

# OPUS 2

## INTERNATIONAL

(1)Dr Helle Poulsen (2 )Mr Barry Weller v (1)Specsavers Optical Grp. Ltd (2)Bognor Regis Visionplus Ltd (3)Bognor Regis Specsavers Ltd v (1)Shakila Parham (2)John Parham v (1) Specsavers Optical Grp. Ltd (2)Uckfield Specsavers Ltd

Day 4

December 3, 2013

Opus 2 International - Official Court Reporters

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1 Tuesday, 3 December 2013  
 2 (10.30 am)  
 3 (Proceedings delayed)  
 4 (11.45 am)  
 5 Housekeeping  
 6 MR STUART: My Lord, before Mr Potts starts, I am asked by  
 7 Dr Poulsen's husband to mention the fact that Dr Poulsen  
 8 has a degenerative back problem, and that is why he says  
 9 she needs the opportunity to get up and walk around  
 10 every hour or so, and that may be why she mentioned  
 11 yesterday -- and it's not something I mentioned before,  
 12 to be honest, I didn't know about it myself, but I am  
 13 asked to mention it to your Lordship. That may be why  
 14 he feels she needs rests: not long rests, but just rests  
 15 that she can get up and walk around.  
 16 MR JUSTICE HILDYARD: Yes. I'll address that in one second.  
 17 Just an apology to you all. I am so sorry that this has  
 18 been delayed. The matter which I had is inherently  
 19 extremely urgent and there is no way I am afraid I could  
 20 interrupt it more than I did, and I am afraid that the  
 21 price of an interruption has been that I need to deal  
 22 with that matter at 4.30 this afternoon, and therefore  
 23 we will not be able to sit late this afternoon, and  
 24 I apologise for that too.  
 25 Dr Poulsen, I am very sorry about your back

1

1 discomfort, and you must say when you are feeling  
 2 discomforted and we will try and accommodate you. I am  
 3 sorry I hadn't appreciated that yesterday. It's not  
 4 meant to be a horrible endurance course, although the  
 5 process of cross-examination is a bit of an endurance  
 6 course.  
 7 THE WITNESS: It is. I am embarrassed, my Lord. I was in  
 8 trouble yesterday and I found it difficult to  
 9 concentrate, but you kindly let me have some breaks, so  
 10 I'll be okay.  
 11 MR JUSTICE HILDYARD: You are the best judge of when you  
 12 need a break, obviously, so if you need a break you must  
 13 indicate to me that fact, and then we will try and do  
 14 our best for you.  
 15 THE WITNESS: Thank you.  
 16 MR POTTS: My Lord, can I ask, in terms of programme for the  
 17 rest, since your Lordship has mentioned this afternoon,  
 18 your Lordship is not sitting tomorrow and Thursday, is  
 19 that right?  
 20 MR JUSTICE HILDYARD: I am not sitting tomorrow or Thursday,  
 21 I have another matter interposed, but we are sitting for  
 22 a full day on Friday. If you would like to start early  
 23 on Friday, I will be amenable to that. I'll leave it to  
 24 you.  
 25 MR POTTS: Can we see how we go? My Lord, I am grateful.

2

1 DR HELLE POULSEN (continued)  
 2 Cross-examination by MR POTTS (continued)  
 3 MR POTTS: Good morning, Dr Poulsen.  
 4 A. Good morning.  
 5 MR POTTS: In your evidence yesterday -- could the  
 6 transcript bundle please be provided -- on Day 3, if you  
 7 could turn through, it's four to a page, page 215.  
 8 Does your Lordship have the transcript?  
 9 MR JUSTICE HILDYARD: Day 3?  
 10 MR POTTS: Yes, my Lord.  
 11 A. Where do you see the numbers, sorry?  
 12 Q. In the middle of the page and then at the bottom of the  
 13 page, do you see it's four pages, it starts on the  
 14 left-hand side, then goes down, then up to the top  
 15 right. Do you see? If you could turn on a number of  
 16 pages, I think there are little indexes and things but  
 17 then you get to the meat of it, and it's 215. It's  
 18 quite a long way into the transcript. Have you found  
 19 the page numbers?  
 20 A. It doesn't make sense to me. Just a minute.  
 21 Q. Just look at any page, do you see?  
 22 A. 56, yes.  
 23 Q. 215, which is sort of in the middle of the two  
 24 holepunches, there is page numbers. Is that okay?  
 25 A. Yeah.

3

1 Q. Okay. On page 215 in the middle of the page, do you see  
 2 on the left-hand side there are some numbers that run  
 3 all the way down, some line numbers? Do you see those?  
 4 A. Yes.  
 5 Q. Lines 12 to 15, I was asking you some questions, and the  
 6 question was:  
 7 "Question: There were a couple of schedules  
 8 produced by your husband at his interview in relation to  
 9 Mr Ferguson's work. Do you remember those?  
 10 "Answer: Yes, they were produced for the  
 11 interview."  
 12 Correct?  
 13 A. Mm.  
 14 Q. Going down the page, we were trying to find the page  
 15 number, at line 24 I refer to two schedules "Correct".  
 16 Then if you go just down, the continuation on page 216:  
 17 "Question: Did you see these at the time?"  
 18 Do you see that? At the top of page 216, the bottom  
 19 right-hand side of that page, do you have that?  
 20 "Question: Did you see these at the time?"  
 21 Have you found where I am?  
 22 A. I've found that bit, yes.  
 23 Q. Okay, so you say:  
 24 "Answer: Yes, we were producing them for the --  
 25 "Question: You were involved in their production?"

4

1 "Answer: Yeah."  
 2 Going down the page to line 18, you said:  
 3 "Answer: ... our purpose, we never had this sort of  
 4 work schedule with John Ferguson because it was a matter  
 5 of saying to him from week to week what needed to be  
 6 done ..."  
 7 Do you see that?  
 8 A. Yeah.  
 9 Q. Right:  
 10 "Answer: ... My husband did all the instructing of  
 11 him. So we sat down and said: if we can try and  
 12 remember what it was we were expecting of John Ferguson,  
 13 and we put this document together, and we never  
 14 pretended that it was something we had written at the  
 15 time."  
 16 Correct; yes? That was your evidence to  
 17 his Lordship yesterday?  
 18 A. Yes, yeah.  
 19 Q. Could I ask you to keep that open and if you could turn  
 20 up, please, E5 and turn, please, to page 1237. This is  
 21 your interview with Mr Barnes on 19 July 2011; correct?  
 22 A. Correct.  
 23 Q. If you could go down to line 321 on the left-hand side,  
 24 do you see just by the second holepunch; yes?  
 25 A. 321?

1 Q. "On the two days a week", do you see that?  
 2 A. Yes.  
 3 Q. You were asked what duties is he required to perform on  
 4 these days; yes?  
 5 A. Mm.  
 6 Q. You said:  
 7 "He has a checklist he is required to go through.  
 8 I haven't got a copy to hand but I believe you have been  
 9 given a copy."  
 10 Yes? That was the two schedules which your husband  
 11 had produced to the interview a few days earlier; is  
 12 that correct?  
 13 A. I don't know if it was --  
 14 Q. Perhaps you can take it from me that it was, these were  
 15 the documents which were produced, and there is a work  
 16 schedule from JF provided to us by GV, you see that at  
 17 326? So that's the point they are making, these are the  
 18 documents provided by your husband; correct? Yes?  
 19 A. If you say so --  
 20 Q. I am just saying that's what it says on the page. The  
 21 question was:  
 22 "The agreement you have with him [that's  
 23 Mr Ferguson] is for him to fulfil what is listed on this  
 24 work schedule in order for him to get his minimum £240  
 25 a week retention."

1 Yes?  
 2 A. Yes.  
 3 Q. You confirmed the answer to that is "yes". Correct?  
 4 A. Where do you see that?  
 5 Q. At the bottom of the page.  
 6 A. Yeah.  
 7 Q. So you -- yes? Do you see that?  
 8 A. Yes.  
 9 Q. At 323 you confirmed that this was the checklist that  
 10 Mr Ferguson was required to go through; correct?  
 11 A. Yes.  
 12 Q. Now, I've taken you to your evidence yesterday where you  
 13 confirmed that this document was in fact created after  
 14 the event for the purpose of the investigation; yes?  
 15 A. Yes, and it was, and I've never hidden -- I've never  
 16 said it wasn't.  
 17 Q. Dr Poulsen, the clear impression you were giving in  
 18 interview was the opposite. You were saying you were  
 19 shown the checklist and you said "I haven't got a copy  
 20 of it", they produced a copy of it, and you confirmed  
 21 this was the checklist he was required to go through;  
 22 isn't that right?  
 23 A. But that's not how I put it over.  
 24 Q. I put it to you that is precisely how you put it over at  
 25 your interview back in 2011, that this was the checklist

1 that he was required to go through?  
 2 A. I can't even remember being shown any checklists or  
 3 anything, and we always said we sat down and we made out  
 4 the list of all the things that we could remember he had  
 5 done.  
 6 Q. That's not what you told the interview in 2011, is it,  
 7 Dr Poulsen?  
 8 A. Well, in that case I would have misunderstood.  
 9 Q. Do you accept that what you told the interview was that  
 10 this checklist was the checklist from 2009 that he had  
 11 to go through every week to get his £240; correct?  
 12 A. Well, I would have said some of the things that was on  
 13 the checklist that that is what he was supposed to do.  
 14 Q. Your evidence to his Lordship yesterday was:  
 15 "... we put this document together, and we never  
 16 pretended it was something [which had been] written at  
 17 the time."  
 18 I put it to you that is precisely what you did in  
 19 the interview?  
 20 A. (Pause). Well, I am sorry, that's not how I remember  
 21 it.  
 22 Q. I am not asking how you remember it, I am asking you to  
 23 look at precisely what you said, there is no doubt about  
 24 what you said. Let me break it down again. Do you  
 25 accept that the clear inference of the words on this

1 page are that what you were saying in interview was that  
 2 this was the checklist from 2009 that he had to go  
 3 through; is that correct?  
 4 A. Yeah.  
 5 Q. You accept that?  
 6 A. Yes.  
 7 Q. That is completely the opposite of what you said to  
 8 his Lordship yesterday; do you accept that?  
 9 A. Yes.  
 10 Q. So you were lying in the interview? This was a document  
 11 you had produced only a few days earlier; is that  
 12 correct?  
 13 A. Yes.  
 14 Q. Did you think it was appropriate to lie in the  
 15 investigation interview?  
 16 A. I didn't have the same respect for those people as  
 17 I have for my Lordship, but I get your point.  
 18 Q. So you were a party to falsely representing a document  
 19 to the interview as having been created at the time  
 20 which you accept now was not, but you are asking  
 21 his Lordship to believe in relation to all the other  
 22 documents which I showed you, including the one that you  
 23 got caught out on that those were not documents created  
 24 at the time with the intention of misrepresenting  
 25 matters to the investigation?

9

1 A. That's not true.  
 2 Q. I put it to you that those documents I showed you  
 3 yesterday were forgeries and you well knew it at the  
 4 time?  
 5 A. No, no.  
 6 Q. You knew that the reason for putting in all this  
 7 documentation was that you knew that staff would say  
 8 that Mr Ferguson was hardly in the store, and you needed  
 9 to invent something for him to have done, hence the  
 10 reference to the lock-up; is that right?  
 11 A. No, it's not true. I just feel that things are getting  
 12 twisted and twisted and twisted, and it's not the truth  
 13 that's coming out of it.  
 14 Q. Okay. Now, yesterday -- let's move on to another  
 15 point -- I asked you about the SEP system; do you  
 16 remember that?  
 17 A. Yes.  
 18 Q. Now, you said that you couldn't remember who in the  
 19 accounts department told you to put Mr Ferguson on; can  
 20 you remember that?  
 21 A. I said we couldn't remember, I never spoke to anybody in  
 22 the first place.  
 23 Q. Do you remember who spoke to the accounts department?  
 24 A. I believe it was my husband.  
 25 Q. Now, can I ask you just a couple more questions about

10

1 your husband's employment file? Could you pick up --  
 2 I think you can put away E5 -- E6, please? Do you have  
 3 that?  
 4 A. I do.  
 5 Q. Could you turn to 1391? That's the rebuttal document  
 6 that you provided along with your resignation letter;  
 7 correct?  
 8 A. Yes.  
 9 Q. Now, if you could turn over to 1391, at point 3 --  
 10 A. Yeah.  
 11 Q. -- you accuse Mr Barnes of lying about the documents,  
 12 the employment file not being in the boxes; correct?  
 13 A. Correct.  
 14 Q. We have discussed that yesterday?  
 15 A. Yes.  
 16 Q. You say the file was in the boxes taken to the  
 17 solicitors. Then it says:  
 18 "A few days later, Dr Poulsen asked us to come down  
 19 to collect some pages from the file because he couldn't  
 20 find some of the documentation and he needed something  
 21 to be photocopied."  
 22 Correct?  
 23 A. Yes.  
 24 Q. "She took the relevant pages away, one of which was the  
 25 file copy on notepaper of the employment letter."

11

1 I think that's the 14 March letter; correct?  
 2 A. Yes.  
 3 Q. Sorry, it's the -- do I mean May? May, I do mean May,  
 4 I am sorry. The 14 May letter. That's the one which  
 5 was photocopied on to the letterhead; correct?  
 6 A. Correct.  
 7 Q. What your husband's witness statement says, is that in  
 8 fact it was only the 14 May letter, the file note that  
 9 you brought home; yes?  
 10 A. No, I --  
 11 Q. I am saying that's your husband's evidence, okay?  
 12 A. Sorry. Sorry.  
 13 Q. Is that right? Would you accept that from me? That's  
 14 what his witness statement says?  
 15 A. I don't know.  
 16 Q. Do you have the transcript still in front of you? Could  
 17 you go, please, to page 196? I asked you about this  
 18 yesterday; do you remember?  
 19 A. Yes, I said I took the file, his employment file.  
 20 Q. Could you turn up page 196, please? In fact starting at  
 21 195, at line 17, you say:  
 22 "... he realised that he was missing [that] one  
 23 letter ..."  
 24 Yes?  
 25 A. I haven't got it here. What did you say?

12

1 Q. 195.  
 2 A. Yeah.  
 3 Q. Line 17.  
 4 A. So this document was produced --  
 5 Q. "It was a couple of days ... some time"; do you see  
 6 that?  
 7 "Answer: It was a couple of days after we had taken  
 8 all the files down ... that he realised that he was  
 9 missing that one letter ..."  
 10 Do you see that at page 195?  
 11 Are you with me at least, Dr Poulsen? I want to  
 12 make sure.  
 13 A. I am sorry.  
 14 Q. 195, line 17.  
 15 A. I have it now, sorry.  
 16 Q. Okay:  
 17 "Answer: Some time -- it was a couple of days after  
 18 we had taken all the files down to the solicitor's  
 19 office that he realised that he was missing that one  
 20 letter ..."  
 21 Yes?  
 22 A. Yes.  
 23 Q. Then you say:  
 24 "Answer: ... I [had] asked them to put out the  
 25 boxes ..."

13

1 Then you say:  
 2 "Question: ... you went down, picked up what?  
 3 "Answer: Picked up the whole file.  
 4 "Question: Yes.  
 5 "Answer: Took it home."  
 6 Then you say:  
 7 "Answer: Copied the employment letter ... a normal  
 8 letter ... we both re-signed it ..."  
 9 And so on.  
 10 A. Yes.  
 11 Q. Then if you go on to page 199, we went back to this  
 12 point, and at the bottom of page 24:  
 13 "Question: So you took the relevant pages away for  
 14 photocopying?"  
 15 And I asked again which ones you took away, and you  
 16 confirmed again:  
 17 "Answer: I took the whole file with me."  
 18 Correct?  
 19 A. Yes, I took the employment letter and the employment  
 20 file, the contract.  
 21 Q. Well, sorry, there are two inconsistent stories here.  
 22 Your husband's story is that you came back with a single  
 23 page document; correct?  
 24 A. No, that was the one we photocopied.  
 25 Q. Sorry, your husband's story is that you came back with

14

1 the single page document, that's his evidence in his  
 2 witness statement, the single letter?  
 3 A. Mm.  
 4 Q. Your evidence to his Lordship was that the whole file  
 5 was taken away, and the rebuttal referred not to the  
 6 whole file but some selected items. Which one was it?  
 7 A. Well, the way I remember it was I took the whole file  
 8 because I didn't stop and look at it much, I just took  
 9 the file and went home.  
 10 Q. That was not what you said contemporaneously in your  
 11 rebuttal statement, was it? Do you have 1391 open?  
 12 A. I did say I took the relevant pages away for  
 13 photocopying, one of which was the file copy.  
 14 Q. Talking about some pages, for example it wasn't his  
 15 contract, was it? You say his employment contract was  
 16 in the file; correct?  
 17 A. Yes.  
 18 Q. So if you took the file away, that would have been in  
 19 the file; correct?  
 20 A. Yes.  
 21 Q. That's not what is said here, is it, in the rebuttal at  
 22 1391? It just talks about the letter. (Pause). It's  
 23 part of the file, isn't it?  
 24 A. Yes, but it's not untrue as well, I took those pages  
 25 away.

15

1 Q. No, you are not answering my question, with respect,  
 2 Dr Poulsen. I am asking you what you took away?  
 3 A. And I say I took the file away.  
 4 Q. The whole file?  
 5 A. Yeah.  
 6 Q. So is that wrong, in 1391? Because it doesn't say the  
 7 whole file?  
 8 A. It's not wrong, because the reason I took the whole file  
 9 was for us to photocopy the office copy of the  
 10 employment letter.  
 11 Q. That was the only document you needed to copy; correct?  
 12 A. Yeah.  
 13 Q. But you are saying now to his Lordship that you took the  
 14 whole file?  
 15 A. I took the whole file, because I didn't stump(?) up to  
 16 find that particular letter, I just took the file.  
 17 Q. Just looking again at 1391 -- and take the time you  
 18 want -- that is not what is said in paragraph 3, is it?  
 19 It does not say that the whole file was taken. In fact,  
 20 it says the opposite. It talks of "some of the file for  
 21 photocopying", and the only thing to be photocopied was  
 22 alleged office copy of that document, the 14 May letter?  
 23 A. Yes, but I do believe that I kept it together in the  
 24 folder it was in.  
 25 Q. Do you accept that 1391 is incorrect?

