled individual."

(present in Appendix 16 and 23 of the Original POC)

Appendix L (see page 36)

IN THE HIGH COURT OF JUSTICE
QUEEN’S BENCH DIVISION
SWANSEA DISTRICT REGISTRY

Case No. 3SA90091

BETWEEN:

STEPHANE (AKA STEVE) PARIS AND ANGEL GARDEN

Claimants

and

DR ANDREW LEWIS

1st Defendant

MRS MELANIE BYNG

2nd Defendant

CONSENT ORDER

UPON the consent of the parties

IT IS ORDERED THAT:

1. The Claimants be granted permission to amend their particulars of claim in the form of the draft provided to the Defendants on 10 March 2014 (the “**Amended Particulars of Claim**”);
2. That the Amended Particulars of Claim be served by the Claimants on the Defendants or before [] March 2014;
3. That the Defendants file and serve a Defence 28 days from service of the Amended Particulars of Claim;
4. That the Claimants do pay the costs of and consequential to the amendment of the Particulars of Claim, such costs to be assessed if not agreed.

dated this day of March 2014