

SCHEDULE 2

SCHEDULE OF NEGATIVE STATEMENTS

Demonstrating One-Sided Pejorative Language Against Ms Lawrence

A. THE ASYMMETRY IN JUDICIAL LANGUAGE

1. The following schedule documents **every pejorative characterisation** used by Judge Hargreaves to describe Ms Lawrence and her submissions across the proceedings, compared with the language used to describe respondents and their conduct.

2. **CRITICAL OBSERVATION:** Despite documented false attestations, impossible dates in witness statements, and proven procedural irregularities by respondents and their representatives, ***not a single negative characterisation has ever been directed at any respondent.***

B. NEGATIVE STATEMENTS ABOUT MS LAWRENCE

No.	Pejorative Term/Phrase	Source Document	Date	Context
1	"vague, unparticularised and unhelpful"	REF/2023/0393 Decision, para 15	21 Dec 2023	Describing Ms Lawrence's witness statement
2	"plainly absurd"	REF/2023/0230 SOP, para 11	24 Jun 2025	Describing Ms Lawrence's application to strike out
3	"waste of time"	REF/2023/0395 & 2024/0589 SOP, para 3	24 Jun 2025	Describing Ms Lawrence's applications
4	"disproportionate"	REF/2023/0230 SOP, para 11	24 Jun 2025	Refusing to engage with her submissions
5	"wholly unsupportable"	REF/2024/0589 SOP, para 3	24 Jun 2025	Describing Ms Lawrence's applications
6	"not useful" / "of little use"	Multiple orders	Various	Describing Ms Lawrence's submissions generally
7	"unhelpful and irrelevant"	REF/2024/0589 FINAL, para 44	29 Sep 2025	Describing Ms Lawrence's submissions
8	"repeatedly irrelevant"	REF/2024/0589 FINAL, para 44	29 Sep 2025	Describing aspects of her submissions
9	"stray wide of the target"	REF/2023/0395 SOP, para 4	24 Jun 2025	Describing Ms Lawrence's submissions
10	"deal with irrelevancies"	REF/2023/0395 SOP, para 4	24 Jun 2025	Describing Ms Lawrence's submissions
11	"misinterpret"	Multiple orders	Various	Characterising her understanding of decisions
12	"subject of adverse comment"	REF/2023/0230 SOP, para 11	24 Jun 2025	Referencing prior criticism
13	"fanciful"	REF/2023/0230 SOP, para 8	26 Nov 2025	Describing her LRA procedure submission
14	"no prospect whatsoever"	REF/2023/0395 SOP, para 4	24 Jun 2025	Pre-judging her case outcome
15	"no reasonable prospect of success"	REF/2024/0589 FINAL, para 41	29 Sep 2025	Pre-judging her application
16	"she appears to challenge everything"	REF/2023/0393 Decision, para 15	21 Dec 2023	Pejorative characterisation of fraud victim
17	"This does not assist"	REF/2023/0393 Decision	21 Dec 2023	Dismissing her evidence
18	"not an answer to the Tribunal's Rule 9 notice"	REF/2023/0393 Decision	21 Dec 2023	Rejecting her response

C. POSITIVE / NEUTRAL STATEMENTS ABOUT RESPONDENTS

No.	Positive/Neutral Term	Source Document	Date	Context
1	"carefully and robustly made"	REF/2023/0230 SOP, para 8	24 Jun 2025	Describing First Respondent's submissions
2	"in a strong position"	REF/2023/0230 SOP, para 8	24 Jun 2025	Describing First Respondent's legal position
3	"useful in a broad sense"	REF/2023/0230 SOP, para 8	24 Jun 2025	Describing First Respondent's submissions
4	"succinctly put"	REF/2023/0393 Decision, para 14	21 Dec 2023	Describing First Respondent's position
5	"I accept in the absence of any clear evidence"	REF/2023/0393 Decision, para 14	21 Dec 2023	Accepting First Respondent's assertions
6	Defects "waived"	REF/2024/0589 FINAL, para 37	29 Sep 2025	Non-compliant witness statement accepted

D. RESPONDENT CONDUCT NEVER CRITICISED

3. The following documented misconduct by respondents and their representatives received **NO CRITICISM WHATSOEVER**:

No.	Documented Misconduct	Responsible Party	FTT Criticism?
1	Kwatia falsely attested to witnessing Ms Lawrence's signature when he never met her	HNW's witness	NONE
2	Setfords confirmed NO signatures obtained on 30 November 2018	HNW's solicitors	NONE
3	Fiona Bee statement: deed "signed 28 November 2018" when deed did not exist until 30 November 2018	HNW's witness	NONE
4	Property sold at £91,000 when valued at £225,000 (less than 50% of value)	Jersey Estates / Hudson	NONE
5	Same-day charge created (suggesting pre-arranged scheme)	Jersey Estates / HNW	NONE
6	Rule 9 notice states registration date (4 Oct 2022) BEFORE application date (28 Oct 2022) - impossible	Applicant / Tribunal	NONE
7	HNW's strike-out application "unsupported by evidence as required" per Practice Direction	HNW Lending	NONE
8	"Second Respondent has not filed a witness statement dealing with this reference though it has had plenty of opportunity"	HNW Lending	NONE
9	Respondent submissions described as "limited and of little use" but NO pejorative characterisation	HNW Lending	NONE
10	False assertion by counsel that "escrow was not pleaded" when Land Registry case summary proves otherwise	Mr Sinclair (counsel)	NONE

E. SUMMARY STATISTICS

Metric	Ms Lawrence	Respondents
Pejorative characterisations used	18+	ZERO
Positive/neutral characterisations used	ZERO	6+
Criticism for procedural non-compliance	Constant	NEVER
Defects in evidence/submissions waived	NEVER	Yes (para 37)
Benefit of doubt on assertions	NEVER	Yes (para 14)

F. CONCLUSION

4. The fair-minded and informed observer, presented with this documented pattern, would inevitably conclude that:

- (a) Ms Lawrence's submissions are **systematically characterised in pejorative terms**, regardless of their actual merit;
- (b) Respondents' submissions are **systematically characterised in positive or neutral terms**, regardless of their deficiencies;
- (c) Documented misconduct by respondents **receives no criticism whatsoever**;
- (d) This asymmetry **cannot be explained by neutral application of legal principles**;
- (e) There is a **real possibility of bias** within the meaning of *Porter v Magill* [2001] UKHL 67.

[END OF SCHEDULE 2]