Judicial Review Reform - Government consultation in response to the Independent Review of Administrative Law

DLA Piper UK LLP Consultation Response

April 2021

DLA PIPER

Introduction

DLA Piper welcomes the opportunity to respond to the Government's consultation paper on possible reforms arising from the Independent Review of Administrative Law (**"IRAL"**) (the **"Consultation"**).

DLA Piper's UK public law practice advises a range of clients including claimants and defendants in judicial review and other public law proceedings. In addition to advisory and contentious work for corporate clients, we are regularly instructed by both central and all tiers of local government as well as the devolved administrations on complex high-profile public law matters.

DLA Piper is therefore well placed to respond to the Consultation, and we do so below. At the outset, please note that this response does not purport to represent the views of DLA Piper as a firm. Rather, this response has been prepared collectively by those DLA Piper public law lawyers named at the end of this consultation response.

Our response to the Consultation

General Observations

Before responding to the Consultation questions, we first make a general observation about the IRAL and its March 2021 report (the **"IRAL Report"**).[1]

In general, we consider the IRAL Report to be measured and the product of careful deliberation. We commend the IRAL Report authors for this. As we explained in our response to the IRAL's call for evidence,[2] judicial review is a key constitutional safeguard and a pivotal part of the rule of law. Reforms to judicial review should therefore be approached cautiously and on an incremental basis. It is welcome that the IRAL endorse this approach in their recommendations. Indeed, notwithstanding the broad terms of reference set by the Government for the IRAL, the IRAL's limited recommendations reflect a key conclusion underpinning the IRAL's recommendations: that while the IRAL "*understands the [Government's] concern about recent court defeats, [the IRAL] considers that disappointment with the outcome of a case (or cases) is rarely sufficient reason to legislate more generally*."

Given the findings of the IRAL, it is therefore somewhat surprising that the Government's Consultation goes beyond what the IRAL was asked to consider or recommended. As a general point, we would therefore encourage the Government to reflect again on the IRAL Report (as well as the responses to the Consultation) before enacting any legislative or policy changes to judicial review. Indeed, we find it surprising that this Government remains so keen to reform at speed what has been a very long-standing part of the United Kingdom's constitutional settlement: judicial review as exercised through the supervisory jurisdiction of the Court.

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[1] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/970797/IRAL-report.pdf

[2] https://www.dlapiper.com/de/UK/insights/publications/2020/11/independent-review-of-administrative-law-call-for-evidence/

Consultation Questions

Question 4: (a) Do you agree that a further amendment should be made to section 31 of the Senior Courts Act to provide a discretionary power for prospective-only remedies? If so, (b) which factors do you consider would be relevant in determining whether this remedy would be appropriate?

We disagree that a further amendment should be made to section 31 of the Senior Courts Act 1981 to provide a discretionary power for prospective-only remedies.

In our previous consultation response, we said the following:

"The rule of law is a constitutional principle in the United Kingdom. One of the practical effects of the rule of law is that courts have the ability to strike down government action which is illegal and/or unlawful. Judicial review is the inherent jurisdiction of the High Court and the primary constitutional role of the judicial branch of government. Therefore, absent some other mechanism through which government action can be held to a correct legal and lawful standard, the importance of maintaining the rule of law requires that the courts must be able to carry this constitutional function, and any reform which attempts to hinder or prevent the courts from doing this would be, in our view, unconstitutional."

To develop these points further, judicial review allows the Court to act as a check and balance against the risk of abuse of power by the executive. In particular, it is an important protection for individual rights. Although the concept of legal certainty is also an important aspect of the rule of law, it is not the most important aspect of the rule of law and it does not mean, in our view, that the rights of individuals to challenge unlawful government action should be diminished in effect by there being the possibility that although government action may be found to be unlawful, it will only be prospectively quashed.

We note that the Government, in the Consultation, states in favour of prospective only remedies:

"this would mitigate effects on government budgeting, which would enable the Government to continue to spend on improving the lives of its citizens"

Although we agree that it is important that taxpayer money is not wasted, and is carefully spent by the Government, we do not think this justifies prospective only remedies. The Government should, at all times, be carefully spending taxpayer money in order to improve the lives of its citizens. In order to avoid the problem whereby compensatory schemes divert from this aim, the Government should be careful not to come to unlawful decisions or make unlawful secondary legislation in the first place.