16

1 A. Well, it's not untrue, is it? It's not untrue that  
2 I took the relevant pages away.  
3 Q. That's not what I am asking you, Dr Poulsen.  
4 A. One of which was the file copy. I took the relevant  
5 pages away for photocopying, one of which was the file  
6 copy, and the one we were actually photocopying was the  
7 file copy.  
8 Q. You see, because what you go on to say in paragraph 3 is  
9 you talk about that this was photocopied, we are talking  
10 about here not the whole file, we are talking about this  
11 14 May document?  
12 A. Yeah.  
13 Q. And the file copy was returned to the solicitors and  
14 placed back in the box in the employment file within  
15 half of hour of it being taken; correct?  
16 A. Yes.  
17 Q. The clear impression which is being given is that the  
18 file was still at the solicitor's office all this time?  
19 A. No, I don't think that's true.  
20 Q. Dr Poulsen, that's the clear impression of those words.  
21 A. No, that's if you really want to be difficult about it,  
22 because I really don't, you know -- obviously I took the  
23 contract together with the employment letter, and that  
24 was in a separate file, in a paper file.  
25 Q. Well, you won't accept that from me, Dr Poulsen --

17

1 A. And I took that back in my bag, and we photocopied the  
2 office copy onto the letterhead like I have said all the  
3 time. I don't think you are right in that. I don't  
4 think that.  
5 Q. Dr Poulsen, I put it to you that the reality is that  
6 none of this story is true, it's difficult to maintain  
7 a lie, and this story is complicated and makes  
8 absolutely no sense?  
9 A. Well, I know you keep on saying that, Mr Potts, but it's  
10 not true. I am sure you appreciate yourself how easy it  
11 is to get a little detail right of which piece of paper  
12 was in the packet as well, but that doesn't mean it's  
13 untrue.  
14 Q. The story you are giving in 1391 is the story at the  
15 time, isn't it?  
16 A. Yes.  
17 Q. Which is different from the story that you are now  
18 giving to his Lordship?  
19 A. I am giving you the story how I remember it, it's also  
20 a long time ago.  
21 Q. You haven't still answered my question. Do you accept  
22 that the story you were giving in paragraph 3 of this  
23 document is different from the story that you are giving  
24 his Lordship?  
25 A. No, I don't.

18

1 MR JUSTICE HILDYARD: The thing is that -- I am sorry to  
2 interrupt -- at 1391, it says that:  
3 "A few days later, Dr Poulsen asked the solicitors  
4 to come down to the office to collect some pages from  
5 Mr Vos' files, because upon him looking through his own  
6 personal records, he couldn't find some of his  
7 documentation, and he required some of the file to be  
8 photocopied so that he had a complete file. She took  
9 the relevant pages away."  
10 The impression given is that you were searching for  
11 individual documents and took individual documents back?  
12 A. Mm.  
13 MR JUSTICE HILDYARD: Is that right?  
14 A. Yes, I can see the way you are pointing it out, but what  
15 I am saying is I didn't stand and look through the file  
16 in the solicitor's office, I took the file.  
17 MR JUSTICE HILDYARD: You took the whole file?  
18 A. Yes.  
19 MR JUSTICE HILDYARD: And that's your distinct recollection  
20 now, is it?  
21 A. It is, which is a paper folder with the employment  
22 letter and that inside it.  
23 MR JUSTICE HILDYARD: Thank you. I am sorry to interrupt.  
24 MR POTTS: No, my Lord, thank you.  
25 Now, we were talking about the storage unit. If you

19

1 go back -- you can put, I think, the transcript away --  
2 to E2, please, page 552. The final document in the  
3 file, if that helps. Do you have it?  
4 A. I do.  
5 Q. We looked at this document yesterday, and I put it to  
6 you that this document was a concocted document. Do you  
7 see that?  
8 A. Yes.  
9 Q. You remember that?  
10 A. Yeah.  
11 Q. One of the things that is emphasised in this document,  
12 do you see at the second holepunch:  
13 "You will also continue to look after our storage  
14 unit and file in order customer files over three years  
15 old" and so on.  
16 Yes?  
17 A. Yes.  
18 Q. "... continually monitor the storage unit."  
19 Correct?  
20 A. Yeah.  
21 Q. Indeed, on the schedule for weekly matters, which you  
22 say -- which we have discussed this morning, he was  
23 meant to be doing that twice a week; correct?  
24 A. Well, that's how we remembered it when we put that  
25 schedule together. But the reality was probably that he

20

1 would be told from week to week what to do that week.  
 2 Q. Well, we have been over that, Dr Poulsen. The document,  
 3 the schedule says that he's required twice a week to go  
 4 down to the storage unit. Do you accept that, I can  
 5 take you to that?  
 6 A. What we said at the time was that if we should put down  
 7 what we would require John to do, what the whole  
 8 situation is, this is what it would look like.  
 9 Q. Could you take up E7? You have not answered my  
 10 question, but let's deal with that. E7/1676. This is  
 11 the schedule which I was discussing with you first thing  
 12 this morning, which was discussed with you in your  
 13 interview; correct?  
 14 A. Yeah.  
 15 Q. If you look, it says:  
 16 "Work schedule, 24-hour emergency cover, weekly  
 17 normal requirements £240 retention per week."  
 18 A. Mm.  
 19 Q. Then there is a list of tasks?  
 20 A. Yeah.  
 21 Q. "Attend store after hours twice a week to ... "  
 22 And if you look down:  
 23 "Take all patient records down to secure storage  
 24 lock-up number 1."  
 25 Do you see that?

21

1 A. Yes.  
 2 Q. "Bring back any files we have requested in number 2.  
 3 "Bring out files in storage area number 3.  
 4 "Ensure the storage units are safe and not a fire  
 5 hazard."  
 6 Correct?  
 7 A. Yeah.  
 8 Q. So the first four items are matters that he's meant to  
 9 do twice a week; correct?  
 10 A. Correct.  
 11 Q. That was the question I asked you. Do you see at the  
 12 bottom of the page:  
 13 "You will cover the reasonable costs of materials  
 14 out of your fee.  
 15 "Provide us with notice if you are not going to be  
 16 available any week."  
 17 Do you see that at the bottom of the page?  
 18 A. I do.  
 19 Q. The impression of that wording is that it's, as you said  
 20 in interview, in 2009, these are the things he is going  
 21 to be required to do, isn't it?  
 22 A. Well, that is our style, it's the same queries you had  
 23 about when we wrote about the meeting with Derek Dyson,  
 24 that is how we work.  
 25 Q. Okay. We have covered that. What you overlooked in

22

1 putting this concocted story together about the storage  
 2 unit in the letter and the schedule was that in fact it  
 3 was possible to check the computer records to see how  
 4 often the unit was accessed; is that right?  
 5 A. No, I won't accept that. I won't accept what you are  
 6 saying there.  
 7 Q. Sorry, do you accept that it was possible to check the  
 8 access?  
 9 A. Well, I have learned since then that it is.  
 10 Q. Yes, so you weren't aware beforehand that it was;  
 11 correct?  
 12 A. I didn't even think about it.  
 13 Q. You didn't think about it, no, that's right. You see,  
 14 Mr McAlindon's evidence is that the unit's accessed via  
 15 an electronic key fob, and that the fob activation  
 16 record in fact shows that in the 17 months from  
 17 26 January 2010 to 3 June, the unit was only visited  
 18 nine times.  
 19 A. No, that's wrong, it was between January 2010 to  
 20 May 2010, sorry, 11, I think it was.  
 21 Q. Can I show you -- if it helps, I am just reading from  
 22 the evidence. Could you pick up volume C, please,  
 23 tab 3, page 71?  
 24 You seem to be very on top of the detail,  
 25 Dr Poulsen.

23

1 A. Well, it looks like it, doesn't it?  
 2 Q. Now let's see, paragraph 80, though, talks about -- do  
 3 you see that at the bottom of the paragraph:  
 4 "In 17 months from January 2010, it was visited only  
 5 nine times."  
 6 Do you see that?  
 7 A. Yes, but if you look in the investigations report it's  
 8 a different time, it's from January 2011 to June 2011.  
 9 Q. Well, it may be --  
 10 A. So I do think that's a mistake in Mr McAlindon's witness  
 11 statement.  
 12 Q. He can be asked about that. But this is the point I'm  
 13 putting to you: that is not what had happened. That was  
 14 nothing like the number of visits that you say  
 15 Mr Ferguson was apparently required to do, twice a week  
 16 for 17 months, according to your schedule?  
 17 A. Well, we would tell him from week to week what to do,  
 18 and we were never insisting on anything like twice  
 19 weekly visits to the storage unit.  
 20 Q. Well, isn't that what that schedule says should happen?  
 21 A. That is what should happen, that is what we thought,  
 22 this is what it --  
 23 Q. So the answer is yes, he was required to go twice  
 24 a week? Is that your answer? Is that right?  
 25 A. No, that's not my answer. My answer is that the reality

24

1 was probably different, that he would be doing what was  
2 most important at that time.  
3 Q. I am not asking you what the reality might have been,  
4 Dr Poulsen, I am asking what you apparently required him  
5 to do according to that schedule we have just looked at.  
6 A. Yes, I know that's what you are saying, but I am also  
7 saying that the reality is different.  
8 Q. Could you answer my question, please? That was what the  
9 schedule required him to do; is that right?  
10 A. The schedule that we were sitting together doing, so  
11 that we could remember what we were expecting of  
12 Mr Ferguson, yes.  
13 Q. You still haven't answered my question, Dr Poulsen.  
14 Could you answer it?  
15 A. I think I've answered it as well as I can.  
16 Q. Isn't the reality, Dr Poulsen, that you were concocting  
17 this evidence because you appreciated that the staff  
18 would say that they had hardly seen Mr Ferguson, and the  
19 reference to the storage unit seemed a good idea as to  
20 how you could justify the time which he hadn't in fact  
21 been spending?  
22 A. No.  
23 Q. And you thought you could do that by putting reference  
24 into a schedule which you created and then a letter in  
25 similar terms which you created for the investigation;

25

1 correct?  
2 A. No.  
3 Q. And what happened was that you had forgotten, as you now  
4 accept, that you could actually check up on the access  
5 to the storage unit, and you got caught out?  
6 A. I didn't know that, we didn't know that, and we didn't  
7 do anything not to get caught out.  
8 Q. I put it to you you did a great deal to avoid getting  
9 caught out, you forged documents?  
10 A. That's not true.  
11 Q. Let me ask you about the SOCRATES system, we talked  
12 about that yesterday, that's the Specsavers computer  
13 system in the store?  
14 A. Yes.  
15 Q. It's the back office system, and it deals with all the  
16 records and the finances and everything else, and the  
17 till, all the systems in the store go through that  
18 system; correct? Yes?  
19 A. Yes.  
20 Q. Mr Ferguson was entered on to the SOCRATES system as  
21 a user, wasn't he?  
22 A. Yes.  
23 Q. That was on 6 June 2011; correct?  
24 A. Correct.  
25 Q. He was given managerial back office access to the

26

1 system; correct?  
2 A. Yeah.  
3 Q. How many people have managerial back office access?  
4 A. Can I tell you the background for why we put --  
5 Q. No, I would like you to answer my question first,  
6 please. How many people have managerial back office  
7 access to the system?  
8 A. I would think that would be four or five people in the  
9 store.  
10 Q. Store employees?  
11 A. Yeah.  
12 Q. Why did you put him on the system?  
13 A. Well, I have been told that my husband and Barry Weller  
14 put him on the system because we had for a long time  
15 been asking if we could get a breakdown on our contact  
16 lens invoices, because we couldn't -- they had  
17 suddenly -- what's it called, we couldn't understand why  
18 it was certainly costing us much more to pay for the  
19 contact lenses, and it was not possible to break them  
20 down so we could see which customer had had which  
21 contact lenses and had they paid for them, and we kept  
22 on asking Specsavers for that information, but they  
23 would only give us a consolidated invoice. So we had  
24 tried to find ways of finding out what was going on, and  
25 I believe that he was meant to try and see if he could

27

1 put those costs together.  
2 Q. What qualifications did he have to do this job?  
3 A. I don't think one needs that much qualification to do  
4 that.  
5 Q. He was the handyman, wasn't he?  
6 A. Well, he can also do other things.  
7 Q. He was the handyman, he used to come and unblock the  
8 toilets, paint a wall; is that right?  
9 A. I know that's what it looks like, but he had had jobs in  
10 the past, I believe, which were quite computer literate.  
11 Q. Your staff members were asked about this during the  
12 investigations. Do you remember seeing their  
13 interviews? They found it absolutely astonishing, this  
14 idea that he would be entered onto the system?  
15 A. Yes, and so did I when I heard about it the first time,  
16 but when it got explained to me, it made sense.  
17 Q. I mean, Claire Stewart, for example, when she was asked,  
18 she said it would be like having her husband put on to  
19 the system, it had nothing to do with the store?  
20 A. Yes, I have seen that.  
21 Q. Yes. Mr Rhoder, the assistant optician, he said it was  
22 weird. He said:  
23 "He doesn't work for Specsavers, he had no reason to  
24 access the system", is what he said. Do you agree?  
25 A. I can only say what I have been told.

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1 Q. Were you aware of this going on at the time?  
 2 A. Not at the time, no.  
 3 Q. Isn't the reason that this was being done to create the  
 4 impression that Mr Ferguson was more greatly involved in  
 5 the business than he actually was?  
 6 A. No, I do believe it was a plan to do that.  
 7 Q. It's not an accident, the date, is it, Dr Poulsen? You  
 8 had received an email on 26 May 2011 saying that  
 9 Mr McAlindon wanted to visit to discuss unusual  
 10 financial transactions?  
 11 A. Well, that is what happens when you as a joint venture  
 12 partner don't do as you are told, so we knew very well  
 13 what that meant.  
 14 Q. So you knew that there was a concern about transactions  
 15 and you appreciated that that was likely to include  
 16 Mr Ferguson?  
 17 A. Well, my husband also said, well, we have to carry on as  
 18 usual, it's our business, we can't just let everything  
 19 lie.  
 20 Q. You haven't answered my question, Dr Poulsen. You  
 21 appreciated, when you received the email on 26 May about  
 22 unusual financial transactions that was likely to  
 23 include the very large payments payable to Mr Ferguson;  
 24 did you appreciate that?  
 25 A. Yes, I did appreciate that when we got the second

1 letter, when -- not the first one from Mr McAlindon,  
 2 because that didn't give any details at all.  
 3 Q. No, but you appreciated, if you thought about unusual  
 4 financial transactions, that that was likely to include  
 5 the very considerable sums paid to Mr Ferguson?  
 6 A. Well, I knew that they were usually after my husband's  
 7 payments whenever they wanted to put pressure on me, so  
 8 I didn't actually think about Mr Ferguson at that time.  
 9 Q. No, but Mr Ferguson was entered onto the system on  
 10 2 June; yes?  
 11 A. Yes, I have been told that.  
 12 Q. But in fact the staff were interviewed about  
 13 Mr Ferguson, and they were saying things that -- for  
 14 example, Ms Scott that he was in no more than a couple  
 15 of times a month, for no more than a couple of hours  
 16 each time?  
 17 A. Well, that's not true.  
 18 Q. She is wrong? Gemma Davies, full-time employee, said  
 19 she had only seen him once since January for five  
 20 minutes; is that wrong?  
 21 A. It's just not true. I think all that was twisted  
 22 anyhow. I've heard since then how pressure was put on  
 23 the staff under those interviews. Anyhow, most of his  
 24 work would have been happening after working hours  
 25 because of the type of his work.

1 Q. We went through yesterday the comparison stores that  
 2 showed that the store was in fact paying about five  
 3 times the level of maintenance costs of other stores; do  
 4 you remember that?  
 5 A. I believe I have also explained to you that the stores  
 6 you were comparing us with had had -- certainly the one  
 7 I knew about the Worthing store had had very large shop  
 8 fits that was like worth half a million pounds.  
 9 Q. I put it to you that Specsavers had very good grounds to  
 10 conclude that you knew that Mr Ferguson was being paid  
 11 grossly excessive sums of money for work he wasn't  
 12 doing? Do you accept that?  
 13 A. No, I don't.  
 14 Q. I also put it to you in fact you were aware that he was  
 15 being paid excessive sums of money?  
 16 A. No.  
 17 Q. And indeed as a party to and in an attempt to mislead  
 18 the investigation, you were a party to the forging of  
 19 both the letters, the letter of 23 July?  
 20 A. No.  
 21 Q. And, as you have accepted before his Lordship today,  
 22 a misrepresentation to the interview in relation to the  
 23 schedule?  
 24 A. That's not -- I think I have explained it as good as  
 25 I could, but ...

1 Q. Could I ask you to turn up E5, please? I just want to  
 2 run through the report, a few points from the  
 3 investigation report. E5/1265. This is Mr McAlindon's  
 4 report. Do you have it?  
 5 A. I do.  
 6 Q. Now, just to run through some points, at 1270, at the  
 7 top of the page, some of these things that we went  
 8 through yesterday. In fact, sorry, 1269, starting  
 9 there, we deal with the meeting on 15 June, and over the  
 10 page. We looked at that as to what had been said by  
 11 Mr Weller or Mr Vos, you say, in relation to Specsavers  
 12 being willing to bribe members of the store; correct?  
 13 A. Yes.  
 14 Q. Then if we go back to 1265, there are findings in  
 15 relation to your husband, your husband's employment; do  
 16 you see that?  
 17 A. Where?  
 18 Q. 1265, it starts, it's just the start at the bottom of  
 19 the page, 1265, payments to WV since he has been on the  
 20 payroll, do you see the heading at the bottom of the  
 21 page, "Investigation Findings"?  
 22 A. Yeah.  
 23 Q. Okay. Then over the page, it talks about details of his  
 24 salary, without approval, and then the payroll records  
 25 as to the amounts paid to him, £139,000-odd, do you see

1 that, second paragraph? Yes? There is a breakdown  
 2 there --  
 3 A. I think I have lost you.  
 4 Q. 1266?  
 5 A. Yeah.  
 6 Q. Okay, second paragraph on the page deals with the total  
 7 amount. Do you see?  
 8 A. Mm.  
 9 Q. Then it deals with the levels of overtime payments, the  
 10 second bullet point, and the hourly rates and overtime.  
 11 Do you see those?  
 12 A. Yeah.  
 13 Q. Making the point it's considered surprising. Do you see  
 14 that? Yes?  
 15 A. Where do you see that?  
 16 Q. At the final bullet point:  
 17 "Level of payment for a part-time 24 hour practice  
 18 manager extremely surprising, far in excess of what  
 19 Mr Weller, who is the joint venture partner, receives."  
 20 Do you see that?  
 21 A. Yes.  
 22 Q. Then over the page, 1267, the reference to the overtime  
 23 payments in the second paragraph refers to the fact that  
 24 there is no overtime records to support the payments?  
 25 A. Yeah.

1 Q. Then we have details of what the staff said, and we  
 2 looked at that yesterday, 1267, all the bullet points in  
 3 relation to members of staff. Do you see that? In  
 4 terms of the amount of hours of work done and what he  
 5 was taking home.  
 6 A. Yes, and I pointed out to you that all the staff had  
 7 been asked about all the time was how many hours did he  
 8 spend in the store.  
 9 Q. It's not quite accurate, Dr Poulsen, but let's move on.  
 10 Then at 1269 there is a reference to the CCTV, we  
 11 went through that yesterday.  
 12 A. Yeah.  
 13 Q. Yes? Then we have covered the 1270, the meeting.  
 14 Then 1273 raises a concern about the veracity of  
 15 documents, you see at the first holepunch, the letter of  
 16 14 May?  
 17 A. Yeah.  
 18 Q. Then also veracity as to the contract and the letter of  
 19 1 May; do you see that?  
 20 A. Yeah.  
 21 Q. And also the fact that it hadn't been produced in time.  
 22 There is a reference again to the file, the fact these  
 23 were not in the file when retrieved from the solicitors,  
 24 at the second holepunch; do you see that?  
 25 A. Yes, and I always believed that it had been removed.

