

MAURICE JOHN KIRK BVSc

Claimant

- and -

SECRETARY OF STATE FOR JUSTICE

1st Defendant

PAROLE BOARD FOR ENGLAND AND WALES

2nd Defendant

THE CHIEF CONSTABLE OF SOUTH WALES POLICE

3rd Defendant

RESPONSE TO FURTHER INFORMATION BY THE 2nd DEFENDANT

In respect of paragraphs 2-10 of the Particulars of Claim which relate to the Claimant's release on licence, specify as follows:

1. It is not alleged that members of the 2nd Defendant were involved in the issue of the Claimant's licence.

In respect of paragraphs 11-21 of the Particulars of Claim which relate to the revocation of the Claimant's licence

1. It is not alleged that members of the 2nd Defendant were involved in the revocation of the Claimant's licence.

In respect of paragraphs 22-28 of the Particulars of Claim, specify as follows

2. It is not alleged that members of the 2nd Defendant were involved in the alleged failure to provide reasons or adequate reasons.
2. In respect of paragraphs 29-30 of the Particulars of Claim, these are perfectly and adequately already set out relating to the failure to hold a Parole hearing regarding the Claimant's further detention in HMP Swansea until his release therefrom.
3. It is not necessary to set out details of any evidence, as the Claimant is only required to plead the facts on which his claim is based, and Particulars of Claim are not witness statements *in lieu*.

3. It is further not possible to state the names of the officials of the 2nd Defendant who committed each and every act, whether by *misfeasance* or otherwise relating to the failure to arrange a Parole hearing in respect of the Claimant, until after disclosure and exchange of witness statements.
4. The Claimant is not currently in possession of the relevant documents and information to give the requested information at the present moment, as these are held by the 2nd Defendant.

Maurice J Kirk BVSc

Dated: 12th July 2017

I believe) that the facts stated in this Response for Further Information are true.

Signed

A handwritten signature in blue ink, appearing to read 'Maurice J Kirk BVSc', written over a horizontal line.

Maurice John Kirk BVSc
Claimant