Dear Lord Justice Simon

We understand that a request for recusal of a judge should in the first instance be written as a letter direct to that judge. We therefore make this request that you recuse yourself on the bases of perceived and of actual bias, as detailed herein:

PERMISSION TO APPEAL HEARING

You have already shown yourself not to be impartial in this case.

At the permission to appeal hearing you were extremely intimidating to us as litigants in person. You made someone speak who was clearly so intimidated he was unable to breathe properly, and you wouldn't allow the other claimant to continue in his stead.

Having created that intimidation you were completely unwilling to properly examine the seriousness of the defendants' course of conduct, dismissing the criminality of deploying of a false mental health smear fuelled by a doctors' authority as being only a "submission", against established principle.

You then falsely claimed that evidence tampering was not one of our grounds of appeal, which it was at point 28 (page AB-14), and was further detailed and evidenced at points 91 - 98 of our skeleton argument (pages AB-38-40). We are attaching that portion of the transcript where you said *"well that is not a ground of appeal that you have raised"* at line 24-25 of page 36.

These are false statements concerning criminal acts.

You made an appearance of listening, and even assenting to cogent and substantive points, including the erroneous allowance of reply to attack privilege for what were clearly, by chronology, retorts, and you then ignored both the facts and established law on that to deny us appeal.

You showed clear bias towards them, and disguised that in your judgement by copious reference to the original judge having been persuaded by their demeanour. Your response to our objection in court on that over-reliance was to refuse to acknowledge it and you also dismissed relevant case law on that.

You justified giving our family home to those threatening our life and liberty by blaming us for having only a defamation case without even recording in your judgement that this was only achieved by a ruling of judge Seys-Llewellyn who, having firstly refused to allow the covert harassment claims in, despite seeing *"obvious candidates"* of it, then unarguably used the lack of those claims to prevent us from questioning Mrs Byng, to the point of proving malice.

Your actions have already compounded the dangerous allowance of the respondents to lie in court by using paedophilia as a smokescreen to disguise cultic abuse. This allowance cannot but be deliberate as it is very clear that we did not write their smear, which was only achieved by means of illegal tampering with a properly contextualised publication about cult abuse, freely available in the public domain since 2011 (two years before commencement of legal action), with no objection or reply by Mrs Byng.

The original judge, going against the judgement in BCA v Singh (which was supposedly so significant it changed the law), allowed the defendants to make a defence out of this criminal evidence tampering to attach a false and extreme meaning which we did not write. You have

colluded with this by means of your false statement, in an affront to articles 6, 8, 9, 10, 11, 14, and 17 of the Human Rights Act.

A non-existent paedophilic meaning has thus been literally and blatantly foisted upon people you yourself referred to as publishers, in the most dangerous manner, and is clearly as unlawful as the tampering with chronology to disguise Mrs Byng's malicious communications beginning well before anything done or published by us.

APPLICATION TO REOPEN APPEAL

Your notice regarding the nature of the fraud committed already shows further and similar bias and makes a false statement concerning the nature, relevance and admissibility of the fresh evidence.

Your Order claims that the *"respondents should be given an opportunity to respond to the deployment of what appears to be a without prejudice letter written over two years ago and which appears to have been intended to settle matters between the parties on terms that it was not to be used for any public purpose".*

In fact, as you are fully aware, the mediation letter was "deployed" by them in a separate case, C00SA374, in order to try to extract more money from us, and we are merely presenting the fresh evidence they themselves released from confidentiality. Whether they did this by design or mistake, it was certainly them who "deployed" it, and to say that they should be given the opportunity to respond to it without making that clear is ambiguous to say the least.

The perjury and criminal intent in Mrs Byng's statements cannot be dressed up as truth, or irrelevant by time or method of discovery, and ambiguity in the Order shows continuing bias.
It is not lawful to use Civil process to protect the secrecy of criminal acts, or to justify the heavy intimidation and abuse of admitting a criminal course of conduct in private while trying to enforce silence about it, and then lying about it in court, knowing we could not say so.

In fact, the letter was written only very shortly before the statements contradicting it in court, a circumstance entirely due to the length of time they refused our repeated requests for ADR, while committing these criminal acts, which eventually forced us, after years of abuse, to relocate and seek justice.

It was the court that relied so heavily on the demeanour of witnesses to the exclusion of facts and chronology. Demeanour was stressed over and over again, by HHJ Seys-Llewellyn, Lord Justice Floyd, and yourself. Now that demeanour has been shown to be fraudulent, and wrongly relied on to commit injustice.

If obvious perjury, evidence tampering and criminal harassment is to be continually ignored because of its private/secret nature, then justice is openly mocked.

RECUSAL

There is simply no equality in the treatment of the parties. The other party is not even expected to obey the law, and when they do not, we are blamed for it. For example, as already stated at point 21 of our original Grounds of Appeal (page AB-13), they are still in breach of an Order since February 2015 to reveal even more damning evidence they don't want anyone to know about. Yet we were made to lose by not knowing that evidence of further malicious communications, stalking, harassment, and threats to life and liberty upon our whole family.

It is clearly dangerously topsy-turvy to reward the acts of any defendants threatening life and liberty by setting them on their victims, yet you even suggested that open publication on matters of public interest with right of reply offered was the real problem compared to such covert skulduggery, and this affront augments the public interest element in this case at a time where free speech is under threat in an uncertain world.

Eventually this injustice must be turned round as the blatant inversion of true principles in it robs everyone in the UK of the freedom to defend themselves from dishonest and vicious networked and co-ordinated covert attack. It is dangerously wrong in principle and self-evidently wrong in fact and In truth proves the opposite of the statement by the Master of the Rolls that justice is a right, not a privilege.

Unfortunately you have demonstrated both perceived and actual bias in this matter already and as this remains unacknowledged by you, it must be hopeless to expect any different now.

In face of the blindingly obvious perjury in their contradictory statements, you have not even justly put an urgent stay on the execution of their legally sanctioned theft of our home, in reward for criminal harassment. This demonstrates and augurs further prejudice.

We therefore respectfully request that you recuse yourself from this case.

Yours faithfully,

Stéphane Paris Angel Garden

my child was school averse, which is why she apparently had made these offers, led us to write what we wrote which was that she had made these healing offers of help to reengage her with the school and sending her son out with the message that he came really only to talk to the daughter about his wonderful school in the country. This was an eleven year old child that she was communicating through with her son. When she then cut off communication why wouldn't we consider that that had been grooming behaviour? It was exploitative in the extreme. She has never denied doing it but the thing, the point that what the judge said comes straight from the respondents' solicitors who basically just ----

FIRST APPLICANT: Misquoted.

SECOND APPLICANT: Well, they chopped up the sentence and put a full stop after grooming in order to make it into some kind of sexual, scurrilous thing which they knew perfectly well that it was not. We do not recognise that as what we wrote, your Honour, and we can't because it is not what we wrote. They have removed two thirds of the sentence and they put that in front of the judge and he has been completely misled by it into thinking it was something that it was not. It is unbelievable that they should be allowed to get away with it.

FIRST APPLICANT: May I add that the judge ----

LORD JUSTICE SIMON: Well, that is not a ground of appeal that you have raised.