1 Q. Then at 1274, details in relation to Mr Ferguson, the  
 2 section starts there. Sorry, the conclusion at 1274,  
 3 the first holepunch, that if he was genuinely completing  
 4 the list of tasks that he would have been in store a lot  
 5 longer, more regularly taking stuff home, on the phone  
 6 to employees, wasn't supported by the evidence and so  
 7 on.  
 8 Then we have Mr Ferguson, and we looked at 1275, at  
 9 the level of payments, we talked about that?  
 10 A. Yeah.  
 11 Q. The SEP system, we have at 1275.  
 12 A. Mm.  
 13 Q. Breach of the guidelines, and so on.  
 14 Then we have the CCTV in terms of actually how much  
 15 Mr Ferguson had turned up at the store. You say he was  
 16 away.  
 17 A. That's correct.  
 18 Q. Then the alarm panel showing that the store wasn't  
 19 accessed very much out of hours; yes? Do you see that?  
 20 A. Well, that I don't understand, because the cleaners  
 21 would come into the store before we were closing it  
 22 down, the door would be open for those, John Ferguson  
 23 would come in at the same time as the cleaners sometimes  
 24 and --  
 25 Q. Well, the point is, as you see on the page at 1277, was

1 that the records of the alarm, he had invoiced for work  
 2 on a certain number of days when it appeared that the  
 3 alarm was not unset on those, all of those days?  
 4 A. Yes.  
 5 Q. Do you see?  
 6 A. I do believe that he only charged for things he did.  
 7 Q. Well, he was charging for work on those days when the  
 8 alarm wasn't activated.  
 9 Then we have the key fob activation at the lock-up  
 10 unit. We have looked at that this morning, haven't we?  
 11 A. Yes, and as I said to you, in this report, it says from  
 12 26 January to 3 June 2011.  
 13 Q. Then there is a reference to Mr Ferguson. He was  
 14 contacted, and in fact he had said he would call back to  
 15 the investigation but didn't; correct?  
 16 A. Yes.  
 17 Q. He agreed in this action to give disclosure in this  
 18 action; do you remember?  
 19 A. Yes, I do.  
 20 Q. He agreed to comply with standards of disclosure in the  
 21 same way that you did; correct?  
 22 A. Mm.  
 23 Q. You have not called him as a witness in this action,  
 24 have you?  
 25 A. No.

1 Q. In 1279 is a summary of the evidence from the employees  
2 who were asked about Mr Ferguson, and we have touched on  
3 some of those matters this morning again; correct?  
4 A. Correct.  
5 Q. Then 1281 to 1285 is the interviews that you, Mr Weller  
6 and your husband were parties to?  
7 A. Yeah.  
8 Q. Then at the bottom of 1285 and over the page is in  
9 relation to the overtime, and at 1291 -- just turning  
10 forward -- is the conclusions in relation to you. Those  
11 matters include knowingly making false payments to  
12 Mr Ferguson; do you see that, point 1(a)?  
13 A. I do.  
14 Q. And negligently doing so.  
15 2, false overtime payments to your husband, 1292?  
16 A. I see that.  
17 Q. Him not completing his contracted hours, at 3?  
18 A. I see that.  
19 Q. Interference with the evidence to the investigation,  
20 supporting your husband at the 15 June where the  
21 allegation of bribery was made and the reminders as to  
22 tasks of Mr Ferguson; do you see that?  
23 A. We spoke about that yesterday, yes.  
24 Q. We did. Then contact with Mr Weller, indeed your  
25 husband, on the investigation, and allowing Mr Ferguson

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1 to be put on SOCRATES; we have just discussed that?  
2 A. Yeah.  
3 Q. Then submission of false forged documents and evidence;  
4 do you see that?  
5 A. Mm.  
6 Q. We have the letter of 14 May, the contract, the letter  
7 of 1 May, the 23 July letter; yes?  
8 A. Yeah.  
9 Q. This was quite a comprehensive report, wasn't it,  
10 Dr Poulsen?  
11 A. Well, it was certainly a lot of accusations.  
12 Q. It was based on a lot of interviews with store staff,  
13 you, your husband and Mr Weller; correct?  
14 A. Correct.  
15 Q. Significant work done, comparisons with other stores;  
16 correct?  
17 A. (Witness nods)  
18 Q. Is that a yes?  
19 A. Yes.  
20 Q. Investigation of CCTV?  
21 A. Yes.  
22 Q. Fob activities?  
23 A. Yes.  
24 Q. The alarm?  
25 A. Yes.

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1 Q. An analysis of the computer systems and invoices?  
2 A. Yes.  
3 Q. Are you still seriously suggesting, Dr Poulsen, that  
4 there were no grounds upon which SOG could have  
5 concluded that you and Mr Weller had been fraudulent or  
6 dishonest in relation to these matters?  
7 A. Yes, because I do think that things got misunderstood on  
8 purpose. I do think that the loss prevention team has  
9 a reputation for going out trying to concoct a story,  
10 and yes, I do agree that it looks very impressive, when  
11 you say "Oh, yes, we investigated the computers and the  
12 CCTV and all this", but that is what they do. That is  
13 what they have done to many joint venture partners who  
14 has refused to do as they were told and has asked  
15 questions. The only difference is that we didn't go and  
16 see Mr McAlindon when he invited us to come and speak to  
17 him at the hotel, because we knew that if we did that,  
18 we would be put under undue pressure, been threatened  
19 with the police, made to sign paperwork we didn't want  
20 to sign, like has happened in other case, and been  
21 offered a pitiful amount of money for our shares.  
22 Q. Are you still maintaining that, Dr Poulsen --  
23 A. I am.  
24 Q. -- having this morning admitted to misleading the people  
25 carrying out the investigation interview to you?

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1 A. Well, I must confess I have got no respect for the  
2 people carrying out the interview, because they have got  
3 the reputation they have.  
4 Q. And if you don't have respect for someone, it's okay for  
5 you to lie to them, is it?  
6 A. No, I appreciate what you are saying, but I do think  
7 that the way they were behaving with John Ferguson, he  
8 was willing to help in the first place, but the way they  
9 turned up on his doorstep and seemed threatening and  
10 wanted access to his house to speak to him, the way they  
11 attacked Barry Weller outside his house, which was  
12 common assault, and the way that John Ferguson received  
13 a threatening letter from the solicitors between  
14 Christmas and New Year about his disclosures, that this  
15 and this would happen if he didn't do that.  
16 I appreciate that that is legal language, but he was  
17 scared out of his mind.  
18 Q. I don't accept any of the matters which you have just  
19 raised --  
20 A. And he got very angry with us that we could even think  
21 of asking him as a witness, because as he said "I am  
22 just the man who has provided you with services which  
23 you have paid for".  
24 Q. After --  
25 A. What would be my point in paying John Ferguson money

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1 that he hadn't earned? Why would I do that?  
 2 Q. Well, just to give one example, Dr Poulsen, if you  
 3 provided the store to pay for services for him, when he  
 4 was rendering services to you, that would create  
 5 an issue in relation to payments which you weren't taxed  
 6 on.  
 7 A. But that was not the case. Where is all this work that  
 8 he is supposed to have done for me? He hasn't.  
 9 Q. You agreed --  
 10 A. He has done a little bit of work on our houses, but we  
 11 have paid for it.  
 12 Q. Now, following receipt of this investigation report,  
 13 there was a board meeting convened to take place on  
 14 21 September; do you remember that?  
 15 A. Yes.  
 16 Q. And it was resolved at that meeting that there should be  
 17 disciplinary procedures instigated against you?  
 18 A. Yes.  
 19 Q. And then you provided your rebuttal document on  
 20 28 September, which we looked at yesterday?  
 21 A. Yeah.  
 22 Q. And you resigned at the same time?  
 23 A. Yes.  
 24 Q. In that rebuttal you allege that Mr Barnes was guilty of  
 25 deceit and that he destroyed documentation; correct?

1 A. That was what we believed. I knew I put the document  
 2 back in the box at the solicitors, so I could see no  
 3 other explanation. Anyhow, Mr Barnes has been known to  
 4 have done something similar before, so ...  
 5 Q. Rather than face disciplinary proceedings you resigned  
 6 on the 28th; is that correct?  
 7 A. Yes, I knew it was a kangaroo court. And I just didn't  
 8 think I could continue to be a director under those  
 9 circumstances.  
 10 Q. Now, you accepted, I think, that charging the company  
 11 for hours that hadn't been worked would be improper;  
 12 correct?  
 13 A. And why would I do that?  
 14 Q. To do so would be improper; do you agree?  
 15 A. Yes.  
 16 Q. And you accepted yesterday that the business wasn't  
 17 yours, it belonged to the company; correct?  
 18 A. What do you mean the business --  
 19 Q. The business belonged -- it wasn't your business, it  
 20 belonged to the company of which you were a shareholder;  
 21 I think you agreed with that yesterday?  
 22 A. Yes, yes, yeah.  
 23 Q. You also accepted you were only entitled to profits  
 24 through dividends and bonuses based on the accounts, the  
 25 bottom line reports; correct?

1 A. Correct, yes.  
 2 Q. You owed a duty to ensure the assets were applied  
 3 properly of the company?  
 4 A. Yeah.  
 5 Q. And you accepted you were responsible for the accounts  
 6 presenting a true and fair view?  
 7 A. I do.  
 8 Q. And also to ensure that the company made correct returns  
 9 for tax?  
 10 A. Yes.  
 11 Q. Siphoning off money improperly would result in the  
 12 accounts being misleading and tax returns being false;  
 13 correct?  
 14 A. Correct.  
 15 Q. We have looked at that memo on income splitting, haven't  
 16 we? Do you remember that yesterday, which you were so  
 17 concerned about? Getting your husband to be paid for  
 18 work he hadn't done would be fraudulent, wouldn't it?  
 19 A. And why would I let him be paid without having done the  
 20 work?  
 21 Q. Could you answer my question? Getting your husband to  
 22 pay for work he hadn't done would be fraudulent?  
 23 A. Yes.  
 24 Q. It would involve a deception?  
 25 A. Yes.

1 Q. Can I move on to the final point? If you go back to  
 2 your witness statement, please, at volume B, page 265.  
 3 Do you have that? Sorry, it's your witness statement.  
 4 I am sorry, it's page 50, does that help, 265?  
 5 A. Yes, I've got it now.  
 6 Q. You saying following your unlawful interjection, you  
 7 entered into a collaboration with Blue Flame Limited?  
 8 A. Correct.  
 9 Q. What was the terms of that collaboration?  
 10 A. Well, Blue Flame is a shop that sells jewellery and  
 11 glasses and there is also a lab that glazes spectacles  
 12 for other stores as well, and what we did was we had  
 13 a little concession in the store where we got part of  
 14 the profit from selling the glasses when we did the eye  
 15 test and the selling of the glasses.  
 16 Q. I see. So at paragraph 265 you refer to the fact that  
 17 you received a letter from the General Optical Council  
 18 concerning whether you were engaged in illegal practice?  
 19 A. Yes.  
 20 Q. And that's because you were referring to yourself as  
 21 an optician, is that right, to do with that sort of  
 22 point?  
 23 A. Yes, it was because the sign over the shop was called  
 24 "Blue Flame Opticians".  
 25 Q. I see.

1 A. And also the marketing material was naming the name  
2 Blue Flame Opticians.  
3 Q. At 269 you say in your witness statement:  
4 "We were not in any doubt at all that the action  
5 taken by the GOC had been instigated by Specsavers in an  
6 effort to deprive [you] of a livelihood."  
7 Is that right?  
8 A. That's correct.  
9 Q. Could I ask you to turn up E6, please? (Pause). Sorry,  
10 just give me one moment, I think I have the wrong  
11 reference. (Pause). The document hasn't got into my  
12 bundle. Do you have 1561-1? I do my junior  
13 a disservice, I do have the document. Do you have that?  
14 It's a letter from Penningtons?  
15 A. No, I don't.  
16 Q. Do you have 1566, which is a fax?  
17 A. Yes.  
18 Q. Okay, can you turn on one page?  
19 A. Yes.  
20 Q. Do you have 1566-1, Penningtons?  
21 A. Yes.  
22 Q. That's a letter from Penningtons solicitors acting for  
23 the GOC?  
24 A. Yes.  
25 Q. Written in response to a letter before claim from your

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1 solicitors about a judicial review claim that you were  
2 threatening; correct?  
3 A. Yeah.  
4 Q. It was dated 18 February 2013, this letter; correct?  
5 A. That's correct.  
6 Q. And you signed your witness statement on 16 June, so you  
7 had this letter at the time you signed your statement;  
8 correct?  
9 A. Correct.  
10 Q. Now, could you go on to tab 1566-9? Because you have  
11 alleged this previously, by your solicitors. Do you see  
12 the second holepunch? Some words in parentheses:  
13 "The claimant apparently believes ..."  
14 Do you see that? The second holepunch. Just above  
15 number 2. Do you see that paragraph?  
16 A. Yeah.  
17 Q. "The claimant apparently believes the original complaint  
18 which led to the GOC letter was made by Specsavers. For  
19 the avoidance of doubt, it was not."  
20 So you here have the GOC itself confirming that it  
21 was not Specsavers that had made the complaint; correct?  
22 A. Well, that was not what it was like when I --  
23 Q. Sorry, could you answer my question, Dr Poulsen?  
24 A. Yes.  
25 Q. You have the GOC itself confirming that it wasn't

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1 Specsavers who made that complaint; correct?  
2 A. Correct.  
3 Q. Notwithstanding that, you were still prepared to allege  
4 in your witness statement, which you have sworn to, that  
5 we were not in any doubt at all that the action taken by  
6 the GOC had been instigated by Specsavers?  
7 A. That's correct.  
8 Q. How can you possibly have said that you were under no  
9 doubt as to Specsavers having made the complaint when  
10 the GOC itself had confirmed that that was not the case?  
11 A. Well, it was the way my telephone conversation was with  
12 the representative from the GOC, when I said to her,  
13 "Well, we are convinced that it -- we have a case  
14 against Specsavers, and we are convinced that it's them  
15 who is causing the mischief", and she says "Well,  
16 I couldn't possibly tell you, but we know all about  
17 Bognor Regis Specsavers" and I took that as an admission  
18 to the fact that it was Specsavers that had, or somebody  
19 at Specsavers that had made -- put in the complaint.  
20 Q. Are you saying that what was said in that letter to you  
21 was a lie, was untrue?  
22 A. No, I am not saying that. I am just saying that  
23 I didn't actually believe that it was as they say.  
24 Q. Isn't the reason, in fact, that you felt able to make  
25 this groundless accusation because you had not disclosed

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1 the letter which we have just looked at, you only  
2 disclosed the letter from your solicitors, not the  
3 response?  
4 A. Well, I believe that you have asked for disclosure, and  
5 you have got the letter, so here it is.  
6 Q. Yes, we didn't have that letter at the time you made  
7 your witness statement, did we, Dr Poulsen, as you well  
8 know?  
9 A. Well, it's also a third party that's involved, isn't it,  
10 Blue Flame Vision, which has nothing to do with this  
11 case, so ...  
12 Q. It was only following the issue of a specific disclosure  
13 application by my clients on 9 October of this year that  
14 you finally disclosed the letter we were just looking  
15 at; correct?  
16 A. Correct.  
17 Q. So notwithstanding the terms of that letter from  
18 Penningtons, you didn't withdraw this allegation in your  
19 witness statement, did you?  
20 A. No.  
21 Q. Isn't the position that you would say anything if you  
22 thought it might support your case, even if you knew it  
23 not to be true?  
24 A. No.  
25 MR POTTS: I have no further questions, my Lord.

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1 Re-examination by MR STUART  
2 MR STUART: Dr Poulsen, I am going to ask you some  
3 questions, and I am going to take the matters in the  
4 order in which Mr Potts asked you about them, so that we  
5 have a sequence at least. So I am going to start with,  
6 you were asked about paragraphs 18 and 24 of your  
7 witness statement, and the document at E1.  
8 A. Which paragraph did you say in my witness statement?  
9 Q. Paragraphs 18 and 24. Specifically you were asked about  
10 when you purchased Bognor Regis, you did so from the  
11 proceeds of sale from Worthing?  
12 A. Yeah.  
13 Q. Do you remember being asked about that yesterday?  
14 A. Yes.  
15 Q. It was suggested to you that you had available from the  
16 sale of Worthing an additional £50,000 because you took  
17 a bonus or distribution of some sort from Worthing upon  
18 the termination of your relationship at Worthing; do you  
19 remember that?  
20 A. Yes, yes.  
21 Q. So it was suggested to you that -- if you go to  
22 paragraph 24 of your first witness statement, this is at  
23 volume B, page 6. Do you have that?  
24 A. I do.  
25 Q. It was suggested to you that these figures are wrong.

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1 My query is this: these figures that you refer to here,  
2 are these gross figures or are they net of tax?  
3 A. Well, they are gross figures.  
4 Q. Okay. In relation to the £50,000 that Mr Potts took you  
5 to and said "Look, you have taken a closing bonus of  
6 £50,000", did you pay tax on that?  
7 A. I would have done, yes.  
8 Q. As income tax or capital gains tax, or what?  
9 A. It was a bonus that was income taxed.  
10 Q. In relation to the shares that you refer to in  
11 paragraph 24 --  
12 A. Yeah.  
13 Q. -- you say:  
14 "I sold my shares in the Worthing store for  
15 £300,000: £200,000 at completion and £100,000 in  
16 instalments."  
17 A. Yeah.  
18 Q. What had you purchased your shares in Worthing for?  
19 A. £60,000.  
20 Q. So that would be a gross profit of about £240,000?  
21 A. Yes.  
22 Q. Did you have to pay tax on that?  
23 A. I did, I had to --  
24 Q. What kind of tax?  
25 A. Capital gains tax.

