

5.8 Where it is not possible to file all the above documents, the claimant must indicate which documents have not been filed and the reasons why they are not currently available. [emphasis added]

- 15. For the avoidance of doubt, and if it becomes necessary to do so, the Defendant will submit that the orders of both courts were lawful, as was the process that led to those orders being made. However, in light of the lack of particularity of the claim, the Defendant is simply unable to assist the court with any detailed analysis in response to the grounds of review.
- 16. As it stands, the claim form is wholly unarticulated and, it follows, is both unarguable and an abuse of the court's process.

CONCLUSION

- 17. The court is respectfully requested to refuse this claim permission, alternatively, the claim should be dismissed, on the bases set out above.
- 18. If the matter is to proceed further, it is respectfully submitted that the Crown Court at Wood Green and Highbury Corner Magistrates' Court both be made Interested Parties to this claim.
- 19. To assist the court, appended to this document are the three orders under challenge and referred to at paragraph 2 above.
- 20. The Commissioner will seek his costs in responding to this claim. A costs schedule also appended to this this document.

ROBERT TALALAY

Dated this 23rd day of May 2017

**Directorate of Legal Services,
Metropolitan Police Service, 10 Lamb's
Conduit Street, London, WC1N 3NR**

Solicitor for the Defendant