

Witness Statement on behalf of the Defendant

Witness: John Duggan

Number of Statement: 1

Exhibits: JDI

Date: 18 September 2023

IN THE COUNTY COURT AT LEEDS

BUSINESS AND PROPERTY WORK

BETWEEN:-

DANIEL THWAITES PLC

Claimant

And

WEB4ORCE LIMITED

Defendant

**FIRST WITNESS STATEMENT OF
JOHN DUGGAN**



I, JOHN DUGGAN, of Airside House, Royd Ing Avenue, Keighley, West Yorkshire England, BD21 4BZ, wish to rely on the following evidence in support of this claim.

1. I am employed by the Defendant in the capacity of Director. I have been employed by the Defendant in this role since 28 April 1999.
2. The facts contained in this witness statement are made from my own knowledge except where otherwise stated. Where facts in this statement are not from my own knowledge, I have stated the source of the information and those facts are true to the best of my knowledge and belief.
3. There is now produced a paginated bundle of copy documents marked **JDI**. References appearing in square brackets are to pages within **JDI**.

4. This statement has been prepared by the Defendant's director in his role as litigant in person based on written correspondence, email correspondence, telephone conversations and website text. This statement was then reviewed by me prior to signature.

Overview

The Defendant does not have sufficient funds to employ the services of a lawyer so instead researched the Internet to discover the appropriate county court procedures. The Claimant's payment record is appalling it was 14 months overdue when paying 2 of the Defendant's 2020 invoices and in 2021 it was 2 months overdue when paying 4 of the Defendant's 2021 invoices. In 2022 the Claimant failed to pay 5 invoices.

Details of claim

- (1) We admit these allegations.
- (2) We admit these allegations.
- (3) We admit / deny parts of these allegations as follows :
 - (a) We admit the 1st sentence.
 - (b) We admit the 2nd sentence.
 - (c) We deny the 3rd sentence. Between 3 April 2020 and 2 April 2021 we emailed 6 invoices to the Harts Head Hotel and the intended debtor was the Claimant. The invoices were emailed to info@hartsheadinn.co.uk.
 - (d) The Claimant failed to mention that on 19/02/2020 their Data Marketing Manager emailed me as the web designer indicating they wanted to take over the contract for the Harts Head hotel. It was the Defendants understanding at the time that she was referring to the contract we had with Cricketers Inns who were the previous owners.
 - (e) I phoned the Marketing Manager some weeks later when I noticed an article in the local newspaper the Craven Herald reporting the sale of the Harts Head hotel on 5 March 2020, in fact the witness Richard Bailey was quoted in the said article, I explained what the Defendant's function was concerning the hotel's website and she was happy to continue the contract provided to the previous owners.
- (4) We admit these allegations.
- (5) We admit these allegations.
- (6) We admit / deny part of these allegations as follows :
 - (a) We admit the 1st part of the allegations.
 - (b) The Claimant failed to mention the payment included payment of the following 2 invoices 772/26745 & 771/26766 for the period 4 April 2020 and 3 April 2021.

- (c) The Claimant's payment constituted an offer to lease the URL's between 3 April 2020 and 2 April 2021 and if upheld does that mean all invoices for that period be paid?
- (7) We admit these allegations.
- (8) We deny these allegations as follows :
- (a) The Claimant's leases were not cancelled in accordance with the Defendant's terms and conditions as stated on their website at www.web4orce.com and see [JD1 001] in paginated bundle **JD1**.
- (9) We admit these allegations.
- (10) We admit these allegations.
- (11) We deny these allegations as follows :
- (a) The Defendant maintains the Claimant failed to cancel its contract in accordance with the terms and conditions see [JD1 002] and published on Defendant's website as above.
- (12) We are unable to admit /deny these allegations, but we require the Claimant to prove them.
- (13) We admit these allegations.

Toni Naylor

5. It is not my intention to respond in detail to Toni's witness statement number 1 as I intend to do that at the forthcoming court appearance. However I believe the following observations should be mentioned now.
6. In paragraph 8 of Toni's witness statement at [TN1 003] she refers to :
- “domain leasing of hartsheadhotel.co.uk”
- It is my understanding that a lease is a contractual agreement between the lessor and the lessee often for a fixed period of time. The question is, does the court rule it's a contract?
7. In paragraph 9 Toni refers to [TN1 004] and quotes as follows :
- “After extensive research there does not appear to be any formal agreement between Daniel Thwaites Plc and my company”
- It was my understanding at the time that a formal agreement occurs when both companies sign under a company stamp.
8. In paragraph 14 Toni refers to [TN1 013] and I direct the court to the top line in the Description box of the invoice that states as follows :
- “In accordance with our terms and conditions”
- This I suggest is a clear statement of the Defendant's trading strategy and it has been repeated many times in the Defendant's invoices from 3 April 2020 onwards .

Richard Bailey

9. It is not my intention to respond in detail to Richard's witness statement number 1 as I intend to do that at the forthcoming court appearance. However I believe the following observations should be mentioned now.
10. After reading Richard's statement on several occasions it clearly reveals his lack of firsthand knowledge of what happened in 2020 / 2021 and in his desperation to prove there was 'no contract' he makes a number of assumptions that occasionally are ill judged.
11. I now direct the court to paragraph 23 wherein he stated "I did not receive a response from the Defendant or Mr Duggan".
12. That statement is untrue because :
 12. (1) On 22 March 2022 the Defendant replied by email just 7 days later and it was emailed to richardbailey@thwaites.co.uk a copy can be seen at **[JD1 003]**.
 12. (2) On the 20 March 2022 the Defendant published the said email in full at the following website www.richardbailey.02.2yu.uk.
 12. (3) On the 20 March 2022 the Defendant invoiced the Claimant for costs incurred creating and publishing the said email. A copy can be seen at **[JD1 004]**.
 12. (4) It was in fact the Claimants 1st email to the Defendant and it was the Defendants 1st email to the Claimant. It is unlikely that Richard Bailey who was in his late 40s at the time could have forgotten this email.
 12. (5) This email introduces a number of important facts for the first time that will later be used in evidence by the Defendant at the forthcoming court action. Item 1 - details about my age and health. Item 2 – the thorny issue concerning whether there was a 'contract' between the Defendant and Claimant and details concerning the Claimant's Digital Marketing Manager's part initiating the contract. Item 3 – information concerning the 'tick box' and the important part it plays with regard to the Defendant's terms and conditions. Item 4 – response to the question whether the Claimant had served a proper notice to terminate the contract as this would have required the Claimant to produce written confirmation with my signature in acknowledgement of the termination.
14. The court should also be made aware there were 2 further occasions when the Defendant emailed richardbailey@thwaites.co.uk see **[JD1 005]** and **[JD1 006]**.
13. Quite recently I have discovered 3 emails that I thought had been lost for good nonetheless I have now found them.
14. The 1st email is from Denise Routh and I direct the court's attention to **[JD1 007]** it reveals that Denise liased between the Defendant and Jayne Markham and helped to arrange payment as described in the following the paragraph.

