

Maurice Kirk v Royal College of Veterinary Surgeons

Amended Particulars of Claim

9CF04115

1. The Defendant entered the veterinary profession in January 1969 and there upon dedicated his life to the welfare of animals and in particular, maintaining the confidentiality between both client and veterinary surgeon throughout.
2. The Defendant owed the Claimant a duty of care in the tort of negligence and that the 1967 Royal Charter bestowed bias in favour of both Defendant and its agents. The failed duties of the Defendant's 'officers of the court', including Registrar, Ms Jane Hern, Deputy Registrar, Mr Gordon Hockey and their instructed solicitors, Penningtons, Alison Foster QC, prosecuting and Sir John Wood, their Legal Assessor to its Disciplinary Committee, caused damage by not so advising the Claimant as to his rights and obligations and of his legal position with regards to the anomaly of apparent influence by 'The Royal Prerogative', enjoyed only by the Defendant.

Extract of RCVS 2004 Statutory Instrument of the Veterinary Surgeons Act

In a conviction case, the respondent may adduce evidence as to the nature and circumstances of the offence, to show that they do not render him unfit to practice veterinary surgery, and may address the Committee. [Charge A]

In a conduct case, the respondent may adduce evidence to show that the facts alleged are not such as to constitute disgraceful conduct in any professional respect, and may address the Committee. [Charge B]

3. In January 2001 a South Wales Police complaint, against the Claimant, was made to the Defendant by an Inspector Collins of the South Wales Police following the incident of two dogs, allegedly falling over a cliff and needing immediate veterinary attention, being the subject matter of Charge B.
4. The Defendant was negligent in failing to properly disclose to the Claimant the other Charge, that of 'breach of trust and confidentiality between veterinary surgeon and his client', that was also being considered by the Defendant.
5. The Defendant failed to inform the Claimant that, during the relevant period, Members of Parliament, Welsh Assembly and officers of South Wales Police, all with erroneous information, complained of the Claimant causing, in 2001, the PI Committee to so refer his case to the Disciplinary Committee.

6. After Charges were listed for hearing the Defendant obtained evidence clearing the Claimant's name, with respects to 'breach in confidentiality' but the Defendant, knowing the complaint had been exaggerated and/or completely fabricated by a Miss Felicity Norton and others, failed to properly inform the Claimant of the circumstances.
7. The Defendant applied pressure through the Members of Parliament, Welsh Assembly Members, Crown Prosecution Service and others to assist in obtaining evidence against the Claimant including a copy the Claimant's police record to which the Defendant was not entitled. This included communication by the Deputy Registrar, Mr Hockey, with all named parties above, undisclosed to the Claimant.
8. The Defendant withdrew the charge of 'breach of confidentiality' and pursued past, spent convictions, dating back to 1993 but without referring the matter back to the Preliminary Investigation Committee for reconsideration. Had the Defendant done so the disciplinary proceedings would have terminated. This act was deliberate and/or negligent and showed malice.
9. The Claimant's list of purported criminal convictions, Charge A and material from police files held at both Cardiff and Barry police stations, disclosed to the Defendant by the South Wales Police and acted upon by the Defendant, was obtained unlawfully, was erroneous and contrary to Home Office Rule 86/45 and showed negligence and/or malice.
10. The convictions had nothing what so ever to do with practicing veterinary surgery.
11. Charge A5. The Defendant knew or ought to have known that no such endorsement was identified on Claimant's motoring record.
12. Charge A7. The Defendant knew or should have known that there was no conviction for 'failing to produce motoring insurance'.
13. Charge A10. The Defendant was negligent and/or malicious in introducing the real risk of invincible prejudice into the minds of the Disciplinary Tribunal by listing convictions that had already been quashed and then, at length, addressing the court on the incident with unsubstantiated defamatory and erroneous allegations.
14. Charge A12. The Defendant was negligent and/or malicious in introducing the real risk of invincible prejudice into the minds of the Disciplinary Tribunal by listing a conviction that had already been quashed and then, at length, addressing the court on the incident at length with unsubstantiated defamatory and erroneous allegations.
15. The Defendant failed to disclose to the Claimant that convictions in Charge A had already been investigated, years earlier and dismissed by the Defendant as irrelevant for the purpose of removing the name of a veterinary surgeon's name from the register.