These economic considerations, and administrative inconvenience, do not justify the incursion on individual rights, or the "unjust outcome" recognised by the Government response, which prospective-only remedies represent.

Question 5: Do you agree that the proposed approaches in (a) and (b) will provide greater certainty over the use of Statutory Instruments, which have already been scrutinised by Parliament? Do you think a presumptive approach (a) or a mandatory approach (b) would be more appropriate?

As stated above, "legal certainty" is indeed an important element of the rule of law. However, this should not be interpreted to mean that the rule of law will be best served by only prospectively invalidating

impugned clauses in statutory instruments. Significant unfairness and harm can be done to individuals affected by unlawful secondary legislation.

The need for legal certainty is not, therefore, a justification for prospective-only quashing orders. This, in our view, would undermine the rule of law, not strengthen it as a critical element of the rule of law which is that the government is accountable under the law. In our view, the Government would effectively be able to legislate at will if it knew that the courts could only prospectively quash secondary legislation.

In our view, the courts already have the capacity to exercise discretion when it comes to remedies and there is no need to introduce a presumption, far less to make it mandatory, for quashing orders to be prospective only.

Question 6: Do you agree that there is merit in requiring suspended quashing orders to be used in relation to powers more generally? Do you think the presumptive approach in (a) or the mandatory approach in (b) would be more appropriate?

Potentially, we think there may be merit in providing the Court with this remedy. The IRAL itself recommended the introduction of suspended quashing orders. The ability to find a practical solution such that, when appropriate, there is an opportunity for any defect which made a decision unlawful to be cured in a reasonable period is valuable as it prevents judicial review remedies being a blunt remedy.

Question 8: Would the methods outlined above, or a different method, achieve the aim of giving effect to ouster clauses?

In summary, we do not agree with the Government's proposals regarding ouster clauses. We think the proposals are unnecessary. In our view, Parliament retains the ability to oust the supervisory jurisdiction of the Court in appropriate cases. In any event, the animus apparently motivating the Government's reforms is not accepted: it is necessary for the Court to interpret ouster clauses narrowly. The rule of law demands as such: the Court, in its supervisory jurisdiction, should not allow unfettered decision-making without judicial supervision.

Before providing our detailed response, we note that the Government's terms of reference for the IRAL did not include ouster clauses as a matter for consideration by the IRAL. Accordingly, the IRAL Report only addresses ouster clauses in limited, indirect detail. Nevertheless, the Government has decided to proceed by proposing a series of reforms, by way of legislation, to "clarify the effect of statutory ouster clauses". Given the lack of consideration by the IRAL, it is surprising that the Government has suggested the proposed reforms.

Turning to the substance of the Government's proposals, we understand the Government is considering legislating for a 'safety valve' provision in how ouster clauses should be interpreted where there exists "sufficient justification" for doing so. It is not clear how this proposal would be provided for in practice. No detail is provided as to possible drafting approaches. Indeed, it is not clear that the Government itself understands how its abstract proposals could be provided for in legislation. As noted, had the IRAL been asked to consider this, then the Government would be in a better place to legislate. Absent such an evidence base, the Government would be advised to approach this matter with a degree of caution.

Parliament has, historically, been able to provide for ouster clauses via the following means:

1. Finality clauses;

2. No certiorari clauses;
3. Conclusive evidence clauses;
4. Time limitations; and
5. Preclusion[3].

The Government's proposals (in as much as they are understood) do not explain how its interpretative clause would operate in relation to the above taxonomy. Any legislation would need to do so – because, as the Government itself has noted, the Court has traditionally been very deferentially to for example time limitation ouster clauses.

More substantively, we do not agree with the motivation apparently motivating the Government's reforms to ouster clauses. As we explained in our response to the IRAL's call for evidence, judicial review is an important constitutional safeguard and a key part of the rule of law. The Court should, in its supervisory jurisdiction, be interpreting ouster clauses narrowly. The rule of law demands as such. Nevertheless, this does not mean that Parliament cannot, in appropriate cases, legislate to oust the role of the Court. See for example the Court's judgment in *R (Hillingdon London Borough Council) v Secretary of State for Transport* [2017] EWHC 121 (Admin) in which Cranston J held that an ouster clause (section 13 of the Planning Act 2008) had effect thereby precluding the claimants in those proceedings from challenging the Secretary of State's publication of a planning National Policy Statement relating to the expansion of Heathrow Airport. So long as Parliament makes its intentions clear – primarily through clear unambiguous drafting – ouster clauses can be given effect. The Government's reforms are thus otiose.