15. I direct the court's attention to **[JD1 008]** where Jayne Markham confirms the Claimants same day payment. The Defendant acknowledges we received the said payment in full and it was delivered by bank automated credit (BAC) on the 15/03/2021. In order to process this payment Jayne had to access the Claimant's account area, where she would have entered the correct user name and password and ticked the box confirming she had read the Defendants terms and conditions. If needed the court can access the said accounts area at www.web4orce.co.uk/user/
16. I direct the court's attention to **[JD1 009]** where the Defendant respectfully suggests that Jen Riley acknowledges the existence of a contract between the Claimant and the Defendant and specifically refers to the domain hartsheadhotel.co.uk.
17. In paragraphs 14 and 15 above the Defendant introduced two more Claimant's employees who made contact with the Defendant via email and this is evidence that Richard's allegations in paragraph 10 are untrue. This I respectfully suggest is another example of Richard Bailey misleading the court.
18. Bearing in mind that the Claimant has introduced the following evidence to the court for its consideration **[RB1 069-070]** it may be they will contact Ann Yerbrugh and invite her to give evidence as a witness to the forthcoming court hearing. However should they decline to do so then the Defendant with the court's permission intends to subpoena her. The Defendant first wrote to Ann Yerbrugh on 15 May 2022 see **[JD1 010]**.
19. I direct the court's attention to paragraph 4 of Richard Bailey's statement where he confirms the Claimant's solicitors and counsel were involved in the preparation of his statement. Does this mean that any mistakes by Richard Bailey are less likely to go unnoticed before he signs the statement than any mistakes by the Defendant because I didn't have the benefits of a solicitor and counsel checking what I have written?

Invoices

18. I direct the court's attention to the following list of outstanding invoices at **[JD1 011-112]** that in total amount to £200,000 as of 18 September 2023. With the court's permission any further invoices that may be incurred following the said date will be submitted to the court at the document discovery date.

Statement of Truth

I believe the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.



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Dated 18 September 2023

IN THE COUNTY COURT AT LEEDS

BUSINESS AND PROPERTY WORK

BETWEEN:-

DANIEL THWAITES PLC

Claimant

And

WEB4ORCE LIMITED

Defendant

JD1

Tab	Document	Date	Page(s)
Correspondence and Images			
1	Defendant's terms and conditions	From January 2020	1 - 3
2	Email from Defendant to Richard Bailey	22 March 2022	4 - 7
3	Invoice from Defendant to Claimant	20 March 2022	8
4	Image of Defendant's client's account gateway	From January 2020	8(1)
5	Email response from Defendant to Richard Bailey	21 May 2022	9 - 12
6	<i>Email from Denise Routh to John Duggan</i>	15 June 2021	13
7	Email from Jayne Markham to John Duggan	15 June 2021	14 - 15
8	Email from Jen Riley to the Defendant	03 August 2020	16
9	Letter from the Defendant to Ann Yerbrugh	14 May 2022	17
10			
11			
12			
13			
14			
15			
16			
17			
18			

Web4orce Limited – as per www.web4orce.com

Terms & Conditions

Unless agreed in writing with Web4orce all services shall be payable in advance.

Invoices are submitted via electronic email 28 days in advance of the next period start date. In addition Invoices can be obtained and printed via the customer's online account.

Payments

The Customer will ensure that all payments are received by Web4orce on or before the due date. All payments must be in UK Pounds Sterling. If your cheque is returned by the bank as unpaid for any reason, you will be liable for a "returned cheque" charge of £35.

Late Payments

Web4orce reserves the right to suspend services without notice should the customer fail to make payment in full by the due date. A Final Reminder or Reminders will also be uploaded to the Internet displaying appropriate information. Subsequently, you will incur a minimum fee of £150 for each Final Reminder that has to be removed.

Very Late Payments

Failure to pay an outstanding invoice within 7 days or 1 month (whichever is applicable) following the due date will result as follows. A Default Notice or Notices will be uploaded to the Internet displaying your business name and address together with further appropriate information whilst stating the circumstances surrounding such an action. Subsequently, you will incur a minimum fee of £150 for each Default Notice that has to be removed.

Prices

Prices for services are guaranteed for the period that the customer purchased. Web4orce does not guarantee to reduce a customer's charges should Web4orce's charges be reduced at a later date. Web4orce reserves the right to change its prices at any time.

Contract duration

The duration of the contract shall be determined by the term purchased by the Customer or by the minimum term of the Services purchased by the Customer.

Auto Renewal Policy

Web4orce operate an Auto Renewal Policy on all products and services, which is designed to ensure continuity of service.

As per the Web4orce Cancellation Policy customers wishing to cancel their Auto Renewal must do so, giving 1 calendar months notice via Royal Mail Recorded Delivery duly signed for by Web4orce prior to the contract expiry date.

Any Auto Renewal notification emails will be sent to the email address that is contained within the customers account at the pertinent time. It is important therefore, that customers ensure their contact and billing details, and more specifically their email address is absolutely up to date.

Cancellation

Customers may cancel services at any time by giving 1 calendar months notice via Royal Mail Recorded Delivery and duly signed for as having been received by Web4orce.

Service upgrades

The Customer can request the upgrade of a Service at anytime. If the Customer has exceeded the minimum term of the Service Web4orce will agree with the Customer to credit any advanced payments Web4orce has received.

Complaints & Escalation Process

We like to think we get it right all the time, every time but the truth of it is everyone gets it wrong from time to time. We can only improve on our services with valid feedback from you, our customers. If you wish to make a complaint about a service you have received, please submit an email to us at complaints@web4orce.com including as much detail from the issue you have. We will acknowledge your complaint within 1 business day and aim to resolve any issues within 5 business days. If you're not happy with the initial outcome of your complaint, you can escalate your complaint to a manager / director by emailing webmaster@web4orce.com.

Limitations

Whilst Web4orce will at all times make every effort to ensure the performance and delivery of Services that are directly within its control or not, Web4orce gives no warranties of any kind, expressed or implied for services provided to the Customer. Web4orce disclaims any warranty or fitness for a particular purpose. This includes loss of business, custom, loss of data and all service interruptions unless otherwise stated by Web4orce or agreed with the customer in writing.

Exclusions

The Customer will have no recourse to Web4orce if a customers account is in arrears; Web4orce has suspended or withdrawn services as a result of the customer being in breach of any of the terms in the use of the services; is subject to a wind-up order, has been placed into receivership, or ceased trading.

Indemnify

The Customer agrees that it shall defend, indemnify, save and hold harmless Web4orce from any and all demands, liabilities, losses, costs and claims, including all legal fees, that may arise or result from any service provided or performed or agreed to be performed by a Customer, its clients, agents, employees or representatives. (1) any injury to person or property caused by any products sold or otherwise distributed in connection with Web4orce's services; (2) any material

supplied by customer infringing or allegedly infringing on the proprietary rights of a third party;
(3) copyright infringement and (4) any defective Product sold via Web4orce's services.

These terms and conditions are subject to English Law.

Web4orce reserves the right to revise these terms at any time without due notice.

Web4orce 2023

To Richard Bailey on 2022-03-22 17:13

Contact photo

Details Headers

On 2022-03-15 18:03, Richard Bailey wrote:

For the attention of John Duggan

Dear Sir,

I have received your letter dated 14 March and am sorry that you have had cause to write to me.

I have looked into this matter and understand that historically you have provided web services to the previous owner of the Harts Head in Giggleswick, an arrangement that we have now terminated and served notice on.

It is my understanding that we contracted for this service until April this year and are paid up to date as we no longer require it and do not want it in the future. We believe that we have served a proper notice to terminate and unless you are able to provide us with a contract otherwise we are not able to pay you unsubstantiated sums. Likewise we are not able to pay you for services that we have not contracted, which all of your invoices represent.

