



Claim Form

In the HIGH COURT, King's Bench Division, Media and Communications List

Fee Account no.

Help with Fees - Ref no. (if applicable)

H W F - - -

For court use only

Claim no.

Issue date

You may be able to issue your claim online which may save time and money. Go to www.moneyclaim.gov.uk to find out more.

Claimant(s) name(s) and address(es) including postcode

PROFESSOR THEODORA KOSTAKOPOULOU
32 SNEYD AVENUE
WESTLANDS
NEWCASTLE UNDER LYME
STAFFORDSHIRE ST5 2PP



KB-2024-001518

Defendant(s) name and address(es) including postcode

- (1) University of Warwick (Corporate Body incorporated by Royal Charter under Royal Charter Number: RC000678) of The University of Warwick, Coventry, CV4 8UW
- (2) Professor Andrew Sanders c/o The University of Warwick, Coventry, CV4 8UW
- (3) Professor Christine Ennew OBE c/o The University of Warwick, Coventry, CV4 8UW
- (4) Professor Andy Lavender c/o Guildhall School of Music and Drama, Silk Street, Barbican, London, EC2Y 8DT
- (5) Ms Diana Āpik c/o The University of Warwick, Coventry, CV4 8UW

Brief details of claim

The Claimant's claim is for the rescission of the QB Judgment and Order of Sir Nicol of 21 December 2021 in QB-2021-000171 pursuant to the Tahkar principles and for case to be heard de novo, thereby correcting the miscarriage of justice which has affected all aspects of my life, my reputation and good name and my health and well-being.

(1) This application requests the High Court to exercise its inherent jurisdiction for the rescission of a judgment obtained by fraud thereby reflecting the principles in *Tahkar v Gracefield Developments Ltd and Others* [2019] UKSC 13, equity (*Flower v Lloyd* [1877] 6 Ch D 297), and several authorities cited in the attached particulars of claim [4]-[6], including *Jonesco v Beard* [1930] AC 298, 301-302 where it was held that 'Fraud is an insidious disease and if clearly proved to have been used so that it might deceive the court, it spreads to and infects the whole body of the judgment'.

(2) The application rests on three grounds, which are elaborated upon, and evidenced, in the particulars of claim and its exhibits namely: A. Deception of the High Court procured by the Defendants' operative materially false and misleading representations; B. Deception of the High Court procured by the Defendants' operative material non-disclosure; C. Judicial impropriety and significant error due to Sir Nicol's judgment copying from, close paraphrasing and relying on substantially similar content with the Defendants' submissions with the statistical probability of this occurring by chance (binomial probability model) being 0,1% (practically impossible).

Value

The Claimant intends to recover the costs of the action which she does not expect to exceed £ 2,000.00

Defendant's name and address for service including postcode

University of Warwick (Corporate Body incorporated by Royal Charter under Royal Charter Number: RC000678), University House, Kirby Corner Road, Coventry, CV4 8UW

	£
Amount claimed	Unspecified
Court fee	115
Legal representative's costs	To be advised
Total amount	

For further details of the courts www.gov.uk/find-court-tribunal.

When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

Claim no.

**You must indicate your preferred County Court Hearing Centre for hearings here
(see notes for guidance)**

The Claimant's claim must be issued in the High Court which will exercise its inherent jurisdiction to rescind Sir Nicol's judgement in QB-2021-000171. This claim is to be placed in the Media and Communications List.

Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

- Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.**

- No**

Does, or will, your claim include any issues under the Human Rights Act 1998?

- Yes**
 No

Claim no.

Particulars of Claim

attached

to follow

Statement of truth

Note: you are reminded that a copy of this claim form must be served on all other parties.

I understand that proceedings for contempt of court may be brought against a person who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

- I **believe** that the facts stated in this claim form and any attached sheets are true.
- The claimant** believes that the facts stated in this claim form and any attached sheets are true. I am **authorised** by the claimant to sign this statement.

Signature



- Claimant
- Litigation friend (where claimant is a child or protected party)
- Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day

2 3

Month

0 5

Year

2 0 2 4

Full name

THEODORA KOSTAKOPOULOU

Name of claimant's legal representative's firm

If signing on behalf of firm or company give position or office held

Claimant's or claimant's legal representative's address to which documents should be sent.

Building and street

32 SNEYD AVENUE

Second line of address

WESTLANDS

Town or city

NEWCASTLE UNDER LYME

County (optional)

STAFFORDSHIRE

Postcode

S T 5 2 P P

If applicable

Phone number

DX number

Your Ref.

Email

dorakostakopoulou@protonmail.com