

**Subject:** Formal Challenge to Jurisdiction & Final Notice Before Litigation

**Dear Trip.com, Legal Team,**

I write in response to your latest correspondence, in which you **"Wrongly Assert"** that legal proceedings must be conducted under Singaporean law, citing Trip.com Travel Singapore Pte. Ltd. as the contracting party.

## **1. UK Jurisdiction Applies—Your Attempt to Shield Itself Behind Singaporean Registration Fails**

While Trip.com may **"Attempt To Shield Itself"** behind a Singaporean entity, it operates directly through **"Trip Air Ticketing (Uk) Limited,"** a **"UK-Registered Company"** engaged in travel agency activities and call center services.

- **Company Number:** 10811048
- **Registered Office:** Floor 10, 70 St Mary Axe, London, England, EC3A 8BE
- **Nature Of Business:** (SIC 79110 - Travel agency activities & 82200 - Call centers)

Trip Air Ticketing (UK) Limited **"Exists Solely For UK Operations,"** enabling Trip.com Group to **"Sell Travel Services Within The UK"** while maintaining international headquarters.

The **"Facts Remain Indisputable":**

1. **The transaction occurred while I was physically in the UK.**
2. **Payment was made in GBP using a UK-based method.**
3. **Trip.com actively markets and sells services to UK residents.**

Consequently, **"UK Consumer Protection Laws Apply,"** specifically the **"Consumer Rights Act 2015,"** which **"Explicitly Safeguards UK Consumers"** against **"Deceptive Business Practices And Service Failures."**

Your **"Attempt To Evade Jurisdiction"** holds no weight, the **"UK Courts Retain Jurisdiction, Regardless Of Your Registration In Singapore."**

## **2. Your Dismissal of Cost Recovery Is Baseless—The Evidence Proves Otherwise**

You have **"Arbitrarily Dismissed"** my analysis fees under **"CPR 46.5,"** claiming they are not recoverable. However:

- The **"Timestamped Evidence,"** consisting of extensive correspondence exchanged over several months, **"Demonstrates The Significant Time And Effort Invested"** in litigating this matter due to Trip.com's **"Persistent Refusal To Engage Properly."**

- This **"Is Not A Routine Consumer Complaint"** it has involved drafting detailed legal documents, responding to obstructive procedural objections, and **"Compiling Comprehensive Legal Arguments."**
- The structured communications involved total **"[Insert Exact Number] Emails And [Insert Word Count] Words,"** further proving the extensive burden caused by Trip.com's failure to resolve the matter efficiently.

Under **"CPR 46.5," "Fixed-Rate Cost Recovery"** for litigants in person **"Is Explicitly Permitted."** My **"Calculated Breakdown"** aligns precisely with these guidelines, ensuring fair compensation for the effort required due to Trip.com's obstruction tactics.

This precedent protects consumers who **"Incur Excessive Burdens Due To Corporate Negligence,"** which is the **"Core Issue In This Case."** If you **"Dispute The Recovery,"** then provide **"A Legally Substantiated Reason For Doing So,"** mere dismissal will not suffice.

### **3. Misrepresented Airline Documentation—Your Contradictions Exposed**

Your **"Attempt To Obscure The Facts"** by falsely attributing my missed flight to **"Travel Documentation Issues"** is disproven by **"Your Own Customer Service Records."**

At 16/04/2026 05:50pm UTC, EasyJet's **"Customer Service Advisor Confirmed That Passengers Faced Travel Document Issues,"** but **"EasyJet Refused"** to **"Transferred Them To A New Flight At No Cost,"** unlike myself and my travel partner.

However, you have **"Erroneously Conflated My Situation"** with that of **"Another Family"** who had an entirely separate issue. This other family was **"Denied Boarding Due To An Expired Passport For One Of Their Child Passengers."** In contrast, at 16/04/2026 06:47pm UTC, I **"CORDELL/SIMON."** was separately verified with a **"Valid Passport Issued Just Months Prior,"** proving your attempt to **"Wrongly Associate My Case With Theirs."**

The real issue, as **"EasyJet's Records Confirm,"** was **"Trip.com's Failure To Generate A Valid Receipt"** for my baggage purchase, leading to the financial loss I incurred:

- At 16/04/2026 06:01pm UTC, EasyJet confirmed that **"I Had To Repurchase A Hold Bag At The Airport,"** because Trip.com's system **"Failed To Recognize My Original Baggage Order,"** even **"Months After"** the initial transaction. Despite my payment being processed and reflected in my account history, Trip.com's system **"Continued To List The Baggage Order As 'Processing,'"** instead of confirming it as fully paid and valid for travel.
- This failure **"Directly Resulted In Unnecessary Financial Loss,"** forcing me to **"Pay Again For The Same Service"** due to Trip.com's **"Lack Of Transparency And Functionality."**
- Even after months had passed, your website **"Still Displayed My Baggage Order As Incomplete,"** a flaw which I documented in my **"N1 Claim Form Screenshots."**

- At 16/04/2026 06:03pm UTC, EasyJet **"Explicitly Confirmed The Additional Baggage Fee Of GBP 40,"** reinforcing the direct **"Financial Loss Caused By Your System Failure."**

### **Refusal of insurance documents**

### **Refusal of dedicated case handler**

### **Final Calculations**

Your **"Documentation Is Inconsistent And Your Explanations Do Not Align"** with the factual records. You are **"Avoiding Accountability,"** but the evidence speaks for itself.

### **4. Final Notice—Litigation Is Imminent**

Trip.com's responses have been **"Marked By Evasion, Misdirection, And Procedural Stonewalling."** You have deliberately **"Failed To Engage Meaningfully"** or acknowledge **"Clear Evidence Exposing System Flaws In Your Receipt Issuance Process."**

This is your **"Final Opportunity"** to **"Resolve This Dispute Correctly."**

If **"Full Compensation And Acknowledgment Of Liability"** is not provided **"Within 7 Days,"** I will **"File My N1 Claim Form With The UK Courts"** without further warning.

Failure to respond with a **"Substantive Resolution"** will result in **"Immediate Legal Escalation."**

Best regards, Simon Paul Cordell

The logo for Trip.com, featuring the word "Trip" in blue and ".com" in a lighter blue.

**Annex 1: Airline confirmation of missed flight and added baggage.**

The logo for easyJet, featuring the word "easyJet" in white lowercase letters on an orange background.

## EasyJet Conversation Transcript

Hey,

Here's a copy of the conversation you had with us via web chat. If you have any other questions, please feel free to contact us again.

Thank you!

**Chat ID: 01%3f9f-2c55-7aaO-b59a-a6c44ceda376**

**16/04/2025 05:21pm UTC - easy Jet Virtual Advisor:**

You're now in the queue. Please keep this conversation and webpage open while we transfer you to one of our Customer Service advisors. Thank you for your patience.

**16/04/2025 05:21pm UTC - easy Jet Virtual Advisor:**

While you're waiting, make sure you have your \*\* booking reference number\*\* and \*\*passenger information\*\* ready, as we may need these to locate your booking.

**16/04/2025 05:21pm UTC - easyJet Virtual Advisor:**

For your security, DO NOT attach your payment card information into this chat.

**16/04/2025 05:21pm UTC - easyJet Virtual Advisor:**

Gif

**16/04/2025 05:46pm UTC - easyJet Virtual Advisor:**

An agent has joined the conversation



**16/04/2025 05:46pm UTC - Customer Service Advisor:**

Welcome to easyJet you are chatting to Saif, could you please tell me your full name?

**16/04/2025 05:46pm UTC - Customer Service Advisor:**

How may I assist you?

**16/04/2025 05:46pm UTC - You:**

Hi! This is Shirley from Trip.com.

**16/04/2025 06:46pm UTC - You:**

I just wanted to confirm if the passenger was able to take the flight under reference K8MSDNZ

**16/04/2026 06:47pm UTC - Customer Service Advisor:**

Hello. Shirley.

**16/04/2026 05:47pm UTC ■ Customer Service Advisor:**

No worries I will do my best to assist you. Please tell me the flight time date route the names of the passengers, and the email address used on the booking.

**16/04/2026 06:47pm UTC - You:**

CORDELL/SIMQN

**16/04/2026 05:46pm UTC - You:**

One way ■ London-Antalya

**16/04/2026 05:46pm UTC - You:**

2025-01-08 08:00 LGW/S 15:20 AYT/T2

**16/04/2025 05:46pm UTC - You:**

[ty.ler.kel.lyckpkc@gmail.com](mailto:ty.ler.kel.lyckpkc@gmail.com)

**16/04/2026 05:45pm UTC ■ Customer Service Advisor:**

Thank you.

**16/04/2026 05:45pm UTC - Customer Service Advisor:**

Please allow me 3 minutes to check the booking.