I understand that the Director of our Pubs and Brewing business authorised an offer to you of £750 to settle matters but that you have rejected this.

I am afraid that in the absence of a contract signed by us, or assigned by the previous owner to us with our consent then the matter is closed.

Your online presence in the absence of any contract or authority from us is unwarranted and is a form of extortion - it may constitute a breach of our legal rights and unless it is taken down we will put the matter in the hands of our lawyers and refer your correspondence to the police.

With kind regards,

Richard Bailey.

Richard Bailey

Executive Chairman

Daniel Thwaites PLC T: _01254 686838_

Myerscough Road M: _07977 236 774_

Mellor E: _

richardbailey@thwaites.co.uk

Blackburn W: _www.thwaites.co.uk_ [1]

Lancs

BB2 7LB

Daniel Thwaites

Myerscough Road, Mellor Brook

Lancashire

BB2 7LB

Disclaimer

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Links:

[1] <http://www.thwaites.co.uk/>

Hi Richard

This is to confirm receipt of your email dated 16/03/2022 and the content of which has been carefully noted. I had hoped to publish your email response ad verbatim but I have been prevented from doing so by a legal clause embedded within the email, and of course I respect that.

By the way I recently celebrated my 83rd birthday and whilst I am in robust health I am not as quick as I was when I was your age (I believe you are in your early 60s) and hence the reason your invoices are somewhat higher than expected, it's simply because everything takes twice as long to process nowadays.

Regarding your email I must admit to being somewhat disappointed with what it contained but I assume you gave the matter due diligence when reaching your conclusion. You mentioned on at least 3 occasions the word 'contract' and this is clearly important to you as it from my point of view as well.

So to help you with that I do recall your Digital Marketing Manager at the time, contacted me as far back as February 2020 and stated that Thwaites were in the process of purchasing the Harts Head Hotel and they were interested in taking over the contract concerning the website. Something else that should be brought to your attention, in June 2021 Thwaites paid my company £1,490.00 to renew your contract with us for a further year. Another factor that's worth bearing in mind is that in the last few weeks alone several members of your staff have accessed / tried to access your accounts area within my company's website and in order to do that they tick a little box confirming they have read our terms and conditions. You also stated in your email that you had served a proper notice to terminate the 2022 - 2023 contract but, unfortunately as you will soon discover that isn't true. Had your statement been correct then you should be able to produce a document with my signature on it agreeing to end our contract but, no such a document exists.

In replying to your email I have to say we shall not be removing the defaulter's notices as suggested, in fact quite the opposite because during the interim period two of your firm's outstanding invoices have triggered further notices and other invoices that are currently outstanding will become overdue in the coming weeks. This has given me an insight where we are going with this and consequently I have spent some considerable time adapting the Defaulter's network such that it will expand organically to accommodate the increasing need for flexibility in the future. In the meantime you can check the updated network by pasting following link into your browser.

<https://www.danielthwaites.01.final-reminder.uk>

Unlike last time I shall not send you a copy of this letter via Royal Mail because you evidently would rather communicate via email so I will do as you prefer and include the modified access codes to Daniel Thwaites accounts area within our website. These are intended for your use only and it will enable you to view every invoice paid / unpaid going

back to April 2020 and you can also print those that you require for your records. Incidentally when I was looking back through the invoices in April 2020 I discovered that Daniel Thwaites had failed to pay its invoices for the period April 2020 to April 2021 so I hope you don't mind if I resubmit them for payment this year instead.

In closing I am open to a phone conversation if it can bring about a mutually acceptable end to this dispute.

With kind regards

John Duggan

Invoice

Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2022-03-20**
 Invoice Number: **896 / 26868**
 Due Date: **2022-03-27**

Description	Cost
<p>To providing the following the following services :</p> <p>Creating an Open Letter and publishing it on the Internet :</p> <p>It is addressed to Richard Bailey at Daniel Thwaites and to check it out click below :</p> <p><u>Richard Bailey 02</u></p> <p>Costs : £570.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	£570.00
Total Cost:	£570.00

Registered In England & Wales No. 03762256
 Registered Office: Aireside House, Royd Ing Avenue, Keighley, West
 Yorkshire BD21 4BZ

[Close](#) [Print Invoice](#)

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WEB4ORCE

CLIENT ACCOUNTS

Within your Accounts Area you can pay outstanding invoices, monitor invoice history, and print any of your invoices.

To access your Accounts area:

- 1) Fill in the following User Name and Password boxes.
- 2) Tick the box marked I have read and agree to Web4orce Ltd Terms & Conditions.
- 3) Click or tap on the Submit button below.

User Name

Password

I have read and agree to [Web4orce Ltd Terms & Conditions](#)

If you have lost or forgotten your Password, click/tap on the Remind Password button above and proceed accordingly.

PLEASE NOTE - if you change your email address kindly inform us asap so that we can update your registered email address.

In May 2016 after months of development we successfully updated our Invoicing service. This enables us to keep our operating costs down and as a consequence pass on the benefits to our clients. Web4orce appreciates your patience during this testing period. Itemised below are the new invoicing procedures. Please note, the item in red below is for those small number of clients who are consistently late payers.

- First time invoices will be created on the service start date.
- Renewal invoices will be created 1 month in advance of the service start date.
- Up to 3 emails will notify you of an outstanding invoice plus a final reminder.
- Invoice payment date must be no later than 7 days after invoice date.
- Failure to pay by the due date may result in de-activation of your services.
- In the event your services are de-activated a minimum fee of £150 will be invoiced to re-activate your services.

Re: Hart Head Website

Contact photo

To Richard Bailey on 2022-05-21 08:36

Details Headers

On 2022-05-17 08:39, Richard Bailey wrote:

Dear Mr Duggan - Mrs Yerburgh has shared with me the letter that you sent her.

Can I suggest that we try and resolve this by way of a telephone call - if you are able to provide a time and a number I will ring you. I am available later this afternoon or tomorrow at noon.

Regards,

Richard Bailey

Richard Bailey

Executive Chairman

Daniel Thwaites PLC

W: [_www.thwaites.co.uk_](http://www.thwaites.co.uk) [1]

T: [_01254 686838_](tel:01254686838)

From: Richard Bailey

Sent: 15 March 2022 18:04

To: info@web4orce.com

Cc: Andrew Buchanan <andrewbuchanan@thwaites.co.uk>

Subject: Hart Head Website

For the attention of John Duggan

Dear Sir,

I have received your letter dated 14 March and am sorry that you have had cause to write to me.

I have looked into this matter and understand that historically you have provided web services to the previous owner of the Harts Head in Giggleswick, an arrangement that we have now terminated and served notice on.

It is my understanding that we contracted for this service until April this year and are paid up to date as we no longer require it and do not want it in the future. We believe that we have served a proper notice to terminate and unless you are able to provide us with a contract otherwise we are not able to pay you unsubstantiated sums. Likewise we are not able to pay you for services that we have not contracted, which all of your invoices represent.

I understand that the Director of our Pubs and Brewing business authorised an offer to you of £750 to settle matters but that you have rejected this.

I am afraid that in the absence of a contract signed by us, or assigned by the previous owner to us with our consent then the matter is closed.

