



5 May 2023

Ms Isherwood



Via email only

Dear Ms Isherwood

**R (Isherwood and others) v Welsh Ministers (CO/1211/2022)**

1. I refer to my letter of 27 January 2023. I note that I have not received a response.
2. We have since received the sum of £10,000.00 in part payment of the interim legal costs awarded by Justice Steyn. The sum of £40,000.00 remains outstanding.
3. In my letter of 27 January I advised that failure to pay the sum of £50,000.00 by 4 pm on 27 January would result in each of the Claimants being in breach of the Order of Mrs Justice Steyn of 13 January 2023. That was not done and each of the Claimants are now in breach of that Order.
4. A breach of an Order of the High Court is an extremely serious matter, and the Welsh Ministers reserve the right to take any necessary steps to enforce the order immediately.
5. In light of your claims of impecuniosity I had requested in my letter of 27 January that you provide us with full details, which must be properly evidenced, of all of the Claimants' and PCPW's assets (not limited to cash assets, but also property, etc). Provision of receipts for expenses will not on its own be sufficient. We will require, for example, bank statements etc. That information has not been provided. Please provide that information by return.

6. I noted in my letter of 27 January that in your submissions to the court on 12 January 2023 you stated that PCPW held assets of £18,259. In your email of 26 January you stated that at the time of that email that figure had reduced to less than £10,000. That discrepancy was not explained in your email. I am obliged to point out once again that it is an extremely serious matter to mislead the Court. In my letter of 27 January I requested an explanation for that discrepancy, but none has been provided. Please provide an explanation for that discrepancy by return.
7. The website of PCPW indicates that the sum £79,278.00 has been raised to pursue the litigation. Therefore, there are sufficient funds to meet the outstanding legal costs which the Claimants are obliged to pay.
8. The above is without prejudice to the Welsh Ministers' rights under the Court's order and, in particular, their rights to enforce the Court's order in its entirety without further notice and/or to claim interest in respect of any sums paid late.

Yours sincerely,

Ceri Planchant (Mr)  
Yr Adran Gwasanaethau Cyfreithiol/Legal Services Department

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