

**BUSINESS AND PROPERTY WORK**

**BETWEEN:**

**DANIEL THWAITES PLC**

**Claimant**

**-and-**

**WEB4ORCE LIMITED**

**Defendant**

---

**DIRECTIONS HEARING BUNDLE**

---

<b>Tab</b>	<b>Document</b>	<b>Date</b>	<b>Page(s)</b>
<b>Claim Documents</b>			
1.	Claim Form	08 August 2023	003 - 005
2.	First Statement of Richard Bailey	08 August 2023	006 - 016
3.	Exhibit RB1	08 August 2023	017 - 202
4.	First Statement of Toni Naylor	08 August 2023	203 - 208
5.	Exhibit TN1	08 August 2023	209 - 223
<b>Responsive Evidence</b>			
6.	First Witness Statement of John Duggan	18 September 2023	224 - 230
7.	Exhibit to the First Witness Statement of John Duggan	18 September 2023	231 - 250
8.	Second Exhibit to the First Witness Statement of John Duggan	18 September 2023	251 - 291
9.	Second Witness Statement of Richard Bailey	03 October 2023	292 - 299
10.	Second Witness Statement of John Duggan (inclusion disputed)	13 October 2023	300 - 304

<b>Case Memorandum</b>			
11.	Case Memorandum	14 November 2023	305 - 308
12.	Draft Order	14 November 2023	309 - 310



# Claim Form (CPR Part 8)

In the County Court at Leeds Business and Property Work	
Claim no.	K80LS081
Fee Account no.	
Help with Fees - Ref no. (if appli- cable)	H W F - - - - -

**Claimant**  
 DANIEL THWAITES PLC  
 MYERSCOUGH ROAD  
 MELLOR BROOK  
 BLACKBURN  
 LANCASHIRE  
 BB2 7LB



**Defendant(s)**  
 WEB4ORCE LIMITED  
 AIRESIDE HOUSE  
 ROYD INGS AVENUE  
 KEIGHLEY  
 WEST YORKSHIRE  
 BD21 4BZ

Does your claim include any issues under the Human Rights Act 1998?  Yes  No

Details of claim (see also overleaf)

The Claimant seeks the following relief:

- (1) A declaration in the terms set out in the Draft Order appended to this Claim Form;
- (2) An injunction in the terms set out in the Draft Order appended to this Claim Form;
- (3) Further or alternative relief as the Court thinks fit;
- (4) Costs

The legal basis upon which the Claim is brought is set out overleaf.

The evidence in support of this claim is contained in the witness statements of Richard Bailey and Toni Naylor annexed to this Claim Form.

Part 8 of the Civil Procedure Rules 1998 applies to this claim.

Defendant's name and address  
 WEB4ORCE LIMITED  
 AIRESIDE HOUSE  
 ROYD INGS AVENUE  
 KEIGHLEY  
 WEST YORKSHIRE  
 BD21 4BZ

	£
Court fee	332
Legal representative's costs	TBC
Issue date	10/08/2023

For further details of the courts [www.gov.uk/find-court-tribunal](http://www.gov.uk/find-court-tribunal).

When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

**Details of claim** (continued)

(1) The Claimant is a Public Limited Company (company no. 00051702) engaged in the business of public houses and bars, among other things, and is the registered freehold proprietor of the property known as the Harts Head Hotel, Belle Hill, Giggleswick, Settle BD24 0BA (the Pub).

(2) The Defendant is a private limited company (company no. 03762256) engaged in the business of information technology consultancy. At all material times, the Defendant acted through its Director and sole shareholder, Martin John Duggan.

(3) The Claimant purchased the Pub on 2 March 2020. The Claimant did not purchase the business being carried on at the Pub. Between 5 April 2020 and 15 June 2021, the Defendant purportedly sent 7 invoices to "Hartshead Hotel" (the Invoices). It is assumed that the Invoices were intended for the Claimant's predecessor. It is not known where the Invoices were actually sent as they were not provided to the Claimant until on or around 12 June 2021.

(4) Two of the Invoices related to the lease of: (i) a uniform resource locator (URL) which hosted a website advertising the Pub (the Website), and (ii) a further URL redirecting to the Website. The leases were for the period 3 April 2021 to 2 April 2022.

(5) The URLs were deactivated by the Defendant on 12 June 2021.

(6) On 15 June 2021 the Claimant paid the Invoices. The Claimant's payment constituted an offer to lease the URLs until 2 April 2022. The Defendant's re-activation of the URLs following payment by the Claimant constituted an acceptance of the Claimant's offer. The Parties' agreement contained no further express terms.

(7) On 8 March 2022, the Claimant's Toni Naylor informed Mr Duggan, via telephone and email, that the Claimant would not be renewing the URL leases in April 2022.

(8) On 2 April 2022, the Claimant's leases of the URLs expired by effluxion of time and were not renewed.

(9) Notwithstanding the matters referred to hereinbefore at §§6, 7 and 8, the Defendant served two invoices on the Claimant on or around 3 April 2022 pertaining to the lease of the URLs between 3 April 2022 and 2 April 2023.

(10) The Defendant has since demanded payment of those invoices on several occasions and has raised, and continues to raise, various invoices pertaining to late payment charges, default notices and the creation of certain websites advertising the Claimant's alleged defaults, among other things. It is also understood that the Defendant expects payment of certain invoices pre-dating the above-described agreement.

(11) There is no lawful basis upon which the Defendant is entitled to demand payment of the said invoices or otherwise continue to produce invoices arising out of its relationship with the Claimant and the Pub.

(12) The Claimant contends that it is appropriate for the Court to grant declaratory relief in accordance with the principles enunciated in *Rolls Royce Plc v Unite the Union* [2009] EWCA Civ 387 and in the terms set out within the attached Draft Order.

(13) Further, the Claimant fears that, unless the Defendant is restrained by the Court, it will continue to bombard the Claimant with baseless invoices and continue publishing and/or promulgating derogatory material about the Claimant online.

ADAM GOULD | PLP

DANIEL THWAITES PLC  
C/O ADDLESHAW GODDARD LLP  
3 SOVEREIGN STREET  
LEEDS  
LS1 4ER  
REF: 106795-23

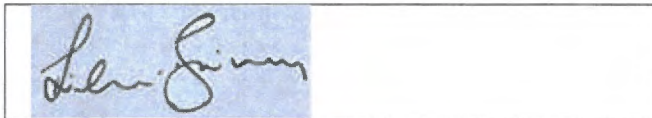
Claimant's or claimant's legal representative's address to which documents should be sent if different from overleaf. If you are prepared to accept service by DX, fax or e-mail, please add details.

## Statement of Truth

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.

- I believe** that the facts stated in these particulars of claim are true.
- The Claimant believes** that the facts stated in these particulars of claim are true. **I am authorised** by the claimant to sign this statement.

### Signature



- Claimant
- Litigation friend (where claimant is a child or a Protected Party)
- Claimant's legal representative (as defined by CPR 2.3(1))

### Date

Day	Month	Year
8	8	2023

Full name

Richard Bailey

Name of claimant's legal representative's firm

Addleshaw Goddard LLP

If signing on behalf of firm or company give position or office held

Chief Executive Officer

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: <https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

Witness Statement on behalf of the Claimant

Witness: Richard Bailey

Number of Statement: 1

Exhibits: RB1

Date: 8 August 2023

**IN THE COUNTY COURT AT LEEDS**

**BUSINESS AND PROPERTY WORK**

**B E T W E E N:-**

**DANIEL THWAITES PLC**

**Claimant**

**And**

**WEB4ORCE LIMITED**

**Defendant**

---

**FIRST WITNESS STATEMENT OF  
RICHARD BAILEY**

---

I, **RICHARD BAILEY**, of Myerscough Road, Mellor Brook, Blackburn, Lancashire, England, BB2 7LB, wish to rely on the following evidence in support of this claim.

1. I am employed by the Claimant in the capacity of Executive Chairman. I have been engaged in this role since 2019, prior to which I was Chief Executive Officer from 2011.
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 and shown to me a paginated bundle of copy documents marked **RB1**. References appearing in square brackets are to pages within **RB1**.

4. This statement has been prepared by the Claimant's solicitors and counsel following a conference. I have also provided instructions via email and over the phone. This statement was then reviewed by me prior to signature.

### **Harts Head Hotel**

5. The Claimant is the registered freehold proprietor of the property known as Harts Head Hotel, Belle Hill, Giggleswick, Settle BD24 0BA (**the Pub**). The Claimant did not purchase the business being carried on at the Pub before it was sold.

### **Web4orce Limited**

6. I understand that the Defendant leased the following uniform resource locators (**URL**) to the occupant of the Pub immediately prior to the Claimant's purchase:

6.1. hartsheadhotel.co.uk; and

6.2. hartsheadinn.co.uk.

7. The former URL hosts the Pub's website, which was designed by a company known as "MadeByShape". The latter URL redirects to the former URL. I will refer to the two URLs in this statement simply as **the URLs**.
8. Shortly before the purchase of the Pub completed, the Claimant's Digital Marketing Manager, Jen Riley, emailed the Defendant's director, John Duggan, asking whether he could assist the Claimant taking over the monthly maintenance contract for the Pub. A copy of Jen's email appears at **[RB1 007]**. I do not know exactly what Jen meant by that email, but I doubt that it was intended to be a reference to the URLs (or to the Defendant in any other sense) because as I understand it the Defendant had never provided a service corresponding even approximately to the description in Jen's email.
9. Jen left the Claimant's employ on 27 July 2021. Our IT department have conducted a search of Jen's emails in an attempt to better understand her involvement with the Defendant / Mr

Duggan. We have not, however, been able to identify a response to the above-mentioned email and have assumed, therefore, that Mr Duggan did not return her email.

10. I would like to confirm from the outset that, save for the matters referred to in this statement and that of my colleague, Toni Naylor, the Claimant has had no dealings with the Defendant, its officers or employees. The Defendant has no desire whatsoever to engage the Defendant in the future.

### **Paid Invoices**

11. Between 3 April 2020 and 15 June 2021, seemingly unaware of the Claimant’s acquisition of the Pub, the Defendant sent several invoices to “Hartshead Hotel”. Those invoices appear at [RB1 120-126]. For ease of reference, I summarise them as follows:

<b>Invoice</b>	<b>Date</b>	<b>Value</b>	<b>Description</b>
771/26766	03/04/20	£95	Leasing domain name <hartsheadinn.co.uk>; redirecting to website: <https://hartsheadhotel>; between 03/04/20 and 02/04/21.
772/26745	03/04/20	£95	Leasing domain name <hartsheadhotel.co.uk> between 03/04/20 and 02/04/21.
771/26784	03/04/21	£95	Leasing domain name <hartsheadinn.co.uk>; redirecting to website: <https://hartsheadhotel>; between 03/04/21 and 02/04/22.
772/26785	03/04/21	£95	Leasing domain name <hartsheadhotel.co.uk> between 03/04/21 and 02/04/22.
854/26783	10/04/21	£275	Fees incurred “...when email / website services in connection with Thwaites Plc were de-activated as a consequence of failure to pay outstanding invoices concerning Hartshead Inn  <i>In addition, to hosting and publishing holding page...”</i>

855/26786	12/06/21	£275	Fees incurred “...when email / website services in connection with Thwaites Plc were de-activated as a consequence of failure to pay outstanding invoices concerning Hartshead Hotel...  In addition, to hosting and publishing holding page...”
856/26787	15/06/21	£560	Creation of default notice for Hartshead Hotel; monitoring mailbox set up to receive complaints posted by people wishing to air their grievances concerning Hartshead Hotel.

12. On 12 June 2021, Mr Duggan sent the Claimant an email stating that the URLs had been deactivated in consequence of “*a number of outstanding invoices*”. I have assumed that Mr Duggan’s email, a copy of which appears at **[RB1 008]**, is referring to the invoices in the above table. As stated at §5, the Claimant did not purchase the business being carried on at the Pub before it was purchased. Whilst the Claimant’s predecessor may have contracted with the Defendant, the Claimant did not. It was not contractually obliged to make payment of the above-mentioned invoices.
13. Notwithstanding the facts set out above, the invoices were paid by our Pubs Team on 15 June 2021. I understand that the reason for payment was that the Claimant wished to make use of the website hosted by the URLs until April 2022, whilst it developed an alternative website.
14. I understand that the URLs were subsequently re-activated by the Defendant.
15. I can confirm that I have not been able to identify any formal contractual arrangement between the Claimant and Defendant. Further, it does not appear that the Claimant sought to engage the Defendant’s services directly; save, of course, Jen’s email of 19 February 2020.
16. Our relationship with the Defendant was limited to paying the above-mentioned invoices on 15 June 2021, by reason of which we had leased the URLs from the Defendant until 2

April 2022 (as stated on invoices 771/26784 and 772/26785). If some sort of informal contract arose between the Claimant and the Defendant as a result of that transaction, the Claimant did not agree that any detailed “*terms and conditions*”, including in particular those displayed on the Defendant's website, would form part of that contract. Nor has the Claimant since agreed to abide by any such “*terms and conditions*”.

### **Toni Naylor**

17. In consequence of Jen’s departure, it appears that there was little interaction between the Claimant and Defendant until Toni Naylor called Mr Duggan in January 2022.

18. I was not involved in Toni’s discussions with Mr Duggan and defer to her statement, which I understand has been sent to the Court together with mine.

### **March 2022**

19. On or around 14 March 2022, I received a letter from the Defendant (a copy of which appears at **[RB1 009]**). The Court will see that, in response to Toni’s refusal to pay certain invoices raised by the Defendant, the Defendant created the following websites (which appear to be no longer accessible):

<https://www.danielthwaites.default-notice.uk>

<https://www.richardbailey.2yu.uk>

20. Furthermore, as the two invoices with references 892\_26865 and 893\_26866 **[RB1 137 and 138]** illustrate, the Defendant wanted to charge us £2,850 for what is described as: “*...costs incurred developing a more effective Defaulters network [sic] designed to publicise the shameful treatment being meted out to my company by Daniel thwaites plc.*” I note that we are also in possession of two further invoices with the same references, dates, and total cost which are described similarly but in different words **[RB1 139 and 140]**.

21. For the avoidance of doubt:

- 21.1. The Claimant has not, at any time, agreed to pay for the creation of a “*defaulters’ network*”.
- 21.2. The Claimant did not agree to the automatic renewal of the above-described leases hence, upon the expiry of the 2021/22 leases, our relationship with the Defendant automatically came to an end.
- 21.3. Toni informed Mr Duggan, in any event, that the Claimant would not be renewing its leases with the Defendant.
- 21.4. In all the circumstances, there was no basis for the Defendant to raise the 5 invoices referred to by Toni within her statement. Nor, subsequently, the invoices referred to at 20 above.
22. Upon receipt of Mr Duggan’s letter, I spoke to Andrew Buchanan (Operations Manager) to better understand why we were being sent invoices by someone publishing potentially defamatory material online. He informed me of the facts and matters which now appear in Toni Naylor’s statement.
23. On 15 March 2022, I responded to Mr Duggan’s letter by email. A copy of my email appears at **[RB1 013-014]**. I don’t propose to repeat the contents of my email, but think it is important to state that I very clearly expressed the fact we no longer required the Defendant’s services and did not want them in the future.
24. I did not receive a response from the Defendant or Mr Duggan. Rather, he persisted to send further, baseless, invoices to the Claimant.
25. I pause to note that, whilst I recognise that the invoices in question are being raised by the Defendant and the websites in questions are apparently being created by the Defendant, I have only ever dealt with Mr Duggan (whom I understand to be the sole Director and sole owner of the Defendant). Throughout my interactions with Mr Duggan it has struck me that this seems to have become a very personal matter for him. The following references suggest to me the Defendant is, for all intents and purposes, one and the same as Mr Duggan:

- 25.1. Mr Duggan refers to "my" company (see, for example, paragraph 20 above), to "my precious time" (see, for example, paragraph 37 below), and to "my" retirement (see, for example, paragraph 35 below) in his correspondence.
- 25.2. Mr Duggan also referred, presumably to himself, as the "84 year old litigant in person" (<https://www.addleshawgoddardversus84yearoldlitigant.2yu.uk/> - being a website he created) and the "84 year old defendant" [RB1 016].
- 25.3. Mr Duggan refers to the Defendant as a "small one man outfit" (<https://www.danielthwaites.publiclydisgraced.2yu.uk/>) [RB1 025].
26. I have also been shown, for the purpose of this witness statement, websites which refer to me in a derogatory way (e.g. <https://www.twatsofblackburn.2yu.uk/> [RB1 035] and <https://www.whatatwat.2yu.uk/>) [RB1 045].
27. Websites referred to by me in this statement were explicitly referred to by Mr Duggan in invoices and/or correspondence save those referred to in paragraphs 25.2 and 26 above, which were accessed through links on the aforementioned websites. These websites have the same distinctive URL ending in '2yu.uk' so I assume they were all created by the Defendant.

