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**STATEMENT ABOUT ROBERT DOUGANS, SOLICITOR AND PARTNER AT BRYAN CAVE,  
IN SUPPORT OF DAVID HAIGH**

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1. I am a freelance writer and researcher, specialising in IT, science and leisure subjects. My work has appeared in numerous publications worldwide for well over a decade and was extremely well received, until the actions of Dougans' clients coincided with a dramatic evaporation of such opportunities. I have a Master of Arts in literature and drama, and a Master of Science in biotechnology. I have been trained in rigorous scientific analysis, and as a result this statement is based on detailed evidence and/or direct personal experience.
2. My family was also responsible for achieving a landmark Human Rights settlement regarding the world-wide anomaly of unchecked bullying at Steiner-Waldorf Schools, the educational front of the cult of Anthroposophy.
3. I will not disclose my personal address, as Dougans' clients - Melanie Byng and Andy Lewis - have provably stalked my family for years [1]. His actions described below show that he cannot be trusted with such information, and I will not reveal where we live under any circumstances.
4. My wife, Angel Garden, and I have had the misfortune of encountering Dougans when Lewis and Byng used him as his lawyer to defend themselves against accusations of stalking, harassment and defamation.
5. By the time Dougans got involved, we were attempting to communicate with Lewis to try and seek mediation with him in order to resolve issues between ourselves.
6. Dougans did his best to avoid this from happening. First by requesting additional information, then, once said information was supplied, by stopping communicating for weeks until the statute of limitation was looming. We felt desperate that if that window passed, there would be no way to resolve our issues with people who had defamed, stalked and harassed us for years, so we felt we had no choice but to serve papers on Lewis and Byng.

7. Even having done so, we tried to communicate directly with Dougans shortly afterwards to see if mediation could still be possible rather than go down the legal route. His response was “it’s far too late for mediation now”. This was very unnerving especially since the long delay caused by his refusal to communicate on behalf of his clients had actually forced us down the litigation path. We later realised he was clearly relying on the fact we were LiPs to be dishonest and deliberately misleading, since we now know mediation can happen at any time, and he offered it himself months later right after disclosure had taken place.
8. At that time, the mediator suggested by Dougans, was beyond useless. It was clear he had no idea what the issues were. His incompetence stretched to repeatedly getting the Claimants and Defendants confused, and thinking it a laughing matter that the Defendants were using the medical credential of a doctor to spread a fake clinical judgement of a serious mental health condition in order to have my wife, and by association myself, ostracised and shunned. It was incredibly stressful to meet our harassers face to face and I remember very clearly Dougans comparing having one’s mental health smeared to being called fat. i.e., he was trying to persuade us that such horrendous mental health smearing was of no consequence.
9. In court, Dougans’ team altered chronology, deliberately lied and deceived, and allowed their clients to perjure themselves. All of the above is ridiculous easy to prove with the actual facts at hand. We thought it was serious professional misconduct to put a lie as a positive case, but this didn’t seem to stop Dougan’s team from doing exactly that in court, and we were baffled that they were getting away with it.
10. Dougans and his legal team’s deception extended to evidence tampering: words we had written were deliberately taken out of context by quoting half a sentence, and replacing the other half with a full stop, without indicating such a change had been made. Such tampered quote was then used in court, where it was claimed the doctored quote was all we had in fact written. He and his team manufactured a paedophilic smear and shoved it in our mouths. I couldn’t believe that a man renowned for being a free speech hero would so deliberately twist the meaning and context of words and then insist that manufactured meaning was the actual intent of our writing (our actual writing had been in the public domain for years prior to this litigation and our actual cultic reference was abundantly clear in the original untampered sentence). [2]
11. It is particularly shocking that Dougans who is known for having defended Simon Singh against the BCA and taking out of context what Singh had written, was now fighting a case where he deliberately took words out of context and attacked the writers based on Dougans’ team’s deliberate extreme misrepresentation of those words.

12. Dougans' team went as far as arguing that an admission by Byng to having used the medical credentials of her husband to spread a made-up clinical judgement, was the same as her going on the stand and denying having done so. [3]
13. Further, Dougans allowed his clients to breach a court order which would've forced Lewis to reveal the communications he had sent to "*most of the big-hitters*", which were designed to warn those people that we were dangerous. Lewis and Byng, his influential clients, are still in breach of that order to this day and we still do not know who those big-hitters are or which lies they told them. [4]
14. I was absolutely distraught that Dougans' team was able to deceive so many with what are so easily provable lies, and we feel powerless against such clear and blatant misrepresentations. My Wie and I have since published all the evidence online, and I have not been shy in informing others of these people's condoned fraudulent course of conduct. You can find all the facts which back up this statement, and more, at [www.stopdefamation.net](http://www.stopdefamation.net).
15. Dougans' inability to grasp with actual truth and reality extends to his later communications with us, having the audacity to tell us in April 2016 that:

*"Given you sought an interim injunction, then engaged lawyers on a "no win no fee" basis, the Defendants had no option but to seek legal representation."*
16. This is a gross and obvious alteration of the facts: he began acting for Lewis in this case in August 2013, then informed us he was representing Lewis on a CFA on the 5th of February 2014. This lead us to get lawyers ourselves who represented us on a CFA in early March 2014, a month later. However, since his defence was based on lies and deceit, including altering chronology, it was both shocking and of little surprise that he would be unable to stop this behaviour, even in private communications with us, people who he was well aware actually knew the facts.
17. Also, as Dougans acted on a CFA, the only way he could win this case, and hence get paid, was through wrongful or criminal deception, with the intended result being financial or personal gain; therefore his course of conduct is clearly fraudulent.
18. I am certain Dougans had my family monitored and this was beyond distressing: as we were getting ready to leave our home as he had put a charge on it (since his team was being rewarded for having so successfully deceived the court), I was moving a large fridge into storage with the help of someone. The very next day, we received an email from Dougans' assistant, Serena Cooke, stating that if we were to leave early, we should make sure to inform them. We have evidence of his clients actively seeking out neighbours and acquaintances of

ours, to monitor us [5], so although this could be viewed as coincidental, the harassment we have suffered at the hands of his clients make that unlikely.

19. Dougans' odd, disturbing and obsessive behaviour extends to social media where he had recently started following my wife and I on Twitter, and recently tweeted in the early hours of the morning that us sticking to evidence over an obviously corrupt and misrepresented judgement was "sad", then lashed out with tweet after tweet that we had been judged "totally without merit" - over and over again. This does not feel like normal behaviour coming from a solicitor who apparently won. This lasted 24 hours from 1:33am on the 29/3/18 to 1:14am on 30/3/18. I have never seen any lawyer from an international law firm such as Bryan Cave tweet and publicly engage with opposing Claimants in a case in such a way.
20. I consider an influential lawyer who does this to be harassing us, and it is an attempt at intimidation.
21. One of his tweets was about Byng's admission of having pretended her husband had made a diagnosis of my wife's mental health, and her later denial in court of having done this [3]. Dougans stated these two contradicting statements were "*clearly factually consistent*" [6]. For a solicitor to attempt to publicly gaslight someone in this way was shocking.
22. It was distressing to see the responses to his tweets by others, and realise the lies told about this legal case. Essentially, Dougans is not disabusing anyone and might in fact be encouraging people to believe that we sued Lewis and Byng "*for not publishing their comments on your blog, and for not being a "proper" opponent of Steiner schools*" [7], whereas in fact we sued them for defamation, for them smearing us in the background. They were also stalking and covertly harassing us, spreading disability abuse, and the aforementioned mental health smears to portray us as mad and dangerous. All of this was happening at a time when the mother of my physically disabled wife was dying of a shock diagnosis of lung cancer.
23. If they'd won fair and square, why would Dougans and his clients need to lie about the reasons for the litigation? This feels beyond unethical.
24. During this event on Twitter, Dougans also repeatedly and gleefully referred to and quoted a "general observation" of the judge which included the following claim:

*"in truth the Second Claimant [my wife] finds it extremely difficult to accept that others may rationally form any view different from her own; and naturally, repeatedly, and very rapidly leaps to the conclusion and settled belief that if they do, they can have done so only out of personal hostility to her."*

But there is, as always, context around this opinion, which Dougans conveniently ignores and hides from his readers.

25. As but a single example, before the trial, Byng had admitted in a confidential document that she had pretended her husband Richard Byng, a mental health doctor working at Plymouth University, had made a diagnosis / clinical judgement against my wife [3]. This totally malicious lie was used to great effect to get many to shun us [8].
26. Yet, not only were we informed by our own lawyers and by Dougans himself that we were not allowed to use or even mention this admission at any time, during the trial, when we were trying to cross-examine Byng to prove malicious intent, she totally denied that she had done this [3]. Bearing this in mind, how can anyone not be frustrated by Byng's casual perjury while being unable to do anything about it? How is Byng's clear, and deliberate malicious action not "personal hostility" towards my wife?
27. The fact that Dougans was fully aware of all of this, as he was responsible for drafting this confidential document, means that him using the effects of this malice as a tool to attack my wife online is again gaslighting, and misogyny in the extreme.
28. Lord Carlile recently stated that:  
*"It's not worth being a lawyer if you don't understand your ethical matrix. Indeed you have no business to be a lawyer if you do not work within an accepted ethical framework"*
29. Our experience with Dougans show him to be a man clearly unable to work within any kind of ethical framework and only too keen to lie, deceive, tamper with evidence, breach a court order, and even go against his own previous arguments, for the sole purpose of winning at all cost, truth be damned. Even though we believe he doesn't know where my family (including our three young children) live at the moment, we feel watched online in a menacing way. I believe it is conduct unbecoming a solicitor, and I feel it brings the profession into disrepute.