Question 9: Do you agree that the CPRC should be invited to remove the promptitude requirement from Judicial Review claims? The result will be that claims must be brought within three months.

We think that there is a strong case to reform the way in which the promptness requirement operates. The current mechanism creates obvious uncertainty for prospective challengers which in turn creates procedural unfairness. This concern led to the Court of Justice of the European Union in the *Uniplex* case requiring the United Kingdom in a procurement context to provide for a certain fixed limitation period so that challengers should always have certainty as to the period within which any legal proceedings had to be launched to avoid being shut out from a remedy on limitation grounds. It is always invidious for a challenge that has been brought within the three months window to then be retrospectively ruled out of time due to a perceived lack of promptitude especially if no other more obvious grounds for refusing the claim leave to proceed have been identified.

Equally, we do not think that a blanket removal of any requirement for promptitude is appropriate. There are judicial review challenges that could and should be brought promptly and where delay even for a limited period would be contrary to the public interest. In this context, our comments would be as follows:

1. There are many categories of potential judicial review challenge where, in reality, promptitude will never be an issue. This involves many of the challenges to the correct interpretation of secondary legislation and statutory guidance as well as many other categories of public law

[3] See Eliasson et al, 'Ousting the Ouster Clause?', *Judicial Review*, 22 (3), 2017.

decision. In those cases, there may indeed be a case for suggesting that the final deadline for the bringing of challenges could be extended from three months to six months with more time being allowed both for pre-action disclosure / correspondence and possible ADR between the parties. We suggest that it should be possible to define the categories of case where there would be a presumption of a lack of any promptitude requirement. It maybe that, as happens in many Sale and Purchase Agreements, there could be a two phase limitation mechanism whereby to preserve limitation a potential claim has to be notified by letter within a preliminary limitation period and if that is done then a longer period within which proceedings must be issued and then served could be triggered.

2. It may also be possible in other cases to introduce a system whereby the decision maker, either at the time of making the relevant decision, or at the time that any initial correspondence is written challenging the decision indicates in response that there is a requirement for promptitude. If such a notification is given then the onus would be on the prospective challenger to issue any challenge promptly or run the risk that the relevant public body could then mount a successful limitation defence. If, however, the relevant public body does not specify at the earliest opportunity a need for promptitude, then there would be a presumption that any challenge could be brought within the normal limitation period without being impugned for lateness. We think a mechanism that operates along these lines could help eliminate uncertainty and might strike a fairer balance between the parties whilst ensuring that in genuinely urgent cases the need to "put up or shut up" would be preserved but in a way that was more transparent.

3. We also note in this context and in relation to question 11 that, particularly in non-urgent cases, there may indeed be some merit in determining that public bodies could and should be permitted to agree to possible standstill arrangements with prospective challengers. These should only be agreed for a limited additional period of time because obviously whilst a particular challenger may bring a legal challenge, there will often be other parties interested in the issues raised by the challenge or whose rights will be impacted by the final decision on which a challenge is based and therefore undue delay in prosecuting such proceedings could cause injustice. However, given the length of time over which such challenges may otherwise come to court, it is hard to see how allowing some limited additional procedural flexibility to facilitate the resolution of challenges outside of court could in any sense be said to be contrary to the public interest. Our suggestion would be to allow up to 3 months in non-urgent cases or longer with the leave of the court.

Question 10: Do you think that the CPRC should be invited to consider extending the time limit to encourage pre-action resolution?

We have addressed this issue in part in our answer to question 9 above.

A key concern is that in many cases the existing limitation rules mean that there is insufficient time for compliance with the duty of candour and / or for FOIA requests to be fully and properly answered so that there can be a serious inequality of arms whereby prospective challengers have not received the information to which they should be entitled in sufficient time to allow them to either analyse their case or present it to full effect. There is a perception that this imbalance is sometimes exploited so as to

deter challenges or make it less likely that the challenge will in fact be granted leave. This is a genuine concern.

In procurement law the limitation period for challenges does not start to run until bidders have been provided with compliant feedback so that they have the basic information required to inform whether or not they have the basis for a potential challenge. We doubt that that mechanism could be replicated for all judicial review challenges but it may be possible to introduce a mechanism whereby if a prospective challenger has made legitimate and reasonable requests for information that will inform the basis for their challenge there will be a presumption in their favour that the limitation period will be extended unless and until those requests have been answered. Properly structured this would go some way to address the perverse incentive on public bodies not to address legitimate information requests in a timely fashion at the pre-action stage of a challenge.