Your online presence in the absence of any contract or authority from us is unwarranted and is a form of extortion - it may constitute a breach of our legal rights and unless it is taken down we will put the matter in the hands of our lawyers and refer your correspondence to the police.

With kind regards,

Richard Bailey.

Richard Bailey

Executive Chairman

Daniel Thwaites PLC T: _01254 686838_

Myerscough Road M: _07977 236 774_

Mellor E: _

richardbailey@thwaites.co.uk

Blackburn W: _www.thwaites.co.uk_ [1]

Lancs

BB2 7LB

Daniel Thwaites

Myerscough Road, Mellor Brook

Lancashire

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Links:

[1] <http://www.thwaites.co.uk/>

Dear Richard

After carefully considering your latest email my company would like you to consider the following counter offer.

First and foremost before we enter into any discussion Daniel Thwaites must settle all outstanding invoices stretching back to 2020 and these are itemised in the website below :

www.danielthwaites.publiclyhumiliated.2yu.uk

Once there are cleared funds in my company's bank account I am prepared to have a conversation with you with a view to settling our dispute and to achieve this I am willing to negotiate with you to bring this matter to a swift conclusion. As a sign of good faith my company is also prepared to de-activate the entire network during our negotiations.

Regards

John Duggan for Web4orce Ltd.

Contact photo

To richardbailey@thwaites.co.uk on 2022-10-24 18:25

Details Headers

Dear Richard

Some 6 months has passed since we last communicated and I imagine just like us you have been very busy. During the interim period my company has developed a new hospitality network and having completed the beta testing period we have recently started rolling it out across the UK and hence the reason for contacting you now.

With your cooperation I should like to bring our long standing dispute to end on terms acceptable to both parties. Our terms are quite straightforward, we will de-activate all 50 plus Default Notices providing your company pays all our outstanding invoices which amounts to a little over £11,000.

Our offer is on the table for 7 days, should you fail to respond or simply reject it out of hand then we shall proceed as planned without further notice.

Thank you for your time.

John Duggan

John Duggan

From: Denise Routh [deniserouth@thwaites.co.uk]
Sent: 15 June 2021 14:01
To: John Duggan
Subject: RE: Overdue Invoices



Hi John,
I know that you have just spoken to my manager Jayne and she said that you had sent your bank details to me but unless I can't see the e mail I don't have them as yet would you please be king enough to re send these so that I can raise the payment
Many thanks
Denise

From: John Duggan <john@duggan.me.uk>
Sent: 15 June 2021 12:31
To: Denise Routh <deniserouth@thwaites.co.uk>
Subject: FW: Overdue Invoices

From: John Duggan [<mailto:john@duggan.me.uk>]
Sent: 15 June 2021 12:27
To: 'accountspayable@thwaites.co.uk'
Subject: Overdue Invoices

As instructed by Denise in your Accounts Department this our latest email concerning a number of overdue invoice.

To view your invoices for the work carried out firstly make a note of the following User Name and Password:

Login details:

User Name: inv856
Password: tJ9mQ33R

Then click on the blue underlined link below

<http://www.web4orce.co.uk/user/index.php?c1=inv856>

Note that if this link does not open, copy the above link and paste it into your web browser.

Thank you for your time.

John Duggan for Web4orce Ltd – Phone : 0845 548 8733

Daniel Thwaites
Myerscough Road, Mellor Brook
Lancashire
BB2 7LB

John Duggan

From: Jayne Kirkham [jaynekirkham@thwaites.co.uk]
Sent: 15 June 2021 14:05
To: john@duggan.me.uk
Subject: FW: Overdue Invoices



Hi John

As discussed, I will arrange a same day payment to be made today which will settle all outstanding invoices.

Please could you confirm that on receipt of the payment, you will take down the default notice and put the websites back to how they worked previously.

I will pass on your details to the relevant department to discuss the purchase of the domain names.

Apologies for any inconvenience caused by the late payment of your invoices. However, I'm sure you will agree that the issue has been dealt with promptly now you have spoken to the correct department.

Kind regards
Jayne

Jayne Kirkham
Finance Manager

T: 01254 686830
M: 07971 565457
E: jaynekirkham@thwaites.co.uk

From: Denise Routh <deniserouth@thwaites.co.uk>
Sent: 15 June 2021 12:58
To: Jayne Kirkham <jaynekirkham@thwaites.co.uk>
Subject: FW: Overdue Invoices

From: John Duggan <john@duggan.me.uk>
Sent: 15 June 2021 12:31
To: Denise Routh <deniserouth@thwaites.co.uk>
Subject: FW: Overdue Invoices

From: John Duggan [<mailto:john@duggan.me.uk>]
Sent: 15 June 2021 12:27
To: 'accountspayable@thwaites.co.uk'
Subject: Overdue Invoices

As instructed by Denise in your Accounts Department this our latest email concerning a number of overdue invoice.

To view your invoices for the work carried out firstly make a note of the following User Name and Password:

Login details:

User Name: inv856

Password: tJ9mQ33R

Then click on the blue underlined link below

<http://www.web4orce.co.uk/user/index.php?c1=inv856>

Note that if this link does not open, copy the above link and paste it into your web browser.

Thank you for your time.

John Duggan for Web4orce Ltd – Phone : 0845 548 8733

Daniel Thwaites

Myerscough Road, Mellor Brook

Lancashire

BB2 7LB

Disclaimer

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Thwaites Pubs and The House of Daniel Thwaites are trading divisions Daniel Thwaites Plc, a company incorporated in the UK. Registered at Myerscough Road, Mellor Brook, Lancashire BB2 7LB. Registered Number 51702.

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John Duggan

From: Jen Riley [jenriley@thwaites.co.uk]
Sent: 03 August 2020 11:16
To: john.duggan@web4orceLtd.co.uk; john.duggan@web4orce.co.uk
Subject: Hart's Head, Giggleswick



Hi John,

I hope you're well.

We're looking to make some changes to the Hart's Head website on the following domain:
<https://hartsheadhotel.co.uk/>

Please could you send me details of the contract we have with you for the domain.

Many thanks,

Jen

Jen Riley
Digital Marketing Manager

Email: jenriley@thwaites.co.uk
Tel: 01254 686886

Daniel Thwaites
Myerscough Road, Mellor Brook
Lancashire
BB2 7LB

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Barwhillanty Estate

Parton

Castle Douglas

DG7 3NS

For the attention of Mrs Ann Yerburgh

14 May 2022

Dear Mrs Yerburgh

On behalf of my company I have decided to write to you because you are one of Daniel Thwaites Plc's main shareholders.

In March of this year I contacted Richard Bailey in a failed attempt to seek his help concerning a number of unpaid invoices that my company had submitted to Daniel Thwaites for payment.

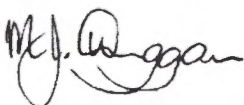
Consequently my company has recently published on the Internet a network of websites detailing the circumstances that brought this about. Suffice to say I have no wish to burden you with the details it's simply that as a shareholder you have a right to be informed. What I can tell you is one of the more compelling sites is currently number 1 in the Google search engine..

As of the date of this letter you are the only person at Daniel Thwaites to learn of the existence of this network but, next Wednesday that situation will change when with the exception of Richard Bailey I will email most of the other directors enclosing a link to the main network website address.

