



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 - - - -

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.

For court use only

Claim no.

Issue date

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

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



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, EC2A 3DF
- (5) Ms Diana Opik c/o The University of Warwick, Coventry, CV4 8UW

KB-2024-001772

RECEIVED BY
THE COURT
11-06-2024

Brief details of claim

KB-2024-001518 seeks the rescission of the Sir Nicol's Judgment and Order of 21 December 2021 in QB-2021-000171 on the ground of fraud. Although it was filed on 23/05/24 and served on the Defendants on 28/05/2024, it originated as an application notice on 28/04/24 sent to the Defendants on 29/04/24. Events on 1/05/2024 and the ensuing legal process led the discovery of additional facts of deception of the High Court in relation to the Defendants' submitted statements of costs which had materially influenced Sir Nicol's costs paragraphs of his Order. Because making an amendment to justify a claim on a different factual basis amounts to making a new claim even if the remedy claimed remains unchanged (Seele Austria GmbH and Co KG v Tokio Marine Europe Insurance Ltd [2009] BLR 481), the present claim relates to the costs paragraphs of Sir Nicol's Order of 21 December 2021 and the Order's rescission on the basis of fraud (Takhar v Gracefield Developments Ltd & Ors [2019] UKSC 13 and the case law referred to in KB-2024-001518). The Defendants knowingly and deliberately submitted statements of costs to the High Court with artificially inflated costs, fraudulent misrepresentations, overcharging and double counting, non-ascription of appropriate hourly rates to categories of fee earners, no breakdown for routine communications and a general failure to adhere to the rules set out in CPR r 44 and PD44, reasonableness and proportionality. This pattern is repeated across several statements of costs, suggesting that it was not a mistake but a deliberate attempt to deceive the Court and to gain an unfair advantage through an unjust, unreasonable and disproportionate costs award that would penalise the Claimant. The Defendants' fraudulent misrepresentations directly influenced the costs' award and the payment of £ 75,000 on account and thus the Order should be set aside.

Value

The Claimant intends to recover the costs of the action; it is anticipated that the amount will not exceed 2000 BP.

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-tribuna.

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)

High Court, KB Division, 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

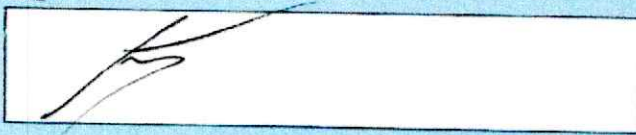
Statement of truth

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

1 1

Month

0 6

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