That said many judicial review claims turn on points of law which require resolution by the Court where greater clarity on factual issues will make little or no difference to the underlying dispute. It is therefore often difficult for parties to settle matters at a pre-action stage. In a typical dispute, both a claimant and defendant are likely to have equally valid interpretations of the underlying legal regime. The opportunity for settlement is therefore limited. In any event, to the extent that settlement can be reached, judicial review claims can (and do) settle after issue. Extending the pre-action period is unlikely to achieve any beneficial effects.

Notwithstanding the above, and as noted in response to question 9 above, we think that there may be some merit in providing for an effective standstill period in certain cases especially in those cases where the real dispute is about the practical efficacy of implementing a particular course of action rather than any underlying disagreement in principle. If enacted, this would negate any need to extend the pre-action period.

Question 11: Do you think that the CPRC should be invited to consider allowing parties to agree to extend the time limits to bring a Judicial Review claim, bearing in mind the potential impacts on third parties?

Please see our above response to question 9.

Question 12: Do you think it would be useful to invite the CPRC to consider whether a 'track' system is viable for Judicial Review claims? What would allocation depend on?

In our response to the IRAL's call for evidence, we said the following:

"*The IRAL may wish to consider recommending the adaption of some form of track system for judicial review cases. All cases would still be referred to a High Court Judge at the leave stage but as well as considering leave the judge would have to certify whether the case was appropriate to be dealt with by the Administrative Court or whether given the complexity of the issues, their public importance or potential administrative impact the issues could be referred to the County Court, Crown Court or other appropriate tribunals in the first instance. If such an approach would free up capacity in the Administrative Courts as well as allowing a significant number of other "simpler" cases to be disposed of more quickly on a "fast track" basis that might help alleviate both the cost and the administrative burden on Government of addressing judicial review as well as managing the cost and resource risk for claimants.*"

Whilst there is no harm in inviting the Civil Procedure Rules Committee to consider this matter, it is questionable whether the proper determination of judicial review proceedings would be assisted through a form of track system. We consider that a track system would add another layer of confusion, complexity and bureaucracy, particularly for self-represented parties.

A track system is ultimately ideal for claims in which value serves as a good proxy for complexity. Judicial review disputes are different. In all such disputes, there are important questions of law (often of relevance beyond the litigating parties) requiring resolution by the Court. Consequently, judicial review claims are not as easily allocated as civil cases.

From a constitutional perspective, all judicial review cases should be dealt with by a High Court judge unless the matter is specifically reserved for a specialist tribunal. Thus, whilst some judicial review claims are more complex than others, the nature and wider purpose of this form of litigation means that such disputes should be determined by a single forum, the High Court, pursuant to its supervisory jurisdiction.

In our previous consultation response, we noted that a High Court judge could determine, at the permission stage, whether the issues could be referred to other courts or appropriate tribunals. Having re-evaluated this suggestion, we do not consider that a track system of this form would be appropriate from a constitutional perspective.

One way in which the judicial review system has been streamlined is the introduction of specialist courts that deal with specific types of judicial review including the Planning Court and the Upper Tribunal (Immigration and Asylum Chamber). One potential avenue would be to explore the implementation of further specialist courts/tribunals for other areas of Judicial Review which are sufficiently large to benefit from this development and who are able to maximise the benefits of efficiency gains in this regard.

As an alternative suggestion to a track system, it would be worthwhile for the Administrative Court to consider avenues in which it can become more efficient. Examples may include (1) migrating to a digitised filing system which is widely used by other courts; and (2) to consider online adjudication.

Question 13: Do you consider it would be useful to introduce a requirement to identify organisations or wider groups that might assist in litigation?

In our response to the IRAL's call for evidence, we said the following:

"*In particular, we think the courts could arguably be more sceptical in their approach to the selection of challengers by prospective claimants as clearly this is done in many cases with the intent of choosing someone who is sufficiently impecunious to restrict future costs risk. We think a duty on lawyers to identify to the court not just the named challenger but any organisation or wider group that that individual represents or is affiliated to might assist*".