16. Had one or more of these charges, in Charge A, **not** been before the Disciplinary Committee their ‘cumulative effect’, in order to remove the Defendant’s name from the register, as referred to by Their Lordships 8th June 2004 Privy Council Judgment, could not have happened.

17. Extract of 2004 Statutory Instrument:

8. Disclosure of documents

At the same time that he serves the College's evidence in accordance with paragraph 7.1, the Solicitor shall send to the respondent and any other party in the case any -

(a) formal complaint;

(b) statement;

(c) admission, explanation or similar document sent to the College by any party to the inquiry; and

(d) evidence which may assist the respondent's case or harm the College's case, acquired in the course of investigating and preparing the disciplinary case against the respondent, which has not already been disclosed under paragraph 7.1.

18. The Defendant failed to conduct the disciplinary proceedings under both criminal and civil court rules, as laid down by law. The Defendant was not entitled to withhold relevant evidence, deny the very existence of contemporaneous record of the enquiry or those of the Tribunal, created in the presence of the Claimant.

19. At the commencement of the original hearing, in January 2001, the Charges were read out in court by the wrong person, in the wrong order and should have been deliberated upon separately and judgment given separately instead of a complete fudge and clear abuse of process, as depicted in the subsequent 8 days or so of official transcript.

20. The Defendant, during the Claimant’s 2nd and later, subsequent applications for reinstatement to the veterinary profession, by stating that any single conviction in Charge A rendered him ‘unfit to practice veterinary medicine’ was groundless, negligent and/or malicious and incurred damage.

21. It is evident from the Defendant’s late partial disclosure, the identification of witnesses and release of written evidence, that had it been put before any Defendant’s committee or subsequent Judicial Committee of the Privy Council the Claimant would have been allowed to continue practicing veterinary surgery.

22. The 19th January 2004 Privy Council Appeal was not by way of a new hearing of evidence [de novo] but a conducted hearing of legal submissions. Neither Their Lordships nor the Claimant were or could have been aware of much of the facts now

23. The Defendant was negligent and/or malicious not to have allowed the Disciplinary Tribunal to have sight of the Claimant's Particulars of Claim against the Chief Constable of South Wales, citing ten years covert surveillance, all relating to Charge A.
24. The Defendant was aware that the South Wales Police, during the relevant period of the Defendant's enquiry, lost in excess of 120 criminal charges against the Claimant. Since 29th May 2002, the day the Claimant had his name removed from the veterinary register, the Defendant was aware no further convictions were sought in the courts by the South Wales Police until 26th February 2009 when the Chief Constable, Ms Barabara Wilding, signed the 26th February 2009 sworn affidavit, stating she was not aware of previous Barry Magistrate's court hearings, involving herself and the Claimant and an incident, on 6th June 1995, causing her police to break into the Claimant's veterinary surgery and cause damage.
25. The Defendant was negligent and/or malicious not to have allowed the medical records of Barry Veterinary Hospital, on the emergency treatment of the two dogs, in Charge B, to have gone before the Tribunal following their direct request for same, subject to with or without the permission from the Defendant's complainant, the Claimant's client, the South Wales Police.
26. Upon striking the Defendant's name off the veterinary register the Tribunal then castigated him for his 'refusal to so disclose the medical records'. The 'officers of the court', present, again remained silent which was, again, negligent and/or malicious with their knowledge that the sick Legal Assessor had refused both the medical records and Particulars of Claim to be introduced into the Claimants' defence case.
27. The removal of the Claimant's name from the veterinary register by the Defendant had been obtained by the conspiracy of South Wales Police, Defendant and others reliant on the continuing failed disclosure of evidence. Their joint conduct was required to assure the Defendant's refusal to reinstate the Defendant thus preventing, once reinstated as a member, the Claimant's access to the Defendant's Council records.
28. The conduct of the 'officers of the court', on behalf of the Defendant, was contrary to the basic rules of natural justice, the 1966 Veterinary Surgeons Act, 1998 Human Rights Act, Articles 6b,c,d of the 1948 European Convention of Human Rights and Fundamental Freedoms and Sections 2, 3 and 4 of the 2006 Fraud Act and in particular:
 - a) The Defendant repeatedly misled the court at the original and subsequent proceedings in their presentation of their case in that the Defendant repeatedly stated relevant disclosure had been carried out knowing or should have known undisclosed evidence was favourable to the Claimant.