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1 Q. Okay. All right.  
2 Next you were asked about the document in bundle D,  
3 that is the constitutional documents bundle, and do you  
4 have D -- yes, put E1 away for the moment. D, page 94,  
5 the shareholders' agreement.  
6 You were specifically asked about this manual, the  
7 Specsavers Manual. Do you recall that? You were taken  
8 to clause 3.1 on page 96. 3.1.1, actually. Do you see  
9 that? It was pointed out to you that, although you were  
10 to manage -- you and Mr Weller -- the operation of the  
11 business, it was to be in accordance with the Specsavers  
12 Manual?  
13 A. Yes, which could be changed from day to day, from any  
14 time, they were allowed to change the manual.  
15 Q. Yes. Then you had previously been taken to page 95 of  
16 the bundle, on the left-hand side of that, in the  
17 "Definitions" section about a third of the way down, we  
18 see "Specsavers Manual". Do you recall that?  
19 A. Yes.  
20 Q. It's defined as:  
21 "The specification of the methods, processes,  
22 techniques, systems, schemes, customer price lists and  
23 tariffs, products and product supplier directories,  
24 including the system, devised and compiled by Specsavers  
25 for the operation of the system, and any amendment or

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1 variation which Specsavers considers appropriate to  
2 further or to be in the interests of the company, and/or  
3 all Specsavers stores generally in the British Isles  
4 and/or the Republic of Ireland and which Specsavers  
5 notifies to the company from time to time, either in  
6 written or electronic form or other medium."  
7 Do you see that?  
8 A. Yeah.  
9 Q. My question is this: the Specsavers Manual that we keep  
10 on being heard talked about, so far as you were aware,  
11 where was it? What was it?  
12 A. Well, I am not quite sure where it was, or what it was.  
13 It was just instructions from time to time, now we have  
14 to put the frames up in this way, or, you know ...  
15 Q. Was there any hard copy of a manual kept at the store?  
16 A. No, I don't believe there was.  
17 Q. Was there any electronic version of the manual available  
18 on some intranet system, or ...?  
19 A. Not as far as I know.  
20 Q. If somebody said "Go to paragraph something of the  
21 Specsavers Manual", where would you find that?  
22 A. I wouldn't know.  
23 Q. Okay. You were then asked about Optimisation  
24 Healthcare, the company.  
25 A. Yeah.

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1 Q. You can put away D now. If you could pull out E1. Put  
2 away E6 as well. You can put away C. You will recall  
3 being taken at quite some length to these invoices.  
4 I think the first reference was E1, page 154-1. Do you  
5 have it?  
6 A. Oh, no, that was 11, sorry. (Pause)  
7 Q. Do you have E1/154-1?  
8 A. Now I've got it.  
9 Q. Do you remember being asked about these various  
10 invoices?  
11 A. Yes.  
12 Q. And specifically the wording in the very small lettering  
13 at the bottom of them?  
14 A. Yeah.  
15 Q. Which it was pointed out to you changed. So, for  
16 example, at page 154-35, for the 31 March invoice, 2008  
17 this is --  
18 A. Yes.  
19 Q. -- the name of the company in the very tiny lettering  
20 that all we are troubling to see, says I think  
21 "Finestone Financial Services Limited" and under that  
22 "Fiscal Resources Group". Do you see that?  
23 A. Yes.  
24 Q. By comparison, if you go back one page to the  
25 February 2008 invoice, so that's the month beforehand,

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1 that at the bottom of the page appears to relate to  
2 Optimisation Healthcare Group Limited?  
3 A. Yes. Well, it was at the time when we had had the  
4 meeting with Michael Rowe and had promised to stop using  
5 Optimisation, I suppose.  
6 Q. Yes.  
7 A. But I must confess I had never noticed the little print  
8 before, so it did throw me yesterday.  
9 Q. Okay. My question was this: these invoices --  
10 A. Yes.  
11 Q. -- we can see your, looks like a sort of -- I am taking  
12 the one at page 154-35 as an example.  
13 A. Yes.  
14 Q. We see a sort of stamp, looks like a stamp with your  
15 squiggle or somebody's squiggle.  
16 A. Yes.  
17 Q. Do you see that?  
18 A. I do.  
19 Q. Two-thirds of the way down, it says:  
20 "Specsavers Bognor Regis 202 account approved for  
21 payment. Dr Helle Poulsen, director. Mr Barry Weller,  
22 director. Date", and there is a squiggle. Is that  
23 right?  
24 A. Yes.  
25 Q. Okay. Then just above that, we have something which

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1 says "Nicola Scott, 4 April 2008" with some sort of  
2 stamp on it?  
3 A. Yes.  
4 Q. Can you just assist us: the first stamp that I've  
5 referred to, the Specsavers one, is your signature on  
6 there? Is that your squiggle or is that Mr Weller's or  
7 somebody else's?  
8 A. I think that's actually Barry's, but it is a squiggle.  
9 Q. So did you see that one?  
10 A. I can't remember if I saw it or not. But I would have  
11 done at the time.  
12 Q. Okay. The bit above, the Nicola Scott, is that anything  
13 to do with Bognor Regis?  
14 A. No, that would be Specsavers' approval of it.  
15 Q. So that's Specsavers head office approval of it?  
16 A. Yeah.  
17 Q. Who generated the invoice, which person?  
18 A. My husband did.  
19 Q. Your husband. Did you discuss with him the content of  
20 the invoice?  
21 A. Yes, we used to talk about what he had done and what  
22 needed to be done.  
23 Q. Okay. We can see from looking at, if you just flick  
24 back to the page I took you to before, 154-34 is the  
25 invoice for February 2008?

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1 A. Yes. I mean, some of it is obviously very repetitive.  
2 Q. I was going to say to you --  
3 A. Yes.  
4 Q. -- the description of the work done --  
5 A. Yeah.  
6 Q. -- appears to be the same. So did you discuss with him  
7 on each occasion, or did you discuss with him  
8 occasionally, or when? Just explain to the court when  
9 you discussed the content.  
10 A. Well, really we would be together and we would be  
11 presented with the invoice, and he would say "This is  
12 what is due this week" or whatever, and we would say  
13 "Okay". But he was very good at always making sure that  
14 Barry knew as well what was being paid, because we were  
15 very sensitive about that, we were husband and wife and  
16 Barry needed to know fully what was going on.  
17 Q. Yes. Just looking at them, 154-35 we started with,  
18 which was the March one, the last sentence of that one,  
19 on the description of the work, says:  
20 "Supervising and assisting with inventory and stock  
21 order."  
22 Do you see that?  
23 A. Yes.  
24 Q. If you go back a page to the February one, we see those  
25 words, but they are now the penultimate sentence:

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1 "Supervising and assisting with inventory and stock  
2 ordering."  
3 Then has been added:  
4 "Interviewing optical assistant staff."  
5 Do you see that?  
6 A. Yes.  
7 Q. Going back one page, for the January one the last  
8 sentence is:  
9 "Assisting with interim stock take 31 January 2008."  
10 A. Right.  
11 Q. Do you see that?  
12 A. Which page was that, sorry?  
13 Q. 154-33.  
14 A. Yes.  
15 Q. Did you have any input into that last sentence on each  
16 occasion, or was that left to your husband?  
17 A. That was left to my husband.  
18 MR STUART: My Lord, I see the time. Would that be  
19 convenient?  
20 MR JUSTICE HILDYARD: Yes, indeed. We will reassemble at  
21 2 o'clock.  
22 (1.05 pm)  
23 (The short adjournment)  
24 (2.00 pm)  
25 MR STUART: Dr Poulsen, I was asking you about the documents

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1 in E1, at pages 154-1 through to 35. In  
2 cross-examination by Mr Potts about these bills from  
3 your husband, your answer was:  
4 "I see it as his bills."  
5 Mr Potts was putting it to you that these were bills  
6 from the companies concerned, at the bottom. Do you  
7 remember him asking you about that?  
8 A. Yes.  
9 Q. You said:  
10 "I see it as his bills."  
11 Meaning your husband, you were referring to your  
12 husband?  
13 A. Yes, yes.  
14 Q. Can you explain to the court what you meant by that?  
15 A. Well, what I meant by that is that it is a fee paid for  
16 his services.  
17 Q. "Some of the bills relate to his services", we have seen  
18 some of them, "some of them do not".  
19 If you go to page 154-24. 154-24 is an example of  
20 a bill which is not for services, it's a disbursement?  
21 A. Yes.  
22 Q. Do you see that?  
23 A. I do.  
24 Q. You described also in cross-examination to Mr Potts  
25 that, you said that there were two elements to the

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1 invoicing done through Optimisation Healthcare, what you  
2 described to Mr Potts as re-charging of employee  
3 expenses, and secondly, Godfrey's services, is what you  
4 said to him?  
5 A. Yes.  
6 Q. Can you explain to the court how those two were  
7 separated?  
8 A. Well, they were separated as bills directly to  
9 Optimisation Healthcare and bills directly to  
10 W Godfrey Vos Accountancy, as you can see along the side  
11 there. But in this case it would have been that he  
12 would have gone and paid with his own credit card the  
13 deposit for the staff Christmas party, so it was simply  
14 him getting the money back he had already paid.  
15 Q. Okay. Then 154-35 you were taken to, specifically the  
16 fact that this was the change to Finestone Services --  
17 Financial Services -- I am sorry -- Limited?  
18 A. Yes.  
19 Q. This happened, as Mr Potts put it to you, at just the  
20 time, March 2008, when you had had your discussion --  
21 A. Yes.  
22 Q. -- about --  
23 A. Where we had promised to stop Optimisation Healthcare.  
24 Q. Yes.  
25 You were asked about Optimisation Healthcare, and

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1 you admitted that you were a director and shareholder of  
2 that company?  
3 A. Yes.  
4 Q. Finestone Financial Services Limited, are you a director  
5 or a shareholder of that company?  
6 A. I am not.  
7 Q. Have you ever had any interest in that company?  
8 A. No.  
9 Q. Did you know that your husband had changed the footing,  
10 I will not call it a heading, of his bills, that is from  
11 154-35 onwards, had changed it to Finestone Financial  
12 Services Limited, did you know that?  
13 A. No, I hadn't noticed that.  
14 Q. Did you discuss with him doing that at that time?  
15 A. No.  
16 Q. Okay. Right, you were then asked about paragraph 40 of  
17 your witness statement in which you made the comment  
18 that the HMRC had recently struck down the unlawful VAT  
19 savings scheme that Specsavers had adopted.  
20 Paragraph 40 of your witness statement. Do you recall  
21 you were asked about that yesterday?  
22 A. Yes.  
23 Q. It was suggested to you that the HMRC didn't finally  
24 strike down anything, I think it was put to you that  
25 nothing was struck down, certainly, but that nothing

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1 happened at that time, that is -- that would have been  
2 back in the first quarter of 2008. Do you recall being  
3 asked about that?  
4 A. I do.  
5 Q. I just want to get clear from you what happened here.  
6 Just keep open that page, but if you just go to page  
7 E3/591. Do you have that?  
8 A. I do.  
9 Q. Just go back a page to see what this is. This is the  
10 partners' letter from Specsavers of 9 October 2009, so  
11 this is a year and a half later?  
12 A. Yes.  
13 Q. On page 591 under the heading "Dual Company Settlement",  
14 do you see that?  
15 A. Yes.  
16 Q. I will not read it all out to you there, but the sum  
17 total of it appears, perhaps, in the third paragraph of  
18 that little section, in the third line. Specsavers say:  
19 "The settlement of the VAT case has drawn a veil  
20 over past uncertainty."  
21 Do you see that? That seems to be the summary of  
22 what their position is, at October 2009. Do you see  
23 that.  
24 A. No. Where did you say that was? Sorry.  
25 Q. So there are three paragraphs under the heading "Dual

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1 Company Settlement".  
2 A. Yes.  
3 Q. Go to the third of those.  
4 A. Yes.  
5 Q. Third line, halfway through it.  
6 A. Yes, I've got it.  
7 Q. "The settlement of the VAT case ..."  
8 So they are notifying the partners that the VAT case  
9 has been settled with the HMRC?  
10 A. Yes. Yeah.  
11 Q. So as Mr Potts put it to you, the HMRC didn't strike  
12 down something, ie the dual company structure is still  
13 a dual company structure, he said to you?  
14 A. Yes.  
15 Q. And the HMRC hasn't struck down anything?  
16 A. But they struck down the scheme.  
17 Q. That's what I wanted to ask you: what did you mean in  
18 paragraph 40 of your witness statement when you said  
19 "The unlawful VAT savings scheme being struck down by  
20 HMRC"?  
21 A. Well, it had to be changed from 100 per cent to  
22 55 per cent.  
23 Q. Okay.  
24 A. And also we had to pay a lot of money back, and we had  
25 to pay a fine.

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1 Q. All right. I just want to then to go, in relation to  
2 that, to E2/284. You can put away E3 and go to E2,  
3 page 284. We are at the beginning of E2, page 284.  
4 Again, we should go back one page just to see what this  
5 document is. This seems to be the sort of equivalent  
6 newsletter or something similar anyway --  
7 A. Yes.  
8 Q. -- for the November 2007?  
9 A. Yes.  
10 Q. So we are back to just before the events of your  
11 meeting?  
12 A. Yes.  
13 Q. At page 284, there is a heading, do you see it, "VAT"?  
14 Do you see that?  
15 A. Yes.  
16 Q. On page 284.  
17 A. Yes.  
18 Q. On the left-hand column. It says:  
19 "As you know, we are currently in the throes of  
20 a major challenge from HMRC in respect of our dual  
21 company structure. The team both in SOG and our  
22 advisers are fully engaged. This notwithstanding, in  
23 order to protect their position, HMRC have now issued  
24 the first assessments for a third of dual company stores  
25 for additional VAT for the period to 2004. These

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1 assessments have only been issued for the Specsavers  
2 company, so the actual liability will be 30 per cent  
3 lower."  
4 Do you see that?  
5 A. I do.  
6 Q. Back at the time, what did you understand the position  
7 to be as at the end of 2007, beginning of 2008,  
8 regarding HMRC's position in relation to this tax saving  
9 scheme?  
10 A. Well, I understood it as if they felt we had done  
11 something wrong, and they decided to change it, and  
12 punish it for us. And there were a lot of JVPs who were  
13 unhappy that this was something that were trusted to  
14 Specsavers to advise us on, but as you show at the end  
15 of the day, we were the ones who ended up taking the rap  
16 and having to pay the money. You can say that yes,  
17 legally it was us who had to pay the money, but you can  
18 also say that Specsavers had some sort of moral  
19 liability there.  
20 Q. Okay. You were then --  
21 MR JUSTICE HILDYARD: Can I just clarify that a little bit?  
22 Do you mind?  
23 MR STUART: No, of course, my Lord.  
24 MR JUSTICE HILDYARD: Sorry, Dr Poulsen, just so I know  
25 exactly what you are telling me. You say:

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1 "I understood it as if they felt we had done  
2 something wrong, and they decided to change it and  
3 punish it for us".  
4 Who is "they", Specsavers?  
5 A. HMRC.  
6 MR JUSTICE HILDYARD: HMRC felt you had done something  
7 wrong?  
8 A. Yes.  
9 MR JUSTICE HILDYARD: And they decided to change it, do you  
10 mean HMRC decided to change it?  
11 A. Yes.  
12 MR JUSTICE HILDYARD: And punish?  
13 A. Punish us, you know.  
14 MR JUSTICE HILDYARD: HMRC punished you?  
15 A. We had to pay a fine, yes.  
16 MR JUSTICE HILDYARD: By issuing a fine for unpaid tax or  
17 underpaid tax. Yes, thank you.  
18 MR STUART: Just to be clear about that, perhaps just to put  
19 some meat on the bones, Dr Poulsen, if you go back to  
20 E3, there is one page perhaps which clarifies this,  
21 page 598. So this is just after the document that we  
22 were just at, the newsletter of October 2009. Page 598.  
23 Do you see that?  
24 A. Yes.  
25 Q. I don't think it was a document you were taken to

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1 yesterday, but this is now specifically to your store,  
2 Bognor Regis Specsavers Limited?  
3 A. Yes.  
4 Q. And it says:  
5 "Dear Partners.  
6 "Dual Company Settlement.  
7 "At the last RCM meeting you heard from the team  
8 involved in reaching settlement of the dual company  
9 issue with HM Revenue & Custom. In summary, we have  
10 agreed with HMRC that:  
11 "1. The dual company stores will pay a total of  
12 15 million plus 1.2 million interest for the period to  
13 30 June."  
14 That's obviously relating to all the stores. Then  
15 it says:  
16 "No adjustment for the period July to September.  
17 "From 1 October Town Specsavers will charge Town  
18 Visionplus."  
19 I think that means Bognor Regis Specsavers --  
20 A. Yes.  
21 Q. -- or Worthing Specsavers or whatever?  
22 A. Yes.  
23 Q. "55 per cent of relevant costs."  
24 So there has obviously been a fixed agreement at  
25 55 per cent?

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1 A. Yes.  
2 Q. "A new spectacle apportionment method and percentage  
3 will be discussed."  
4 Then if you drop down two paragraphs, the actual  
5 figures for your store. So it says:  
6 "Your store's share is £34,626.86 plus interest  
7 £2,770. Your store's share of the third party costs in  
8 resolving the issue is £2,500. Your store will be  
9 charged £39,951."  
10 Then the paragraph below that:  
11 "As previously advised, the balance on your VAT  
12 reserve account", I think that's what you were  
13 describing to the court yesterday?  
14 A. Yes.  
15 Q. "... (currently £75,000) will be transferred to the  
16 store's current account on 22 October 2009. The  
17 settlement amount will then be paid from your current  
18 account to SOS."  
19 So it appears that you left the settlement of the  
20 VAT dispute entirely in the hands of Specsavers?  
21 A. Well, it was Specsavers that the HMRC actually demanded  
22 to pay the money, it wasn't me personally.  
23 Q. Okay.  
24 A. Because they felt that Specsavers were 100 per cent in  
25 control of all the stores.

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1 Q. I am not going to go there. I don't understand that  
2 answer myself. Perhaps just to take up his Lordship's  
3 question, the scheme, the dual company structure with  
4 VAT being charged or not charged in between the dual  
5 companies, et cetera, who thought up that scheme? Was  
6 it the shop or was it Specsavers?  
7 A. It was Specsavers.  
8 Q. Okay. Right. You can put away E3 for the moment. You  
9 were asked again about Optimisation Healthcare, but this  
10 time you were taken to bundle E2, and specifically your  
11 emails, page 330 and 331.  
12 A. Yes.  
13 Q. It was put to you by Mr Potts that within those emails  
14 you did not expressly state, or even I think Mr Potts  
15 would put it implicitly state, that you had an interest  
16 in Optimisation Healthcare. Do you remember being asked  
17 about these emails?  
18 A. I do. I do.  
19 Q. You mentioned something about the previous dealings with  
20 Optimisation Healthcare in relation to the Worthing  
21 store?  
22 A. Yes.  
23 Q. And that that's how you had first become involved with  
24 Optimisation Healthcare?  
25 A. Yes.