We maintain that a duty could be provided for that required the parties to identify to the Court any organisation or wider group that a named challenger represents or is affiliated to. We consider that this approach may help to identify potential intervenors at an early stage. To clarify this point further, we consider that the introduction of this duty would encourage the participation of interested parties such as charities, non-governmental organisations or other organisations with an interest in proceedings.

Currently, under the Civil Procedure Rules, the parties are required to identify any interested parties to the proceedings. As the Government will be aware, an interested party is defined in CPR 54.1(2)(f) as

any person (other than the claimant and defendant) who is directly affected by the claim. Often this definition is construed as persons that are negatively affected by the claim for example, in the context of a procurement judicial review, an economic operator who would subsequently lose its contract if the challenge is successful. However, in our experience, it is fairly common for organisations such as a charity or an NGO to join proceedings as an intervenor and this can generally be very helpful for all parties including the claimant, defendant and the court.

Such intervention by these organisations often provides a different perspective due to their unique experience in the area under challenge. Furthermore, these organisations generally have a good understanding of the relevant regulatory codes which may form the subject of the legal challenge. As a result, the organisations are often well placed to identify novel legal issues which can then subsequently be addressed. This provides a positive contribution to the proceedings and assists the Court with the resolution of the issues in dispute. Consequently, we consider that this has the impact of maximising jurisprudential value of the courts time and therefore, this form of participation should be actively encouraged.

Whilst the current regime already permits interventions as under CPR 54.17 any person may apply for permission to intervene or to make legal submissions, an important distinction should be drawn between an interested party and an intervenor. An interested party has an automatic right to be informed of the proceedings whereas an intervenor only has the right to apply for permission to participate in the proceedings. In this regard, we consider that any potential intervenors should be actively identified by the parties to the proceedings to support the facilitation and uptake of the right to intervene.

To illustrate our point using an example, in a case which concerns financial regulation, regardless of who the defendant is, it would be useful to invite the Financial Conduct Authority (**"FCA"**) to consider intervening. Whilst the FCA has a statutory remit to keep an eye on issued proceedings, there is no system of notification when proceedings are issued. Therefore, a duty to consider potential intervenors could assist organisations by bringing a matter to their attention which may otherwise be missed.

In terms of implementation of the duty, the CPR could be amended in a simple way to create an obligation for the parties to consider inviting organisations who may have an interest to participate in the proceedings. We would recommend that this duty is not framed as a binding obligation but nevertheless encourages the parties to consider this approach.

Question 14: Do you agree that the CPRC should be invited to include a formal provision for an extra step for a Reply, as outlined above?

We think that the parties (including the Court) may benefit from having certainty – by way of a formal amendment to the CPR – for the option of a reply. Currently, there is ambiguity as to whether replies are permitted. However, we think that in practice a reply adds little (other than costs) at the pre-permission stage. If the Civil Procedure Rules are amended to provide for this option, then we suggest that guidance (e.g. in the relevant PD or Administrative Court Guide) makes clear that replies should only be filed if a new matter arises between the filing of a claim and the grant of permission.

Question 15: As set out in para 105(a) above, do you agree it is worth inviting the CPRC to consider whether to change the obligations surrounding Detailed Grounds of Resistance?

We do not agree with the Government's proposals at paragraph 105(a) of the Consultation.

The obligation on a defendant to file summary grounds of resistance is not especially onerous and it serves as a useful pleading for the Court to determine whether to grant permission. Summary grounds of resistance can (and do) serve as a defendant's detailed grounds of resistance. Work completed on summary grounds is not therefore necessarily wasted.

We are in any event not clear how the Government's proposals would be provided for in practice. The current procedure is clear and provides parties and the Court with a degree of certainty in what pleadings are required and by when. The proposals (that the defendant would only be obliged to submit summary grounds where the pre-action protocol was not followed or a claimant has raised (without sufficient notice) new grounds not foreshadowed in pre-action correspondence) are likely to be highly subjective and result in satellite litigation between the parties as to whether a defendant was in fact subject to an obligation to file summary grounds. The Government's proposals should not be pursued any further.

Question 17: Do you have any information that you believe would be useful for the Government to consider in developing a full impact assessment on the proposals in this consultation document?

Costs capping

An additional area which would benefit from clarification concerns the availability of judicial review costs capping orders ("**JRCCO**"). In our recent experience the law on JRCCOs is unclear and we consider that orders have been granted too liberally in cases where there the judicial review process is being used primarily for political points scoring rather than seeking the meaningful intervention of the courts on points of law that require clarification.