### **May 2022**

28. On or around 17 May 2022, it was brought to my attention that Mr Duggan had contacted my predecessor, Ann Yerburch, seemingly in an attempt to go over my head following my response in March 2022.
29. I promptly contacted Mr Duggan and asked him to resolve matters by way of a telephone call. A copy of my email appears at [RB1 013]. Unfortunately, Mr Duggan's response was simply to demand payment of certain invoices itemised on another website he had created: [www.danielthwaites.publiclyhumiliated.2yu.uk](http://www.danielthwaites.publiclyhumiliated.2yu.uk) [RB1 058]

30. By this point, the Defendant was seeking payment of £11,785 across 25 invoices. Only two of those invoices related to the lease of the URLs, which we had declined. The balance related to default notices, the creation of more websites and the like.

31. I did eventually speak with Mr Duggan during a telephone conversation on 27 May 2022. The discussion was not productive. Mr Duggan simply stated that he would rubbish our reputation and waste as much of our time as possible. He went on to tell me that he had done this and “*they*”, by which I assume he meant other targets of his, paid him out on the court steps. Mr Duggan also purported to raise further invoices in the name of the Defendant for time spent during this conversation.

### **June 2022**

32. Matters continued in a similar vein, culminating in a further letter to Ann Yerburgh dated 4 June 2022 which appears at [RB1 069]. On this occasion, Mr Duggan stated that he would “*tweak the code to maintain front page listings*” and confirmed that his “*defaulters' network*” now comprised 56 websites (all of which are set out at addendums 4 and 5 of his letter at [RB1 074]). Again, Mr Duggan purported to raise further invoices in the name of the Defendant for time spent during this conversation.

### **Pre-Action Correspondence**

33. The Defendant continued to raise baseless invoices throughout the remainder of 2022. In consequence of their ceaseless, bothersome conduct, I instructed Addleshaw Goddard LLP (AG) to write to the Defendant with a view to resolving matters.

34. AG sent a letter before claim to the Defendant on 8 February 2023. A copy of that letter appears at [RB1 104]. The unpaid invoices referred to at page 4 of that letter appear at [RB1 127-158].

35. Mr Duggan’s response to that letter, an email dated 6 March 2023, appears at [RB1 108]. It is unclear what Mr Duggan’s response to our case is because he simply says that the substance of the letter of claim is “*best argued in court*”. It is also clear, on reading the

second substantive paragraph of his email, that the Defendant / Mr Duggan has no intention of pursuing the disputed invoices. The paragraph concludes:

*“That being so it would be appreciated if you proceeded with your court action without further ado as the sooner this matter is resolved the quicker I can return to enjoying my retirement.”*

36. Mr Duggan’s email goes on to refer to terms and conditions contained on his website which, to my knowledge, have never been agreed to by the Claimant (as discussed at paragraphs 11 to 16 (inclusive) above).

37. Thereafter, he proposes, seemingly by way of settlement:

*“1. Payment in full of all outstanding invoices, this is not open to negotiation.  
2. £48,000 payment in compensation for unwarranted stress, this is open to negotiation.  
3. £480,000 payment in compensation for unwarranted loss of my precious time, this is open to negotiation.”*

38. AG did not respond to this email.

39. AG received a further email from Mr Duggan on 18 April 2023, which appears at **[RB1 110]**. On this occasion, Mr Duggan had created a further website, this time targeted at AG: [www.addleshawgoddardinplainsight.2yu.uk](http://www.addleshawgoddardinplainsight.2yu.uk) **[RB1 111]**.

40. Mr Duggan refers to a number of other sites created in the hope it would *“...speed up the judicial process.”*

### **Further Invoices**

41. Since the Claimant's letter before claim to the Defendant on 8 February 2023, Mr Duggan also sent the Claimant at least a further 28 emails. 13 of these emails demanded payment of additional invoices dated between 8 March 2023 and 5 April 2023 **[RB1 159-171]**. The remaining emails were reminders for supposedly outstanding invoices with links to access those invoices **[RB1 172-186]**.

42. It is also worth me noting that we are aware that from time to time, the Defendant provided links to invoices by emails to various employees of the Claimant, or to central email accounts of the Claimant including [hello@thwaites.co.uk](mailto:hello@thwaites.co.uk) and [accountspayable@thwaites.co.uk](mailto:accountspayable@thwaites.co.uk). It is not possible, however, for the Claimant's IT department to universally search all "thwaites.co.uk" email addresses for these emails from the Defendant. It is possible, therefore, that we are not aware of every single invoice or communication received from the Defendant.

**Relief Sought**

43. In consequence of the matters set out above, the Claimant has been left with little alternative but to apply to the Court for an order confirming that we are not indebted to the Defendant, as alleged, and restraining them from serving any further invoices, creating any more websites and/or expanding the "*defaulters' network*", or otherwise taking steps to enforce those invoices which are currently "outstanding".

**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.



.....

Dated: 8 August 2023

Witness Statement on behalf of the Claimant

Witness: Richard Bailey

Number of Statement: 1

Exhibits: RB1

Date: 8 August 2023

**IN THE COUNTY COURT AT LEEDS**  
**BUSINESS AND PROPERTY WORK**

**B E T W E E N:-**

**DANIEL THWAITES PLC**

**Claimant**

**And**

**WEB4ORCE LIMITED**

**Defendant**

---

**RB1**

---

**IN THE COUNTY COURT AT LEEDS**

**BUSINESS AND PROPERTY WORK**

**B E T W E E N:-**

**DANIEL THWAITES PLC**

**Claimant**

**And**

**WEB4ORCE LIMITED**

**Defendant**

---

**RB1**

---

<b>Tab</b>	<b>Document</b>	<b>Date</b>	<b>Page(s)</b>
<b>Correspondence and Websites</b>			
1.	Email from Jen Riley to John Duggan	19 February 2020	007
2.	Email from John Duggan to Daniel Thwaites Plc	12 June 2021	008
3.	Letter from John Duggan Daniel Thwaites Plc	14 March 2022	009 - 012
4.	Emails between Richard Bailey and John Duggan	15 March 2022 to 17 May 2022	013 - 015
5.	<a href="http://www.addleshawgoddardversus84yearoldliti.gant.2yu.uk">www.addleshawgoddardversus84yearoldliti.gant.2yu.uk</a>	undated	016 - 023
6.	<a href="https://www.danielthwaites.publiclydisgraced.2yu.uk">https://www.danielthwaites.publiclydisgraced.2yu.uk</a>	undated	024 - 034
7.	<a href="https://www.twatsofblackburn.2yu.uk">https://www.twatsofblackburn.2yu.uk</a>	undated	035 - 044

8.	www.whatatwat.2yu.uk	undated	045 - 057
9.	www.danielthwaites.publiclyhumiliated.2yu.uk	undated	058 - 068
10.	Letter from John Duggan to Ann Yerburch	04 June 2022	069 - 103
11.	Letter Before Claim to Web4orce Limited	08 February 2023	104 - 107
12.	John Duggan's Limited Response to LBC	06 March 2023	108 - 109
13.	Email from John Duggan to Addleshaw Goddard	18 April 2023	110
14.	www.addleshawgoddardinplainsight.2yu.uk	undated	111 - 119

**Paid Invoices**

15.	Invoice 771/26766	03 April 2020	120
16.	Invoice 772/26745	03 April 2020	121
17.	Invoice 771/26784	03 April 2021	122
18.	Invoice 772/26785	03 April 2021	123
19.	Invoice 854/26783	01 April 2021	124

20.	Invoice 855/26786	12 June 2021	125
21.	Invoice 856/26787	15 June 2021	126
<b>Unpaid invoices up to 8 February 2023</b>			
22.	Invoice 177/26680	10 May 2020	127
23.	Invoice 178/26681	10 May 2020	128
24.	Invoice 182/26687	10 June 2020	129
25.	Invoice 183/26688	10 June 2020	130
26.	Invoice 884/26853	15 February 2022	131
27.	Invoice 887/26855	06 March 2022	132
28.	Invoice 771/26859	03 April 2022	133
29.	Invoice 772/26860	03 April 2022	134
30.	Invoice 888/26861	09 March 2022	135
31.	Invoice 889/26862	14 March 2022	136

32.	Invoice 892/26865	14 March 2022	137
33.	Invoice 893/26866	14 March 2022	138
34.	Invoice 892/26865 (2)	14 March 2022	139
35.	Invoice 893/26866 (2)	14 March 2022	140
36.	Invoice 894/26867	17 March 2022	141
37.	Invoice 896/26868	20 March 2022	142
38.	Invoice 897/26869	25 March 2022	143
39.	Invoice 900/26874	22 March 2022	144
40.	Invoice 901/26875	22 March 2022	145
41.	Invoice 903/26876	28 March 2022	146
42.	Invoice 905/26884	30 March 2022	147
43.	Invoice 906/26885	30 March 2022	148
44.	Invoice 907/26886	05 April 2022	149

45.	Invoice 908/26887	11 April 2022	150
46.	Invoice 909/26888	11 April 2022	151
47.	Invoice 910/26889	19 April 2022	152
48.	Invoice 911/26890	19 April 2022	153
49.	Invoice 916/26919	29 November 2022	154
50.	Invoice 917/26920	30 November 2022	155
51.	Invoice 918/26921	02 December 2022	156
52.	Invoice 919/26925	23 January 2023	157
53.	Invoice 920/26926	23 January 2023	158
<b>Unpaid invoices post 8 February 2023</b>			
54.	26939	08 March 2023	159
55.	26940	08 March 2023	160
56.	26941	08 March 2023	161

57.	26942	08 March 2023	162
58.	26947	12 March 2023	163
59.	26948	12 March 2023	164
60.	26949	12 March 2023	165
61.	26950	12 March 2023	166
62.	26951	20 March 2023	167
63.	26952	20 March 2023	168
64.	26959	05 April 2023	169
65.	26966	05 April 2023	170
66.	26967	05 April 2023	171
<b>Additional email demands</b>			
67.	Additional email demands	08 March 2023 - 20 March 2023	172 - 186

From: Jen Riley <jenriley@thwaites.co.uk>  
Sent: 19 February 2020 11:52  
To: john.duggan@web4orce.co.uk  
Subject: Hart's Head, Giggleswick Website

---

Hi John,

I'm hoping you can help with this query.

We are in the process of buying The Hart's Head pub in Giggleswick, and I've been passed your contact details as the web designer.

We'd like to take over the monthly maintenance contract for the pub – is this something you can help with?

Many thanks,

Jen

**Jen Riley**  
**Digital Marketing Manager**

Email: [jenriley@thwaites.co.uk](mailto:jenriley@thwaites.co.uk)  
Tel: 01254 686886

From: Kevin Wood <kevinwood@thwaites.co.uk>  
Sent: 12 June 2023 16:58  
To: Richard Bailey  
Subject: FW: Outstanding Invoices

---

**From:** John Duggan  
**Sent:** 12 June 2021 16:38  
**To:** Info  
**Subject:** Outstanding Invoices

This is to inform you that a number of outstanding invoices remain unpaid despite a couple of phone calls and many email reminders regarding the following domain names :

[hartsheadhotel.co.uk](http://hartsheadhotel.co.uk)  
[hartsheadinn.co.uk](http://hartsheadinn.co.uk)

and in accordance with our terms and conditions we have de-activated your website and published holding pages in the meantime.

Hopefully this email will attract your organisation's urgent attention as it is not a task we undertake lightly.

Regards

John Duggan for Web4orce Ltd – 0845 548 8733



Aireside House  
Royd Ing Avenue  
Keighley  
West Yorkshire BD21 4BZ  
info@web4orce.com - Email  
http://www.web4orce.com - Url  
0845 548 8733 - Tel

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

**For the attention of Richard Bailey**

14 March 2022

Dear Richard

On behalf of my company I have decided to write to you in this manner to attract your attention, and also because last year my company was in a similar situation with your Organisation and apparently matters show little sign of improvement.

Bullying tactics rarely work with me and they didn't last Wednesday when around midday Toni Naylor phoned me and tried to coerce my company into cancelling an outstanding invoice for £285 and in exchange for which she stated that she would authorise immediate payment of the other 4 outstanding invoices. I did try to reason with her but she left me with little alternative either accept her conditions or she would refer it up to one of the directors, I declined her offer.

Afterwards when I was thinking about it I wondered how many other times she had resorted to such tactics because it happens all too often when large organisations pressurise small businesses to either reduce their prices or extend their terms of credit and more often than not they succeed in doing so.

Consequently after mulling over what our options were, I decided a new approach was called for that encompassed a more effective online network designed to publicise the shameful treatment being meted out to my company. This resulted in myself and a colleague spending more than 24 hours in the last few days designing and testing an updated Defaulters network and Daniel Thwaites is shortly going to be on the receiving end and hopefully it will achieve its objective.

Last Wednesday Toni could have brought our dispute to an end and agreed to pay all 5 outstanding invoices amounting to £1,045 but no she misjudged the situation and consequently we will now be invoicing Daniel Thwaites for this site, the latest Defaulters site plus extra hosting and invoicing costs.

So where can you check out this Defaulters site well usually it would have replaced the Hartshead Hotel website but on this occasion I decided to place it elsewhere because the issue my company has is not with the Hartshead Hotel but it is with those members of staff at Daniel Thwaites that were responsible for this dilemma and through no thanks to them we have in the meantime re-instated the hotel's website.

<https://www.danielthwaites.default-notice.uk>

Accordingly I have created a new domain namely danielthwaites.default-notice.uk and hosted the new Defaulters site on our server. Initially, the only people who will be aware of this site is yourself

and those members of staff who learn of its existence in the course of their work. Search engines have been prevented from caching both sites and I hope you appreciate this isn't normally how matters progress but in this instance I was prepared to make an exception and await the outcome of your findings.

In summing up what's particularly galling about this whole episode is that my company have been doing business with the Hartshead Hotel without incident since 2003 that is until Daniel Thwaites purchased it some 2+ years ago. In the course of my investigation I phoned the new tenants at the Hartshead Hotel to find out if they were responsible for non payment of the overdue invoices and the lady that spoke to me said she knew nothing about it. My next port of call was your Accounts Department but the lady that answered was confrontational culminating in her putting the phone down on me. Following that I spoke to a lady at Reception and she was very helpful and provided me with an alternative email address to forward copies of our overdue invoices to. Finally I have sent you an unredacted copy of this letter, marked 'Personal and Confidential' via the Royal Mail to your Headquarters near Blackburn.

Regards



John Duggan

Company Director

/ Invoices enclosed

# 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: **2022-03-14**  
 Invoice Number: **892 / 26865**  
 Due Date: **2022-03-21**

Description	Cost
<p>For providing the following services :</p> <p>To costs incurred developing a more effective Defaulters network designed to publicise the shameful treatment being meted out to my company by Daniel Thwaites plc. The first part of the network can be viewed at the following website address :</p> <p><a href="https://www.danielthwaites.default-notice.uk">https://www.danielthwaites.default-notice.uk</a></p> <p>The time involved was conservatively calculated to be a minimum of 24 hours and priced at £95 per hour or part thereof.</p> <p>Balance outstanding is £2,280.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£2280.00</p>
<b>Total Cost:</b>	<b>£2280.00</b>

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

# 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: **2022-03-14**  
Invoice Number: **893 / 26866**  
Due Date: **2022-03-21**

Description	Cost
<p>For providing the following services :</p> <p>To costs incurred developing a more effective Defaulters network designed to publicise the shameful treatment being meted out to my company by Daniel Thwaites plc. The second part of the network can be viewed at the following website address :</p> <p><a href="https://www.richardbailey.2yu.uk">https://www.richardbailey.2yu.uk</a></p> <p>The time involved was conservatively calculated to be a minimum of 6 hours and priced at £95 per hour or part thereof.</p> <p>Balance outstanding is £570.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£570.00</p>

Total Cost:	£570.00
-------------	---------

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

From: info@web4orce.com <info@web4orce.com>  
Sent: 21 May 2022 08:37  
To: Richard Bailey  
Subject: Re: Hart Head Website

---

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  
> 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  
> BB2 7LB  
>  
> Disclaimer  
>  
> The information in this email is confidential and may be legally  
> privileged. It does not constitute an offer or an acceptance of an  
> offer or a representation or warranty, nor shall it form any part of a  
> legally binding contract. It is intended solely for the addressee.  
> Access to this email by anyone else is unauthorised. If you are not  
> the intended recipient, any disclosure, copying, distribution or any  
> action taken or omitted to be taken is reliance on it, is prohibited  
> and may be unlawful.  
>  
> 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.  
>  
> This email has been scanned for viruses and malware, and may have been  
> automatically archived by Mimecast Ltd.,  
>  
> 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](http://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.

-----

# ADDLESHAW GODDARD

VERSUS 84 YEAR OLD LITIGANT IN PERSON

NEWS ROYAL OAK BAD REVIEWS SHOAL HILL TAVERN BAD REVIEWS SOLENT HOTEL BAD

## ADDLESHAW GODDARD NOTE DEFENDING THE INDEFENSIBLE MEANS RESULT IS INEVITABLE



ADDLESHAW GODDARD  
DEFENDING THE  
INDEFENSIBLE

ADDLESHAW GODDARD  
IN PLAIN SIGHT

ADDLESHAW GODDARD  
REVIEWS

DANIEL THWAITES PLC  
PUBLICLY DISGRACED

DANIEL THWAITES PLC  
PUBLICLY HUMILIATED

DANIEL THWAITES PLC  
PUBLICLY SHAMED

## ON THE 8 FEBRUARY 2023

LETTER BEFORE CLAIM.