The prime objective of the network is to bring Daniel Thwaites to the negotiating table to obtain payment of all those overdue invoices that have remained unpaid since the beginning of March. Incidentally the network is currently scheduled to increase by 4 to 5 sites per week which means that by next weekend it will have expanded to 45 sites and the focus of attention is now directed at Daniel Thwaites hotels.

Before undertaking this mammoth task my company had to accept this dispute might last for many months perhaps even ending up in the courts and whilst I am much older than you I am more than able to achieve my company's objective. Whatever the outcome one thing is certain, those employees and they know who they are will sorely regret the part they played in this shameful episode in Daniel Thwaites's recent history.

Yours sincerely



John Duggan

Company Director

UNPAID INVOICES
CLAIM NO. K80LS081

Invoice

Web4orce Limited
 Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire, BB2 7LB

Invoice Date: **2022-11-29**
 Invoice Number: **916 / 26919**
 Due Date: **06/12/2022**

Description	Cost
<p>For providing the following services :</p> <p>Costs incurred emailing the person below :</p> <p>CEO Richard Bailey</p> <p>One off Cost: £95.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£95.00</p>
Total Cost:	£95.00

Registered In England & Wales No. 03762256
 Registered Office: Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

018

Invoice

Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2022-11-30**
 Invoice Number: **917 / 26920**
 Due Date: **07/12/2022**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay a number of overdue invoices</p> <p>The Very Late Payments clause triggered a new Default notice that has been published on the Internet and to check it out click below :</p> <p><u>Latest Default Notice Type 1</u></p> <p>The costs incurred developing the latest one off Default notice designed to make Daniel Thwaites plc question the wisdom of their failure to settle all outstanding debts owed to our company. The time involved was conservatively calculated to be a minimum of 36 hours priced at £95 per hour as it also included a lot of research.</p> <p>Costs : £3420.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£3420.00</p>
Total Cost:	£3420.00

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 Yorkshire BD21 4BZ

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Invoice

Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2022-12-02**
Invoice Number: **918 / 26921**
Due Date: **09/12/2022**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay a number of overdue invoices</p> <p>The Very Late Payments clause triggered another unique Default notice that has been published on the Internet and to check it out click below :</p> <p>Latest Default Notice Type 2</p> <p>The costs incurred developing the latest one off Default notice designed to inform the viewing public of 2 director's lack of integrity. The time involved was conservatively calculated to be a minimum of 24 hours priced at £95 per hour.</p> <p>Costs : £2280.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£2280.00</p>
Total Cost:	£2280.00

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Invoice

Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2023-01-06**
Invoice Number: **919 / 26925**
Due Date: **13/01/2023**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay a number of overdue invoices</p> <p>The Very Late Payments clause triggered a new Default notice that has been published on the Internet and to check it out click below :</p> <p><u>Latest Default Notice Type 3</u></p> <p>The costs incurred developing the latest one off Default notice designed to make Daniel Thwaites plc question the wisdom of their failure to settle all outstanding debts owed to our company. The time involved was conservatively calculated to be a minimum of 12 hours priced at £95 per hour as it also included a lot of research.</p> <p>Costs : £1140.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£1140.00</p>
Total Cost:	£1140.00

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Invoice

Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2023-01-06**
 Invoice Number: **920 / 26926**
 Due Date: **13/01/2023**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay a number of overdue invoices</p> <p>The Very Late Payments clause triggered a new Default notice that has been published on the Internet and to check it out click below :</p> <p>Latest Default Notice Type 4</p> <p>The costs incurred developing the latest one off Default notice designed to make Daniel Thwaites plc question the wisdom of their failure to settle all outstanding debts owed to our company. The time involved was conservatively calculated to be a minimum of 16 hours priced at £95 per hour as it also included a lot of research.</p> <p>Costs : £1520.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£1520.00</p>
Total Cost:	£1520.00

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Invoice

Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2023-01-10**
 Invoice Number: **921 / 26927**
 Due Date: **17/01/2023**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay a number of overdue invoices</p> <p>The Very Late Payments clause triggered a new Default notice that has been published on the Internet and to check it out click below :</p> <p>Default Network Notices Type 21 - Updated</p> <p>The costs incurred developing the latest Default network designed to make Daniel Thwaites plc question the wisdom of their failure to settle all outstanding debts owed to our company. The time involved was conservatively calculated to be a minimum of 106 hours priced at £95 per hour as it also included a lot of research.</p> <p>Latest Update : 20/02/2023. The time involved was conservatively calculated to be a minimum of 57 hours priced at £200 per hour as it also included further research.</p> <p>Costs : £21470.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£21470.00</p>
Total Cost:	£21470.00

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Invoice

Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2023-02-23**
Invoice Number: **924 / 26939**
Due Date: **02/03/2023**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay a number of overdue invoices</p> <p>The Very Late Payments clause triggered a new Default notice that has been published on the Internet and to check it out click below :</p> <p>Default Network Notices Type 21</p> <p>The costs incurred developing the latest one off Default notice designed to make Daniel Thwaites plc question the wisdom of their failure to settle all outstanding debts owed to our company. The time involved was conservatively calculated to be a minimum of 12 hours priced at £95 per hour as it also included a lot of research.</p> <p>Costs : £5600.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£5600.00</p>
Total Cost:	£5600.00

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Invoice

Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2023-02-26**
 Invoice Number: **925 / 26940**
 Due Date: **05/03/2023**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay a number of overdue invoices</p> <p>The Very Late Payments clause triggered a new Default notice that has been published on the Internet and to check it out click below :</p> <p>Default Network Notices Type 21</p> <p>The costs incurred assembling the latest one off Default notice designed to make Daniel Thwaites plc question the wisdom of their failure to settle all outstanding debts owed to our company. The time involved was conservatively calculated to be a minimum of 28 hours priced at £200 per hour as it also included a lot of research.</p> <p>Costs : £5600.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£5600.00</p>
Total Cost:	£5600.00

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Invoice

Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2023-03-01**
 Invoice Number: **926 / 26941**
 Due Date: **08/03/2023**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay a number of overdue invoices</p> <p>The Very Late Payments clause triggered a new Default notice that has been published on the Internet and to check it out click below :</p> <p><u>Default Network Notices Type 21</u></p> <p>The costs incurred assembling the latest one off Default notice designed to make Daniel Thwaites plc question the wisdom of their failure to settle all outstanding debts owed to our company. The time involved was conservatively calculated to be a minimum of 28 hours priced at £200 per hour as it also included a lot of research.</p> <p>Costs : £5600.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£5600.00</p>
Total Cost:	£5600.00

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Invoice

Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2023-03-04**
 Invoice Number: **927 / 26942**
 Due Date: **11/03/2023**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>For providing the following services :</p> <p>Consolidated Hosting Package - incl management and search engine submission costs :</p> <p>Average number default notices / month = 34.75 x £30 / month :</p> <p>Period of Service : 06/03/2022 to 05/03/2023</p> <p>Costs : £12510.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£12510.00</p>
Total Cost:	£12510.00

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027

Invoice

Web4orce Limited
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Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire, BB2 7LB

Invoice Date: **2023-04-03**
 Invoice Number: **771 / 26945**
 Due Date:

Description	Cost
<p>For providing the following services :</p> <p>Leasing the domain name listed below :</p> <p>hartsheadinn.co.uk</p> <p>Re-directing it to - the website listed below :</p> <p>https://hartsheadhotel.co.uk</p> <p>Annual Cost: £95.00</p> <p>Period of Service: 2023-04-03 to 2024-04-02</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£95.00</p>
Total Cost:	£95.00