- b) The defendant refused the Claimant right to call Inspector Collins to give evidence following his January 2001 written complaint to the Defendant.
- c) Potential witnesses were interviewed by the Defendant but neither their identity nor any contemporaneous note taken has ever been disclosed to the Claimant. Mrs. Hunt, Miss M Williams, magistrate, Miss Williams, retired head teacher, Mr J James, Mr and Mrs. Gregson and Miss A Tucker, the latter employed to investigate the enquiry, interviewing and writing down the evidence, are but a few examples. There are many more.
- d) Subpoenaed police officers by the Defendant, not by the High Court, were interviewed by the Defendant and contemporaneous notes taken but none these were disclosed to the claimant. To then to have hidden them in the bowels of the college during the trial, without notifying the claimant they were available as defence witnesses until after the prosecution case had closed is just an example of the day by day abuse of process and breaches of the rule of law.
- e) Mr and Mrs. Gregson, one of the Claimant's own clients, could not be traced, in time for court, by the Claimant due to the Defendant supplying to the Claimant a false address on their draft un read and unsigned witness statements.
- f) Defendant had, before the court, denied needing their attendance in court knowing full well the Gregsons had refused to attend.
- g) The Defendant falsified evidence in that it served on the Claimant witness statements purported to be approved by the witnesses only for it to be found, after the trial, that statements, tendered, had been fabricated by the Defendant.
- h) Magistrate, Miss M Williams's original statement contained, "there was no doubt about Mr Kirk's concern for the dog" but not included in her 'draft' witness statement fabricated and tendered by the Defendant. Miss M Williams's 4th January complaint to the Deputy Registrar contained,
- i) "I would be grateful to learn if this is true [her original statement was withheld until after the claimant was struck off] especially as the statement contained the fact there was no doubt in my mind that Mr Kirk's concern for the well being of the dog was evident and paramount".
- j) The Defendant refused to allow Mr and Mrs Ebbs to give evidence, as an example of many, they having never refused to attend to give evidence. Mr and Mrs Ebbs would have told the court Christopher Paul Ebbs, their son, a key prosecution witness, was known in the General Aviation world as a congenital liar, a thief and a fraudster, having had CAA engineering qualifications withdrawn owing to his worsening mental condition, originating from his early childhood requiring long term psychiatric hospitalisation.

- k) The Defendant's employment of the Legal Assessor, refusing a string of both competent and compellable defence witnesses, to give relevant evidence, identical in standing to those tendered by the prosecution, ie eye witnesses, investigating police officers, 'as to the nature and circumstances of the offence', was negligent and/or showed malice. The Legal Assessor's speech, demeanor and writings, some caught on court record and having to repeatedly adjourn the hearing, for medical reasons, indicated illness sufficient to exempt him from so acting, falling outside Section 7 of the Courts and Legal Services Act 1990. For no officer of the court to so intervene, once damage was done was an abuse of process, negligence and/or malice.
- l) The legal procedures, demanded on the Claimant, by the Defendant, before the commencement of the 29th January 2001 trial, stating witness summonses must only be issued by the High Court and not to be issued by the Royal College of Veterinary surgeons was malicious when Registrar, Miss Jane Hern had just issued her own summonses on prosecution witnesses in order for them to attend court.
- m) For the Defendant to demand, in front of prosecuting Queen's Counsel and its attending legal team, he divulge his own defence case and that from his proposed defence witnesses, was not just unique in the history of the veterinary profession, it revealed premeditated criminal conduct driven by malice and was a clear contempt of court.
- n) Before, during and after not less than thirty or so judicial enquiries, conducted under the 1966 Veterinary Surgeons Act, held at the premises of the Defendant, in the Privy Council Court, Downing Street, Administrative Court, Court of Appeal or Cardiff County Court the Defendant repeatedly failed to disclose relevant evidence both favourable to the Claimant and/or undermined the Defendant's case. This was negligent and/or showed malice.

Failure by the Defendant to re instate the claimant to the veterinary register.

Extract of 2004 Statutory Instrument:

20.3 On receipt of an application to which this Rule applies, the application shall be listed for hearing within 3 months.