Synopsis of Lawyer's letter.

Daniel Thwaites PLC's Rick Bailey acting as Executive Chairman & Chief Executive finally decided to instruct their lawyers Addleshaw Goddard, to launch a high court action citing their Creditors company alleging that Daniel Thwaites PLC is not obliged to pay the Creditor's invoices. The solicitor's letter was posted on the above date to the

# ADDLESHAW GODDARD

VERSUS 84 YEAR OLD LITIGANT IN PERSON

invoices.

The Creditor responded some 21 days later and as invited included a proposed Out of Court settlement offer.

## 8 JUNE 2023

The Creditor patiently waiting.

Addleshaw Goddard are one of UK's top international law firms and their head office is in London. In 2022 its global revenue was reported to be £377 million whilst profits topped £155 million and equity partner profits were around £690,000.

Clearly they are a very busy practice and one would have thought that once they accept instructions from a trusted client they would waste no time ensuring their lucrative fees commenced rolling in but, in this particular case 3 months has passed and its as quiet as a grave!

So with time on his hands the Creditor decided to investigate Addleshaw Goddard and publish a small network recording what he had discovered and so far and it has been most enlightening. One particular discovery was so heartbreaking it left the Creditor in tears and that is something that rarely happens. This event concerned a female lawyer who was employed by their parent organisation, Addleshaw Booth & Co and it is arguably the worst miscarriage of justice ever recorded in UK legal history concerning a lawyer when an English court handed down 2 life sentences for murder. Just over 3 years later her sentences were quashed by the Court of Appeal and she was released from prison. After her release, her husband said she would "never be well again" and sadly he proved to be right because just 4 years later at the age of 42 she died of alcoholic poisoning, though the coroner stressed that there was no evidence that she

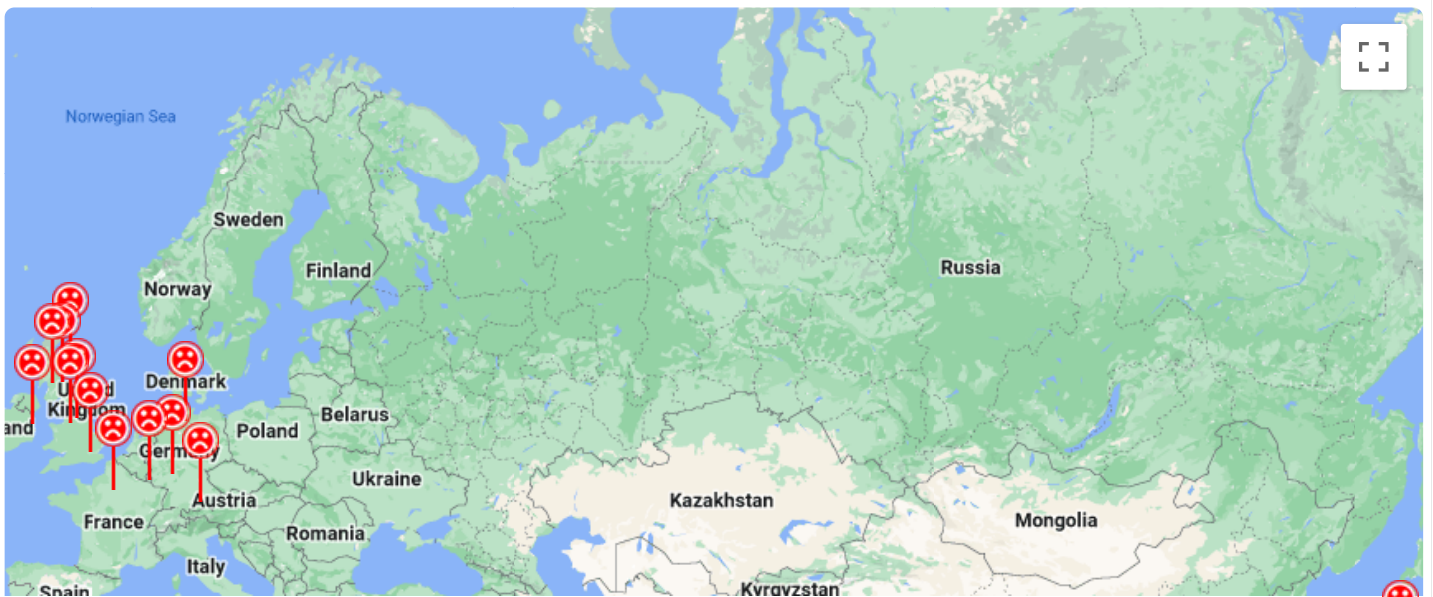
# ADDLESHAW GODDARD

VERSUS 84 YEAR OLD LITIGANT IN PERSON

maintains that AG's client Daniel Thwaites PLC doesn't have a leg to stand on in their dispute and perhaps the reason why they've not been in touch since February 2023?

## ADDLESHAW GODDARD OFFICE MARKERS

To examine the map in fullscreen view - click on the white square icon in the top right corner of the map. In the event the red markers in the map are overlapping then click on the plus icon in the bottom right corner of the map until they are separated, click on the same markers to discover Addleshaw Goddard office title, address, phone number, email / website links plus an image.



By using our services you agree to our use of cookies [Accept all Cookies](#) [Read Privacy Policy](#)

# ADDLESHAW GODDARD

VERSUS 84 YEAR OLD LITIGANT IN PERSON



[Addleshaw Goddard Edinburgh](#)



[Addleshaw Goddard Doha](#)



[Addleshaw Goddard Dubai](#)



[Addleshaw Goddard Dublin](#)



[Addleshaw Goddard Edinburgh](#)



[Addleshaw Goddard Frankfurt](#)



[Addleshaw Goddard Glasgow](#)



[Addleshaw Goddard Hamburg](#)



[Addleshaw Goddard Leeds](#)



[Addleshaw Goddard London](#)



[Addleshaw Goddard Luxembourg](#)



[Addleshaw Goddard Manchester](#)



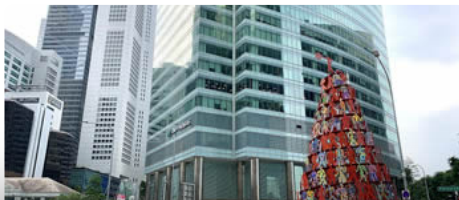
[Addleshaw Goddard Munich](#)



[Addleshaw Goddard Muscat](#)



[Addleshaw Goddard Paris](#)



By using our services you agree to our use of cookies [Accept all Cookies](#) [Read Privacy Policy](#)

# ADDLESHAW GODDARD

VERSUS 84 YEAR OLD LITIGANT IN PERSON

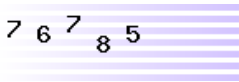
## ADDLESHAW GODDARD REVIEWS FORM

Your Full Name

Valid Email Address

Your Review

If you have any reviews concerning Addleshaw Goddard and feel strongly enough to air your views please fill in this form and we will publish them in the Latest Reviews section below, and please be assured all reviews will be dealt with anonymously when requested.



Type Security Code Here

Submit

**ADDLESHAW GODDARD**

VERSUS 84 YEAR OLD LITIGANT IN PERSON

**ADDLESHAW GODDARD LATEST REVIEWS**

Reviewed : 28 Jul 2023

**Made very difficult for you to get promoted at AG**

Pros - Decent work life balance and nice people

Cons - Very little perks. Salary below market.

Reviewed : 26 Jul 2023

**Good office environment.**

Pros - Good people in the team

Cons - Poor salary for office location.

Reviewed : 24 Jul 2023

**Addleshaw Goddard awful place to work!**

Pros - Reasonable working hours considering size of the firm

Cons - Culture varies significantly depending on department, benefits are sub-par.

Reviewed : 17 Jul 2023

**Addleshaw Goddard slightly toxic atmosphere**

Pros - Good IT system. Nice office and location. Some people were nice

Cons - TST paralegal role had high turnover. Lack of trust amongst colleagues. Poor management. Favoritism. Long working hours for no recognition. Work not allocated fairly. Staff complained all the time because they were unhappy.

Reviewed : 15 Jul 2023

**High stress, little reward or recognition.**

## ADDLESHAW GODDARD

VERSUS 84 YEAR OLD LITIGANT IN PERSON

Cons - Extremely high pressure and little training making the job very stressful, unrealistic targets, hierarchical culture, little reward or recognition for your work, very underpaid paralegals with absolutely no guarantee or encouragement of progression.

Reviewed : 19 Jun 2023

### **Great office culture, poor management.**

Pros - Big opportunities including international secondment. Hybrid working. Cross office working

Cons - Paralegals do not often receive quality work and is usually routine tasks. Management in the team is poor: Overly focused on chargeable hours rather than learning.

Reviewed : 15 Jun 2023

### **If you enjoy law firm environment this is quite good.**

Pros - Good benefits. Some good people. Great depth of knowledge

Cons - Wasn't the right environment for me, couldn't deal with the ego's and politics. Travelling UK wide on a regular basis (2 times a week). Time spent away from family.

Reviewed : 14 Apr 2023

### **Addleshaw Goddard not pleasant place to work.**

Pros - Some genuinely interesting work if you're in the right place at the right time.

Generally a nice bunch of co-workers

Cons - 18k is the starting salary and is the salary you will likely stay on regardless of performance or billable hours. Bonuses, not likely your friends in other industries are getting 10% bonuses and yearly pay rises.

Reviewed : 24 Mar 2023

# ADDLESHAW GODDARD

VERSUS 84 YEAR OLD LITIGANT IN PERSON

Pros - Achievable targets Managers are generally friendly and down to earth as are the people

Cons - Low pay and little chance of progression, dull and repetitive work unless you're passionate about PI.

## ADDLESHAW GODDARD VERSUS 84 YEAR OLD LITIGANT AND SEARCH ENGINES

The following phrases are examples of what people type into search engines such as Ask, Bing, Google, Yahoo, Dogpile, DuckDuckGo, Wow and Yandex when searching for Addleshaw Goddard versus 84 year old Litigant. To check them out click on your chosen search engine links below :

84 YEAR OLD LITIGANT - [GOOGLE](#)    ADDLESHAW GODDARD VERSUS 84 YEAR OLD LITIGANT - [YAHOO!](#)

# DANIEL THWAITES PLC

PUBLICLY DISGRACED

ETONS HOTEL BAD REVIEWS

NORTH LAKES HOTEL BAD REVIEWS

ROACHES LOCK INN BAD



NOT ONLY HAS RICK BAILEY DAMAGED DANIEL THWAITES PLC REPUTATION BY HIS APPALLING BEHAVIOUR HE HAS BY ASSOCIATION ALSO IMPLICATED HIS IN-LAWS, THE YERBURGH FAMILY WHO HAPPEN TO BE ITS MAIN SHAREHOLDERS

DANIEL THWAITES PLC  
BLACKBURN

DANIEL THWAITES PLC  
DUPLICITY

DANIEL THWAITES PLC  
EXPOSED

DANIEL THWAITES PLC  
NEGLIGENCE

DANIEL THWAITES PLC  
PUBLICLY HUMILIATED

DANIEL THWAITES PLC  
PUBLICLY SHAMED

## On the 14 April 2022

Daniel Thwaites PLC has once again failed to honour its debts, what is even more surprising bearing in mind it implicates one of UK's most prominent Hotel and Public House chains one would have thought that publication of a default notice such as this could have been avoided with a little more endeavour on their part.

The current situation has rumbled on for some time now and despite a number of

By using our services you agree to our use of cookies [Accept all Cookies](#) [Read Privacy Policy](#)

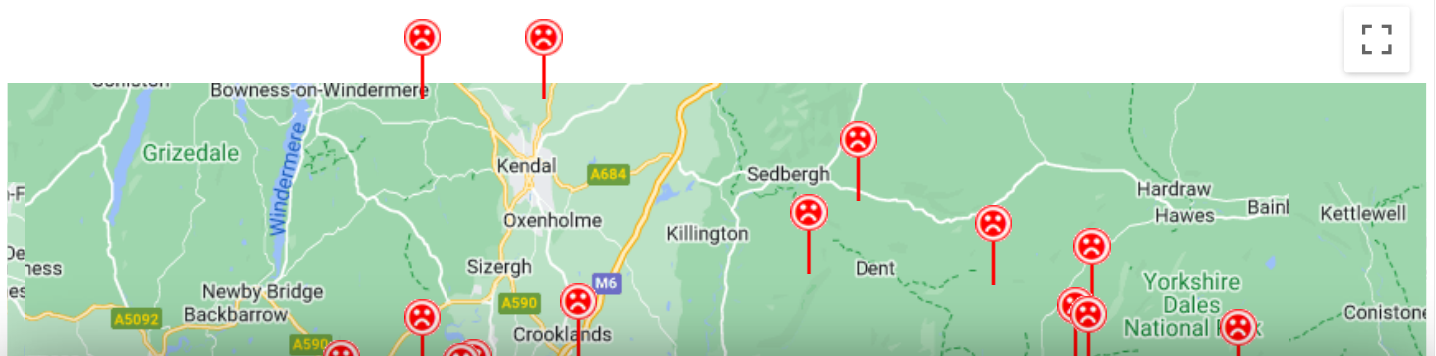
circumstances when a small one man outfit is being outpunched by a huge organisation such as Daniel Thwaites PLC drastic action is called for if it hopes to attract the disgraced perpetrator's attention.

It is a serious matter and needs to be sorted as quickly as possible for debtor and creditor alike, especially when it impacts on ones reputation and financial wellbeing. Disappointingly, situations like this nearly always result in the termination of what might have been an otherwise good business relationship.

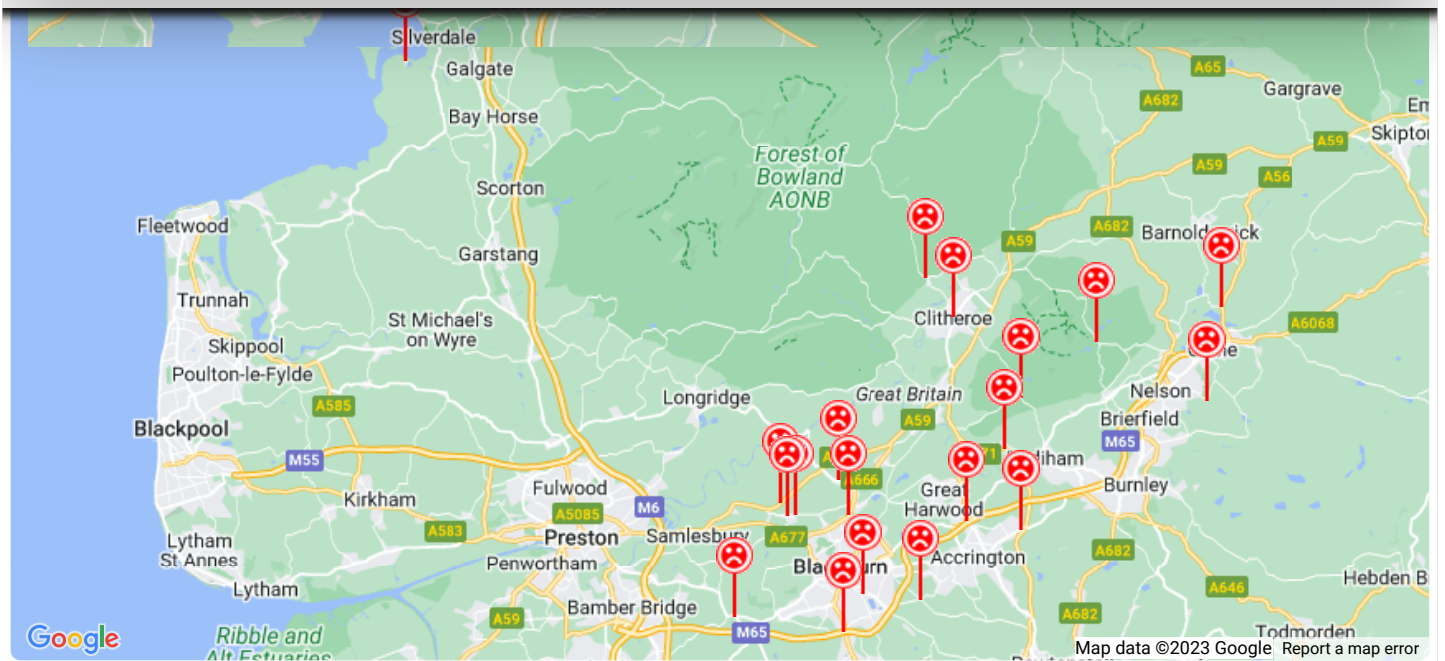
If this dispute is not resolved in the foreseeable future it will leave the creditor little alternative but to instigate court proceedings to recover the overdue debts including legal costs. From the creditor's viewpoint it is not a write-off able amount that's at stake. However, it likely pales into insignificance as far as Thwaites is concerned so it begs the question are they prepared to jeopardise their financial reputation in such circumstances as this or does Daniel Thwaites PLC think it is so fireproof it can afford to being disgraced as such?

## DANIEL THWAITES PLC PUBLICLY DISGRACED PUB MARKERS

To examine the map in fullscreen view - **click on the white square icon in the top right corner of the map**. In the event the **red markers** in the map are overlapping then click on the plus icon in the bottom right corner of the map until they are separated, click on the same markers to discover their Hotel / Pub title, address, phone number, email / website links plus an image.