Registered In England & Wales No. 03762256
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028

Invoice

Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire, BB2 7LB

Invoice Date: **2023-04-03**
 Invoice Number: **772 / 26946**
 Due Date:

Description	Cost
<p>For providing the following services :</p> <p>Leasing the domain name listed below :</p> <p>hartsheadhotel.co.uk</p> <p>Pointing it at the - DNS listed below :</p> <p>ns1.tsohost.co.uk ns2.tsohost.co.uk ns3.tsohost.co.uk</p> <p>Annual Cost: £95.00</p> <p>Period of Service: 2023-04-03 to 2024-04-02</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£95.00</p>
Total Cost:	£95.00

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Invoice

Web4orce

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Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire, BB2 7LB

Invoice Date: **2023-03-06**
Invoice Number: **928 / 26947**
Due Date: **2023-03-20**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>For providing the following services :</p> <p>Consolidated Hosting Package - incl management and search engine submission costs :</p> <p>Currently comprising of 92 Default sites at £40 / site / month :</p> <p>Monthly Cost: £3680.00</p> <p>Period of Service: 2023-03-06 to 2023-04-05</p> <p>PLEASE REMEMBER TO INFORM US IMMEDIATELY IF YOU CHANGE YOUR EMAIL ADDRESS</p>	<p>£3680.00</p>
Total Cost:	£3680.00

Registered In England & Wales No. 03762256
Registered Office: Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

030

Invoice

Web4orce

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire, BB2 7LB

Invoice Date: **2023-02-08**
 Invoice Number: **929 / 26948**
 Due Date: **2023-02-22**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>For providing the following services :</p> <p>Web4orce Ltd sustained a substantial loss of income as a consequence of Daniel Thwaites PLC launching a legal action against our company that necessitated our director having to investigate the legal implications concerning commercial contracts also the responsibilities encountered by an individual acting as a Litigant in person on behalf of a company at the High Court.</p> <p>The time involved was conservatively calculated to be a minimum of 20 hours priced at £200 per hour as it included a lot of research. Ongoing research will occur on a monthly basis in the lead up to the hearing at court.</p> <p>Monthly Cost: £4000.00</p> <p>Period of Service: 2023-02-08 to 2023-03-07</p> <p>PLEASE REMEMBER TO INFORM US IMMEDIATELY IF YOU CHANGE YOUR EMAIL ADDRESS</p>	<p>£4000.00</p>

Total Cost: £4000.00

Registered In England & Wales No. 03762256
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Invoice

Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2023-03-12**
 Invoice Number: **930 / 26949**
 Due Date: **19/03/2023**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>To responding to Addleshaw Goddard's letter dated 8 February 2023 concerning Daniel Thwaites PLC's threat of impending high court action.</p> <p>The time involved was conservatively calculated to be a minimum of 12 hours priced at £200 per hour as it also included a lot of research.</p> <p>Costs : £2400.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£2400.00</p>
Total Cost:	£2400.00

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032

Invoice

Web4orce

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire, BB2 7LB

Invoice Date: **2023-03-08**
 Invoice Number: **929 / 26950**
 Due Date: **2023-03-22**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>For providing the following services :</p> <p>Web4orce Ltd sustained a substantial loss of income as a consequence of Daniel Thwaites PLC launching a legal action against our company that necessitated our director having to investigate the legal implications concerning commercial contracts also the responsibilities encountered by an individual acting as a Litigant in person on behalf of a company at the High Court.</p> <p>The time involved was conservatively calculated to be a minimum of 20 hours priced at £200 per hour as it included a lot of research. Ongoing research will occur on a monthly basis in the lead up to the hearing at court.</p> <p>Monthly Cost: £2000.00</p> <p>Period of Service: 2023-03-08 to 2023-04-07</p> <p>PLEASE REMEMBER TO INFORM US IMMEDIATELY IF YOU CHANGE YOUR EMAIL ADDRESS</p>	<p>£2000.00</p>
<p>Total Cost:</p>	<p>£2000.00</p>

Registered In England & Wales No. 03762256
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Invoice

Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2023-03-20**
 Invoice Number: **932 / 26952**
 Due Date: **27/03/2023**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay a number of overdue invoices</p> <p>The Very Late Payments clause triggered a new Default notice that has been published on the Internet and to check it out click below :</p> <p><u>Latest Default Notice Type 7</u></p> <p>The costs incurred developing the latest one off Default notice designed to make Daniel Thwaites plc question the wisdom of their failure to settle all outstanding debts owed to our company. The time involved was conservatively calculated to be a minimum of 12 hours priced at £200 per hour as it also included a lot of research.</p> <p>Costs : £2400.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£2400.00</p>
Total Cost:	£2400.00

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 Yorkshire BD21 4BZ

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Invoice

Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2023-04-02**
 Invoice Number: **934 / 26959**
 Due Date: **12/04/2023**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay a number of overdue invoices</p> <p>The Very Late Payments clause triggered a new Default notice that has been published on the Internet and to check it out click below :</p> <p>Latest Default Notice Type 4</p> <p>The costs incurred developing the latest one off Default notice designed to make Daniel Thwaites plc question the wisdom of their failure to settle all outstanding debts owed to our company. The time involved was conservatively calculated to be a minimum of 16 hours priced at £200 per hour as it also included a lot of research.</p> <p>Costs : £3200.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£3200.00</p>
Total Cost:	£3200.00

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Invoice

Web4orce

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire, BB2 7LB

Invoice Date: **2023-04-06**
 Invoice Number: **928 / 26966**
 Due Date: **2023-04-20**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>For providing the following services :</p> <p>Consolidated Hosting Package - incl management and search engine submission costs :</p> <p>Currently comprising of 92 Default sites at £40 / site / month :</p> <p>Monthly Cost: £3680.00</p> <p>Period of Service: 2023-04-06 to 2023-05-05</p> <p>PLEASE REMEMBER TO INFORM US IMMEDIATELY IF YOU CHANGE YOUR EMAIL ADDRESS</p>	<p>£3680.00</p>
<p>Total Cost:</p>	<p>£3680.00</p>

Registered In England & Wales No. 03762256
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Invoice

Web4orce

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire, BB2 7LB

Invoice Date: **2023-04-08**
 Invoice Number: **929 / 26967**
 Due Date: **2023-04-22**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>For providing the following services :</p> <p>Web4orce Ltd sustained a substantial loss of income as a consequence of Daniel Thwaites PLC launching a legal action against our company that necessitated our director having to investigate the legal implications concerning commercial contracts also the responsibilities encountered by an individual acting as a Litigant in person on behalf of a company at the High Court.</p> <p>The time involved was conservatively calculated to be a minimum of 20 hours priced at £200 per hour as it included a lot of research. Ongoing research will occur on a monthly basis in the lead up to the hearing at court.</p> <p>Monthly Cost: £4000.00</p> <p>Period of Service: 2023-04-08 to 2023-05-07</p> <p>PLEASE REMEMBER TO INFORM US IMMEDIATELY IF YOU CHANGE YOUR EMAIL ADDRESS</p>	<p>£4000.00</p>
Total Cost:	£4000.00