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1 Q. It was suggested to you that you were not being frank by  
2 not disclosing your interest in Optimisation Healthcare  
3 within these two emails, which are addressed to Mr Rowe?  
4 A. Yes.  
5 Q. My questions, then, from that are this: do you say that  
6 someone at Specsavers knew that you were interested in  
7 Optimisation Healthcare?  
8 A. Well, I had actually discussed it with the founder's  
9 husband, Mr Doug Perkins.  
10 Q. With Mr Doug Perkins?  
11 A. At an annual seminar when I started up doing the  
12 glaucoma clinic, because I thought it might be something  
13 that all the stores could do. But he said he didn't  
14 feel it was something that all the stores could do, and  
15 it was only because of my special background education  
16 wise, but I discussed it with him, because at that time  
17 one was talking about: would it be possible to do  
18 cataract surgery in the high street, there was lots of  
19 things going on.  
20 Q. Was that Worthing, before 2005?  
21 A. Yes. And he has also seen the leaflets that offer that  
22 service and that's also from Optimisation Healthcare.  
23 Q. Okay. Apart from Mr Perkins, who you had that  
24 conversation with, are you saying that anyone else at  
25 Specsavers knew that you had an interest in Optimisation

1 Healthcare before 2008?  
2 A. Well, Mr Michael Ryan did, and --  
3 Q. Mr Michael Ryan, okay?  
4 A. Who was the director of business transfer.  
5 Q. How did he know?  
6 A. He knew because when I left the Worthing store my -- one  
7 of my codirectors there, Mr David Symons, demanded  
8 monies for lost customers, there were a bit of  
9 a discussion there whether I would be taking customers  
10 away from the store, because the customers that were  
11 under the glaucoma and cataract scheme were very loyal  
12 to me especially.  
13 Q. And that was all through Optimisation Healthcare?  
14 A. Yeah.  
15 Q. Okay. Were you a director of Optimisation Healthcare at  
16 that time?  
17 A. Yes, I always were.  
18 Q. You always were. When I say director, you were  
19 an actual Companies Act registered director? You were  
20 registered as Companies House as a director?  
21 A. Yes, yeah, I believe so.  
22 Q. When you sold your shares in Worthing and bought your  
23 interest in Bognor Regis, were any enquiries made  
24 regarding your directorships of companies?  
25 A. I can't remember that, but I think -- I think they

1 actually did a search and said to me "is it true, what  
2 are these directorships you have got there?" And I had  
3 to explain that one of them were really like a members'  
4 association with houses where we were living, that was  
5 one of them, and the other one was Optimisation  
6 Healthcare, and I explained what that was about as well,  
7 and they did recognise what it was when I explained it.  
8 Q. Okay.  
9 A. So it was found that it was not important for Specsavers  
10 at all, the companies I was a director of, it was really  
11 very minor.  
12 Q. Now, apart from your interest in Optimisation  
13 Healthcare, looking at page 331, you were taken to  
14 page 31 by Mr Potts, and -- well, 330 first of all,  
15 let's do it in order. 330, Mr Rowe was writing to you  
16 to discuss the issue, as he puts it, that had arisen.  
17 A. Yes.  
18 Q. The issue is:  
19 "I have been contact [I think that must be  
20 contacted] by Guernsey with concerns over the invoicing  
21 from a company, Optimisation Healthcare Group. The  
22 purpose of the meeting will be to discuss the nature of  
23 the relationship and the concerns ref the invoicing."  
24 Do you see that?  
25 A. Yes.

1 Q. "I can then have the internal conversations and agree  
2 a way forward."  
3 If you skip down a paragraph:  
4 "As I said earlier, the meeting is to understand  
5 from both of you [just to get it clear, that's addressed  
6 to you and Barry Weller, not to you and Mr Vos] the  
7 reason for using this company in this way, the benefits  
8 to your Specsavers business from operating in this way  
9 and for me to share our concerns ref [and then he says]  
10 tax, benefit in kind, et cetera."  
11 Do you see that?  
12 A. Yes, I do.  
13 Q. Did you understand what he meant by that?  
14 A. I think so.  
15 Q. What did you understand him to mean?  
16 A. Well, benefit in kind, that was really not appropriate  
17 in this connection, and tax, well, my husband would be  
18 paying tax from his income from services he had been  
19 doing. So I couldn't see it was a problem.  
20 Q. He is referring to "our concerns", I think he means  
21 Specsavers' concerns?  
22 A. Yes.  
23 Q. Did you understand what his concerns were? You may not  
24 have agreed with them or not, I don't know, but did you  
25 understand what his concerns were?

1 A. Well, I thought I did.  
 2 Q. Okay. Your reply is at 331. And you make the point in  
 3 the third paragraph you don't see what all the intrigue  
 4 is about. You did say to Mr Potts this was drafted by  
 5 your husband?  
 6 A. Yes.  
 7 Q. By use of the quotation marks.  
 8 A. Mm.  
 9 Q. But the paragraph 4 starts:  
 10 "The company concerned [that's Optimisation  
 11 Healthcare, obviously] is a facilitation company working  
 12 for and providing exactly the same services it does for  
 13 us to dentists, health clinics and similar  
 14 organisations. Neither of us are personally involved."  
 15 This is signed by you and Mr Weller.  
 16 A. Yes.  
 17 Q. Not meant to be you and Mr Vos.  
 18 "The benefit to us is that it organises  
 19 accommodation for locums, collects and delivers  
 20 vehicles, pays bills, ensures optoms and other  
 21 professional staff are properly registered" et cetera.  
 22 "Invoices are clearly detailed as to the services  
 23 provided, for whom and what disbursements have been made  
 24 on our behalf. Therefore they are very clear for  
 25 processing via accounts if there are any benefits in

1 kind [that seems to refer back to Mr Rowe's email] which  
 2 there are none for either of us, and we pay tax on use  
 3 of our motor vehicles for example."  
 4 That seems a reference to tax. What was the purpose  
 5 of writing that letter to Mr Rowe?  
 6 A. It was really to start explaining to him that he had no  
 7 need to worry about Optimisation, the things he had  
 8 mentioned in his letter, there was no need to worry  
 9 about it.  
 10 Q. It was put to you that you didn't, there, refer to (a)  
 11 your personal interest in Optimisation, which I have  
 12 dealt with, but also your husband's personal interest,  
 13 because he is family, obviously your husband, and the  
 14 company was paying money to him?  
 15 A. Yes.  
 16 Q. There might be an issue about tax. That was put to you  
 17 by Mr Potts.  
 18 A. Why would that be an issue about tax, if my husband paid  
 19 tax on his income from it?  
 20 Q. Okay, my questions are this: the invoices concerned say  
 21 "Mr W Vos trading as", and then it has "Optimisation  
 22 Healthcare" as the details?  
 23 A. Mm.  
 24 Q. Who at Specsavers was aware that Mr Vos was your  
 25 husband?

1 A. Michael Ryan, Tim Moyles, Adrian Deane, probably lots of  
 2 other people I can't remember right now.  
 3 Q. What about Mr Rowe?  
 4 A. Mr Rowe as well.  
 5 Q. He was aware who Mr Vos was?  
 6 A. Yeah. Yeah.  
 7 Q. Okay. You were then asked about the meeting itself, the  
 8 March 2008 meeting itself, and you were taken to  
 9 pages 340 and 341, especially 340. At the bottom of  
 10 page 340, where again we know it's drafted by your  
 11 husband --  
 12 A. Yes.  
 13 Q. -- on your behalf?  
 14 A. Yes.  
 15 Q. But it was your email so you were asked about it. It's  
 16 put in the bottom paragraph there:  
 17 "You [that is Mr Rowe] appear to be being less than  
 18 candid and it appears very cagey about providing us with  
 19 the information requested."  
 20 It was put to you that Mr Rowe hadn't been cagey at  
 21 all, because at page 330, the email I've just taken you  
 22 to, he had told you what -- initially he told you the  
 23 purpose of the meeting.  
 24 Then you were taken to 337, on 17 March, so two days  
 25 before your email, he had written or rather Specsavers

1 had written this. It's not from him, but it's copied to  
 2 him, it's from Gill Morris.  
 3 So the second paragraph:  
 4 "The piece in the directors' newsletter in relation  
 5 to the employment of family members in store does not  
 6 refer to correspondence from HMRC. Accordingly there is  
 7 no correspondence specifically relating to Bognor.  
 8 I can confirm that income splitting, as it is known, is  
 9 now a hot topic with HMRC, generally known within the  
 10 tax industry. It is an abuse where members of a higher  
 11 rate taxpayer's family receive remuneration when either  
 12 no work is performed for the business or the  
 13 remuneration does not accurately reflect the duties  
 14 carried out."  
 15 Do you see that?  
 16 A. I do.  
 17 Q. "We have identified stores where this has occurred in  
 18 the past and the abuse has been notified to HMRC. We  
 19 would normally agree such a course of action with the  
 20 store directors. The above article was not intended to  
 21 be threatening. We were merely reminding store  
 22 directors of the law and the risk that the business is  
 23 running if family members are shown to be receiving  
 24 remuneration which is not commensurate with their duties  
 25 and our obligations under the law. We know family

1 members do work in store legitimately and for  
 2 a reasonable salary. There is no issue where this is  
 3 the case. However, where family members receive more  
 4 than would be paid to a member of staff who is  
 5 unrelated, then there is a risk that HMRC will treat  
 6 this as income splitting. This is exacerbated where  
 7 family members are not treated like other staff, ie  
 8 where there are no contracts of employment", et cetera.  
 9 Do you recall that?  
 10 A. I do.  
 11 Q. It was put to you that since you therefore had a pretty  
 12 clear picture from Specsavers as to their concerns about  
 13 taxing and family members having money paid to them  
 14 through whatever means, et cetera, and income splitting,  
 15 that you were therefore well aware what the issue was,  
 16 so that it was unfair of you, at page 340, to write two  
 17 days later saying that they were being less than candid  
 18 or very cagey.  
 19 MR POTTS: My Lord, I am afraid that's not the way I put the  
 20 question at all.  
 21 MR STUART: I am sorry then.  
 22 MR POTTS: I have remained seated for a while, but that  
 23 certainly is not the question I put.  
 24 MR STUART: I'll just ask you the question about the email  
 25 on 340, to start with. What did you mean, with your

1 husband, by Specsavers being "less than candid" or "very  
 2 cagey"?  
 3 A. I just thought it would be an easy thing to  
 4 straightforward pick up the phone and tell us what their  
 5 concerns were.  
 6 Q. Okay. Going back, then, to page 337, did you understand  
 7 what the concerns were as set out on page 337?  
 8 A. Yes.  
 9 Q. What did you understand them to be?  
 10 A. I understood it that, as it's mentioned in the letter,  
 11 that one had to be very strict with doing the correct  
 12 thing when your family members were working in a store.  
 13 Q. Did you discuss that with your husband at that time?  
 14 A. Yes, he saw the letter and -- yes.  
 15 Q. I am sorry, I didn't hear that.  
 16 A. He did see the letter, yeah.  
 17 Q. Did you reach any plan as to what you would do about  
 18 dealing with this issue, with your husband, I'm talking  
 19 about now?  
 20 A. Well, we were talking about after the meeting with  
 21 Michael Rowe, the business review meeting, whether he  
 22 would be happy to go on the payroll, and he just said  
 23 that he wasn't happy about that, he didn't wish to be  
 24 an employee of Specsavers, and he also felt it would be  
 25 more expensive for us. So he would rather stay the way

1 he were.  
 2 Q. Okay. Let's move, then, to that business review  
 3 meeting, that's what you were asked about next, and you  
 4 were specifically taken to page 371, the letter shortly  
 5 after the meeting sent by -- said to be sent by Mr Rowe.  
 6 Do you remember page 371?  
 7 A. Yes.  
 8 Q. You were taken especially, about two little paragraphs  
 9 from the bottom, under the heading "Actions"?  
 10 A. Yes.  
 11 Q. And number 2 was the one you were taken to?  
 12 A. Yes.  
 13 Q. "You will meet with Godfrey and arrange for him to be  
 14 employed at the practice."  
 15 A. Yes, and I was explaining that I did suffer a bit from  
 16 the ostrich syndrome at the time, and when we had had  
 17 the meeting and Mr Rowe had gone away, we thought maybe  
 18 we can have some peace for a while, and Godfrey weren't  
 19 willing to go on the payroll at the time, so as nobody  
 20 came back to us and said "What happened?", it carried on  
 21 for a while until Barry fell ill, and my husband could  
 22 see that it was necessary for him to get more involved.  
 23 Q. The answers you gave in cross-examination to Mr Potts  
 24 were that you said you had not agreed to arrange for him  
 25 to be employed, you had agreed to discuss with Godfrey?

1 A. That's correct, and that's why we asked for the minutes  
 2 of the meeting, when we sought their advice on almost  
 3 a year later, because we said to each other -- we saw  
 4 this letter and said "That's not what we agreed, so what  
 5 happened to the minutes of the meeting?" So we kept on  
 6 asking for the minutes of the meeting, but didn't get  
 7 them. Then we thought maybe we should just keep quiet  
 8 at the moment.  
 9 Q. Okay. Going back to what Specsavers say is the minute  
 10 of the meeting, page 365, just back a few pages, you  
 11 were taken to that by Mr Potts?  
 12 A. Yes. I do remember when we got the meeting minutes  
 13 finally, we looked at each other, reading it through,  
 14 Barry and I say, and we were like, "is that the same  
 15 meeting that we went to?"  
 16 Q. Okay. But in relation to this part of it, ie whether  
 17 you agreed to arrange for Mr Vos to be employed or  
 18 whether you agreed only to discuss with him. Can you go  
 19 to page 367?  
 20 A. Yes.  
 21 Q. About halfway down, just above the word "Communication",  
 22 do you see that, there is a thing which says "Action."  
 23 JVPs"? Do you see that?  
 24 A. Yes.  
 25 Q. It says:

1 "JVPs to discuss with Godfrey the best way of  
2 positing him onto the books as a result of Godfrey being  
3 an outside agent."  
4 A. So I read as if we were right about that.  
5 Q. I am just asking: is that what you actually say was  
6 agreed, that you would discuss with Godfrey the best way  
7 of, et cetera?  
8 A. No, we agreed that we would talk to him about being put  
9 on the books. That was how it was put.  
10 Q. Okay. Right, the next one I want to ask you about -- we  
11 are jumping forward quite a bit -- you were asked about  
12 paragraph 57 of your witness statement. We are dealing  
13 now with the -- we are skipping forward to June 2009.  
14 A. Yes.  
15 Q. Sorry, we are not, it's 2008. Sorry, my writing is  
16 wrong.  
17 A. Yes.  
18 Q. So you were asked about that letter.  
19 A. Yes.  
20 Q. And you were asked to clarify whether you were now  
21 saying you had received that letter or not, because  
22 paragraph 57 of your witness statement --  
23 A. No, we had received the letter.  
24 Q. I am sorry, I didn't hear that.  
25 A. We had received the letter.

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1 Q. You had received it?  
2 A. Yes, yeah.  
3 Q. Okay.  
4 Next you were asked about the mystery shopper issue.  
5 Can I ask you to go to E2? You were taken to page --  
6 no, you weren't. Sorry. You were asked about the  
7 mystery shopper issue. I want you to go to page 293 in  
8 E2, which is from you to Mr Deane about the mystery  
9 shopper videoing issue. Do you have it, page 293?  
10 A. Yes.  
11 Q. So we can understand the run of the emails here, about  
12 a third of the way down it says:  
13 "Hi all, advice and feedback please. I am in the  
14 process of finalising the 2008 mystery shopper criteria.  
15 This year Tern have been able to offer videoing ..."  
16 Do you see that?  
17 A. Yes.  
18 Q. We can see on page 294 that this is an email coming from  
19 Mr Deane?  
20 A. Yes.  
21 Q. It says:  
22 "This year Tern have been able to offer videoing in  
23 the test room portion of the MS as they have new  
24 equipment and the batteries last longer. We thought  
25 that directors would benefit from videoing the test

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1 room, however since this has been announced on IQ ..."  
2 What is IQ?  
3 A. That is an internet in Specsavers.  
4 Q. Some sort of --  
5 A. An internal communications way on a computer.  
6 Q. Okay.  
7 " ... several negative comments have been placed.  
8 I would like some feedback on videoing the test room.  
9 If it is all negative, then I will cancel."  
10 Your response is:  
11 "Dear Adrian, we do not support videoing in the test  
12 room and if introduced, will opt out. This is a step  
13 too far."  
14 A. Yes.  
15 Q. Then Mr Potts put it to you that E2, page 436 -- do you  
16 remember being taken to this document yesterday?  
17 "Mystery Shopper 2008 Store Brief".  
18 A. Yes.  
19 Q. Do you remember being taken to this? It was suggested  
20 to you that this is evidence somehow that filming is in  
21 the manual?  
22 A. Specsavers always pretend anything is in the manual.  
23 Q. Okay. Is this the manual or not? What is this  
24 document?  
25 A. Well, I am not quite sure what it is. It says "Store

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1 Brief", but I am not quite sure.  
2 Q. Okay.  
3 A. It's the sort of thing that would be posted to all the  
4 joint venture partners.  
5 Q. Were you ever told that filming was a -- within the  
6 mystery shopper process -- requirement, a contractual  
7 requirement?  
8 A. Not when I signed the contract.  
9 Q. Okay. You were then -- it was then explained that ...  
10 we are into the beginning of 2009 now, and you were  
11 taken to page 441. Do you see that?  
12 A. Yes.  
13 Q. At the bottom, email from you about the board meeting  
14 that was about to happen. You said yesterday, your  
15 precise words were:  
16 "Every JVP knows what a board meeting means"?  
17 A. Yes. All --  
18 Q. Just so that the court can understand, what do you mean  
19 by that?  
20 A. Well, all joint venture partners know that when they  
21 have overstepped the mark in any way, and you are not  
22 always sure where the mark is, but whenever you have  
23 asked the wrong question or said no to something, and in  
24 our case all the way through it was saying no to Sunday  
25 trading, because they couldn't persuade us it would be

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1 profitable to us, then you will have done something and  
 2 they would say, "Well, we have got to escalate this" and  
 3 that would mean a board meeting and that would mean  
 4 an opportunity to put you on a disciplinary and get rid  
 5 of you.  
 6 Q. Just in that regard, if you would flick on to page 454,  
 7 this is now 9 March 2009.  
 8 A. Yes.  
 9 Q. This was put to you yesterday, that in this letter you  
 10 don't criticise, I think that's the way it was put,  
 11 Specsavers; if anything, you appear to be saying  
 12 positive things:  
 13 "Dear Adrian, it was so lovely to see you again at  
 14 the meeting with Derek Dyson last Friday."  
 15 Do you see that?  
 16 A. Yes, I do.  
 17 Q. Then in the second paragraph you deal with the issue of  
 18 covert filming. Then in the last paragraph you say:  
 19 "I was however very unhappy to hear that  
 20 Christina Del Grazia was prepared to 'consign us to the  
 21 scrapheap' and get us suspended with her request for  
 22 a directors' meeting with the intention of getting 'rid  
 23 of us'."  
 24 And six question marks. What were you referring to  
 25 there?