By using our services you agree to our use of cookies [Accept all Cookies](#) [Read Privacy Policy](#)



Daniel Thwaites PLC  
Nabs Head



Daniel Thwaites PLC  
Traders Arms



Daniel Thwaites PLC  
Nellie Deans



Daniel Thwaites PLC  
Anchor Pub



Daniel Thwaites PLC 3  
Horse Shoes



Daniel Thwaites PLC  
Pendle Inn



Daniel Thwaites PLC No  
4 Pub



Daniel Thwaites PLC  
Duke of York



Daniel Thwaites PLC  
Royal Oak



Daniel Thwaites PLC  
Station Pub



Daniel Thwaites PLC  
Mill Hill



Daniel Thwaites PLC  
Rishton Arms



[Daniel Thwaites PLC Smiths Inn](#)



[Daniel Thwaites PLC Rock Inn](#)



[Daniel Thwaites PLC Globe Inn](#)



[Daniel Thwaites PLC Griffins Head](#)



[Daniel Thwaites PLC New Inn](#)



[Daniel Thwaites PLC Toll House Inn](#)



[Daniel Thwaites PLC Harts Head](#)



[Daniel Thwaites PLC Royal Oak](#)



[Daniel Thwaites PLC Black Bull](#)



[Daniel Thwaites PLC Brown Cow Inn](#)



[Daniel Thwaites PLC Manor House](#)



[Daniel Thwaites PLC White Hart Inn](#)



[Daniel Thwaites PLC Britannia Pub](#)



[Daniel Thwaites PLC Black Dog Inn](#)



[Daniel Thwaites PLC Queens Hotel](#)



[Daniel Thwaites PLC Swan Pub](#)



[Daniel Thwaites PLC Craven Heifer](#)



[Daniel Thwaites PLC Anglers Arms](#)



[Daniel Thwaites PLC Dog Inn](#)



[Daniel Thwaites PLC Dalton Arms](#)

By using our services you agree to our use of cookies [Accept all Cookies](#) [Read Privacy Policy](#)



Daniel Thwaites PLC  
Royal Hotel



Daniel Thwaites PLC  
Havelock Inn



Daniel Thwaites PLC  
Listers Arms



Daniel Thwaites PLC  
Crown Hotel



Daniel Thwaites PLC  
Bay Horse



Daniel Thwaites PLC  
Joiners Arms



Daniel Thwaites PLC  
Smithy Inn



Daniel Thwaites PLC  
Navigation Inn



Daniel Thwaites PLC  
Queens Pub



Daniel Thwaites PLC  
Sun Hotel



Daniel Thwaites PLC  
Bonny Inn



Daniel Thwaites PLC  
Buck Inn



Daniel Thwaites PLC  
Howard Arms



Daniel Thwaites PLC  
Gateway Inn



Daniel Thwaites PLC  
Gamecock Inn



Daniel Thwaites PLC  
White Lion



Daniel Thwaites PLC  
Craven Pub



Daniel Thwaites PLC  
White Bull



Daniel Thwaites PLC  
Grey Horse



Daniel Thwaites PLC  
Golden Lion

By using our services you agree to our use of cookies [Accept all Cookies](#) [Read Privacy Policy](#)



[Daniel Thwaites PLC Ranken Arms](#)



[Daniel Thwaites PLC Millstone Pub](#)



[Daniel Thwaites PLC George Pub](#)



[Daniel Thwaites PLC Park Pub](#)



[Daniel Thwaites PLC Black Bull Pub](#)



[Daniel Thwaites PLC Grey Mare](#)



[Daniel Thwaites PLC Sun Pub](#)



[Daniel Thwaites PLC Saddle Inn](#)



[Daniel Thwaites PLC Kings Arms](#)



[Daniel Thwaites PLC Ivy Hill](#)



[Daniel Thwaites PLC Crown Pub](#)



[Daniel Thwaites PLC Crown Inn](#)



[Daniel Thwaites PLC White Bull Inn](#)



[Daniel Thwaites PLC Stork Hotel](#)



[Daniel Thwaites PLC Bridge Inn](#)

## DANIEL THWAITES PLC PUBLICLY DISGRACED LATEST REVIEWS

Reviewed : 27 Jul 2023

**Came hungry left even hungrier!! Not good at all**

Ordered a 'special' red tai curry worth £20. Came in a tiny dish, rock hard microwaved

By using our services you agree to our use of cookies [Accept all Cookies](#) [Read Privacy Policy](#)

had came cold and one tasted as though it was drenched in Sambuca! Came hungry left hungry. Expected so much better from other reviews but wont be returning anytime soon! Awful

Reviewed : 25 Jul 2023

## **A bloody awful meal**

Overpriced food, poor quality. My friend found foreign objects in her pudding, and sent it back. Some staff had attitude, and not acceptable to be moved out of the dining area to continue with our drinks into a packed standing room only bar area from an empty dining area. Was advised this place was recommended, it was crap.

Reviewed : 24 Jul 2023

## **Food hygiene is a joke.**

There were other, potentially serious, problems. Firstly the stale milk, both in my room and at breakfast. This was totally unacceptable, as everyone knows about food hygiene standards nowadays. If that wasn't enough, the room was on the cramped side, my egg's benedict has no butter and the waitresses forgot my orange juice. Oh and I had to ask for the complimentary coffee to be placed in my room(with food). How can you charge £180/night for a room and not even provide the free drinks?

Reviewed : 24 Jul 2023

## **Overpriced, lacklustre service, couldn't use facilities**

We had several issues with our stay, all of which would probably have been fine at a cheaper hotel, but were really not up to four star standard. Furthermore could probably have let them go by if any member of staff had shown anything more than grumpy disinterest in our comfort or experience: I received emails telling me to call and book in advance to get a slot in the pool, when I did call I was told only direct bookings could prebook.

Reviewed : 23 Jul 2023

## Bitter experience

It really pains me to write a bad review of this pub as I have supported this pub for over 20 years but the sourness of the landlady left an incredible bitter taste in my mouth and I will not set foot in here again. The landlady was behind the bar on arrival but did not acknowledge me or my family. On ordering food, the grumpiness with me and the staff from the landlady was noticeable. The table next to us was served before us despite ordering after us.

Reviewed : 23 Jul 2023

## Overpriced and disappointing. Will not return

The room was tired. cracked lamp shades, peeling paint and a gap around the door I could literally fit my hand down. I'm fairly certain it doesn't comply with fire regulations. Breakfast was served basically in the lobby. on arrival we waited to try even get in the car park, there was only 1 member of staff and after walking to reception then walking back to the car to gain entry we went to our room.

Reviewed : 20 Jul 2023

## Went for a meal very disappointed

Went for a meal very disappointed crinkle chips small portions but expensive for what we had would not recommend felt rushed and not relaxing atmosphere .

Reviewed : 18 Jul 2023

## Really poor

Lift broken x nobody advised us so mother in law stuck in her room. Receptionist rude x abrupt. Food for a buffet was a disgrace, pretty much inedible. Have emailed General Manager 3 times along with the CEO of Thwaites x not even the courtesy of a reply from

either of them, typical of Richard Bailey. If I could would give no stars but can only leave review if you click at least 1.

Reviewed : 12 Jul 2023

## **Food Poisoning at 4 star hotel.**

My partner and I stayed one night at this 4 star hotel last weekend. We both had dinner in the restaurant. About midnight my partner was suddenly feeling sick and was up all night throwing up. Not the weekend away we had planned. I was Ok although I think it was because I had a cooked started and she had a selection from the chefs cold table. I did tell the reception on checkout and they said they were sorry but that was it.

Reviewed : 10 Jul 2023

## **Over priced and dirty**

We had the twilight package for the spa and evening meal in the restaurant! The "spa" is a swimming pool, sauna and steam room. Very small area and was dirty. Towels and robes given were also dirty and had to request new ones, then was given a robe so worn and ripped! Girl on reception was rude and did not have a clue how to work her computer system. Didn't explain anything to us and just pointed us in the direction of the changing room. Staff for the treatment turned up 5 minutes late.

Reviewed : 09 Jul 2023

## **I was mis sold my room at the Aztec Hotel**

I selected the hotel using the 'refine search' functions and found one with a pool. I booked this and it was not until I had my payment accepted and confirmation that it said the price did not include the pool. apparently this is only for people booking direct. I was mis sold my room, unfortunately this started my stay on a negative and its quite difficult to see positives after you know you have been duped. the hotel blamed booking.com.

## DANIEL THWAITES PLC PUBLICLY DISGRACED REVIEWS FORM

Your Full Name

Valid Email Address

Your Review

If you have any comments concerning Daniel Thwaites PLC publicly disgraced and feel strongly enough to air your views please fill in this form and we will publish them in the Latest Reviews section above, and please be assured all comments will be dealt with anonymously when requested.

1 8 7 2 4

Type Security Code Here

Submit

## DANIEL THWAITES PLC PUBLICLY DISGRACED SEARCH ENGINE PHRASES :

The following phrases are examples of what people type into search engines such as Ask, Bing, Google, Yahoo, Dogpile, DuckDuckGo, Wow and Yandex when searching for

Daniel Thwaites PLC publicly disgraced. To check them out click on your chosen search engine links below :

TES PLC PUBLICLY DISGRACED - [DUCKDUCKGO](#) DANIEL THWAITES PLC PUBLICLY DISGRACEI

# TWATS OF BLACKBURN

REVIEWS   SOLENT HOTEL BAD REVIEWS   SPORTSMAN INN BAD REVIEWS   SWAN AND CEME



NEITHER SHAREHOLDERS NOR DIRECTORS WILL APPRECIATE BEING ASSOCIATED WITH THIS SITE BUT THEY CAN THANK RICK BAILEY FOR THIS BECAUSE HE IS RESPONSIBLE FOR EVADING PAYMENT OF OUTSTANDING DEBTS STRETCHING BACK TO 2020.

THWAITES RICK BAILEY

THWAITES TWATS

WHAT A TWAT

## TWATS OF BLACKBURN BUCHANAN & BAILEY

In 2022 Daniel Thwaites Plc's bosses were again left red-faced [see original](#) when they learned what their employees Andrew Buchanan and Rick Bailey had got up to in March 2022. For those of you that don't know, Andrew Buchanan is the director of Pubs and Brewing and Richard Bailey is the Chief Executive Officer. What happened was Andrew had to approve payment of 5 outstanding invoices from one of Thwaites creditors and the total amount owing was **£1,045**. But instead he decided to instruct one of his staff to phone the Creditor and give them an ultimatum either accept £760 or

By using our services you agree to our use of cookies   [Accept all Cookies](#)   [Read Privacy Policy](#)

payment in full for all 5 invoices or none of the invoices would be paid. The employee then did as instructed but the Creditor refused to accept the ultimatum. Some days later the Creditor wrote to Rick Bailey explaining what had transpired in the hope he would intervene and overrule Andrew's decision but, in his written response he stated that as the offer had been rejected then as far as he was concerned the matter was closed. It is now the 30th July 2023 and to date those invoices have still not been paid but the invoice total has now mushroomed to **£95,135**.



Thwaites Andrew Buchanan



Twats Neon Sign above Thwaites in 2014



Thwaites Richard Bailey

## TWITTER USERS WHO SPOTTED THE TWATS SIGN IN 2014 :

**Keith Brunt** : I worked there for 6 years and they are what it says lol.

**Grandad** : Nothing more northern than when the staff at Thwaites brewery in Blackburn tampered with the lighting after being told of redundancies from 'Thwaites' to 'Twats'

**Cheesebutty** : Most of the directors are a bunch of #twats

**Joe bong** : Twats Brewery in England told workers it was cutting 60 staff. My dad's mates worked as electricians there and shorted the lights in retaliation.

**Blackadder** : Richard Bailey recently met one of his pub landlords as they had lots in common namely that they are both fucking twats!

**Slanderous** : The only other one they could have done was TITS, good call I think but twats better

**Jacko** : Whether this was morally or ethically justified or not, it's still hilarious and the twats deserved it.

**Bonzai** : Morally or electrically justified the electricians certainly made the twats regret it.

**Todoronron** : I can't believe all the comments describing this as anything other than a brilliant prank when you've just found out you and 60 of your colleagues are losing your jobs for political reasons. It's a brilliant way to go out. Up the Twats!

**Mofa** : Twats neon sign is basically a landmark in Blackburn. I always used to get a warm feeling and now it makes me smile

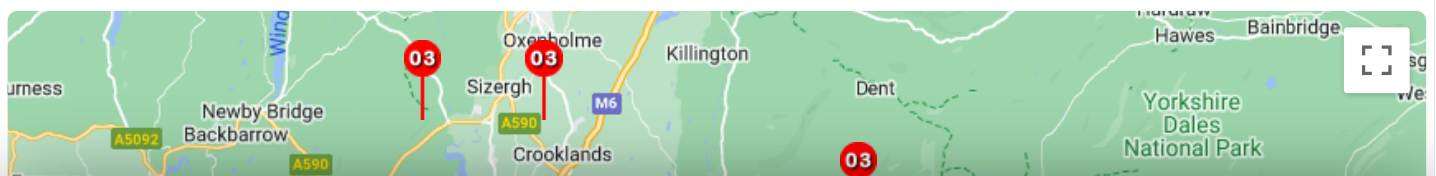
**Yotski** : The electricians are saving the twats some money on the electric bill by turning off a few letters.

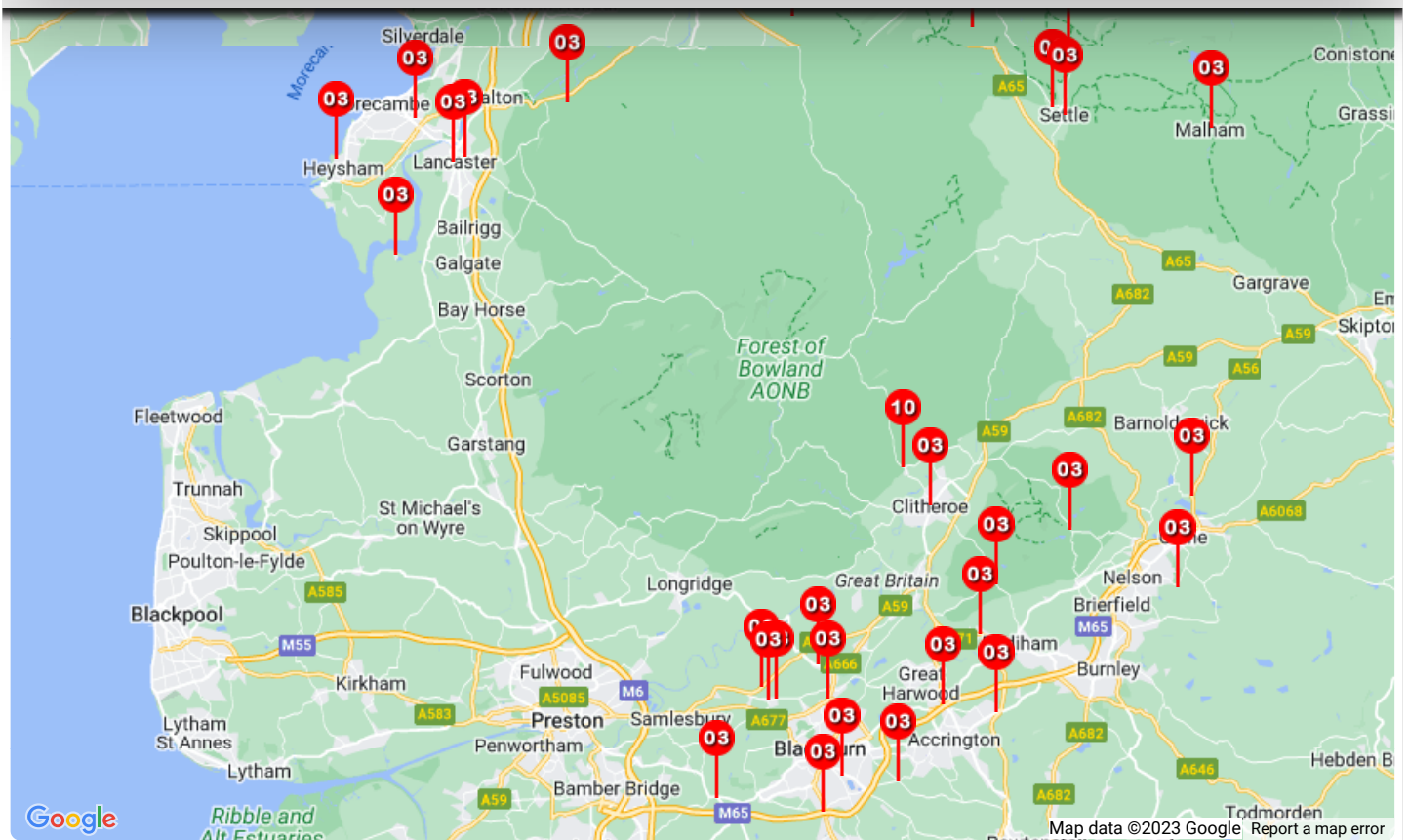
**Becciping** : Oops I think Thwaites brewery in Blackburn have a couple of bulbs out. Haha. #thwaites #twats #blackburn #lancashire.