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Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2023-04-10**
 Invoice Number: **935 / 26968**
 Due Date: **12/04/2023**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay a number of overdue invoices</p> <p>The Very Late Payments clause triggered a new Default notice that has been published on the Internet and to check it out click below :</p> <p>Default Network Notices Type 21</p> <p>The costs incurred developing the latest one off Default notice designed to make Daniel Thwaites plc question the wisdom of their failure to settle all outstanding debts owed to our company. The time involved was conservatively calculated to be a minimum of 16 hours priced at £200 per hour as it also included a lot of research.</p> <p>Costs : £5600.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£5600.00</p>
Total Cost:	£5600.00

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Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2023-04-15**
 Invoice Number: **936 / 26969**
 Due Date: **12/04/2023**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay a number of overdue invoices</p> <p>The Very Late Payments clause triggered a new Default notice that has been published on the Internet and to check it out click below :</p> <p>Default Network Notices Type 21</p> <p>The costs incurred developing the latest one off Default notice designed to make Daniel Thwaites plc question the wisdom of their failure to settle all outstanding debts owed to our company. The time involved was conservatively calculated to be a minimum of 16 hours priced at £200 per hour as it also included a lot of research.</p> <p>Costs : £5600.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£5600.00</p>
Total Cost:	£5600.00

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Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2023-04-20**
 Invoice Number: **939 / 26970**
 Due Date: **12/04/2023**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay a number of overdue invoices</p> <p>The Very Late Payments clause triggered a new Default notice that has been published on the Internet and to check it out click below :</p> <p><u>Latest Default Notice Type 4</u></p> <p>The costs incurred developing the latest one off Default notice designed to make Daniel Thwaites plc question the wisdom of their failure to settle all outstanding debts owed to our company. The time involved was conservatively calculated to be a minimum of 16 hours priced at £200 per hour as it also included a lot of research.</p> <p>Costs : £3200.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£3200.00</p>
Total Cost:	£3200.00

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Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2023-04-25**
 Invoice Number: **940 / 26971**
 Due Date: **12/04/2023**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay a number of overdue invoices</p> <p>The Very Late Payments clause triggered a new Default notice that has been published on the Internet and to check it out click below :</p> <p>Latest Default Notice Type 4</p> <p>The costs incurred developing the latest one off Default notice designed to make Daniel Thwaites plc question the wisdom of their failure to settle all outstanding debts owed to our company. The time involved was conservatively calculated to be a minimum of 16 hours priced at £200 per hour as it also included a lot of research.</p> <p>Costs : £3200.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£3200.00</p>
Total Cost:	£3200.00

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Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2023-04-30**
 Invoice Number: **944 / 26972**
 Due Date: **12/04/2023**

Description	Cost		
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay a number of overdue invoices</p> <p>The Very Late Payments clause triggered a new Default notice that has been published on the Internet and to check it out click below :</p> <p>Latest Default Notice Type 4</p> <p>The costs incurred developing the latest one off Default notice designed to make Daniel Thwaites plc question the wisdom of their failure to settle all outstanding debts owed to our company. The time involved was conservatively calculated to be a minimum of 16 hours priced at £200 per hour as it also included a lot of research.</p> <p>Costs : £3200.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	£3200.00		
<table border="1"> <tr> <td>Total Cost:</td> <td>£3200.00</td> </tr> </table>		Total Cost:	£3200.00
Total Cost:	£3200.00		

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Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2023-05-04**
 Invoice Number: **945 / 26973**
 Due Date: **12/04/2023**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay a number of overdue invoices</p> <p>The Very Late Payments clause triggered a new Default notice that has been published on the Internet and to check it out click below :</p> <p>Latest Default Notice Type 4</p> <p>The costs incurred developing the latest one off Default notice designed to make Daniel Thwaites plc question the wisdom of their failure to settle all outstanding debts owed to our company. The time involved was conservatively calculated to be a minimum of 16 hours priced at £200 per hour as it also included a lot of research.</p> <p>Costs : £3200.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£3200.00</p>
Total Cost:	£3200.00

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Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2023-05-08**
 Invoice Number: **946 / 26974**
 Due Date: **12/04/2023**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay a number of overdue invoices</p> <p>The Very Late Payments clause triggered a new Default notice that has been published on the Internet and to check it out click below :</p> <p><u>Latest Default Notice Type 8</u></p> <p>The costs incurred developing the latest one off Default notice designed to make Daniel Thwaites plc question the wisdom of their failure to settle all outstanding debts owed to our company. The time involved was conservatively calculated to be a minimum of 16 hours priced at £200 per hour as it also included a lot of research.</p> <p>Costs : £3200.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£3200.00</p>
Total Cost:	£3200.00

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Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2023-05-11**
 Invoice Number: **947 / 26975**
 Due Date: **12/04/2023**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay a number of overdue invoices</p> <p>The Very Late Payments clause triggered a new Default notice that has been published on the Internet and to check it out click below :</p> <p>Latest Default Notice Type 8</p> <p>The costs incurred developing the latest one off Default notice designed to make Daniel Thwaites plc question the wisdom of their failure to settle all outstanding debts owed to our company. The time involved was conservatively calculated to be a minimum of 16 hours priced at £200 per hour as it also included a lot of research.</p> <p>Costs : £3200.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£3200.00</p>
Total Cost:	£3200.00

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Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2023-05-14**
 Invoice Number: **948 / 26976**
 Due Date: **12/04/2023**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay a number of overdue invoices</p> <p>The Very Late Payments clause triggered a new Default notice that has been published on the Internet and to check it out click below :</p> <p><u>Latest Default Notice Type 8</u></p> <p>The costs incurred developing the latest one off Default notice designed to make Daniel Thwaites plc question the wisdom of their failure to settle all outstanding debts owed to our company. The time involved was conservatively calculated to be a minimum of 16 hours priced at £200 per hour as it also included a lot of research.</p> <p>Costs : £3200.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£3200.00</p>
Total Cost:	£3200.00

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Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2023-05-17**
 Invoice Number: **949 / 26977**
 Due Date: **12/04/2023**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay a number of overdue invoices</p> <p>The Very Late Payments clause triggered a new Default notice that has been published on the Internet and to check it out click below :</p> <p><u>Latest Default Notice Type 8</u></p> <p>The costs incurred developing the latest one off Default notice designed to make Daniel Thwaites plc question the wisdom of their failure to settle all outstanding debts owed to our company. The time involved was conservatively calculated to be a minimum of 16 hours priced at £200 per hour as it also included a lot of research.</p> <p>Costs : £3200.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£3200.00</p>
Total Cost:	£3200.00

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Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2023-05-20**
 Invoice Number: **950 / 26978**
 Due Date: **12/04/2023**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay a number of overdue invoices</p> <p>The Very Late Payments clause triggered a new Default notice that has been published on the Internet and to check it out click below :</p> <p><u>Latest Default Notice Type 8</u></p> <p>The costs incurred developing the latest one off Default notice designed to make Daniel Thwaites plc question the wisdom of their failure to settle all outstanding debts owed to our company. The time involved was conservatively calculated to be a minimum of 16 hours priced at £200 per hour as it also included a lot of research.</p> <p>Costs : £3200.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£3200.00</p>
Total Cost:	£3200.00