1 A. Well, I knew I had to do some major grovelling, which is  
 2 what I do in the first paragraph, because I was very  
 3 scared after that meeting, you know, things had  
 4 happened, as I explained yesterday, that I had not  
 5 expected at all, very frightening, and I couldn't  
 6 understand that in a decent company one couldn't sit  
 7 down -- if the relationship were not good why couldn't  
 8 one sit down and say "Why don't we stop it here and find  
 9 a way that suits everybody? We will buy back your  
 10 shares and we will call it a day if we can't agree on  
 11 the way forward". I didn't expect to get a threat like  
 12 that at all, and I still couldn't kind of help putting  
 13 a little dig in, in the end.  
 14 Q. The threat that you have just referred to, is that --  
 15 A. Was the Mr Dyson one, yes.  
 16 Q. That's the Mr Dyson threat?  
 17 A. Yes.  
 18 Q. Page 451?  
 19 A. Yes.  
 20 Q. You were asked about this at length yesterday by  
 21 Mr Potts?  
 22 A. Yes.  
 23 Q. It was suggested to you that you have just created this?  
 24 A. No, that really shook me up. That really shook me up,  
 25 and I just had this habit of wanting to put things down

1 in writing that has happened in my life that I think  
 2 this is something that's going to have consequences in  
 3 the future somehow, I need to remember what happened  
 4 today.  
 5 Q. Okay. You see, it was suggested to you that you have  
 6 created this document, pages 450 to 451, and that  
 7 Mr Dyson hadn't made that threat at that meeting, as you  
 8 have said on page 451, and it was put to you that when  
 9 you eventually wrote to them immediately thereafter, on  
 10 page 454, you had not mentioned the threat?  
 11 A. Well, I think that I have explained now the grovelling  
 12 I had to do, and I also think that you have understood  
 13 my passion for the not video filming in the testing room  
 14 or the staff in general, well enough to know that if  
 15 something dreadful had not happened, I would not have  
 16 climbed down.  
 17 Q. Next you were asked about what you acknowledge to be  
 18 a mistake in your reading of the figures in relation to  
 19 the bonus payment issue in March 2008.  
 20 A. That's the 2008, 28,000 we are talking about.  
 21 Q. That's right. It's paragraph 42 of your witness  
 22 statement.  
 23 A. Yes.  
 24 Q. 42 of your witness statement.  
 25 A. Yeah.

1 Q. And it was suggested to you that there was obviously  
 2 no -- there was no issue with a bonus payment at all at  
 3 that time, but I want you to go still in E2 to page 297.  
 4 You have acknowledged that you have misread 299 and  
 5 28,000 as 2,800. That was your mistake?  
 6 A. That's what it looked like to me when Mr Potts took me  
 7 to it yesterday.  
 8 Q. Yes, I am not seeking to ask you about that. I am  
 9 seeking to ask you whether there was some other issue  
 10 about not paying a bonus. Do you see in your witness  
 11 statement you said:  
 12 "We requested a bonus of £12,000 to be paid in  
 13 February 2008."  
 14 A. Yes.  
 15 Q. Looking at page 297, by the second holepunch, there is  
 16 a number 2?  
 17 A. Yes.  
 18 Q. Under the heading:  
 19 "To date, the following has occurred or not occurred  
 20 as the case may be:  
 21 "2. Our request for a 12,000 bonus to be paid with  
 22 our February 2008 salaries has been refused."  
 23 A. So it was a month later we got the 28,000, obviously,  
 24 yeah. Because of them doing their adjustments to avoid  
 25 paying the company tax. I just thought that was two

1 numbers close to each other, 2,800 and 28,000, so  
 2 I thought, mm, maybe I got it wrong.  
 3 Q. Okay, put away E2 now and pull out E3. You were asked  
 4 about the business improvement programme?  
 5 A. Yes.  
 6 Q. This was all in relation to whether Mr Weller was being  
 7 pressured, bullied as you put it?  
 8 A. Yes.  
 9 Q. Do you recall being asked about this yesterday by  
 10 Mr Potts?  
 11 A. I do, I do.  
 12 Q. One of your answers was that you said or felt that the  
 13 business improvement programme wasn't a requirement, it  
 14 was an invitation?  
 15 A. Yes.  
 16 Q. Do you recall those were your words yesterday?  
 17 A. I remember in previous years to be sitting at an RCM  
 18 with other joint venture partners, and Chris Howarth was  
 19 talking about this adventure or this course.  
 20 Q. Okay.  
 21 A. We were saying to him we were really very angry the way  
 22 you said it was an invitation but it turned out not to  
 23 be, and we got this, to say exactly the words "this  
 24 arsey letter back from you", a lot of the JVPs were very  
 25 angry, and that was the work that was put to

1 Chris Howarth at the time.  
 2 Q. Okay, I would like you to look, whilst you are in E3, at  
 3 pages 592 to 593 where this issue seems to be  
 4 documented. Just to be clear where we are again, we are  
 5 in that same document that starts at page 590, it's the  
 6 partners' letter, this is the one from October 2009 that  
 7 we just saw about with dual company ...  
 8 Over at the bottom of 592 to 593 there is a heading  
 9 "Business Improvement Programme". Do you see that?  
 10 Bottom of 592.  
 11 A. Yeah.  
 12 Q. It says:  
 13 "The first sessions of the new business improvement  
 14 programme for partners start next week and will continue  
 15 over the next 18 months or more until all partners have  
 16 had the opportunity to attend."  
 17 A. Yes.  
 18 Q. Do you see that?  
 19 A. Yes.  
 20 Q. Then jump to the bottom paragraph:  
 21 "The potential benefits in the areas covered by the  
 22 programme are significant. It is therefore  
 23 disappointing to see how low take-up has been for the  
 24 initial sessions."  
 25 A. Yes.

1 Q. Over the page:  
 2 "Sessions are being delivered to correspond with  
 3 your store's financial year. In order to ensure maximum  
 4 benefit to you, our business environment is changing  
 5 constantly and we will all need to ensure that we can  
 6 lead our people effectively. I urge you to treat your  
 7 invitation to the BIP sessions as highly important and  
 8 to respond positively when it arrives."  
 9 Is that what you are referring to?  
 10 A. Yes.  
 11 Q. Right, you were then questioned about this issue about  
 12 Mr Yogaratnam, so Mr Weller's sale of his shares to  
 13 Mr Yogaratnam.  
 14 A. Yeah.  
 15 Q. Do you recall?  
 16 A. I do.  
 17 Q. Mr Potts sought to analyse it that you were only able to  
 18 come up with three, two, three or four stores where, as  
 19 he put it, the classic dual structure of an optometrist  
 20 director and a retail director was not in play. Do you  
 21 recall him asking you about that?  
 22 A. Yes, I do. I thought afterwards actually I know quite  
 23 a few stores that only have one director, and it is  
 24 sometimes either an optom, or sometimes a retail  
 25 director.

1 Q. The way he put it to you was there are an awful lot of  
 2 stores in this country -- how many stores are there in  
 3 this country?  
 4 A. About 700.  
 5 Q. And that you were only able to refer to two or three.  
 6 My questions are this: of those 700, how many do you  
 7 actually know the make-up of the two directors, as  
 8 between optometrist and retailer?  
 9 A. Well, I think we looked into it at the time and came up  
 10 with quite a long list of stores that weren't.  
 11 Q. That were not?  
 12 A. That were not.  
 13 Q. When you say a long list, how many are we talking about?  
 14 A. I can't remember off my head, but it was maybe 50 or 100  
 15 or something like that.  
 16 Q. Okay. All right. You can put away E3 and move on to  
 17 E4.  
 18 MR JUSTICE HILDYARD: Can I just clarify that last answer?  
 19 I am so sorry. 50 or 100 stores that had an optometrist  
 20 and a retailer, or 50 or 100 that you didn't know?  
 21 A. No, who didn't.  
 22 MR JUSTICE HILDYARD: Who did not?  
 23 A. Who had one or the other, or two optometrists. I don't  
 24 think we even went through all 700. What we did, we sat  
 25 down with the directory, where there is all the names of

1 the shops and the names of the directors working in  
2 them, and it's indicated there whether it's an optician  
3 or whether it's a retail director. We just looked  
4 through, some of the first pages, and thought: no,  
5 that's not true.  
6 MR STUART: Just to summarise it by reference to Mr Potts:  
7 you accept, as I understand it, that the standard model,  
8 as he put it -- you accepted to him that the standard  
9 model is to have an optometrist and a retail --  
10 A. Yes, and I am not saying the model is wrong, I can see  
11 its good sides too, I just thought in our Bognor Regis  
12 store we had had such problems getting opticians to stay  
13 with us, because of our location, that I thought it  
14 would be really good for the business to be two  
15 opticians there, that were actually tied in with the  
16 store.  
17 Q. Okay. So if you --  
18 A. I thought that Mr Yogaratnam had the advantage of having  
19 been a Vision Express director already and knew a lot  
20 about retail.  
21 Q. If you have E4, on this issue, then, you were taken by  
22 Mr Potts to page 887, a letter from Mr Ryan of  
23 19 April 2011.  
24 A. Yeah.  
25 Q. Mr Potts specifically took you to the third paragraph,

1 and said "Look at this, this is not Specsavers refusing  
2 to consider Mr Yogaratnam, this is Specsavers putting  
3 forward an alternative which includes the concept of  
4 enabling Mr Weller to sell his shares".  
5 A. And I was almost hypnotised by that letter yesterday,  
6 because I thought this was the letter I have been  
7 waiting for and waiting and waiting, and I hadn't seen  
8 it before and I was trying to read what it actually  
9 said, because I got engrossed into: what did they  
10 actually decide in the end? Then afterwards I realised  
11 it didn't really matter what they decided in the end  
12 because they had already decided to get rid of us, so it  
13 would never have happened.  
14 Q. All right. My question is this: if you keep that letter  
15 to one hand but then flick to page 912, you wrote to  
16 Mr Ryan by email on 30 May.  
17 A. What page is it, sorry?  
18 Q. Page 912.  
19 A. Okay.  
20 Q. "Dear Michael, four months and counting without  
21 an answer."  
22 A. That's correct. I never got that letter.  
23 Q. Okay. (Pause). I don't need to ask you about that.  
24 Right. The latter part of yesterday afternoon in  
25 cross-examination, you were asked at length about these

1 letters and documents relating to your husband's  
2 contract of employment in 2009 and --  
3 A. Yes.  
4 Q. -- Mr Ferguson's arrangements in 2009?  
5 A. Yes.  
6 Q. Can I ask you first of all: those documents that you  
7 were taken to --  
8 A. Yes.  
9 Q. -- four, do you remember there are four listed, I'll  
10 take you to those precisely --  
11 A. Yes.  
12 Q. -- who drafted those documents, which person drafted  
13 those documents?  
14 A. My husband did.  
15 Q. Did you have any personal involvement in drafting them?  
16 A. No, other than we were sitting talking about what we  
17 thought should be in them.  
18 Q. Okay.  
19 A. As I explained yesterday, we sit and discuss what ought  
20 to be in the letters, and then he puts it down, and then  
21 we read it through and we sign it.  
22 Q. Yes. Now, in relation to -- let's go to them. In  
23 relation to -- if you -- which file do you have open,  
24 E4?  
25 A. Sorry?

1 Q. Close E4 and get E2.  
2 A. Yeah.  
3 Q. 527, first of all, in E2. Taking this letter on its own  
4 for now, did you discuss the contents of this letter  
5 with your husband at the time of him drawing it up?  
6 A. I think he had actually perhaps put that one together  
7 before we sat down and talked about it, but I can't  
8 remember whether he was saying "This is what I -- this  
9 is what my proposal will be like, what do you say? Is  
10 there anything that you want to talk about, or add to  
11 it?" But I think as far as I remember, he presented us  
12 with the letter.  
13 MR JUSTICE HILDYARD: He what, sorry?  
14 A. My husband presented us with the letter in its form as  
15 it is here.  
16 MR JUSTICE HILDYARD: Thank you.  
17 A. Because he was always very conscious, because of the way  
18 Specsavers were looking at us and because of us being  
19 husband and wife, that he needed to keep it all very  
20 much above board.  
21 MR STUART: It was suggested to you yesterday that the  
22 content of this letter, since it refers so conveniently  
23 or, as Mr Potts put it to you, in such a contrived way  
24 to all the issues -- some of the issues -- that were  
25 being put forward at the 2011 investigation, about hours

1 of -- you know, times at which he did his work, the  
 2 extent of his work, this is Mr Vos' work I'm talking  
 3 about, et cetera, et cetera, and that that, the  
 4 contrived nature of the content, was evidence that you  
 5 had -- you and your husband -- put this together in  
 6 2011, shortly before the investigation meeting, and not  
 7 its date, ie May 2009.  
 8 A. Yes, and I assured his Lordship that that was not true.  
 9 Q. Okay. The actual detail of these things in here that  
 10 you were taken to yesterday, on page 528 you were taken  
 11 to --  
 12 A. Yes.  
 13 Q. -- all about additional hours, meetings, do you see  
 14 number 5, you were taken to that, meetings after hours?  
 15 A. Yes.  
 16 Q. Meetings, number 6, first thing in the morning,  
 17 et cetera?  
 18 A. Yeah.  
 19 Q. Was that something you discussed in 2009 when this was  
 20 created?  
 21 A. Well, we did discuss along the way what would it mean if  
 22 he was going to take over more of Barry's role, what it  
 23 would be necessary to do.  
 24 Q. Okay, and he was taking over Barry's role when? What  
 25 period are you talking about?

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1 A. Well, it was really already in April that he was --  
 2 Q. April 2000 and ...?  
 3 A. Yes --  
 4 Q. No, 2000 and what?  
 5 A. Not officially but he had already started to help us  
 6 more and more then.  
 7 Q. In which year?  
 8 A. 2009.  
 9 Q. Because I was just looking at the invoices that he was  
 10 providing to Specsavers.  
 11 A. Yeah.  
 12 Q. Page 295, whilst we are in this bundle, as an example.  
 13 A. Which bundle was that in?  
 14 Q. In the same bundle. I could take you back to where we  
 15 had seen it in other bundles, but this is a January 2008  
 16 invoice for your husband's work, so this is not  
 17 expenses.  
 18 A. Which page was it?  
 19 Q. 295.  
 20 A. Thanks.  
 21 Q. Do you see 295?  
 22 A. Yes.  
 23 Q. This is your husband's invoice for his work in  
 24 January 2008?  
 25 A. Yeah.

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1 Q. Do you see that?  
 2 A. Yeah.  
 3 Q. For his personal work. It's not the expenses of the  
 4 company being reimbursed point.  
 5 A. No.  
 6 Q. It's all about accountancy fees, reconciling suppliers,  
 7 preparing invoices. Then do you see, new paragraph:  
 8 "Dealing with staff matters, disciplinary matters,  
 9 general advice and assistance on the business, its  
 10 staffing and profitability, analysis of financial  
 11 results and general advice and assistance to the  
 12 directors, weekly meetings with directors on a Tuesday  
 13 evening, processing monthly salaries, bonuses, arranging  
 14 locums, supervising and assisting, assisting with  
 15 interim stocktake ..."  
 16 Do you remember I pointed you to those words  
 17 specially last time you saw this document?  
 18 A. Yeah.  
 19 Q. So this was his work in 2008?  
 20 A. Mm.  
 21 Q. How do you say in April 2009 his work was going to  
 22 become either more or the same?  
 23 A. Well, on top of all the other things that he was doing,  
 24 he also had to spend much more time with Barry and  
 25 support him and try to build up his confidence to go out

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1 on the shop floor again.  
 2 Q. Okay. So that's 527. The next one, the next document  
 3 that is said to be wrong is 529, and this is the one  
 4 that ... do you see 529?  
 5 A. Yes, that's the famous letter that I went down to get so  
 6 we could photocopy it and make a proper complete  
 7 employment contract for my husband.  
 8 Q. Could you speak up a little bit?  
 9 A. Yes, sorry.  
 10 Q. Do you remember -- we are almost done, don't worry --  
 11 when we started all of this yesterday morning, Friday  
 12 morning, I said "Do speak up".  
 13 A. Yes, sorry, it's always been a problem. I have dealt  
 14 with many deaf patients.  
 15 Q. This was the letter that was 14 May 2009?  
 16 A. Yes.  
 17 Q. To your husband which enclosed the staff employment  
 18 contract which we find at page 530. Do you see that?  
 19 A. Yes. That's the original contract photocopy there.  
 20 Q. Yes.  
 21 I just want to ask --  
 22 A. That one we didn't need to photocopy, we already had  
 23 that one.  
 24 Q. That's what I wanted to ask you. Page 530 to 538.  
 25 A. Yes.

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1 Q. It appears to be a contract. Then there is a job  
2 description at 539. Do you see that? My question is  
3 this: of the documents that you were asked about this  
4 morning --  
5 A. Yes.  
6 Q. -- and yesterday, about collecting, and in the file,  
7 and all those questions you were asked, I want you to be  
8 clear, if you can recall --  
9 A. Yes.  
10 Q. -- which of these documents were in the file, which of  
11 them were not, et cetera. So can we go through them  
12 individually in page 529, the letter.  
13 A. Yeah.  
14 Q. One sheet. Is that right?  
15 A. Yeah.  
16 Q. Just confirm what is the position about that sheet?  
17 A. Well, I think that there were all three in the file, as  
18 far as I remember.  
19 Q. All three being what, then?  
20 A. In the staff file.  
21 Q. All three, what are you referring to as all 3, page 529?  
22 A. The letter of 1 May, the letter of 14 May, and the staff  
23 employment contract.  
24 Q. Which is page 530 through to --  
25 A. Yes, which is what I took with me.

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1 Q. Okay. What about 539, the job description, was that  
2 part of 530?  
3 A. That's part of that whole pile, yes.  
4 Q. That's part of all of it, okay.  
5 A. And so is the confidentiality agreement.  
6 Q. Okay, so when you describe collecting the file, as you  
7 put it, apart from those three documents, are you saying  
8 there were any other documents in the file?  
9 A. No. Everything I have pointed out here.  
10 Q. Okay. Then it was pointed out to you that in your  
11 rebuttal document, it says "of which a copy was taken,  
12 blah blah blah".  
13 A. Mm.  
14 Q. Which documents were copied?  
15 A. The 14 May.  
16 Q. The 14 May, that's page 529?  
17 A. Yeah.  
18 Q. What about the 527 to 528?  
19 A. No.  
20 Q. And 530 through to 539?  
21 A. No. No. That was the only one.  
22 Q. The document that is now 529 --  
23 A. Yeah.  
24 Q. -- is, as we know, the 2011 --  
25 A. Version.