The Court's jurisdiction to make a JRCCOs is governed by sections 88 and 89 of the Criminal Justice and Courts Act 2015 (CJCA 2015). The original purpose of protective costs orders (the forerunner to JRCCO) was to enable a claimant "*of limited means access to the court in order to advance his case without the fear of an order for substantial costs being made against him, a fear which would inhibit him from continuing with the case at all*" per *R (Corner House Research) v Secretary of State for Trade and Industry* [2005] EWCA Civ 192, [2005] 1 WLR 2600 at §6).

The CJCA 2015 aimed to enshrine the principles in *Corner House Research* in statutory form (see §§98-99 of the Explanatory Notes).

It is in practice especially difficult for the Court to conclude where the public benefit lies. While in our submission JRCCOs serve an extremely important purpose in ensuring that genuinely important judicial review challenges are not abandoned simply for lack of funding, our view is that an entity seeking or individual who is merely seeking publicity, or seeking to promote a cause or campaign, etc, should not be afforded taxpayer funded costs protection. Determining public interest in the context of a publicity campaign puts the Court in the position of having to exercise judgment on whether the object or activities come within the spirit and intendment of the being genuinely for the "public interest" for the purpose of receiving very real benefits at the expense of the Crown.

Determining whether an applicant for a JRCCO is acting in the public interest by bringing the proceedings should in our submission be considered in the analogous context of whether a particular aim or purpose of an organisation can be said to be within the "general public good" category of acceptable charitable objects. English law has consistently maintained there must be a 'political

exception' to the public interest, because a trust for the attainment of political objects is invalid on the basis that the Court has no means of judging whether a proposed change in the law will or will not be for the "public benefit".

Public interest should not in our submission be narrowly defined by reference to giving satisfaction to those who are backing the cause that they are promoting – it must legitimately be a public wide interest that is proved to be of 'public good to all'. Public money should not permit campaign organisations to engage in political point scoring in the Courts through seeking endless judicial reviews.

Identity of litigation funders

A trend in the past few years has been the emergence of crowd funded judicial review litigation. While this has arguably improved access to justice in respect of popular causes, our opinion is that new rules are warranted to clarify the scope of crowd funding in the context of judicial review.

Crowd funding of proceedings in sensitive areas of policy would in our opinion potentially give rise to opportunities for anonymous individuals or organisations, including potentially organisations who intend to cause social or other forms of harm or to gain knowledge, to play a role in championing the costs of judicial review litigation with a view to delivering upon a silent motive. Judicial review should be completely in the open as envisaged under the formulation of the duty of candour, and we therefore would encourage a requirement for crowd funded claimants to disclose or at least maintain records concerning the details of donors who support their litigation.

Such information could be material in establishing or ruling out whether donors are exercising a degree of control over the litigation that could amount to a breach of the prohibition of maintenance/champerty, as well as to establish the sources of finance for the purpose of providing security of costs.

Paul Stone

Partner

paul.stone@dlapiper.com

Princes Exchange, Princes Square, Leeds, LS1 4BY, United Kingdom
T: +44 (0)113 369 2700 F: +44 (0)113 369 2799 M: +44 (0) 7971 142 302

Martyn Scott

Legal Director

martyn.scott@dlapiper.com

Princes Exchange, Princes Square, Leeds, LS1 4BY, United Kingdom
T: +44 (0)113 369 2946 F: +44 (0)113 369 2799 M: +44 (0) 7738 295 910

Jonathan Blunden

Senior Associate

jonathan.blunden@dlapiper.com

160 Aldersgate Street, London, EC1A 4HT, United Kingdom
T: +44 (0)207 796 6561 F: +44 (0) 20 7796 6666 M: +44 (0) 7738 296 119

Sarah Burton

Associate

sarah.burton@dlapiper.com

160 Aldersgate Street, London, EC1A 4HT, United Kingdom
T: +44 (0)207 796 6612 F: +44 (0) 20 7796 6666 M: +44 (0) 7880 433 770

George McLellan

Senior Associate

george.mclellan@dlapiper.com

160 Aldersgate Street, London, EC1A 4HT, United Kingdom
T: +44 (0)207 796 6626 F: +44 (0) 20 7796 6666 M: +44 (0) 7823 536 933

www.dlapiper.com