**Surgramps** : Brewery bosses had a bitter pill to swallow after some of the lights on their iconic sign were switched off to spell out a rude message just days after the firm announced a string of redundancies. The red neon sign above the Thwaites brewery in Blackburn, has blazed out like a beacon announcing the word TWATS which informed all the town's residents what Thwaites employees thought of the decision!.

## TWATS HOTEL MARKERS

To examine the map in fullscreen view - **click on the white square icon in the top right corner of the map**. In the event the **red markers** in the map are overlapping then click on the plus icon in the bottom right corner of the map until they are separated, click on the same markers to discover their Hotel title, address, phone number, email / website links plus an image.





[Thwaites Golden Lion](#)



[Thwaites Cock and Bottle](#)



[Thwaites Grey Mare](#)



[Thwaites Sunnyhurst Pub](#)



[Thwaites Manor House](#)



[Thwaites Millstone Pub](#)



[Thwaites Crown Pub](#)



[Thwaites Ranken Arms](#)



[Thwaites Victoria Pub](#)



[Thwaites Brown Cow](#)



[Thwaites Station Pub](#)



[Thwaites Hare and Hounds](#)

By using our services you agree to our use of cookies [Accept all Cookies](#) [Read Privacy Policy](#)



[Thwaites Horse and Farrier](#)



[Thwaites Rose and Crown](#)



[Thwaites Oaks Pub](#)



[Thwaites Grey Mare Inn](#)



[Thwaites Eagle and Child](#)



[Thwaites King William](#)



[Thwaites Sportsmans Pub](#)



[Thwaites Foresters Arms](#)



[Thwaites Winterburn Pub](#)



[Thwaites Dungeon Inn](#)



[Thwaites Summit Pub](#)



[Thwaites Drop Kick](#)



[Thwaites Plough and Harrow](#)



[Thwaites White Horse](#)



[Thwaites Waggonmakers Arms](#)



[Thwaites Sundial Pub](#)



[Thwaites Swan Pub](#)



[Thwaites Queens Pub](#)



[Thwaites Royds Arms](#)



[Thwaites Help Me Thro](#)



[Thwaites The Millstone Inn](#)



[Thwaites Hare & Hounds](#)



[Thwaites John Bull Chophouse](#)



[Thwaites White Lion](#)



[Thwaites Queens Pub](#)



[Thwaites White Boar](#)



[Thwaites Swan and Cementery](#)



[Thwaites Queen Anne](#)



[Thwaites Grapes Pub](#)



[Thwaites Queen Anne Pub](#)



[Thwaites La Roma](#)



[Thwaites Lindley Tap](#)



[Thwaites Horse Shoe Inn](#)



[Thwaites North Star](#)



## TWATS OF BLACKBURN LATEST REVIEWS

Reviewed : 15 Jul 2023

### Wheelchair users Not Welcome

Tried staying here as a wheelchair user wanting to simply sleep, eat, wash and shower BUT despite booking a wheelchair accessible room this is not possible at at this 4\*\*\*\* hotel. They told me my only option was to use the spa facilities which were some 100m from my room. MOST UNWELCOME AVOID AT ALL COSTS IF YOU ARE A WHEELCHAIR USER !!!

## Overpriced and disappointing. Will not return

The room was tired. cracked lamp shades, peeling paint and a gap around the door I could literally fit my hand down. I'm fairly certain it doesn't comply with fire regulations. Breakfast was served basically in the lobby. on arrival we waited to try even get in the car park, there was only 1 member of staff and after walking to reception then walking back to the car to gain entry we went to our room.

Reviewed : 29 Jun 2023

## Not good enough ?

We had been to a canal gala and drove here for a late Sunday lunch. We were met by a lady who said we could sit at any table that hadn't got a reserved notice (we are not stupid) and she would follow us through with menus. We found a nice table for two and waited and waited for the lady to appear. We were completely ignored and yet people arriving after us were shown the specials board and given menus. We eventually left without either food or drink.

Reviewed : 27 Jun 2023

## Family meal

We went up after the refurb and yes what a difference the deco and the place looks amazing well done to the new tenants and all the staff. We ordered food which the Chef Colin always delivers and the quality is amazing. Would recommend to anyone.

Reviewed : 27 Jun 2023

## Overpriced and not worth the money

Completely over rated and over priced £160 one night for graduation stay over no air con and they knew it was broken. Breakfast dreadful. I have no idea how they can charge this much. Needed an iron was directed to a cupboard photos to follow. No care for customers

Reviewed : 24 Jun 2023

## **Absolutely superb**

Myself, wife and daughter are vegan and they made a separate mini buffet for us on a separate table. The food was the best I have ever had for a buffet in a pub. Homemade pizza, garlic bread, salad, spring rolls and an amazing tomato soup. Everything was delicious. Really cannot fault this pub, brilliant and please visit for superb food, great beer choice and friendly smiling faces...perfect.

Reviewed : 18 May 2023

## **Quite uncomfortable due to the freezing cold room**

The room was freezing cold. We couldn't get the temperature above 15oC and the air conditioning blew cold air all night. The shower room was freezing , even with the heated towel rail on. The breakfast wasn't very hot. The receptionist took a note of the problems we had encountered but didn't really offer any apology.

Reviewed : 12 May 2023

## **Another good customer Lost**

We have been regular customers at this pub over the years & always had good service and meals . . . until yesterday (Tuesday) lunchtime. You expect three things when you enter a restaurant: to be given a table, a menu & offered drinks. So we were given a table in full sight of the lady in charge and were then ignored for ten minutes, at which point we got up and left. As we left, the lady offered the excuse that there was a problem with the gas in the kitchen.

Reviewed : 05 May 2023

## **UNTRUSTWORTHY STAFF**

Stayed in this hotel for 2 nights for a friends wedding. When I checked out Saturday

phoned the hotel straight away to inform them as cleaners had not yet been to my room to clean. A lady on reception told me they would go to the room to retrieve the items and call me back to arrange posting. I received a phone call over 24 hours later on Sunday evening to say that none of my items were found.

## TWATS OF BLACKBURN REVIEWS FORM

Your Full Name

Valid Email Address

Your Review

If you have any comments concerning thwaites and feel strongly enough to air your views please fill in this form and we will publish them in the Latest Reviews section above, and please be assured all comments will be dealt with anonymously when requested.

7 7 6 9 1

Type Security Code Here

Submit

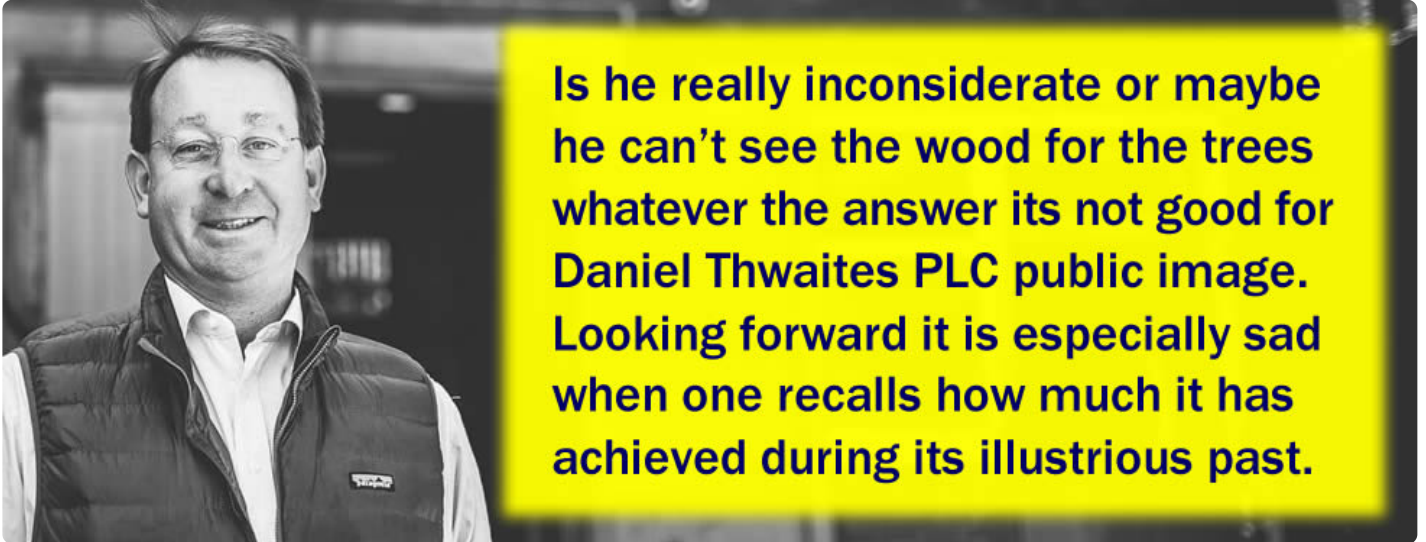
The following phrases are examples of what people type into search engines such as Ask, Bing, Google, Yahoo, Dogpile, DuckDuckGo, Wow and Yandex when searching for Blackburn Twats. To check them out click on your chosen search engine links below :

BLACKBURN - [GOOGLE](#) TWATS OF BLACKBURN - [YAHOO](#)

# WHAT A TWAT

RICK BAILEY

THWAITES PLC NEGLIGENCE DANIEL THWAITES PLC PUBLICLY DISGRACED D/



NEITHER SHAREHOLDERS NOR DIRECTORS WILL APPRECIATE BEING ASSOCIATED WITH THIS SITE BUT THEY CAN THANK RICK BAILEY FOR THIS BECAUSE HE IS RESPONSIBLE FOR EVADING PAYMENT OF OUTSTANDING DEBTS STRETCHING BACK TO 2020.

THWAITES RICK BAILEY THWAITES TWATS TWATS OF BLACKBURN

## On the 9 March 2022

Daniel Thwaites PLC defaulted on payment of 5 outatanding invoices which amounted to **£1,045** and unfortunately Rick Bailey became involved in this dispute and his ill considered response triggered a

By using our services you agree to our use of cookies [Accept all Cookies](#) [Read Privacy Policy](#)

Creditor which in turn created more overdue invoices and consequentially even more Default notices. This pattern of events continued until some months later when Daniel Thwaites main shareholder encouraged Rick Bailey to contact the Creditor with a view to settling the dispute.

## On the 17 May 2022

Rick Bailey phoned the Creditor but at the start of their discussion the Creditor insisted that Thwaites had to pay all 25 overdue invoices that amounted to **£11,550** before negotiations leading to settlement could take place, Richard Bailey countered by saying he couldn't accept that condition and consequently this opportunity ended in failure.

Following on from that phone call the Creditor faced the inevitable conclusion that Rick Bailey was clearly unconcerned about the effect these Default notices were having on Thwaites reputation. So it was a little later in **June 2022** that the Creditor decided the current style of Default notice was not fit for purpose and therefore would require a complete rethink. But first he needed to carry out a lot of research about Daniel Thwaites from its origins up to the present day and the more he investigated the more useful and relevant data was uncovered.

Sometime later the Creditor discovered that in 2014 Thwaites was made the laughing stock of Blackburn when unhappy brewery workers

that THWAITES was changed to TWATS. Furthermore when the national press got hold of the story it went nationwide and this was quickly followed by social media which helped promote it worldwide. It later transpired that Rick Bailey played a pivotal role in this nightmare scenario because he was their Chief Executive at the time. This discovery encouraged the Creditor to carry on the research for a couple of months longer and it was well worthwhile.

With all this additional data in place the Creditor set about introducing a completely new Default notice that would prove to be much more effective in future. This was a massive undertaking for a 1 man outfit and in **August 2022** the Creditor began to work longer and longer hours and more often than not seven days a week, it was really demanding work and this meant routinely starting at 5am on most days.

Eventually after months of hard work the new Default notice started to take shape and it had so much potential that it was no longer hard work and the final result was a reward in itself particularly when he paid homage to the ingenuity of those brewery workers when he specifically integrated their original idea into some of the new designs.

Following on from this the Creditor decided to develop an innovative network of some 200 pages that would incorporate the new Default notices with the specific objective on focussing on Thwaites pubs,

development will hopefully cause Daniel Thwaites PLC's directors and shareholders to question the mentality of Rick Bailey's decision not to authorise payment of those 5 overdue invoices back in **March 2022**.

## At the beginning of November 2022

A comprehensive beta-testing period started for the new Default network that would last for a couple of months. In the meantime there was the little matter of invoicing Thwaites for all the hard work it entailed.

## At the beginning of January 2023

The Creditor launched the first of the new Default networks that also included 1,000's of backlinks targeting Thwaites most mischievous Default notices which incidentally are coloured to co-ordinate with its associated network. Naturally Blackburn was chosen as the location for the first network because it is where Daniel Thwaites headquarters are located nearby and Clitheroe, Lancaster and Settle quickly followed in close order.

## On the 8 February 2023

Nearly 12 months after the first Default notices started to appear on the Internet Rick Bailey contacted Daniel Thwaites lawyers (Addleshaw Goddard) and instructed them to launch a high court action citing the Creditor's company with the objective of petitioning

**6 March 2023** the Creditor responded to the solicitor's letter and at this juncture there were 41 outstanding invoices totalling **£71,175**.

## As of the 18 March 2023

The latest statement records the total outstanding invoices are **£85,255**

## Just a thought

Who knows maybe when Rick Bailey views this site he might reflect that during the past 12 months perhaps he should have been more proactive in curtailing the proliferation of so many sites designed to call into question Thwaites creditworthiness which still continues to harm its good name. But being the unmittigated twat he is, all he really cares about is his own self-importance.

## WHAT A TWAT MARKERS

To examine the map in fullscreen view - **click on the white square icon in the top right corner of the map**. In the event the **red markers** in the map are overlapping then click on the plus icon in the bottom right corner of the map until they are separated, click on the same markers to discover their Hotel / Pub title, address, phone number, email / website links plus an image.



**Thwaites  
Commercial Inn**



**Thwaites Union  
Arms**



**Thwaites The  
Gatehouse**



**Thwaites Inn On  
The Green**



By using our services you agree to our use of cookies

[Accept all Cookies](#)

[Read Privacy Policy](#)

Thwaites Hare and Hounds



Thwaites Judges Lodging



Thwaites Stones Roses Bar



Thwaites White Lion



Thwaites Lighthorseman



Thwaites Jacobs Well Inn



Thwaites Elephant Pub



Thwaites Lock Inn



Thwaites Rock Face



Thwaites Clothiers Arms



Thwaites Jacks Craft Ale House



Thwaites Stamford Arms



Thwaites Bush Inn



Thwaites Fox Tavern



Thwaites Saughall Pub



Thwaites Plough Inn



Thwaites Eagle and Crown



Thwaites Dale Inn



Thwaites The Little B



By using our services you agree to our use of cookies

[Accept all Cookies](#)

[Read Privacy Policy](#)

Thwaites Red Lion

Inn



Thwaites Rose and

Crown



Thwaites Shippons

Inn



Thwaites Corner Cupboard



Thwaites Ring O Bells



Thwaites Beechwood Pub



Thwaites White Lion Pub



Thwaites Wheatsheaf Pub



Thwaites Sportman Inn



Thwaites Druids Inn



Thwaites Blue Ball



Thwaites Old Horns Inn



Thwaites Griffin Pub



Thwaites Peacock Inn



Thwaites Ship Inn



Thwaites Parkgate Inn



Thwaites Old Queens Head



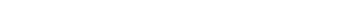
Thwaites Sportsmans Arms



Thwaites Barrel Pub



Thwaites Beverley



Thwaites Bridge Inn



Thwaites Broughton



Thwaites Travellers



By using our services you agree to our use of cookies

[Accept all Cookies](#)

[Read Privacy Policy](#)

## WHAT A TWAT LATEST REVIEWS

Reviewed : 25 Jul 2023

### **Overpriced and disappointing. Will not return**

The room was tired. cracked lamp shades, peeling paint and a gap around the door I could literally fit my hand down. I'm fairly certain it doesn't comply with fire regulations. Breakfast was served basically in the lobby. on arrival we waited to try even get in the car park, there was only 1 member of staff and after walking to reception then walking back to the car to gain entry we went to our room.

Reviewed : 22 Jul 2023

### **Good value for money**

Went for impromptu lunch. Excellent service. Food was lovely and very good value for money. I chose the scampi and changed the sides due to my foodie intolerances and this was accommodated without fuss. Staff very friendly.

Reviewed : 12 Jul 2023

### **I will never visit again**

I was very disappointed with food I had the turkey off the special board and it was the worst turkey I have ever had the sprouts where undercooked the parsnips where hard and the roast potatoes where hard I got a little pot of gravy which was tasteless the pig in blankets where pink and a little ring of stuffing it all was disgusting and I wasn't the only one who complained about there food around the table one even complained that much they got there money back im not one too complain so didn't

Reviewed : 24 Jun 2023

## **This is a Fawly Towers hotel without the wit**

This hotel entirely rests on its laurels due to the location. My room was incredibly noisy, small and massively overpriced. This is a Fawly Towers hotel and don't bother to complain because neither the staff nor Basil can handle it. Its all the customers fault.