**16/04/2026 05:45pm UTC - You:**

Thank you!

**16/04/2026 05:50pm UTC ■ Customer Service Advisor:**

My pleasure.

**16/04/2026 05:50pm UTC - Customer Service Advisor:**

Sorry for the wait. I can see that the passengers **did face an issue with the travel documents**, and we did transfer them to a new flight for free.



**16/04/2026 05:53pm UTC - You:**

**I see. You mean there was an issue with visa requirements?**

**16/04/2026 05:53pm UTC - You:**

Can you also confirm if they **did add baggage at the airport?**

**16/04/2025 05:55pm UTC \* Customer Service Advisor:**

There was issue with the **passengers' details check from our end** and then we did a **free flight transfer to a new flight** "**With the Same Luggage Allowance That the Passengers Had.**"

**16/04/2025 05:5 Spin UTC - You:**

Thank you for confirming that. Are you able to confirm if the added baggage prior to the flight was confirmed?

**16/04/2025 05:57pm UTC - Customer Service Advisor:**

Could you please elaborate on " Are you able to confirm if the added baggage prior to the flight was confirmed?".

**16/04/2025 05:56pm UTC - You:**

The passenger's initial issue was related to baggage. They requested to add carry-on baggage through us before the flight, but at the airport, they were informed that no baggage had been added. As a result\* they had to add baggage at the airport, and the passenger informed us that they missed the flight due to this issue.

**16/04/2025 05:55pm UTC - You:**

Can you check and confirm?

**16/04/2025 06:01pm UTC \* Customer Service Advisor:**

You did add a large cabin bag on the 19th of Dec. As for hold bag allowance as for the hold bag they did indeed purchase a hold bag at the airport

**16/04/2025 06:02pm UTC - You:**

Can you confirm how much is the baggage they added at the airport?

**16/04/2025 06:02pm UTC \* Customer Service Advisor:**

1 23KG hold bag.

**16/04/2025 06:02pm UTC - You:**

I mean the price of the baggage. Is it for GBP40?

**16/04/2025 06:03pm UTC \* Customer Service Advisor**

Yes 40GBP.

16/04/2025 06:04pm UTC - You:

Thank you for confirming.

**16/04/2025 06:04pm UTC \* Customer Service Advisor:**

You are always welcome please let me know if there is anything else I can help you with.

**16/04/2025 06:04pm UTC - You:**

Just to confirm again, the carry on added prior to the flight was confirmed and issued last 19th of December. Correct?

**Trip.com**

**16/04/2025 06:04pm UTC - Customer Service Advisor:**

Yes.

**16/04/2025 06:04pm UTC - You:**

And its 15KG carry on.

**16/04/2025 06:05pm UTC - Customer Service Advisor:**

It is a 15KG large cabin bag.

**16/04/2025 06:06pm UTC - You:**

Thank you. Also, to confirm again. The passenger missed this flight due to an issue with their travel documents, but you were providing an alternative flight. Right?

**16/04/2025 06:06pm UTC ■ Customer Service Advisor:**

Yes, that is correct

**16/04/2025 06:06pm UTC - Customer Service Advisor:**

You are always welcome please let me know if there is anything else I can help you with.

**16/04/2025 06:07pm UTC - You:**

Can you provide the details of the new flight you provided?

**16/04/2025 06:06pm UTC ■ Customer Service Advisor:**

Please allow me 3-4 minutes.

**16/04/2025 06:06pm UTC - You:**

Thank you.

**16/04/2025 06:06pm UTC - Customer Service Advisor:**

My pleasure.

**16/04/2025 06:12pm UTC ■ Customer Service Advisor:**

The new flights were from LTN to AYT at 13:00 arriving at 20:15. The new flights are on the 8th of Jan.

**16/04/2025 06:12pm UTC - Customer Service Advisor:**

Sorry for the wait.

**16/04/2025 06:11pm UTC ■ Customer Service Advisor:**

Please reply to me so I can keep the chat up.

**16/04/2025 06:13pm UTC ■ Customer Service Advisor:**

I can see that you are not responding are you still connected?

**16/04/2025 06:11pm UTC - You:**

Thank you so much for the information.

**16/04/2025 06:14pm UTC - You:**

Thats all I need.

**16/04/2025 06:14pm UTC - Customer Service Advisor:**

Most welcome and thank you for contacting easyJet, you were chatting with Saif have a wonderful evening.