#### **STATEMENT OF TRUTH**

I can confirm that this statement is true to the best of my knowledge and belief.

Steve Paris

Date

2/4/18

## [1] Examples of Stalking Behaviour by Dougans' clients

Quotes of Stalking from Lewis and Byng's disclosure include:

- **23-Sep-2011** - *"Btw, now — this morning — they're in Paris"*
- **28-Sep-2011** - *"the hospital [where my wife's mother was dying of cancer] will be in Guilford Home | The Royal Surrey County Hospital – NHS Trust. One call from R [that's Dr Richard Byng, Melanie Byng's husband] to this team... Palliative Care"*
- **31-May-2013** - *"I know their children had new iPads. They were in Bristol."*
- **5-Jul-2013** - *"Our friends are not just on a jaunt to Venice. Angel is speaking at a conference on cults . Jeebus"*

## [2] Tampered Quote 1

Here is the actual quote we wrote, comparing Byng's actions to the actions of the cult our children had been damaged by:

*"It has been a shocking experience, to say the least, and resembles nothing more strikingly than the behaviour of the Steiner School our kids went to. The anonymous critic [Byng] displayed the same seductive, grooming types of behaviour that we have had to document at the school [...]"*

*"Does Alicia not know then, about how "Thetis Mercurio" [Byng] has demonstrated what can really only be described as grooming behaviour towards our child? How can we call it otherwise when "Thetis Mercurio" made so many advances towards her, with healing offers of help to re-engage her with school, even sending out her son to us with the message that he came really only to talk to our daughter about his wonderful school, in the country."*

Here is the quote of the second paragraph used in court documents and in court by Dougans' team. That quote is how it appeared in the case's Defence document:

*"[The Second Defendant] has demonstrated what can really only be described as grooming behaviour towards our child[.] How can we call it otherwise when [the Second Defendant] made so many advances towards her."*

Notice the glaring omission of square brackets around the last manufactured full stop, taking the sentence completely out of its natural context, but hiding that fact from the court.

### [3] Tampered Quote 2

Byng admitted the following in a private document:

*"I want to make it clear that there has been no clinical assessment of Angel Garden's mental health by my husband, Ms Garden is not his patient and he has never diagnosed her with any mental health issue. Any comments I have made which might suggest otherwise are untrue and understandably distressing to Ms Garden."*

This is in direct contradiction to what she said on the stand:

*"If what you are saying is that I am pretending that Richard has made a diagnosis of Ms. Garden, it is completely untrue."*

In a document to the Appeal judge, Dugans' team argued both statements were "factually consistent" by deliberately removing the last sentence of the first statement.

### [4] The "Big-Hitters"

The following was discovered within Lewis and Byng's disclosure:

- **3-May-2012** - *"Andy Lewis of the Quackometer [...] knows most of the big-hitters so he has put out a warning."*

A court order was issued to release this warning and to know who it was sent to. Dougans' team never obeyed this order and remain in breach of it to this day.

### [5] Finding Neighbours and Acquaintances

Dougans' clients were adept at looking for people who lived near us, even looking for people from the cult school our children had been evicted from to see if she could find any info to attack us with, even from the other side of the world (at the time, we were living in New Zealand and they in the UK):

- **6-Nov-2012** - *"He certainly said nothing unkind about the children or anything alarming about the way they were treated. [...] there's nothing of this kind being circulated among WC etc and I've not heard accusations from the Steiner school in Titirangi through any source, including other parents."*

Having neighbours spy on us in the UK on behalf of Dougans, his team and his clients, is therefore not beyond the realms of possibility.

## [6] Gaslighting



For Dougans, a solicitor, to publicly state two obviously contradicting statements [3] are “*clearly factually consistent*” is nothing but an attempt at gaslighting.

## [7] Lying about the Defamation Case



David Colquhoun’s response to this question was “*I think that is more or less right*”. Neither Dougans, nor his clients who were tagged to that tweet corrected him on that false assumption because it is actually one of the numerous lies they are spreading about this case.

## [8] Using Byng’s Husband’s Medical Credentials and Made Up Diagnosis to Spread the False Notion my Wife is Dangerously Mentally Ill

There are many examples throughout her disclosure of which the following are but a small sample:

**13-Oct-2011** - “*At the end of this is his clinical judgement, which she seems to have forgotten.*”

**12-Jan-2012** - “*Angel has a borderline personality disorder. This is a clinical judgement, not a personal opinion. It isn’t simply depression. It makes her very dangerous*”

**31-Jan-2012** - “*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.*”