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Invoice

Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2023-05-23**
 Invoice Number: **951 / 26979**
 Due Date: **12/04/2023**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay a number of overdue invoices</p> <p>The Very Late Payments clause triggered a new Default notice that has been published on the Internet and to check it out click below :</p> <p><u>Latest Default Notice Type 8</u></p> <p>The costs incurred developing the latest one off Default notice designed to make Daniel Thwaites plc question the wisdom of their failure to settle all outstanding debts owed to our company. The time involved was conservatively calculated to be a minimum of 16 hours priced at £200 per hour as it also included a lot of research.</p> <p>Costs : £3200.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	£3200.00
Total Cost:	£3200.00

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Web4orce Limited

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Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire BB2 7LB

Invoice Date: **2023-05-26**
 Invoice Number: **953 / 26980**
 Due Date: **17/01/2023**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay a number of overdue invoices</p> <p>The Very Late Payments clause triggered a much more efficient Default network that has been published on the Internet. It now utilises just 1 domain per town rather than the previous version that utilised 9 domains per town.</p> <p>The costs incurred developing the very latest Default network designed to make Daniel Thwaites plc question the wisdom of their failure to settle all outstanding debts owed to our company. The time involved was conservatively calculated to be a minimum of 168 hours priced at £200 per hour as it also included a lot of research.</p> <p>Costs : £33600.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£33600.00</p>
Total Cost:	£33600.00

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Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire, BB2 7LB

Invoice Date: **2023-09-18**
 Invoice Number: **955 / 26981**
 Due Date: **2023-10-02**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>For providing the following services :</p> <p>Web4orce Ltd sustained a substantial loss of time as a consequence of Daniel Thwaites PLC launching a county court action against our company that necessitated our director having to investigate the legal implications concerning county court rules, litigant in person responsibilities, commercial contracts and witness statement in truth implications. We also had to create court documents and print multiple copies of paperwork and invoices for the court and claimant.</p> <p>The time involved was conservatively calculated to be a minimum of 20 hours priced at £200 per hour as it included a lot of research.</p> <p>One-off Cost: £40800.00</p> <p>PLEASE REMEMBER TO INFORM US IMMEDIATELY IF YOU CHANGE YOUR EMAIL ADDRESS</p>	<p>£40800.00</p>
<p>Total Cost: £40800.00</p>	

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Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire, BB2 7LB

Invoice Date: **2023-09-09**
 Invoice Number: **956 / 26982**
 Due Date: **2023-09-23**

Description	Cost
<p>In accordance with Web4orce Ltd email to Addleshaw Goddard on 6 March 2023 and specifically the Out of Court Settlement Proposal it stated that it wanted compensation for unwarranted stress inflicted on its director in the sum of £48000. This averaged out at £4000 per month for the previous 12 months.</p> <p>Calc: 12 mnths at £4000 / mnth + 6 mnths at £5000 / mnth</p> <p>Current Cost: £78000.00</p> <p>Period to Date: 2022-03-08 to 2023-09-07</p> <p>PLEASE REMEMBER TO INFORM US IMMEDIATELY IF YOU CHANGE YOUR EMAIL ADDRESS</p>	<p>£78000.00</p>

Total Cost: £78000.00

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Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire, BB2 7LB

Invoice Date: **2023-05-06**
 Invoice Number: **928 / 27000**
 Due Date: **2023-05-20**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>For providing the following services :</p> <p>Consolidated Hosting Package - incl management and search engine submission costs :</p> <p>Currently comprising of 92 Default sites at £40 / site / month :</p> <p>Monthly Cost: £3680.00</p> <p>Period of Service: 2023-05-06 to 2023-06-05</p> <p>PLEASE REMEMBER TO INFORM US IMMEDIATELY IF YOU CHANGE YOUR EMAIL ADDRESS</p>	<p>£3680.00</p>
Total Cost:	£3680.00

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Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire, BB2 7LB

Invoice Date: **2023-05-08**
 Invoice Number: **929 / 27001**
 Due Date: **2023-05-22**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>For providing the following services :</p> <p>Web4orce Ltd sustained a substantial loss of time as a consequence of Daniel Thwaites PLC launching a legal action against our company that necessitated our director having to investigate the legal implications concerning commercial contracts also the responsibilities encountered by an individual acting as a Litigant in person on behalf of a company at the High Court.</p> <p>The time involved was conservatively calculated to be a minimum of 20 hours priced at £200 per hour as it included a lot of research. Ongoing research will occur on a monthly basis in the lead up to the hearing at court.</p> <p>Monthly Cost: £1000.00</p> <p>Period of Service: 2023-05-08 to 2023-06-07</p> <p>PLEASE REMEMBER TO INFORM US IMMEDIATELY IF YOU CHANGE YOUR EMAIL ADDRESS</p>	<p>£1000.00</p>
Total Cost:	£1000.00

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Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire, BB2 7LB

Invoice Date: **2023-09-09**
 Invoice Number: **959 / 27002**
 Due Date: **2023-09-23**

Description	Cost
<p>In accordance with Web4orce Ltd email to Addleshaw Goddard on 6 March 2023 and specifically the Out of Court Settlement Proposal it stated that it wanted compensation for unwarranted loss of precious time inflicted on its director in the sum of £480000. It averaged out at £40000 per month for the previous 12 months.</p> <p>This was based on 2023 life expectancy statistics for UK males being 81.77 years which means he is already living on borrowed time.</p> <p>Calc: 12 mnths at £40000 / mnth + 6 mnths at £50000 / mnth</p> <p>Current Cost: £780000</p> <p>Period to Date: 2022-03-08 to 2023-09-07</p> <p>PLEASE REMEMBER TO INFORM US IMMEDIATELY IF YOU CHANGE YOUR EMAIL ADDRESS</p>	<p>£780000</p>
Total Cost:	£780000

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Invoice

Web4orce

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire, BB2 7LB

Invoice Date: **2023-06-06**
 Invoice Number: **928 / 27004**
 Due Date: **2023-06-20**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>For providing the following services :</p> <p>Consolidated Hosting Package - incl management and search engine submission costs :</p> <p>Currently comprising of 92 Default sites at £40 / site / month :</p> <p>Monthly Cost: £3680.00</p> <p>Period of Service: 2023-06-06 to 2023-07-05</p> <p>PLEASE REMEMBER TO INFORM US IMMEDIATELY IF YOU CHANGE YOUR EMAIL ADDRESS</p>	<p>£3680.00</p>
Total Cost:	£3680.00

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Invoice To: **Daniel Thwaites plc**
Myerscough Road, Mellor Brook, Blackburn
Lancashire, BB2 7LB

Invoice Date: **2023-06-08**
 Invoice Number: **929 / 27005**
 Due Date: **2023-06-22**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>For providing the following services :</p> <p>Web4orce Ltd sustained a substantial loss of time as a consequence of Daniel Thwaites PLC launching a legal action against our company that necessitated our director having to investigate the legal implications concerning commercial contracts also the responsibilities encountered by an individual acting as a Litigant in person on behalf of a company at the High Court.</p> <p>The time involved was conservatively calculated to be a minimum of 20 hours priced at £200 per hour as it included a lot of research. Ongoing research will occur on a monthly basis in the lead up to the hearing at court.</p> <p>Monthly Cost: £1000.00</p> <p>Period of Service: 2023-06-08 to 2023-07-07</p> <p>PLEASE REMEMBER TO INFORM US IMMEDIATELY IF YOU CHANGE YOUR EMAIL ADDRESS</p>	<p>£1000.00</p>
Total Cost:	£1000.00

Registered In England & Wales No. 03762256
 Registered Office: Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

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