At the hearing of an application to which this Rule applies –

- (a) The applicant shall be entitled to address the Committee, and to adduce evidence and make submissions, in support of the application;**
- (b) (b) The Solicitor shall be entitled to address the Committee, and to adduce evidence and make submissions, in opposition to the application.**

1. Since the Claimant's name was removed from the veterinary register the Defendant has continued to fail to disclose evidence either favourable to the Claimant or harmful to the Defendant required for court applications. Defendant statements before and/or during Judicial Review Applications of 2005, 2006, 2007, 2008 and 2009 have indicated contemporaneous note, as likened to a policeman's note book, was recorded from inquiry witnesses since before 1987. It was not until 2007 did the Defendant finally admit their existence but pleaded all were non disclosable due to 'professional legal privilege'. A different Legal Assessor, Mr Gary Flather, stated 'contemporaneous record' should be disclosed. This defence, not to disclose, whether claiming 'qualified' or 'absolute' is an abuse of process and avoiding the Legal Assessor's statement to the open court, was contrary to The Veterinary Surgeons Act and malicious.
2. Since the removal of his name from the register, the Appellant has been unable to practice within the United Kingdom as a veterinary surgeon.
3. On or about 31 July 2007 the Appellant applied to the Disciplinary Committee of the Council pursuant to Section 18 of the Act for his name to be restored to the register.
4. Section 18 of the Act provides:
 - (1) Where a person's name has been removed from the register of veterinary surgeons... in pursuant of a direction under Section 16 of this Act, the name of that person shall not again be entered in the register from which it was removed unless the disciplinary committee on application made to them in that behalf otherwise direct.
 - (2)
 - (3) Any application under this section for the restoration of a name to either of the said registers or for the removal of a suspension of registration shall not be made to the disciplinary committee –
 - (a) within ten months of the date of removal or suspension; or
 - (b) within ten months of a previous application there under.
5. On or about 31 July 2007 the Appellant applied to the Disciplinary Committee of the Council pursuant to Section 18 of the Act for his name to be restored to the register.
6. By letter dated 4 September 2007, the Appellant was informed by the Chairman of the disciplinary committee of the Council, that the Appellant's application made on or about 31 July 2007 had been removed from the list for hearing on 6 September 2007 and the

Appellant was subsequently informed that his said application would not be put before the Disciplinary Committee for hearing.

7. On 4 July 2008, the Appellant applied to the Disciplinary Committee of the Council pursuant to Section 18 of the Act for his name to be restored to the register.
8. By letter dated 21 August 2008 the Appellant was informed by the Chairman of the Disciplinary Committee of the Council that the Appellant's said application would not be listed for hearing before the Disciplinary Committee.
9. On 14 May 2009 the Appellant again applied to the Disciplinary Committee of the Council pursuant to Section 18 of the Act for his name to be restored to the register.
10. By letter dated 12 June 2009, the Appellant was informed by the Chairman of the Disciplinary committee of the Council that the Appellant's said application would not be listed for hearing before the disciplinary committee.
11. Rule 20 of Part V of the Veterinary Surgeons and Veterinary Practitioners (Disciplinary Committee) (Procedure and Evidence) Rules Order of Council 2004 ("Rules Order of Council 2004"), prescribes the procedure to be adopted when an application is made to the disciplinary committee of the Council pursuant to Section 18 of the Act for the restoration of a name to the register. Rule 20 provides as follows:
 - 20.1 An application to the Committee under Section 18 of the Act, for the restoration of a name to the register..., shall be made in writing to the Clerk and shall set out the grounds for the application.
 - 20.2 The applicant may submit with his application any documentary evidence which he wishes to have drawn to the attention of the Committee in support of his application, including references.
 - 20.3 On receipt of an application to which this Rule applies, the application shall be listed for hearing within three months.
 - 20.4
 - 20.5
 - 20.6 At the hearing of an application to which this Rule applies -