Reviewed : 10 Jun 2023

## **Sunday lunch oh no!**

We have dined at this pub before but a few weeks ago had an awful meal. the pie was dreadful with what was the meat?! and the pastry was inedible .The vegetables were soggy & overcooked.the staff were nice. The price we paid for what we had was expensive! We wont be diniing here again.

Reviewed : 10 Jun 2023

## What a treat

After a couple recent positive visits for food and drinks I thought we could arrange a long awaited family get together to Celebrate so many missed special occasions over the last few months .. we decided to use the marquee area ( even though the rest of the pub take hygiene VERY seriously). Ben and Kerry suggested a buffet due to numbers, I even met with the chef to choose options ! Boy we were not disappointed.

Reviewed : 07 Jun 2023

## Bitter experience

It really pains me to write a bad review of this pub as I have supported this pub for over 20 years but the sourness of the landlady left an incredible bitter taste in my mouth and I will not set foot in here again. The landlady was behind the bar on arrival but did not acknowledge me or my family. On ordering food, the grumpiness with me and the staff from the landlady was noticeable. The table next to us was served before us despite ordering after us.

Reviewed : 19 May 2023

## Quite uncomfortable due to the freezing cold room

The room was freezing cold. We couldn't get the temperature above

was freezing , even with the heated towel rail on. The breakfast wasn't very hot. The receptionist took a note of the problems we had encountered but didn't really offer any apology.

## WHAT A TWAT REVIEWS FORM

Your Full Name

Valid Email Address

Your Review

If you have any comments concerning what a twat and feel strongly enough to air your views please fill in this form and we will publish them in the Latest Reviews section above, and please be assured all comments will be dealt with anonymously when requested.

8 2 9 3 7

Type Security Code

Submit

## WHAT A TWAT SEARCH ENGINE PHRASES :

The following phrases are examples of what people type into search engines such as Ask, Bing, Google, Yahoo, Dogpile, DuckDuckGo, Wow and Yandex when searching for Top twat at Thwaites. To check them out click on your chosen search engine links below :

NAT - [GOOGLE](#)    WHAT A TWAT - [YAHOO](#)

# DANIEL THWAITES PLC

PUBLICLY HUMILIATED

RICK BAILEY WHAT A TWAT    YERBURGH FAMILY IMPLICATED    TWATS HOTELS    TWATS INN



NOT ONLY HAS RICK BAILEY DAMAGED DANIEL THWAITES PLC REPUTATION BY HIS APPALLING BEHAVIOUR HE HAS BY ASSOCIATION ALSO IMPLICATED HIS IN-LAWS, THE YERBURGH FAMILY WHO HAPPEN TO BE ITS MAIN SHAREHOLDERS

DANIEL THWAITES PLC  
BLACKBURN

DANIEL THWAITES PLC  
DUPLICITY

DANIEL THWAITES PLC  
EXPOSED

DANIEL THWAITES PLC  
NEGLIGENCE

DANIEL THWAITES PLC  
PUBLICLY DISGRACED

DANIEL THWAITES PLC  
PUBLICLY SHAMED

## On the 14 April 2022

It all started to go badly wrong back in 2020, to be precise on the 3rd April when their Creditor emailed 2 invoices for payment covering the period 2020 -2021 to Daniel Thwaites PLC Headquarters in Blackburn. Sometime later when payment failed to arrive the Creditor phoned Thwaites Accounts Department and explained the failure to a female member of staff who insisted on saying the Harts Head Hotel in

therefore not responsible and despite protests to the contrary she quickly terminated the phone call.

Unfortunately around this period the Creditor was really busy and although Thwaites final reminder and Thwaites default notices were published on the Internet Thwaites slipped under the radar and it was not until some 12 months later when the Creditor similarly invoiced Daniel Thwaites for the period 2021 – 2022 that Thwaites defaulted on payment of these invoices as well. The Creditor was now determined not to let them get away with it this time, firstly by replacing the Harts Head Hotel website with a default notice, and secondly by publishing more final reminders and default notices elsewhere on the Internet naming Thwaites as the culprits.

A couple of months passed by and as soon as Daniel Thwaites PLC realised they were being humiliated and attracting unwanted attention they agreed to pay most of the outstanding invoices immediately. The Creditor agreed to accept their offer as the dispute had dragged on for a little over 12 months by now and it had been quite stressful. Their payment also included 2 annual invoices for the previous 12 months and the Creditor agreed to de-activate the 4 unpaid defaulter's notices on the proviso there would be no repeat of their failure to pay outstanding invoices by the due date in future.

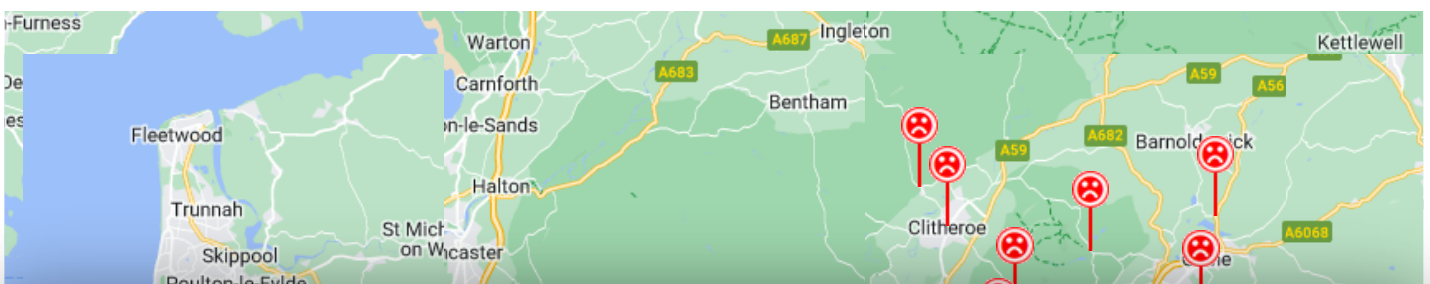
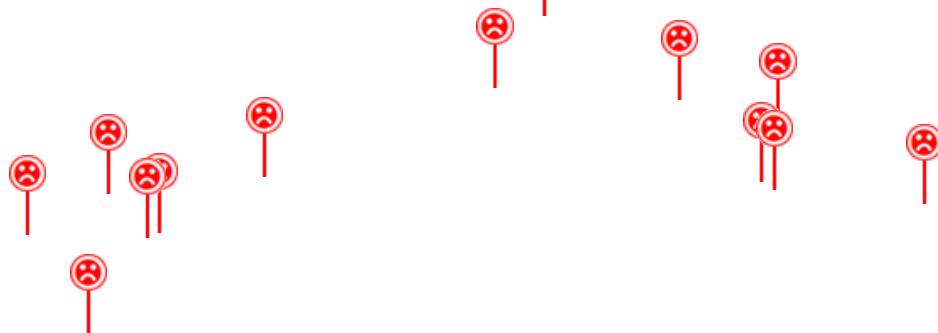
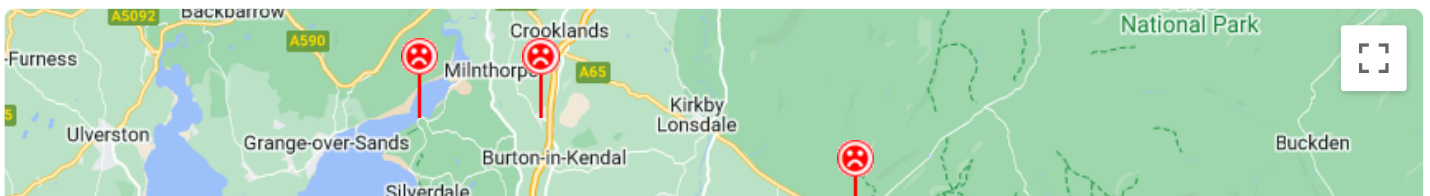
Sadly you can tell by looking at the number of **Unpaid** invoices below Daniel Thwaites are back to their old tricks but this time matters are a lot worse and it has mainly happened on Richard Bailey's watch who as Thwaites Executive Chairman must also be feeling humiliated by this scandal. It came about when the Creditor contacted him in mid March hoping that as a senior board member at Thwaites he would have their best interests at heart especially as there were just 7 outstanding invoices amounting to £2,090 and 3 defaulter's notices displayed on the Internet at this juncture but, things didn't work out as intended.

What actually happened was the Creditor wrote two open letters to Richard Bailey,

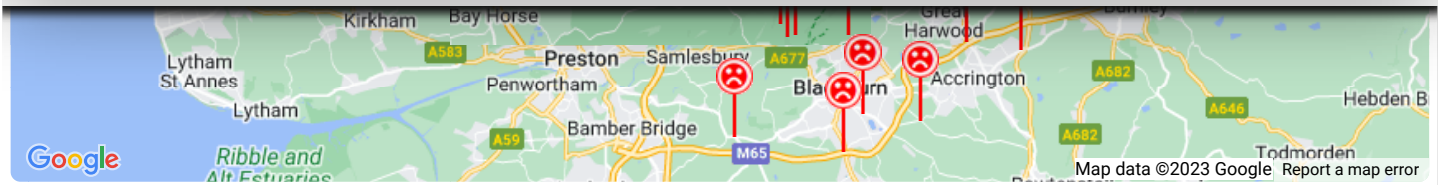
response was an email dated 15/03/2022 at 18:03, it was factually incorrect on several counts, ill thought out, and it all pointed to being a knee jerk reaction. As their Executive Chairman one would have thought that a thorough investigation was called for in these unusual circumstances rather than a quickly cobbled reply on the same day he read the open letter. Nevertheless, sometime later in the absence of a further response from Daniel Thwaites PLC it left the Creditor with little alternative but to carry on incorporating more default notices within Thwaites publicly humiliated network.

## DANIEL THWAITES PLC PUBLICLY HUMILIATED PUB MARKERS

To examine the map in fullscreen view - **click on the white square icon in the top right corner of the map.** In the event the **red markers** in the map are overlapping then click on the plus icon in the bottom right corner of the map until they are separated, click on the same markers to discover their Hotel / Pub title, address, phone number, email / website links plus an image.



By using our services you agree to our use of cookies [Accept all Cookies](#) [Read Privacy Policy](#)



[Daniel Thwaites PLC Golden Lion](#)



[Daniel Thwaites PLC Rishton Arms](#)



[Daniel Thwaites PLC No 4 Pub](#)



[Daniel Thwaites PLC Ivy Hill](#)



[Daniel Thwaites PLC Bonny Inn](#)



[Daniel Thwaites PLC Smithy Inn](#)



[Daniel Thwaites PLC Swan Pub](#)



[Daniel Thwaites PLC Craven Heifer](#)



[Daniel Thwaites PLC New Inn](#)



[Daniel Thwaites PLC White Hart Inn](#)



[Daniel Thwaites PLC Joiners Arms](#)



[Daniel Thwaites PLC Park Pub](#)



[Daniel Thwaites PLC Globe Inn](#)



[Daniel Thwaites PLC Sun Pub](#)



[Daniel Thwaites PLC George Pub](#)



[Daniel Thwaites PLC Queens Hotel](#)



By using our services you agree to our use of cookies [Accept all Cookies](#) [Read Privacy Policy](#)

[Daniel Thwaites PLC Duke of York](#)



[Daniel Thwaites PLC Sun Hotel](#)



[Daniel Thwaites PLC Dalton Arms](#)



[Daniel Thwaites PLC Traders Arms](#)



[Daniel Thwaites PLC White Bull](#)

[Daniel Thwaites PLC White Bull Inn](#)

[Daniel Thwaites PLC Queens Pub](#)

[Daniel Thwaites PLC Navigation Inn](#)



[Daniel Thwaites PLC Bay Horse](#)

[Daniel Thwaites PLC Griffins Head](#)

[Daniel Thwaites PLC Black Bull Pub](#)

[Daniel Thwaites PLC Saddle Inn](#)



[Daniel Thwaites PLC 3 Horse Shoes](#)

[Daniel Thwaites PLC Listers Arms](#)

[Daniel Thwaites PLC Crown Pub](#)

[Daniel Thwaites PLC Grey Horse](#)



[Daniel Thwaites PLC Smiths Inn](#)

[Daniel Thwaites PLC Crown Inn](#)

[Daniel Thwaites PLC Nellie Deans](#)

[Daniel Thwaites PLC Britannia Pub](#)



[Daniel Thwaites PLC Rock Inn](#)

[Daniel Thwaites PLC Ranken Arms](#)

[Daniel Thwaites PLC Royal Oak](#)

[Daniel Thwaites PLC Buck Inn](#)

By using our services you agree to our use of cookies [Accept all Cookies](#) [Read Privacy Policy](#)



[Daniel Thwaites PLC Royal Hotel](#)



[Daniel Thwaites PLC Gamecock Inn](#)



[Daniel Thwaites PLC Anchor Pub](#)



[Daniel Thwaites PLC Gateway Inn](#)



[Daniel Thwaites PLC Bridge Inn](#)



[Daniel Thwaites PLC Anglers Arms](#)



[Daniel Thwaites PLC Dog Inn](#)



[Daniel Thwaites PLC Grey Mare](#)



[Daniel Thwaites PLC Stork Hotel](#)



[Daniel Thwaites PLC White Lion](#)



[Daniel Thwaites PLC Station Pub](#)



[Daniel Thwaites PLC Craven Pub](#)



[Daniel Thwaites PLC Mill Hill](#)



[Daniel Thwaites PLC Black Bull](#)



[Daniel Thwaites PLC Brown Cow Inn](#)



[Daniel Thwaites PLC Kings Arms](#)



[Daniel Thwaites PLC Black Dog Inn](#)



[Daniel Thwaites PLC Havelock Inn](#)



[Daniel Thwaites PLC Pendle Inn](#)



[Daniel Thwaites PLC Harts Head](#)



[Daniel Thwaites PLC  
Millstone Pub](#)



[Daniel Thwaites PLC  
Howard Arms](#)



[Daniel Thwaites PLC  
Nabs Head](#)



[Daniel Thwaites PLC  
Royal Oak](#)



[Daniel Thwaites PLC  
Manor House](#)



[Daniel Thwaites PLC  
Crown Hotel](#)



[Daniel Thwaites PLC Toll  
House Inn](#)

## DANIEL THWAITES PLC PUBLICLY HUMILIATED LATEST REVIEWS

Reviewed : 27 Jul 2023

### Awful stay at the Cottons hotel

Dirty beds, ants and loud rooms. Over booked rooms (and keys to said rooms given out to multiple sets of guests!). Other guests starting fights and stealing. Items missing from food order at breakfast. This is NOT a four star hotel. I wouldn't stay again even if it were given to me for free. Sorry.

Reviewed : 27 Jul 2023

### I paid for 3 empty rooms out of 4 at the Cottons hotel

Unable to reclaim this expense at work, so I personally lost +£420. I was hoping for some professional interaction and understanding from the hotel but the first time I got silence and on the subsequent occasion, received a direct no at reception. Pretty sure a hotel such as Cottons could have survived without this additional revenue. Will not book any of my clients into Cottons hotel again and warn my colleagues to avoid this hotel.

Reviewed : 26 Jul 2023

## Aztetec hotel's spa is disgusting, it's cold

Both the pool and the saunas are cold and full of children going in and out of the saunas and leaving the door open, the jacuzzi is closed but they were letting the children in and out of it, as well as splashing water in the pool and yelling, and understand me, it's a spa, not a public pool.

Reviewed : 25 Jul 2023

## Mismanagement at the Aztec Hotel

We booked and paid for a signature family room, but when we opened the door, there were other people in the room. Quite embarrassing experience as obviously the room was double booked. Eventually we were given a standard double bed room and the sofa was turned into an extra bed for our son. There was no compensation.

Reviewed : 17 Jul 2023

## UNTRUSTWORTHY STAFF

Stayed in this hotel for 2 nights for a friends wedding. When I checked out Saturday morning I realised within 15 minutes that I had left my toiletries in the bathroom and phoned the hotel straight away to inform them as cleaners had not yet been to my room to clean. A lady on reception told me they would go to the room to retrieve the items and call me back to arrange posting. I received a phone call over 24 hours later on Sunday evening to say that none of my items were found.

Reviewed : 16 Jul 2023

## Christening what a mistake!

I had booked one of the rooms for my grandsons christening and the quality of the Buffett was very poor. For the money I had paid there was hardly enough food for my

last minute. I always give a second chance but I will never come here again. It's a shame as the hotel is lovely but the standard of service you would expect here is just not good enough.

Reviewed : 14 Jul 2023

### **Absolute rip-off**

£25 to check in early? £25 to check out later? Because I used Booking.com, I had to also pay £10 to use the spa facility, which i didn't, because you cant continue to use the spa after 11am on day of check out. Total con, and £17 for breakfast is truly obscene, I travelled alone but if your a family of 4 breakfast will set you back £68.00!!! Management obsessed with tricking customers out of anything they can. Pathetic actually. Plenty of other hotels in the area, use them instead.

Reviewed : 13 Jul 2023

### **This is a Fawly Towers hotel without the wit**

This hotel entirely rests on its laurels due to the location. My room was incredibly noisy, small and massively overpriced. This is a Fawly Towers hotel and don't bother to complain because neither the staff nor Basil can handle it. Its all the customers fault.