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1 Q. -- print of the document?  
2 A. Yeah.  
3 Q. But the original of the 2009 document that was in the  
4 file --  
5 A. Yes, was put back with the file in the solicitor's box,  
6 and that was like a blank office copy, just the letter,  
7 you know like when you print up.  
8 Q. It wasn't printed on letterheading of any sort?  
9 A. Not at all, no.  
10 Q. Okay.  
11 A. That's how we keep the letter of employment for all the  
12 staff.  
13 Q. Okay. So these three documents, that is the original  
14 version at page 529, and the originals of 527 and 530 to  
15 539 you say were back in the file?  
16 A. Yeah.  
17 Q. And that you took that file back to the solicitor's  
18 office?  
19 A. Yes, within half an hour.  
20 Q. And where did you put it?  
21 A. I put it in the box, it was like a removal box, we had  
22 taken it all down, and there were two boxes which the  
23 loss prevention team later collected, I don't know when  
24 they collected it.  
25 Q. Okay. Let me just go back, then, to 529, the original

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1 of it, drafted in May 2009. Who drafted that document?  
2 A. My husband did.  
3 Q. Did you have any involvement in the drafting of that  
4 one-page letter? By which I mean did you discuss it  
5 with him at the time he drafted it?  
6 A. Yes, we did at the time.  
7 Q. Okay. Then the staff employment --  
8 A. As you can see, part of it is quite sort of an automated  
9 thing, like you would give to any employer. Like "we  
10 should be grateful if you would sign both copies".  
11 That's a usual sort of, that you put in all the letters.  
12 Q. Okay. Do you know how he actually generated the  
13 document?  
14 A. No.  
15 Q. No, okay.  
16 At the top of page 529 in the middle, there is  
17 a little bit that says "Our ref HPBWSEC09, Staff  
18 Employment Contracts 14 May 2009." Do you see that?  
19 A. Yes.  
20 Q. Do you know what that is?  
21 A. No.  
22 Q. Okay. I can't ask you about it.  
23 Next, then, is the employment contract itself.  
24 Page 530 through to, as you put it, 539.  
25 A. Yes.

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1 Q. Did you discuss the content of this document with your  
2 husband at the time in May 2009?  
3 A. Yes, at the time we went through what was going to be in  
4 it, yes, because he sat us down and said "If we are  
5 going to do it this way, it will have to be this and  
6 this and this", and we understood that.  
7 Q. I will ask you again: do you know how this was generated  
8 as a document? It's obviously in some sort of format,  
9 isn't it we can see that, but did you have any knowledge  
10 of how the format is created?  
11 A. Well, it's a template that Specsavers provide that you  
12 fill in, basically. You don't sit and have to do a new  
13 one every time.  
14 Q. Okay.  
15 A. So it's the same one as we use for everybody.  
16 Q. And 539, the job description for Mr Vos as practice  
17 manager.  
18 A. Yes.  
19 Q. Did you assist your husband in the actual wording of  
20 that? That's obviously not part of the template -- it's  
21 a template, but the content cannot be a template, it  
22 must be tailored?  
23 A. Yes, I think that's actually something -- certainly the  
24 bottom bit of it is something and a template as well.  
25 Q. Okay. The last four documents that you were taken to is

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1 552, which is the last document in this. 552?  
2 A. Yeah.  
3 Q. This letter to Mr Ferguson; do you see that?  
4 A. Yes.  
5 Q. Which again it was suggested to you that the -- first of  
6 all, let's find where the document came from. Was this  
7 in any of the files that you -- sorry, in the file or  
8 the documents that you collected?  
9 A. No. No.  
10 Q. So this has nothing to do with the going to the  
11 solicitor's?  
12 A. No, no.  
13 Q. It was suggested to you that the content of this was too  
14 contrived, it was mentioning all of the things about  
15 Mr Ferguson's work that turned out to then be mentioned  
16 in 2011. Do you recall Mr Potts putting that to you?  
17 A. I do, yeah.  
18 Q. Did you have any involvement in the content of this  
19 letter, in other words did you discuss with your husband  
20 what to put into a letter to John Ferguson?  
21 A. No, not much. I wasn't really dealing with  
22 John Ferguson much. I mean, I was the one who was sort  
23 of saying, "Oh, wouldn't it be nice if we had a new  
24 podium in the store, a new shelf behind the counter", or  
25 something like that, and Godfrey would talk about it, or

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1 Barry would say, "Oh, there has been some water damage  
2 there" and Godfrey would say, "Leave it to John". That  
3 became our way of saying, "Leave it to John, do not  
4 interfere in how he is supposed to do it", because Barry  
5 and I almost could see ourselves doing it, in what would  
6 be the best way, but it was always, "Leave it to John".  
7 Q. Fine.  
8 A. The only thing I think I was talking to, to Godfrey  
9 about at the time, was the filing cabinets which were  
10 always a problem, and I was going through with him which  
11 files could be removed and as I explained yesterday, we  
12 were trying to ask Specsavers first if they had any  
13 solution like putting all the files on a microfiche, but  
14 it turned out it would cost £30,000 to do, for a person  
15 to come in and do that. So that's part of why we chose  
16 to let John get involved as well.  
17 Q. Okay. Whilst you are on the business of what was  
18 happening at the time, you are talking about the time  
19 being 2009?  
20 A. Yes.  
21 Q. You were taken yesterday to what was happening at around  
22 this time, which was Jena Laker's complaint had been  
23 made --  
24 A. Yes.  
25 Q. -- I think on 6 April 2009, page 519, and you were

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1 specifically taken to Mr Jason North's deliberations and  
2 conclusions as to her grievance on page 51. Do you  
3 remember you were taken by Mr Potts to your letter,  
4 email, to Mr North --  
5 A. Yes, yes.  
6 Q. -- where you thanked him for the professional manner in  
7 which he conducted the investigation?  
8 A. Yes, I was very relieved that we didn't have to pay  
9 compensation to Jena Laker, I must confess.  
10 Q. Yes. I just want to get clear what the position was  
11 regarding that at this time. Page 519, she's made her  
12 grievance; is that right?  
13 A. Yes.  
14 Q. That grievance seems to include page 520 at the top,  
15 a grievance about your husband; is that right?  
16 A. Yes. Yeah.  
17 Q. Because your husband had questioned her qualifications?  
18 A. He couldn't find her on the GOC register, because --  
19 MR JUSTICE HILDYARD: Could you say that again? Will you  
20 try and keep your voice up? I am finding it really  
21 quite difficult.  
22 A. I am so sorry. He was trying to find her on the GOC  
23 register, she was a dispensing optician.  
24 MR JUSTICE HILDYARD: Ah, yes.  
25 A. And it turned out that she had spelled her name in two

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1 different ways, and that was why he couldn't find her,  
 2 but obviously he had to speak to her and say, "I can't  
 3 find you", and she took offence at that.  
 4 MR STUART: Okay.  
 5 At the bottom of page 520 there seems to be some  
 6 involvement from your husband as well, this is in  
 7 relation to an incident in March 2009:  
 8 "Barry stormed up to me ..."  
 9 That would be stormed up to Jena Laker?  
 10 A. Yeah.  
 11 Q. It's her grievance. Then over the page, 521, the item  
 12 for 17 March 2009 seems to involve you and your husband;  
 13 do you see that?  
 14 A. When did you say, 11 March?  
 15 Q. 17 March:  
 16 "Barry took me to one side and told me that he liked  
 17 me and not to take it personally the way he had been  
 18 treating me recently. He said that Helle and Godfrey he  
 19 was not to be nice and friendly to me", et cetera  
 20 et cetera?  
 21 A. Well, we told him to keep a little distance to the  
 22 girls, because he had a clique around him where he was  
 23 sort of ruffling their hair, and we had been saying to  
 24 him for a while, "Be careful, because it could be sexual  
 25 harassment" or, "You could be seen to be more fond of

1 this girl than that girl".  
 2 Q. If you go to 522, the conclusion of Ms Laker's  
 3 complaint, do you see the fourth paragraph down  
 4 starting:  
 5 "I am also very confused as to who is in charge ..."  
 6 Do you see that?  
 7 A. Yes.  
 8 Q. "...because I always believed there to be three  
 9 directors: Dr Helle Poulsen, Mr Godfrey Vos and  
 10 Mr Barry Weller and yet recently Barry informed me that  
 11 in fact Godfrey is not a director. Any queries we had  
 12 or days off required, holidays, all had to go through  
 13 Godfrey. Recent correspondence has also come from  
 14 Godfrey, yet I am very confused as to his role. Please  
 15 find recent correspondence I received from Godfrey",  
 16 et cetera.  
 17 Do you see that?  
 18 A. I see that, yes.  
 19 Q. Then down in the next paragraph:  
 20 "In the correspondence I received from Godfrey, he  
 21 stated he wanted me to see an occupational health  
 22 adviser", et cetera?  
 23 A. Yes.  
 24 Q. She attaches, for example, page 523, it is indeed  
 25 a letter from Godfrey. Do you see that?

1 A. I do.  
 2 Q. And page 525, also a long letter from Godfrey. Do you  
 3 see that?  
 4 A. I do.  
 5 Q. Were you aware at that time, that is April 2009, of the  
 6 content of Ms Laker's grievance?  
 7 A. These letters are from before the grievance came in.  
 8 Q. Yes. Were you aware of the grievance --  
 9 A. I was aware --  
 10 Q. -- and that it was referring to your husband and his  
 11 role, et cetera, et cetera?  
 12 A. No, not when he wrote those letters, no. The grievance  
 13 were only a couple of days later, that it reads --  
 14 Q. That's what I am asking. Were you aware of the content  
 15 of the grievance?  
 16 A. Yes.  
 17 Q. Were you shown a copy of the grievance?  
 18 A. Yeah. We all were.  
 19 Q. When?  
 20 A. I am trying to remember. I mean, quite soon after  
 21 she -- quite soon after she had sent them to  
 22 Skelmersdale, we had the grievance put to us, I think.  
 23 Q. Okay. Was the issue of your husband's role, were you  
 24 asked about that during Mr North's --  
 25 A. Yes, yeah.

1 Q. What did you say?  
 2 A. Well, I said to him that Jena Laker always knew my  
 3 husband's role, and his position in the company, because  
 4 he was actually interviewing her for the job when she  
 5 came, and he's always very careful in pointing out "I am  
 6 Godfrey, I am this, this is Barry, he is a director, and  
 7 this is Helle, she is a director" and making sure that  
 8 we were all involved.  
 9 Q. If you go to page 541, document heading:  
 10 "Specsavers Opticians Bognor Regis.  
 11 "General Information.  
 12 "Management Structure."  
 13 A. Yes.  
 14 Q. It says about Godfrey Vos, it says:  
 15 "Godfrey Vos is the business practice manager. He  
 16 is responsible directly and is the senior director for  
 17 general business and retail operations and strategy,  
 18 financial control, human resources, employment of staff  
 19 and locums, disciplinary procedures, staff grievances,  
 20 staff scheduling and holidays, staff sickness and  
 21 managing the optical laboratory and contact lens  
 22 department, stock controls", et cetera, et cetera.  
 23 Do you see all of that?  
 24 A. Yes.  
 25 Q. Did you have any input into the content of the

1 description of Mr Vos' role?  
 2 A. No.  
 3 Q. Who drew up this document?  
 4 A. He actually produced this document.  
 5 Q. What was done with this document?  
 6 A. It was put up on the wall in the staff room and I can't  
 7 remember if it was put up anywhere else --  
 8 Q. Was it discussed with Mr North?  
 9 A. Yes, yes, Mr North said that -- it was actually Mr North  
 10 who had asked us to do it in the first place, because he  
 11 said that there seemed to be some confusion about who  
 12 was a director and who wasn't, as Godfrey did so much  
 13 work there and was so involved. So he said it would be  
 14 a good idea to put together a document and introduce  
 15 everybody, and describe their role.  
 16 Q. Did Mr North see the document?  
 17 A. Yes, he did, and he didn't like the -- originally we had  
 18 put "senior director" and "junior director" in after  
 19 Barry's and my name, and he didn't like that, so we took  
 20 it off again, because he said we were equal directors.  
 21 But otherwise he was happy.  
 22 Q. Okay, I think that's it from yesterday.  
 23 MR JUSTICE HILDYARD: How much further do you have, because  
 24 I am anxious to give a break at some point?  
 25 MR STUART: My Lord, I think I will only be another 15

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1 minutes.  
 2 MR JUSTICE HILDYARD: We will return at just before 20 to.  
 3 MR STUART: Thank you, my Lord.  
 4 (3.27 pm)  
 5 (A short break)  
 6 (3.40 pm)  
 7 MR JUSTICE HILDYARD: Yes.  
 8 MR STUART: Dr Poulsen, I want to move on now, then, to the  
 9 question of the last main document that it was suggested  
 10 was a forgery or a contrived document, and one that you  
 11 referred to this morning.  
 12 A. Yes.  
 13 Q. We find that in bundle E7. We can put away for the  
 14 moment all the other bundles, if you want to, but we are  
 15 going to have to pull many of them out again. We are  
 16 dealing now with Mr Ferguson.  
 17 A. Yes.  
 18 Q. Page 1676. Do you have it?  
 19 A. I have it, yeah.  
 20 Q. Good. It goes on to page 1681. Do you see that?  
 21 A. I do, yes.  
 22 Q. You were asked about this this morning. Let's go in  
 23 stages. Did you have any part to play in the content of  
 24 this document?  
 25 A. The 1676 one?

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1 Q. 1676 through to 1681.  
 2 A. Yes, we sat down and tried to remember what  
 3 John Ferguson had been doing in all the time he had been  
 4 working in the Bognor store.  
 5 Q. Okay. Who actually drafted it, need I ask?  
 6 A. My husband did.  
 7 Q. Nice and loud just for the record.  
 8 A. My husband did.  
 9 Q. It was drafted in which month of which year?  
 10 A. It was drafted before the investigatory interview.  
 11 Q. In 2011?  
 12 A. Yes.  
 13 Q. It was suggested to you this morning, and I think it's  
 14 fair to say that you agreed, that you had lied about  
 15 this document in your interview. Will you keep open  
 16 page 1676 for the moment?  
 17 A. Yeah.  
 18 Q. But also take out E5, you were taken to E5, page 1237.  
 19 We are here in the middle of your interview, 1237, do  
 20 you have that?  
 21 A. I do.  
 22 Q. Just so you can see, to put it in context, 1229 is the  
 23 beginning of the record of the conversation, we can see  
 24 it took place on 19 July at the Aurora Hotel, you were  
 25 present with Mr Barnes and Mr Walls was the witness. Do

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1 you see that?  
 2 A. Yeah.  
 3 Q. At page 1237 you were taken to by Mr Potts --  
 4 A. Yes.  
 5 Q. -- I think we pick it up at around line 308.  
 6 A. Yes.  
 7 Q. 308 on 1237:  
 8 "PB pointed out that there is no paperwork in the  
 9 store showing exactly what JF [that's Mr Ferguson] has  
 10 invoiced for and by HP's own admission, she has had to  
 11 ask him for this paperwork because she too is unable to  
 12 locate it. Therefore all of us are blind to what he has  
 13 actually done."  
 14 Do you see that?  
 15 A. Yeah.  
 16 Q. Pause while you take a text from your dentist.  
 17 A. And it was from my dentist, yes.  
 18 "Question: Do you think that if and when you needed  
 19 work carrying out you shopped around, you would find  
 20 somebody to carry that work out without paying 10K per  
 21 year retention fee?"  
 22 Obviously he was aware that there was a retention  
 23 fee?  
 24 A. Yes.  
 25 Q. Then:

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1 "Answer: I can't comment on that as we had this  
2 arrangement in place and it works for us and I think  
3 that when you run a shop, you build up a list of  
4 people", et cetera, et cetera.  
5 Then:  
6 "Question: On the two days a week that you pay JF  
7 for his retention, what duties is he required to perform  
8 on these days?  
9 "Answer: He has a checklist that he is required to  
10 go through. I haven't got copy to hand, but I believe  
11 you have been given a copy. PB refers to the  
12 investigation files. PB shows HP section 4.5 of file 2,  
13 which is a work schedule for JF provided to us by GV."  
14 So this is a document provided by Mr Vos, your  
15 husband. Do you see that?  
16 A. Can I just read that one more time? I am sorry,  
17 I forgot to concentrate.  
18 Q. Yes, I am sorry. Yes, do concentrate. So what he is  
19 saying here is that you were referred to, so he  
20 physically, I think, showed you, is what is being  
21 suggested --  
22 A. Yeah.  
23 Q. --HP, section 4.5 file 2, which is, and this is the  
24 important bit, "a work schedule for JF provided to us by  
25 [Mr Vos]."

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1 A. Yes.  
2 Q. You see that?  
3 A. Yeah.  
4 Q. Now, keep that open, keep E5 open, and if you would go  
5 to E4, one of your answers to Mr Potts this morning was  
6 that the document had been provided to Specsavers by  
7 your husband obviously before your investigation  
8 interview?  
9 A. Yes.  
10 Q. If we go to E4, page 1046, right near the back, we see  
11 the interview with your husband on 5 July.  
12 A. Yes.  
13 Q. Do you see that?  
14 A. Mm.  
15 Q. The relevant part of it seems to start on page 1059 --  
16 A. I am lost, sorry.  
17 Q. 1059 in E4.  
18 A. Yeah.  
19 Q. Do you have that?  
20 A. I do.  
21 Q. If you go down to -- you have line numbers, so it  
22 helps -- line 391, this is a question from Mr Barnes,  
23 the interviewer.  
24 A. Yes.  
25 Q. 391:

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1 "We have noticed an individual who is being paid by  
2 the business called John Ferguson whom I believe you  
3 must have a relationship with. I say this because  
4 I note that he signs the director's JVA as the personal  
5 witness. Can you explain your relationship with him?"  
6 And your husband is the reply, do you see that?  
7 A. Yes.  
8 Q. "He is the handyman, I don't have a personal  
9 relationship with him, he is not the sort of person who  
10 I would have a personal relationship with. He is  
11 a diver and a surfer, an outdoor person, which I am  
12 not."  
13 Do you see that?  
14 A. Yes.  
15 Q. Then he was asked about the holiday that Mr Ferguson had  
16 gone on for four weeks in Australia.  
17 Then over the page, 405:  
18 "Why is he set up on SOCRATES?"  
19 Do you remember Mr Potts asking about this this  
20 morning?  
21 A. I do, I do.  
22 Q. Then:  
23 "Question: Can you tell me who set him up on the  
24 system and why?  
25 "Answer: Barry and I set him up on SOCRATES.