- (a) The applicant shall be entitled to address the Committee and to adduce evidence and to make submissions, in support of the application.
- (b)
- (c) The Appellant contends that the decisions of the Chairman of the disciplinary committee of the Council not to list for hearing his applications listed in Section 5 hereof made pursuant to Section 18 of the Act, is unlawful.
- (d) The procedure set out in Rule 20 of Part V of the Rules Order of Council 2004 is prescriptive. Rule 20.3 directs that an application pursuant to Section 18 of the Act "... *shall* be listed for hearing within three months". (The Appellant's italics). Neither the disciplinary committee, nor its Chairman, has the power to refuse to list an application for hearing.
- (e) By letters dated 24th December 2004 and 2 October 2006 from Penningtons LLP, the solicitors instructed by the Respondent, the disciplinary committee sought to impose pre-conditions on the Appellant's ability to obtain an oral hearing before the disciplinary committee. In authorising such letters, the disciplinary committee sought to predetermine the Appellant's application.
- (f) By Section 15(2) of the Act, the disciplinary committee is a committee of the Respondent Council and any failure with regard to the discharge of the Committee's functions, is a default by the Respondent Council so as to engage the jurisdiction of the Judicial Committee of the Privy Council pursuant to Section 22 of the Act.
- (g) The Appellant contends that the 1966 Veterinary Surgeons Act is in breach of the 1998 Human Rights Act.
- (h) The Appellant contends that the 1967 Royal Charter is in breach of both Article 1 and Article 6 of The European Convention on Human Rights and Fundamental Freedoms in that it bestows bias and that the Appellant should have been made aware of this apparent anomaly by the Respondent Council in 2001 and thereon.
- (i) On each of the Claimant's applications to the Defendant, in 2004, 2005, 2006, 2007, 2008 and 2009, for his name to be restored to the veterinary register, in order to practice veterinary medicine, the Defendant continued to abuse the laws of disclosure and laid down onerous conditions and in particular:

- 1 Withheld contemporaneous notes obtained by both lay and professional staff of the Defendant, Penningtons, solicitors and the South Wales Police, when all interviewed including the Claimant's clients, eye witnesses and/or investigating police officers. Ms A Tucker is but one example of at least six deployed across the UK to obtain evidence Ms being one of the refused character witnesses at Applications for re instatement.
- 2 During the October 06 Claimant's Application, for re instatement, on the Defendant's premises, he was refused following refusal of an adjournment to call character witnesses. An adjournment had been blocked by the erroneous ex parte telephone call, purportedly from Penningtons, to HHJ Hickenbottom, Cardiff County court, for the Defendant's malicious intent, again, to block the issuing of witness summonses. RCVS used the excuse of the then current Extended Civil Restraint Order, obtained by the RCVS, preventing the Claimant from the issuing of witness summonses until cleared by the High Court.
- 3 The Claimant was entitled to character witnesses, under the Act and the Defendant informed the court that the office lawyer, in the Royal Courts of Justice's Administrative Court, the day before, was arranging the temporary lifting of the ECRO in order that evidence could be made available. This, coupled with the HM Attorney General's 2003 Order to instigate a 'Vexatious Litigant' enquiry with almost everyone relevant notified, save the target, the Claimant, the conduct of the Defendant to withhold those witnesses, [Defendant's investigator(s) who gathered the original witness material] was unlawful, including the then current Fraud Act.
- 4 The Defendant denied their very existence of this relevant evidence, gathered by its own staff and agents until 2007, again held at Belgravia House, 62, Horseferry Road, London, when the different Legal Assessor, to the original, so directed the Defendant to disclose. The Defendant continues to refuse.
- 5 These withheld contemporaneous notes and witness statements of relevant evidence, under the control of the Defendant and South Wales Police, following the Claimant's application under the Data Protection Act to the Information Commissioner, he receiving erroneous information from the Defendant, caused the Defendant, when addressing judges in the Royal Courts of Justice and elsewhere, on oath, to state 'failed disclosure' of evidence or admission of its very existence, was accepted by the Information Commissioner as lawful. The Defendant's conduct was negligent and/or malicious.
- 6 All lawyers for the Defendant, including The Registrar, Deputy Registrar, solicitors of Penningtons and their barristers, all remained silent, contrary to their oath to the Crown, when they should have brought breaches of law, by the Legal Assessor and of themselves, to the notice of the lay tribunal of the Disciplinary Committee. For the QC, deliberately towards the close of the trial, to mutter the Claimant should have been allowed the refused witnesses after all further supports the claimant's contention that the trial was rigged from the start.

