

**From:** ANM anmletters@gmail.com  
**Subject:** Re: Claim C00SA374 - Lewis & Byng -v- Paris & Garden  
**Date:** 16 September 2016 at 10:09 am  
**To:** Dougans, Robert Robert.Dougans@BryanCave.com  
**Cc:** Cooke, Serena Serena.Cooke@bryancave.com



Dear Sirs

We have just printed the Draft Order and have noticed a small error. Paragraph 6.1 states "retain the amount due to him as stated in paragraph 1;" but paragraph 1 doesn't mention this.

When supplying the assurances requested earlier this morning, to allow us to take the Order to the Court this afternoon, please therefore include your permission to remove "as stated in paragraph 1" in order to facilitate matters and avoid potential uncertainty.

Yours faithfully,

Steve Paris & Angel Garden

On 16/09/2016, at 8:24 am, ANM <anmletters@gmail.com> wrote:

Dear Sirs

We acknowledge receipt of your letter, and it's good news that you have finally produced the order in line with the undertakings that you originally made to us.

Had you done this in the first place instead of serving your vexatious claim, then you could have saved yourself the cost of further complaining about our freedom of speech.

On receipt of your further assurance that you will not be seeking costs for the hearing today from us, nor for the hearing you applied for on 26th September, we will agree to take the order to the hearing today.

Please confirm that by presenting this order today, the hearing on the 26th will no longer be necessary and will therefore be vacated.

You also have not been clear about which of the documents attached to your email have been sent to the court, please clarify.

We would like to point out to you the glaring obvious: your claim that we are the "architects of our own misfortune" entirely contradicts any "honest belief" you've managed to persuade Judges of in Ms Garden having a mental health condition. Someone with such a condition, while they would most obviously be provoked by your further sudden vexatious pursuit of them, could not in any way be framed as "the architect of their own misfortune" in the aggressive manner adopted by you, but would have to, by definition, be seen as a victim of the circumstance of suffering a mental health condition.

This easy lie, on top of all the other lies and threats you and your clients have made, more than justify our fear of you having a forwarding address. You do know where we live now with our children, and you are taking it from them, in spite of supposedly "honestly believing" Ms Garden to be mentally ill! Anyone would be right to be scared of such people.

The total lack of understanding of free speech in both purpose and execution demonstrated by your further blanket complaint of our Article 10 Rights (while nowhere claiming that anything published by us is inaccurate or defamatory,) is further reason to be afraid, as you publicly claim to promote and champion others' rights of expression per se, sadly not borne out in any action.

In a free and democratic society, having opinions or being able to furnish facts throwing doubt even upon those presented in a judgement does not equate to "not accepting" it, neither does it evidence any refusal to cooperate whatsoever and we reiterate the second paragraph above.

Of course we "accept" the judgement, in the same sense that we "accept" Tiananmen Square: it happened, that does not make it right.

Yours faithfully,

Steve Paris & Angel Garden

On 15/09/2016, at 6:19 pm, Dougans, Robert <Robert.Dougans@BryanCave.com> wrote:

Dear Sirs,

We regret that we have not been in a position to respond to your correspondence. We did not receive your application to strike out until 9 September 2016 and we have been preparing our evidence in response which we have had to prioritise.

Accordingly, please find enclosed the Second Witness Statement of Robert Dougans dated 15 September 2016 in response to your application. As you will see we consider that your application has no merit and it will be opposed at the hearing tomorrow.