Reviewed : 09 Jul 2023

### **Thwaites hotels are awful.**

I booked two rooms to treat my Mum to a night away. We had our rooms beside each other & upon entrance of the room I was instantly disappointed. The decor & furnishings are so tired & dated, the walls had marks all over them in various places, the bathroom shower tiles are in serious need of new grouting & the marble sink is discolored & stained, not what I expect to see when paying for a 4 \* hotel! The bar service is a joke, waiting half an hour for our drinks to be brought over to us.

Reviewed : 08 Jul 2023

## Very disappointed. Not the hotel it used to be.

Most of staff were indifferent at best and miserable at worst. Had to chase tidying up and preparation of room every day. Public area toilets were in a poor state. Annoyed that a separate payment was required to use the pool in what is supposed to be a spa hotel. Service was slow. The hotel lacked any form of front of house leadership or motivation or support. Nothing made us feel like we would like to come to Cottons again

Reviewed : 06 Jul 2023

## Not a good experience

We ordered two meals. Scampi and chips and Hunters chicken with chips. After 20 minutes we were told they had no Scampi and was offered Fish goujons but in batter not breadcrumbs. Why tell us after 20 minutes ? And not after we had ordered. Surely the chef should know what he has in . Another 25 minutes of waiting, the food arrived . Only to have some Scampi on it and some fish goujons. Over cooked. Fries not chips. The Hunters chicken had way too much cheese on top.

## DANIEL THWAITES PLC PUBLICLY HUMILIATED REVIEWS FORM

Your Full Name

Valid Email Address

If you have any comments concerning Daniel Thwaites PLC publicly humiliated and feel strongly enough to air your views please fill in this form and we will publish them in the Latest Reviews section above, and please be assured all comments will be

Your Review

dealt with anonymously when requested.

4 1 8 3 7

Type Security Code Here

Submit

### DANIEL THWAITES PLC PUBLICLY HUMILIATED SEARCH ENGINE PHRASES :

The following phrases are examples of what people type into search engines such as Ask, Bing, Google, Yahoo, Dogpile, DuckDuckGo, Wow and Yandex when searching for Daniel Thwaites PLC publicly humiliated. To check them out click on your chosen search engine links below :

[BING](#) DANIEL THWAITES PLC PUBLICLY HUMILIATED - [GOOGLE](#) DANIEL THWAITES PLC PUB

**Barwhillanty Estate  
Parton  
Castle Douglas  
DG7 3NS**

**For the attention of Mrs Ann Yerburgh**

4th June 2022

Dear Mrs Yerburgh

Thank you for your response to my previous letter it is much appreciated.

I truly am sorry to be troubling you again but my latest encounter with Richard Bailey has left me with little alternative.

As a result of your recent intervention Richard Bailey emailed me on the 17/05/2022 see **ADDENDUM 1**.

On the 21/05/2022 I emailed him our counter proposal, see **ADDENDUM 2**.

Despite receiving my company's counter proposal only days earlier, Richard Bailey in an unscheduled call on the 27/05/2022 from his mobile just went into attack mode repeating the same allegations contained in his email of the 15/03/2022 see **ADDENDUM 3** concerning extortion, the police and instructing lawyers, those remarks were not credible then and they are even less credible now.

The phone call only lasted about 20 minutes or so, he simply blustered and ranted and a lot of what he said didn't make sense. Afterwards when I was thinking about what had occurred it struck me that perhaps he'd had a lot to drink the night before and was still suffering the effects. Whatever it was his communication skills were abysmal on that day and when he phones again the conversation will be recorded.

I realize of course he blames himself for misjudging my company's reaction back in March however had Andrew Buchanan not authorized Toni Naylor to coerce me into accepting £285 less than was due during her phone call to me on the 9<sup>th</sup> March the resultant network would never have existed.

My company's main objective back in March was to come up with a plan to encourage Thwaites to settle my company's outstanding invoices but that was thwarted by Richard Bailey's failure to intervene. So Web4orce had to adopt a strategy that would encourage Richard Bailey to think again.

Hence the reason Web4orce has invested so much of my time creating, developing and building this particular network that in recent weeks has switched the main focus of its attention to promoting Thwaites hotels and pub's bad reviews and to a great extent that is now nearing completion.

In the coming months all the major search engine's algorithms will continue to evaluate the network and Web4orce is confident they will follow Google's lead. When necessary we will tweak the code to maintain front page listings and of course publish customer's complaints as and when they are posted to the sites.

In the meantime, I have enclosed printouts of all outstanding invoices together with **ADDENDUM 4** an updated list of all 56 networked websites and **ADDENDUM 5** a sample of the latest search engine phrases that place the network at the top of Google. In the event you have an IT Department they will be able to confirm the positions in Google of each of the listed search phrases, and no doubt make further discoveries.

I can also confirm the following individual hotel websites have also recently appeared on the front page of Google for the following search phrases 'middletons hotel bad reviews' and 'kettering park hotel bad reviews'.

I sincerely hope for all our sakes that Thwaites leadership finally grasps the nettle and realises that failure to agree a negotiated settlement means the general public will soon become aware of the network. Thwaites intransigence back in March did not help matters and it still doesn't now. Thank you for your time.

Regards

A handwritten signature in black ink, appearing to read 'John Duggan', written in a cursive style.

John Duggan

Company Director

## **ADDENDUM 1 – Richard Bailey’s email dated 17/05/2022**

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

## **ADDENDUM 2 – John Duggan’s email dated 21/05/2022**

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](http://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.

### **ADDENDUM 3 – Richard Bailey’s email dated 15/03/2022**

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.

## ADDENDUM 4 – Thwaites latest network sites 56 in total

www.danielthwaites.richardbailey.01.2yu.uk  
www.danielthwaites.publiclydisgraced.2yu.uk  
www.danielthwaites.publiclyhumiliated.2yu.uk  
www.danielthwaites.publiclyshamed.2yu.uk  
www.danielthwaites.richardbailey.02.2yu.uk  
www.thwaites.bad.debtors.01.2yu.uk  
www.thwaites.bad.debtors.02.2yu.uk  
www.thwaites.bad.debtors.03.2yu.uk  
www.thwaites.bad.debtors.04.2yu.uk  
www.thwaites.bad.publicity.01.2yu.uk  
www.thwaites.bad.publicity.02.2yu.uk  
www.thwaites.bad.publicity.03.2yu.uk  
www.thwaites.bad.publicity.04.2yu.uk  
www.thwaites.bad.publicity.05.2yu.uk  
www.thwaites.bad.publicity.06.2yu.uk  
www.thwaites.bad.publicity.07.2yu.uk  
www.thwaites.bad.reputation.01.2yu.uk  
www.thwaites.bad.reputation.02.2yu.uk  
www.thwaites.bad.reputation.03.2yu.uk  
www.thwaites.bad.reputation.04.2yu.uk  
www.thwaites.bad.reputation.05.2yu.uk  
www.thwaites.bad.reputation.06.2yu.uk  
www.thwaites.bad.reputation.07.2yu.uk  
www.thwaiteshotels.badreviews.01.2yu.uk  
www.thwaiteshotels.badreviews.02.2yu.uk  
www.thwaiteshotels.badreviews.03.2yu.uk  
www.thwaiteshotels.badreviews.04.2yu.uk  
www.thwaitespubs.badreviews.01.2yu.uk  
www.thwaitespubs.badreviews.02.2yu.uk  
www.thwaitespubs.badreviews.03.2yu.uk  
www.thwaitespubs.badreviews.04.2yu.uk  
www.aztechotel.badreviews.2yu.uk  
www.beverleyarms.badreviews.2yu.uk  
www.cottonshotel.badreviews.2yu.uk  
www.crowninn.badreviews.2yu.uk  
www.fleececiirencester.badreviews.2yu.uk  
www.flyingelephantpub.badreviews.2yu.uk  
www.hareandhounds.badreviews.2yu.uk  
www.hollybushinndenford.badreviews.2yu.uk  
www.ketteringparkhotel.badreviews.2yu.uk  
www.langdalechase.badreviews.2yu.uk  
www.listerarmsmalham.badreviews.2yu.uk  
www.middletonshotel.badreviews.2yu.uk  
www.northlakeshotel.badreviews.2yu.uk  
www.roacheslockinn.badreviews.2yu.uk  
www.royaloakkeswick.badreviews.2yu.uk  
www.shoalhilltavern.badreviews.2yu.uk  
www.solenthotel.badreviews.2yu.uk  
www.sportsmaninnhayfield.badreviews.2yu.uk  
www.swanandcemetery.badreviews.2yu.uk  
www.thejudgeslodging.badreviews.2yu.uk  
www.millstoneatmellor.badreviews.2yu.uk  
www.redlionburnsall.badreviews.2yu.uk  
www.theroyaltheysham.badreviews.2yu.uk  
www.threehorseshoesingleton.badreviews.2yu.uk  
www.tollhouseinn.badreviews.2yu.uk

## **ADDENDUM 5 – Google Search Phrases**

This is a sample list of search engine phrases that when submitted to Google place Thwaites latest network at the very top of the first page.

daniel thwaites bad publicity	thwaites bad publicity
daniel thwaites bad reputation	thwaites bad reputation
daniel thwaites bad reviews	thwaites bad reviews
daniel thwaites bad debtors	thwaites bad debtors
daniel thwaites bad payers	thwaites bad payers
daniel thwaites pubs bad publicity	thwaites pubs bad publicity
daniel thwaites pubs bad reputation	thwaites pubs bad reputation
daniel thwaites pubs bad reviews	thwaites pubs bad reviews
daniel thwaites hotels bad publicity	thwaites hotels bad publicity
daniel thwaites hotels bad reputation	thwaites hotels bad reputation
daniel thwaites hotels bad reviews	thwaites hotels bad reviews
daniel thwaites publicly disgraced	thwaites publicly disgraced
daniel thwaites publicly humiliated	thwaites publicly humiliated
daniel thwaites publicly shamed	thwaites publicly shamed
kettering park hotel bad reviews	middletons hotel bad reviews

# 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: **2022-04-19**  
Invoice Number: **911 / 26890**  
Due Date: **2022-04-26**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26860</p> <p>The Very Late Payment clause triggered a Default Notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Default Notice 07</u></b></p> <p>Costs : £475.00</p> <p>To monitoring a mailbox set up to receive complaints posted by people wishing to air their grievances concerning</p> <p>To publishing these complaints within the above Default Notice</p> <p>Currently we have published complaints at a cost of £95.00 per complaint</p> <p>The current one off cost is £.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£475.00</p>
Total Cost:	£475.00

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

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

# 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: 2022-04-19  
Invoice Number: 911 / 26890  
Due Date: 2022-04-26

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26860</p> <p>The Very Late Payment clause triggered a Default Notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Default Notice 07</u></b></p> <p>Costs : £475.00</p> <p>To monitoring a mailbox set up to receive complaints posted by people wishing to air their grievances concerning</p> <p>To publishing these complaints within the above Default Notice</p> <p>Currently we have published complaints at a cost of £95.00 per complaint</p> <p>The current one off cost is £.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£475.00</p>

Total Cost:	£475.00
-------------	---------

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

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

# 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: **2022-04-19**  
Invoice Number: **910 / 26889**  
Due Date: **2022-04-26**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26859</p> <p>The Very Late Payment clause triggered a Default Notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Default Notice 06</u></b></p> <p>Costs : £475.00</p> <p>To monitoring a mailbox set up to receive complaints posted by people wishing to air their grievances concerning</p> <p>To publishing these complaints within the above Default Notice</p> <p>Currently we have published complaints at a cost of £95.00 per complaint</p> <p>The current one off cost is £.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£475.00</p>

Total Cost:	£475.00
-------------	---------

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

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

# 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: **2022-04-11**  
Invoice Number: **909 / 26888**  
Due Date: **2022-04-18**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26860</p> <p>The Late Payment clause triggered a Final Reminder notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Final Reminder 07</u></b></p> <p>Costs : £285.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£285.00</p>
<b>Total Cost:</b>	<b>£285.00</b>

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

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

# 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: **2022-04-11**  
 Invoice Number: **908 / 26887**  
 Due Date: **2022-04-18**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26859</p> <p>The Late Payment clause triggered a Final Reminder notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Final Reminder 06</u></b></p> <p>Costs : £285.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£285.00</p>
<b>Total Cost:</b>	<b>£285.00</b>

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

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

# 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: **2022-04-05**  
Invoice Number: **907 / 26886**  
Due Date: **2022-04-12**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26868</p> <p>The Very Late Payment clause triggered a Default Notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Default Notice 05</u></b></p> <p>Costs : £475.00</p> <p>To monitoring a mailbox set up to receive complaints posted by people wishing to air their grievances concerning</p> <p>To publishing these complaints within the above Default Notice</p> <p>Currently we have published complaints at a cost of £95.00 per complaint</p> <p>The current one off cost is £.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£475.00</p>
<b>Total Cost:</b>	<b>£475.00</b>

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

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

# 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: **2022-03-30**  
 Invoice Number: **906 / 26885**  
 Due Date: **2022-04-06**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26866</p> <p>The Very Late Payment clause triggered a Default Notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Default Notice 04</u></b></p> <p>Costs : £475.00</p> <p>To monitoring a mailbox set up to receive complaints posted by people wishing to air their grievances concerning</p> <p>To publishing these complaints within the above Default Notice</p> <p>Currently we have published complaints at a cost of £95.00 per complaint</p> <p>The current one off cost is £.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£475.00</p>
<b>Total Cost:</b>	<b>£475.00</b>

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

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

# 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: **2022-03-30**  
 Invoice Number: **905 / 26884**  
 Due Date: **2022-04-06**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26865</p> <p>The Very Late Payment clause triggered a Default Notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Default Notice 03</u></b></p> <p>Costs : £475.00</p> <p>To monitoring a mailbox set up to receive complaints posted by people wishing to air their grievances concerning</p> <p>To publishing these complaints within the above Default Notice</p> <p>Currently we have published complaints at a cost of £95.00 per complaint</p> <p>The current one off cost is £.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£475.00</p>
<b>Total Cost:</b>	<b>£475.00</b>

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

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

# 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: **2022-03-28**  
Invoice Number: **903 / 26876**  
Due Date: **2022-04-04**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26868</p> <p>The Late Payment clause triggered a Final Reminder notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Final Reminder 05</u></b></p> <p>Costs : £285.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£285.00</p>
<p><b>Total Cost:</b></p>	<p><b>£285.00</b></p>

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

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

# 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: **2022-03-22**  
 Invoice Number: **901 / 26875**  
 Due Date: **2022-03-29**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26866</p> <p>The Late Payment clause triggered a Final Reminder notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Final Reminder 04</u></b></p> <p>Costs : £285.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£285.00</p>
<b>Total Cost:</b>	<b>£285.00</b>

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

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

# 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: **2022-03-22**  
 Invoice Number: **900 / 26874**  
 Due Date: **2022-03-29**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26865</p> <p>The Late Payment clause triggered a Final Reminder notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Final Reminder 03</u></b></p> <p>Costs : £285.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£285.00</p>
<b>Total Cost:</b>	<b>£285.00</b>

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

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

# 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: **2022-03-25**  
 Invoice Number: **897 / 26869**  
 Due Date: **2022-04-01**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26861</p> <p>The Very Late Payment clause triggered a Default Notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Default Notice 02</u></b></p> <p>Costs : £475.00</p> <p>To monitoring a mailbox set up to receive complaints posted by people wishing to air their grievances concerning</p> <p>To publishing these complaints within the above Default Notice</p> <p>Currently we have published complaints at a cost of £95.00 per complaint</p> <p>The current one off cost is £.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£475.00</p>

Total Cost:	£475.00
-------------	---------

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

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

# 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><b><u>Richard Bailey 02</u></b></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>	<p>£570.00</p>

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](#)

# 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: **2022-03-17**  
Invoice Number: **894 / 26867**  
Due Date: **2022-03-24**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26861</p> <p>The Late Payment clause triggered a Final Reminder notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Final Reminder 02</u></b></p> <p>Costs : £285.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£285.00</p>

Total Cost:	£285.00
-------------	---------

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

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

# 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: **2022-03-14**  
 Invoice Number: **893 / 26866**  
 Due Date: **2022-03-21**

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><b><u>Richard Bailey 01</u></b></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>	<p>£570.00</p>
<b>Total Cost:</b>	<b>£570.00</b>

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

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

# 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: **2022-03-14**  
Invoice Number: **892 / 26865**  
Due Date: **2022-03-21**

Description	Cost
<p>For providing the following services :</p> <p>To costs incurred developing a more effective Defaulters network designed to publicise the shameful treatment being meted out to my company by Daniel Thwaites plc.</p> <p>The time involved was conservatively calculated to be a minimum of 24 hours and priced at £95 per hour or part thereof.</p> <p>Costs : £2,280.00</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>
<b>Total Cost:</b>	<b>£2280.00</b>

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

Close

Print Invoice

# 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: **2022-03-14**  
Invoice Number: **889 / 26862**  
Due Date: **2022-03-21**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26853</p> <p>The Very Late Payment clause triggered a Default Notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Default Notice 01</u></b></p> <p>Costs : £475.00</p> <p>To monitoring a mailbox set up to receive complaints posted by people wishing to air their grievances concerning Daniel Thwaites</p> <p>To publishing these complaints within the above Default Notice</p> <p>Currently we have published 0 complaints at a cost of £95.00 per complaint</p> <p>The current one off cost is £0.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£475.00</p>
<b>Total Cost:</b>	<b>£475.00</b>