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1 "Question: What work does he do in store?  
2 "Answer: We were going to get him to come in to  
3 analyse contact lenses sales because we have limited  
4 resources and we need to figure out why our contact lens  
5 cost of sales is so high."  
6 I think that's what you were referring to with  
7 Mr Potts earlier as well.  
8 A. Yes, yeah.  
9 Q. :  
10 "Question: "When was it set up?  
11 "Answer: I haven't a clue, two three weeks ago."  
12 So that would be June 2011?  
13 A. Yeah.  
14 Q. That seemed to come out this morning.  
15 "Answer: He is paid as a technician through the  
16 SEP.  
17 "Question: Who is it that processes his payments  
18 through the SEP system?"  
19 Answer from your husband:  
20 "Answer: Me or one of the others.  
21 "Question: The others?  
22 "Answer: Sarah or I process most of them or Barry  
23 has done a few.  
24 "Question: He has been paid a total of £36,000 in  
25 the last 18 months, he has been paid £120 a day for

120

1 a weekday and £150 for weekends, can you tell what  
2 activities he performs in the store?"  
3 Do you see the question?  
4 A. Yes.  
5 Q. :  
6 "Answer: I have a list of what he does."  
7 A. Mm.  
8 Q. Were you aware that your husband was going to provide  
9 a list?  
10 A. No.  
11 Q. You weren't aware?  
12 A. No.  
13 Q. That he was going to provide a list when he went for his  
14 interview?  
15 A. No. No. And I actually can't remember seeing any  
16 paperwork about John Ferguson because when I walked out  
17 of court at lunchtime and got a bit of fresh air  
18 I thought: there is something wrong here because  
19 I cannot remember Mr Barnes showing me any paperwork  
20 about John Ferguson at all. I can remember him asking  
21 questions, but I can't remember him actually showing me  
22 the list we had provided or anything else. He just said  
23 "Oh, I have been provided a list".  
24 Q. Okay. Looking at the record of the interview, back on  
25 page E5/1237, this is when was put to you this morning

1 21

1 by Mr Potts --  
2 A. Yes.  
3 Q. -- it shows that, I have already taken you to this,  
4 323, you answered:  
5 "Answer: He has a checklist that he is required to  
6 go through, I haven't got copy to hand but I believe you  
7 have been given a copy."  
8 A. Mm.  
9 Q. What were you referring to there, then?  
10 A. I was referring to the long list of all the jobs he had  
11 been doing, that was what I had in my mind.  
12 Q. So that is what we see at E7/1676?  
13 A. Well, the one with all the numbers on, yes.  
14 Q. It's important you take it out and identify it, because  
15 I don't want there to be any -- so far as I am aware,  
16 I have been through all these bundles and there is not  
17 any other list, but you had better check this is what we  
18 are talking about.  
19 A. The list I'm talking about is 1678, that is what  
20 I believed he was talking about.  
21 Q. Okay. Okay. All right. Looking at 1677, which seems  
22 to be the second page of 1676, because 1676 starts with  
23 a heading "Weekly normal requirements (£240 retention  
24 per week)" --  
25 A. Yes.

1 22

1 Q. And 1677 says:  
2 "Extra call-out requirements (£120 per call-out --  
3 materials included)."  
4 Do you see that?  
5 A. Yes, I do.  
6 Q. Beneath the two lists of numbers there is on the same  
7 page, it says:  
8 "Other regular jobs: power wash down front of the  
9 store on a regular basis, clean signs et cetera", do you  
10 see that?  
11 A. Yes, I do.  
12 Q. And then there is something which says:  
13 "General comments".  
14 A. Yeah.  
15 Q. Do you see that?  
16 A. Yes.  
17 Q. "When store was taken over by Helle and Barry it was in  
18 an appalling state. None of the equipment worked  
19 properly, decoration was very poor, there was rubbish  
20 and old shop fittings all over the patio area, grass and  
21 weeds growing up through the patio tiles. Store chairs  
22 were rickety et cetera, doors were coming off frame and  
23 other cupboards, et cetera. Leaks from the plumbing in  
24 the lab, leaks in the toilets, toilets stopped up  
25 regularly, fire doors not closing properly, loose strips

1 23

1 on staircase, the roof was leaking and a quote obtained  
2 locally to replace the roof came to over £20,000."  
3 Dr Poulsen, I am asking you about this because it  
4 was put to you this morning by Mr Potts that when this  
5 document was presented by your husband, and then  
6 referred to by you at 1237, that it was being put by you  
7 and your husband that this document was actually  
8 a contemporaneous document of 2009 addressed to  
9 Mr Ferguson, rather than a document generated in 2011  
10 addressed to Specsavers. Do you recall that?  
11 A. Yes.  
12 Q. Did you have any input into the "General Comments"  
13 section of this document?  
14 A. No, not really, except for us remembering what he would  
15 normally be doing.  
16 Q. I am carrying on quoting it:  
17 "When SOG was spoken to about this, they informed  
18 the store that they would arrange the replacement, but  
19 that there would also be their management charge levied.  
20 New equipment for the testing rooms was purchased and  
21 for other parts of the store. This resulted in the  
22 layout of the testing rooms having to be changed, and  
23 they had to be redecorated. The store itself had to be  
24 redecorated from top to bottom, loose railings on the  
25 staircase repaired, roof leaks repaired, frame racks

1 24

1 secured properly, et cetera. The remedial work could  
 2 not be undertaken in store opening hours and was  
 3 undertaken at night and on Sundays by John Ferguson over  
 4 a period of time until the store was up to acceptable  
 5 retail standards. Since then there have been many  
 6 problems that required attention and the store adopted  
 7 a policy of constant rolling redecoration. He", who is  
 8 he?  
 9 A. Well, it must be John Ferguson, but the way I --  
 10 Q. Okay:  
 11 "... has also repaired the roof on a number of  
 12 occasions over the years and the results of damage  
 13 caused by any leaks."  
 14 It was suggested to you this morning, and you  
 15 appeared to accept, being taken to page 1237 in E5, that  
 16 this document was being put forward to Specsavers by you  
 17 at page 1237 and that you were lying to Specsavers in  
 18 that it is not a 2009 document, it's obviously 2011?  
 19 A. It is what I say it is, it's a description to Specsavers  
 20 about what he does, and the background for it.  
 21 Q. At the bottom of page 1237, it was suggested to you by  
 22 Mr Potts -- can you take out 1237?  
 23 A. Yes.  
 24 Q. This is the specific allegation put.  
 25 A. Where is it now?

1 25

1 Q. 325, I have already taken you to 323 to 4:  
 2 "I haven't got copy to hand but I believe you have  
 3 been given a copy. PB refers to the investigation  
 4 files, section 5, file 2, which is a work schedule for  
 5 JF provided to us by GV."  
 6 Do you see that?  
 7 "Question: The agreement that you have with him is  
 8 for him to fulfil what is listed on this work schedule  
 9 in order for him to get paid his minimum of a £240 per  
 10 week retention, is that right?  
 11 "Answer: Yes."  
 12 Over the page you were taken to, about the other  
 13 work that he did. Then if you go to 338, line 338 --  
 14 A. I've lost you at the moment, I'm so sorry.  
 15 Q. Page 1238, concentrate if you can. Do you have it?  
 16 A. Yeah.  
 17 Q. At the top, the issue of the storage unit is raised, but  
 18 then you were taken to line 338, do you see the  
 19 question?  
 20 A. Yes.  
 21 Q. "PB hands HP page 1 of the work schedule."  
 22 A. Yes.  
 23 Q. Page 1, so you were not shown the whole work schedule,  
 24 you were just shown the first page?  
 25 A. Yes.

1 25

1 Q. Do you see that?  
 2 A. Yeah.  
 3 Q. That would be page 1676?  
 4 A. Yes.  
 5 Q. Do you see that? 1676 is page 1 of the work schedule.  
 6 Do you see that?  
 7 A. I do.  
 8 Q. That's what you were shown?  
 9 A. Mm.  
 10 Q. You don't appear to have been shown the second page,  
 11 which is page 1677, which is the page that I just took  
 12 you through in detail. Do you see that?  
 13 A. Yes.  
 14 Q. Nor were you shown the next few pages, which is a longer  
 15 list of all the other things that he did. Back to  
 16 page 1238 in bundle E5:  
 17 "PB hands HP page 1 of the work schedule.  
 18 "Question: Is it fair to say that all the jobs  
 19 listed on there are just checks to be carried out?  
 20 "Answer: Well, it does say 'check and repair when  
 21 necessary'.", et cetera.  
 22 Do you see that?  
 23 A. Yes, I do.  
 24 Q. Now, this morning when all of this was put to you by  
 25 Mr Potts, you appeared to agree with him that when that

1 27

1 document, 1676 onwards, was provided by your husband and  
 2 referred to by you, that you were, in his words, lying  
 3 to Specsavers. What do you say about that now?  
 4 A. Well, I got a bit upset, because I thought I really, as  
 5 I said to you before, I didn't have respect for these  
 6 people, the loss prevention department, in the first  
 7 place, and I couldn't remember having been shown  
 8 anything when we were talking about it, and I just got  
 9 flustered and thought, well, if that is what --  
 10 I couldn't remember lying. I really couldn't  
 11 remember --  
 12 Q. So why did you admit to Mr Potts that you were lying?  
 13 A. Because he kept on saying "Well, this is what it says  
 14 and this is what you must have done".  
 15 Q. But all he put to you was "page 1237 in the bundle, this  
 16 is what it says", but all it says is that you said  
 17 "I haven't got copy to hand but I believe you have been  
 18 given a copy", and then you were shown parts of the  
 19 document, and you confirmed that's a list of the things  
 20 that he did.  
 21 A. Right.  
 22 Q. So were you lying to Specsavers or were you not lying to  
 23 Specsavers in page 1237 at the bottom?  
 24 A. I wasn't lying to Specsavers, no.  
 25 Q. Okay. I am almost finished now. You were asked about

1 28

1 this complaint to the GOC, do you remember? Bundle E6.  
 2 You can put away all the other bundles, we are really  
 3 almost there.  
 4 I am sorry, my Lord, I am taking just a few minutes  
 5 longer than I thought, but this is my last point.  
 6 Do you remember, at E6, page 1566?  
 7 A. Yes.  
 8 Q. 1566-1.  
 9 A. Yes.  
 10 Q. You were taken to the reference on page 1566-9, just  
 11 below, just near the bottom:  
 12 "The claimant [in brackets] apparently believes that  
 13 the original complaint relating to its activities which  
 14 led to the GOC letter to the claimant dated  
 15 15 March 2012 was made to the GOC by Specsavers. For  
 16 the avoidance of doubt, it was not."  
 17 I have a couple of questions about that. Have you  
 18 ever been told who personally made the complaint?  
 19 A. No.  
 20 Q. Do you know who personally, what person, made the  
 21 complaint?  
 22 A. I don't.  
 23 Q. Have you ever seen it, whether in written form or any  
 24 other form?  
 25 A. No.

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1 Q. It was suggested to you that, given that answer, you  
 2 know that Specsavers -- perhaps we ought to look at the  
 3 precise -- it was put to you that your witness statement  
 4 was false, and that is in bundle B, page 50. Do you see  
 5 that?  
 6 A. Page 50?  
 7 Q. You were taken to paragraph 269, but I think started off  
 8 at 265, so we can get the sense of this.  
 9 A. Yes.  
 10 Q. 265:  
 11 "Not long after we opened for business, the GOC  
 12 wrote to me on 15 March 2012 to say that 'the GOC has  
 13 received information that you are engaged in illegal  
 14 practice'. "  
 15 Do you see that?  
 16 A. Yes.  
 17 Q. 266:  
 18 "The letter gave us two weeks to prove that we were  
 19 not contravening the Act. Mr Weller received a similar  
 20 letter."  
 21 Then there's a follow-up letter, 267:  
 22 "The email attached copies of the company's  
 23 marketing material and photographs of our store's  
 24 frontage where we were using the word 'optician'.  
 25 Do you see that?"

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1 A. I do.  
 2 Q. 268:  
 3 "The GOC in the email told us that Blue Flame Vision  
 4 must cease using the word 'optician'. "  
 5 Then what Mr Potts took you to as being, as he put  
 6 it, "You are prepared to say anything, aren't you" is:  
 7 "We were not in any doubt at all that the action  
 8 taken by the GOC had been instigated by Specsavers."  
 9 What did you mean by "instigated by Specsavers"?  
 10 A. Well, I meant that would probably not do it themselves,  
 11 they would get somebody, a family member or a member of  
 12 the public to do it for them.  
 13 Q. So when we go back to page 1566-9 and the GOC's  
 14 solicitor's letter:  
 15 "The claimant apparently believes that the original  
 16 complaint which led to the letter was made to the GOC by  
 17 Specsavers. For the avoidance of doubt, it was not."  
 18 Do you have any reason to disbelieve the Penningtons  
 19 letter?  
 20 A. Well, just because it says it's not by Specsavers, as  
 21 such, doesn't mean that they didn't cause the complaint  
 22 to arise.  
 23 MR STUART: My Lord, I have no more questions for  
 24 Dr Poulsen. Does your Lordship have some questions for  
 25 her?

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1 MR JUSTICE HILDYARD: Give me one second.  
 2 MR STUART: Yes.  
 3 (Pause)  
 4 MR JUSTICE HILDYARD: No, I think you have all covered  
 5 things very comprehensively.  
 6 I know you will be here for the rest of the case in  
 7 all probability, but thank you very much for your  
 8 evidence, and it's been a long haul.  
 9 THE WITNESS: Thank you.  
 10 MR JUSTICE HILDYARD: Thank you.  
 11 MR STUART: Dr Poulsen, thank you.  
 12 (The witness withdrew)  
 13 Discussion re timetable  
 14 MR STUART: My Lord, I see the time, and my next witness  
 15 will be Mr Vos.  
 16 MR JUSTICE HILDYARD: Yes.  
 17 MR STUART: I know your Lordship has another matter at 4.30.  
 18 MR JUSTICE HILDYARD: Yes.  
 19 MR STUART: I am not saying that, you know, we should want  
 20 to lose 10 or 15 -- if we left here at 25 past 4, it  
 21 takes a bit of a palaver to get out.  
 22 MR JUSTICE HILDYARD: Yes. I should certainly appreciate  
 23 a bit of time, but I know that I have lost you some time  
 24 by dealing with other matters.  
 25 MR STUART: It just occurs to me, my Lord, that 15 minutes

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1 in the scheme of things isn't go to make much difference  
 2 to this trial.  
 3 MR JUSTICE HILDYARD: No. How far are we behind on the time  
 4 schedule?  
 5 MR STUART: We are about a couple of hours behind.  
 6 MR POTTS: I am a little concerned about the time, my Lord.  
 7 If the extent of re-examination on all the witnesses is  
 8 going to be that long, I can see quite a lot of  
 9 slippage. I am a little concerned on the timing.  
 10 Certainly for Friday, I think, my Lord, subject to my  
 11 learned friend, and subject to your Lordship, if we  
 12 could start a little earlier, I think that might be  
 13 an idea.  
 14 MR JUSTICE HILDYARD: Yes. You don't press, in other words,  
 15 to continue now?  
 16 MR POTTS: My Lord, I would like to crack on, to be honest,  
 17 because I am concerned about time, but I am in  
 18 your Lordship's hands as to what your Lordship has  
 19 hereafter and what is involved in that.  
 20 MR STUART: My Lord, could I just say, obviously given that  
 21 we are not going to start again until perhaps 10 o'clock  
 22 on Friday morning, that would put ...  
 23 MR JUSTICE HILDYARD: I am conscious of the fact that he  
 24 would be in purdah, as it were, over that period, which  
 25 is quite a long period, and so it does have some

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1 logistical advantage of deferring commencement of his  
 2 examination until Friday.  
 3 MR STUART: Yes, please, my Lord.  
 4 MR JUSTICE HILDYARD: Equally I am very bothered about what  
 5 I perceive to be a little more than two hours behind the  
 6 time. While as I say I quite understand the reasons for  
 7 it, the re-examination was relatively long, if I can put  
 8 it that way.  
 9 MR STUART: My Lord, I think it was two hours 20 minutes.  
 10 MR JUSTICE HILDYARD: Yes. I'll say no more about that.  
 11 What time do you wish me to start on Friday?  
 12 MR STUART: 10 o'clock if possible, my Lord.  
 13 MR POTTS: I think 10 o'clock, my Lord. I think anything  
 14 more than that is stretching it for anybody, maybe we  
 15 can see how we go -- I hesitate because it will be  
 16 Friday afternoon. My Lord, shall we start at 10 and see  
 17 how we go, my Lord?  
 18 MR JUSTICE HILDYARD: Yes. I can't remember how much time  
 19 you have built in at the end for written closings.  
 20 MR POTTS: No, my Lord, that's my concern. If your Lordship  
 21 looks at the timetable, one of my concerns is that there  
 22 isn't much time. In fact I don't think there is any --  
 23 no days allocated to the timetable.  
 24 MR JUSTICE HILDYARD: I mean, in a case like this where we  
 25 will have travelled over a number of documents, a full

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1 written closing from each of you will definitely assist  
 2 me.  
 3 MR POTTS: Yes.  
 4 MR JUSTICE HILDYARD: For that purpose, you need a proper  
 5 time.  
 6 MR POTTS: We do, my Lord. Yes.  
 7 MR STUART: My Lord, on present estimates -- we were working  
 8 it out earlier, and we think that Day 15, which we have  
 9 down as short oral submissions by the claimants and by  
 10 the defendants, will be the last day of term. That's  
 11 our present timetable.  
 12 MR JUSTICE HILDYARD: Yes. Well, we are a bit behind on  
 13 that already.  
 14 MR POTTS: I think we are about a day behind.  
 15 MR JUSTICE HILDYARD: My feeling is we are exactly a day  
 16 behind.  
 17 MR POTTS: Yes, I agree.  
 18 MR JUSTICE HILDYARD: I earlier expressed the gloomy thought  
 19 that, allowing sufficient time for written submissions,  
 20 we are not going to conclude this matter this term.  
 21 MR POTTS: My Lord, I should mention that I have some  
 22 difficulties, I am afraid, that I have a six week trial  
 23 starting at the start of next term.  
 24 MR JUSTICE HILDYARD: The very start?  
 25 MR POTTS: I will check that, but I believe it is starting

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1 from the very start.  
 2 MR JUSTICE HILDYARD: Yes. You may have to sort of try and  
 3 reorganise a bit, however. I cannot see that you will be  
 4 able to prepare sufficiently full written closings to  
 5 enable half a day each oral closings in less than two  
 6 days. I just cannot see that. I think that's quite  
 7 a tall order as it is, because I think there will be  
 8 a lot to summarise and put forward.  
 9 MR POTTS: My Lord, could I suggest perhaps -- I think  
 10 I need to look at a diary -- perhaps I can speak to my  
 11 friend and maybe we can mention the matter again on  
 12 Friday.  
 13 MR JUSTICE HILDYARD: Absolutely, that's why I raise it now,  
 14 because I think -- I didn't know about your commitment,  
 15 and obviously I will do what I can reasonably to assist,  
 16 but I have a feeling that the written submissions will  
 17 have to take up the rest of the term and then for there  
 18 to be your short blast at the beginning of term,  
 19 I suspect. I just seed that thought.  
 20 MR STUART: We will liaise.  
 21 MR POTTS: We will count the days and see how we are going.  
 22 MR JUSTICE HILDYARD: See how you are going. 10 o'clock,  
 23 then, on Friday.  
 24 (4.15 pm)  
 25 (The court adjourned until 10.00 am

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1 on Friday, 6 December 2013)  
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