- 7 The Legal Assessor, first refusing the Claimant to comply to the Order of the Disciplinary Committee, to lodge his medical records, for the two dogs admitted to his hospital, would have been a clear breach of Claimant's client's confidentiality, had he done so, the South Wales Police having **not** given him that permission is but one example. The Claimant being struck off, effectively for life, when the committee, just minutes later, castigating the Claimant for 'refusing to disclose medical records', is just another example of the Abuse of Process throughout the trial under the sole control of the Defendant.
- 8 During the 2002 trial the Defendant served it own witness summonses for obtaining specific officers of police, of its own choosing, to attend court to give 'defence evidence', unbeknown to the Claimant and contrary to the ruling of Mr Justice Sullivan J whilst informing the Claimant the hearing had been held in the Court of Appeal, not the Administrative Court the latter allowing the Claimant's right of appeal. The Defendant's conduct was negligent and/or malicious and caused damage.
- 9 The Defendant deliberately misled or was negligent in advising the Claimant that witness summons could only be issued by the High Court.
- 10 On 19th January 2004 The Defendant fraudulently claimed costs before the Judicial Committee of the Privy Council only for the bill of costs to be later taxed from around £66,000 to £44,000, approximately a one third reduction.
- 11 On 15th June 2009 The Defendant fraudulently claimed, in a short hearing, around £7000 costs withholding the fact from Mr Deputy Justice Goordie that the previous judge, on 16th June 2008, Mr Justice Lloyd Jones, had refused costs. The Defendant used almost an identical copy, if not the same small bundle of papers, from those used on the previous application.
- 12 In February 2010, unbeknown to the Claimant, then falsely imprisoned, on remand, for a fictitious South Wales Police allegation, the Defendant fraudulently claimed £6,676.83p simply to place what would cost, the High Court stated, would be around £250, for a charging order on the Claimant's property that, by mutual consent, could have cost nothing. The judgment reducing the claim to £676.83p confirms fraud and the Claimant claims damages.
- 13 On 15th June 2009 The Defendant fraudulently claimed over £8000 costs withholding the fact from Mr Deputy Justice Goordie that the judge, on 16th June 2008, Mr JusticeLloyd, refused costs, the Defendant having used almost an identical small bundle of papers from those used in the previous application for reinstatement, the cost of photocopying being insignificant.

- 14 No contemporaneous notes at all of the convictions, causing the Claimant's name removed from the veterinary register, have ever been disclosed needed for Re instatement Applications.
- 15 Four Applications by the Claimant, to be restored to the veterinary register, have been refused by the Defendant, including November/December 2004, by not allowing the Application to go before the Disciplinary Committee and have used different excuses each time, without foundation by changing the ground rules. The Defendant's conduct was unlawful.
- 16 Defendant's solicitor's letters, 23rd December 2004 and 2nd October 2006, contained both onerous and unique demands on the Claimant and sought to impose pre-conditions contrary to both the 1998 Human Rights Act and 1948 European Convention of Human Rights and Fundamental Freedoms.
- 17 No veterinary surgeon has ever been prosecuted for such minor criminal offences, none of them relevant to dishonesty, use and abuse of drugs or interfering with their patients, the usual causes for concern in a self regulating British profession.
- 18 No other veterinary surgeon has ever been prosecuted to render him or her unfit, as per Charge A, "that one or more of these convictions, whether taken singly or together, renders you unfit to practice veterinary surgery".
- 19 Para. 8 of Privy Council Judgment stated that the Claimant 'may adduce evidence'. The Defendant failed to allow this and thus caused damage for re instatement.

The Defendant has relied on its own procedures in court, failure to disclose evidence and falsify evidence, to deny re instatement, for its own vindictive purposes putting at risk the good name of the veterinary profession and causing the claimant and his family to claim for punitive damages.

The 'disciplinary procedure' conducted by the Royal College of Veterinary Surgeons, was contrary to the **Human Rights Act, Article 6**, as simplified below from the **Legal Services Commission (LSC)** pamphlet.

- *"Right to a fair trial*
- *A trial within a reasonable time*
- *An independent judge*
- *A public hearing*
- *Have the judge's decision made public*
- *Know the judges reason for the decision*
- *Protects the right to take court proceedings to settle a dispute*

- *Applicant be present at his/her trial*
- *Right to call witnesses”*

The Claimant contends one’s private life to one’s professional life is entirely separate and to say it is now not so for a veterinary surgeon or any other profession, as stated in 19th January 2004 Privy Council Judgment, is a clear breach of the Human Rights Act 1998 and The Defendant has no right to continue using that flawed argument for preventing The claimant from being reinstated to his chosen profession.

And the claimant claims damages and costs and the right to amend this Claim once he can obtain independent legal advice and proper pretrial disclosure as per rule of law.

Maurice J Kirk BVSc,

Claimant

29th May 2010