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

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

# 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: **2022-03-09**  
 Invoice Number: **888 / 26861**  
 Due Date: **2022-03-16**

Description	Cost
<p>For providing the following services :</p> <p>To responding to phone calls and emails from Toni Naylor your Pub Marketing Manager on 08/03/2022. It was about outstanding invoices concerning the following domain names :</p> <p>hartsheadhotel.co.uk and hartsheadinn.co.uk</p> <p>The time involved was conservatively calculated to be between 2 and 3 hours and priced at £95 per hour or part thereof.</p> <p>Balance outstanding is £285.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£285.00</p>
<b>Total Cost:</b>	<b>£285.00</b>

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

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

# 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: **2022-04-03**  
Invoice Number: **772 / 26860**  
Due Date: **2022-04-10**

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: 2022-04-03 to 2023-04-02</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£95.00</p>
<b>Total Cost:</b>	<b>£95.00</b>

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

Close

Print Invoice

# 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: **2022-04-03**  
Invoice Number: **771 / 26859**  
Due Date: **2022-04-10**

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><a href="https://hartsheadhotel.co.uk">https://hartsheadhotel.co.uk</a></p> <p>Annual Cost: £95.00</p> <p>Period of Service: 2022-04-03 to 2023-04-02</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£95.00</p>
<b>Total Cost:</b>	<b>£95.00</b>

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

Close

Print Invoice

# 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: **2022-03-06**  
Invoice Number: **887 / 26855**  
Due Date: **2022-03-13**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26853</p> <p>The Late Payment clause triggered a Final Reminder notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Final Reminder 01</u></b></p> <p>Costs : £285.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£285.00</p>
<b>Total Cost:</b>	<b>£285.00</b>

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

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

# 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: **2022-02-15**  
 Invoice Number: **884 / 26853**  
 Due Date: **2022-02-22**

Description	Cost
<p>For providing the following services :</p> <p>To responding to a phone call and email from Toni Naylor your Pub Marketing Manager in January 2022. It was about the leasing arrangements concerning the following domain names :</p> <p>hartsheadhotel.co.uk and hartsheadinn.co.uk</p> <p>She also requested a copy of the agreement between Thwaites and Web4orce and despite our best efforts which involved our Accountants we did not find any such agreement. For what it is worth there was such an agreement with a previous owner of the Harts Head Hotel but we were not able to locate that either.</p> <p>The time involved was conservatively calculated to be between 2 and 3 hours and priced at £95 per hour or part thereof.</p> <p>Balance outstanding is £285.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£285.00</p>
<b>Total Cost:</b>	<b>£285.00</b>

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

# Invoice

## Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Harts Head Hotel**  
**Belle Hill, Giggleswick, Settle**  
**North Yorkshire BD24 0BA**

Invoice Date: **2020-06-10**  
Invoice Number: **183 / 26688**  
Due Date: **2020-06-17**

Description	Cost
<p>In accordance with our terms and conditions concerning Very Late Payments clause about Default Notices :</p> <p>To creating a specific Default Notice for Harts Head Hotel as follows :</p> <p><a href="https://www.thwaites.04.uk-hotel.org.uk">https://www.thwaites.04.uk-hotel.org.uk</a></p> <p>The one off cost is £465.00</p> <p>To monitoring a mailbox set up to receive complaints posted by people wishing to air their grievances concerning Harts Head Hotel</p> <p>To publishing these complaints within the above Default Notice</p> <p>Currently we have published 3 complaints at a cost of £95.00 per complaint</p> <p>The current one off cost is £285.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£750.00</p>
<b>Total Cost:</b>	<b>£750.00</b>

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

# Invoice

## Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Harts Head Hotel**  
**Belle Hill, Giggleswick, Settle**  
**North Yorkshire BD24 0BA**

Invoice Date: **2020-06-10**  
 Invoice Number: **182 / 26687**  
 Due Date: **2020-06-17**

Description	Cost
<p>In accordance with our terms and conditions concerning Very Late Payments clause about Default Notices :</p> <p>To creating a specific Default Notice for Harts Head Inn as follows :</p> <p><a href="https://www.thwaites.03.uk-hotel.org.uk">https://www.thwaites.03.uk-hotel.org.uk</a></p> <p>The one off cost is £465.00</p> <p>To monitoring a mailbox set up to receive complaints posted by people wishing to air their grievances concerning Harts Head Hotel</p> <p>To publishing these complaints within the above Default Notice</p> <p>Currently we have published 3 complaints at a cost of £95.00 per complaint</p> <p>The current one off cost is £285.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£750.00</p>
<b>Total Cost:</b>	<b>£750.00</b>

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

# Invoice

## Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Harts Head Hotel**  
**Belle Hill, Giggleswick, Settle**  
**North Yorkshire BD24 0BA**

Invoice Date: **2020-05-10**  
Invoice Number: **178 / 26681**  
Due Date: **2020-05-17**

Description	Cost
<p>In accordance with our terms and conditions concerning Late Payments clause about Final Reminder Notices :</p> <p>To creating a specific Final Reminder Notice for Harts Head Hotel as follows :</p> <p><a href="https://www.thwaites.02.uk-hotel.org.uk">https://www.thwaites.02.uk-hotel.org.uk</a></p> <p>The one off cost is £275.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£275.00</p>
<b>Total Cost:</b>	<b>£275.00</b>

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

# Invoice

## Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Harts Head Hotel**  
**Belle Hill, Giggleswick, Settle**  
**North Yorkshire BD24 0BA**

Invoice Date: **2020-05-10**  
Invoice Number: **177 / 26680**  
Due Date: **2020-05-17**

Description	Cost
<p>In accordance with our terms and conditions concerning Late Payments clause about Final Reminder Notices :</p> <p>To creating a specific Final Reminder Notice for Harts Head Hotel as follows :</p> <p><a href="https://www.thwaites.01.uk-hotel.org.uk">https://www.thwaites.01.uk-hotel.org.uk</a></p> <p>The one off cost is £275.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£275.00</p>
<b>Total Cost:</b>	<b>£275.00</b>

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

www.danielthwaites.richardbailey.01.2yu.uk  
www.danielthwaites.publiclydisgraced.2yu.uk  
www.danielthwaites.publiclyhumiliated.2yu.uk  
www.danielthwaites.publiclyshamed.2yu.uk  
www.danielthwaites.richardbailey.02.2yu.uk  
www.thwaites.bad.debtors.01.2yu.uk  
www.thwaites.bad.debtors.02.2yu.uk  
www.thwaites.bad.debtors.03.2yu.uk  
www.thwaites.bad.debtors.04.2yu.uk  
www.thwaites.bad.publicity.01.2yu.uk  
www.thwaites.bad.publicity.02.2yu.uk  
www.thwaites.bad.publicity.03.2yu.uk  
www.thwaites.bad.publicity.04.2yu.uk  
www.thwaites.bad.publicity.05.2yu.uk  
www.thwaites.bad.publicity.06.2yu.uk  
www.thwaites.bad.publicity.07.2yu.uk  
www.thwaites.bad.reputation.01.2yu.uk  
www.thwaites.bad.reputation.02.2yu.uk  
www.thwaites.bad.reputation.03.2yu.uk  
www.thwaites.bad.reputation.04.2yu.uk  
www.thwaites.bad.reputation.05.2yu.uk  
www.thwaites.bad.reputation.06.2yu.uk  
www.thwaites.bad.reputation.07.2yu.uk  
www.thwaiteshotels.badreviews.01.2yu.uk  
www.thwaiteshotels.badreviews.02.2yu.uk  
www.thwaiteshotels.badreviews.03.2yu.uk  
www.thwaiteshotels.badreviews.04.2yu.uk  
www.thwaitespubs.badreviews.01.2yu.uk

www.thwaitespubs.badreviews.02.2yu.uk  
www.thwaitespubs.badreviews.03.2yu.uk  
www.thwaitespubs.badreviews.04.2yu.uk  
www.aztechotel.badreviews.2yu.uk  
www.beverleyarms.badreviews.2yu.uk  
www.cottonshotel.badreviews.2yu.uk  
www.crowninn.badreviews.2yu.uk  
www.fleececiirencester.badreviews.2yu.uk  
www.flyingelephantpub.badreviews.2yu.uk  
www.hareandhounds.badreviews.2yu.uk  
www.hollybushinndenford.badreviews.2yu.uk  
www.ketteringparkhotel.badreviews.2yu.uk  
www.langdalechase.badreviews.2yu.uk  
www.listerarmsmalham.badreviews.2yu.uk  
www.middletonshotel.badreviews.2yu.uk  
www.northlakeshotel.badreviews.2yu.uk  
www.roacheslockinn.badreviews.2yu.uk  
www.royaloakkeswick.badreviews.2yu.uk  
www.shoalhilltavern.badreviews.2yu.uk  
www.solenthotel.badreviews.2yu.uk  
www.sportsmaninnhayfield.badreviews.2yu.uk  
www.swanandcemetery.badreviews.2yu.uk  
www.thejudgeslodging.badreviews.2yu.uk  
www.millstoneatmellor.badreviews.2yu.uk  
www.redlionburnsall.badreviews.2yu.uk  
www.theroyaltheysham.badreviews.2yu.uk  
www.threehorseshoesingleton.badreviews.2yu.uk  
www.tollhouseinn.badreviews.2yu.uk

## Thwaites network phrases at the top of Google

daniel thwaites bad publicity	thwaites bad publicity
daniel thwaites bad reputation	thwaites bad reputation
daniel thwaites bad reviews	thwaites bad reviews
daniel thwaites bad debtors	thwaites bad debtors
daniel thwaites bad payers	thwaites bad payers
daniel thwaites pubs bad publicity	thwaites pubs bad publicity
daniel thwaites pubs bad reputation	thwaites pubs bad reputation
daniel thwaites pubs bad reviews	thwaites pubs bad reviews
daniel thwaites hotels bad publicity	thwaites hotels bad publicity
daniel thwaites hotels bad reputation	thwaites hotels bad reputation
daniel thwaites hotels bad reviews	thwaites hotels bad reviews
daniel thwaites publicly disgraced	thwaites publicly disgraced
daniel thwaites publicly humiliated	thwaites publicly humiliated
daniel thwaites publicly shamed	thwaites publicly shamed

Our reference 106795-23

8 February 2023

Web4orce Limited  
Aireside House  
Royd Ings Avenue  
Keighley, West Yorkshire  
BD21 4BZ

***By registered post***

**LETTER BEFORE CLAIM**

**Our client: Daniel Thwaites plc**

- 1 We act for Daniel Thwaites plc ("**Thwaites**") in relation to a payment dispute with Web4orce Limited ("**you**" or "**WL**"), and related matters, arising from allegedly unpaid invoices pertaining to the Harts Head Hotel and services allegedly provided by WL.
- 2 This letter is being sent to you in accordance with the Practice Direction on Pre-action Conduct and Protocols (the "**PDPAC**") contained in the Civil Procedure Rules (CPR). In particular, we refer to paragraphs 13 to 16 of the PDPAC concerning the Court's powers to impose sanctions for failing to comply with its provisions. Ignoring this letter may lead to proceedings being commenced against you without further notice and may increase your liability for costs.
- 3 **We suggest that you take urgent independent legal advice.** If you have instructed solicitors, please provide their details so that we may write directly to them.

**Thwaites' Claim**

- 4 WL alleges that Thwaites is obliged to pay 30 invoices totalling £19,625, as set out in Part A of the Appendix hereto (the "**Disputed Invoices**"). Thwaites does not accept that it is obliged to pay the Disputed Invoices, for at least the following reasons:
  - (a) No contractual basis has ever been identified by or on behalf of WL for the invoices purportedly rendered. Indeed, by email on 21 January 2022 it was acknowledged on behalf of WL (by its sole director, Martin John Duggan – "**Mr Duggan**") that "[a]fter extensive research there does not appear to be any formal agreement between [Thwaites] and [WL]".
  - (b) No particulars have ever been provided by or on behalf of WL as to how it is alleged, if indeed it is alleged, that a contract was concluded informally between Thwaites and WL. It is highly unlikely that any such contract exists. WL provided services to a business which

Addleshaw Goddard LLP, 3 Sovereign Square, Sovereign Street, Leeds LS1 4ER  
Tel +44 (0)113 209 2000 Fax +44 (0)113 209 2060 DX 12004 Leeds  
www.addleshawgoddard.com

Addleshaw Goddard LLP is a limited liability partnership registered in England and Wales (with registered number OC318149) and is authorised and regulated by the Solicitors Regulation Authority (with authorisation number 440721) and the Law Society of Scotland. A list of members is open to inspection at our registered office, Milton Gate, 60 Chiswell Street, London EC1Y 4AG. The term partner refers to any individual who is a member of any Addleshaw Goddard entity or association or an employee or consultant with equivalent standing, their experience and/or qualifications.

formerly operated at the Harts Head Hotel. Thwaites bought the property, not any going-concern business (whether trading as an incorporated entity or otherwise), out of administration on 1 March 2020. This appears to have been recognised by WL because, prior to Thwaites' Toni Naylor contacting WL to request details of certain invoices, WL addressed its invoices to the "*Harts Head Hotel*" and not to Thwaites. Besides paying, without prejudice to its position that it was not contractually obliged to do so, certain invoices addressed by WL to "*Harts Head Hotel*" (as set out in Part B of the Appendix hereto), Thwaites has had no commercial dealings with WL (besides the present dispute) which could have given rise to any binding contractual relationship.

- (c) Over half of the Disputed Invoices purportedly rendered by WL, by both value (£13,300 out of £19,625) and by number (18 out of 30), are expressly late payment charges in respect of earlier invoices. Again, no contractual basis has ever been explained by or on behalf of WL as to how any right to levy such charges arises, even if the earlier invoices were lawfully rendered (which, for the reasons set out in the preceding sub-paragraphs, they were not).
- (d) As to the balance:
  - (i) 5 out of 12 relate to the creation of default notices, payment reminders or correspondence / telephone discussions with Thwaites concerning allegedly unpaid invoices. Although each such invoice is described on its face as being raised "[i]n accordance with our terms and conditions...", no such terms and conditions have ever been successfully incorporated into a binding contract between Thwaites and WL as set out above and therefore WL is not entitled to levy any such charges;
  - (ii) A further 5 out of 12 invoices relate to steps taken by or on behalf of WL to create web pages or other public notices with the express intention of bullying Thwaites into meeting WL's demands. Mr Duggan was threateningly transparent about his intention to apply illegitimate commercial pressure to Thwaites – in a letter dated 4 June 2022 he referred to having adopted "*a strategy that would encourage [Thwaites' management] to think again*"; and
  - (iii) The final 2 out of 12 invoices appear to relate to further charges relating to a period after Thwaites had made it clear it neither required nor authorised the relevant arrangements to be renewed – there was therefore absolutely no lawful basis for those invoices to be rendered to Thwaites.

5 Perhaps unsurprisingly, given Mr Duggan's expressly stated intentions, WL has hitherto taken no steps whatsoever legitimately to pursue any debt allegedly owed by Thwaites to WL. Instead it seems to prefer to continue deliberately to promulgate derogatory material about Thwaites and its management and to seek to render invoices purportedly payable by Thwaites in respect of the time spent doing so. In order to bring WL's campaign of harassment to an end, Thwaites intends to seek declaratory relief from the Court as to the absence of any lawful basis for the invoices rendered, and sums claimed, by WL.

### **Relevant documents**

6 We do not enclose any copy documents with this letter, because the documents on which Thwaites relies are all (i) in the public domain, (ii) created by WL, or (iii) correspondence passing between WL and Thwaites of which we assume you have retained copies. If you require copies of any correspondence referred to herein, we shall provide them on request.

- 7 Please provide to us, within 21 days of the date of this letter, a copy of the contractual terms between WL and Thwaites on which you purport to rely in raising the Disputed Invoices (which expressly on their face purport to be raised in accordance with such terms).
- 8 Thwaites' rights to seek further information and documents from WL in due course are reserved. Please confirm that WL will take proper and appropriate steps to ensure no relevant documents, including electronic documents, that are in WL's control, are altered, lost, destroyed or disposed of pursuant to paragraph 7 of CPR Practice Direction 31B.

### **Alternative Dispute Resolution**

- 9 We are instructed that Thwaites has on a number of occasions sought to reach an amicable resolution with WL in relation to the Disputed Invoices, but that such attempts have been unsuccessful. In the circumstances, and given that WL's ongoing conduct is in Mr Duggan's own admission deliberately designed to exert commercial pressure on Thwaites, there appears at this stage to be limited value in further attempts at alternative dispute resolution.
- 10 That being said, Thwaites remains open to exploring settlement, on a without prejudice basis, on the proviso that any discussions in this connexion are approached reasonably and constructively on behalf of WL. If you have any proposals to make, please set them out at your earliest convenience and in any event within 21 days of the date of this letter.

### **Action required**

- 11 Please confirm within 21 days of the date of this letter (namely by 1 March 2023) that WL accepts that it had no lawful basis for rendering the Disputed Invoices and therefore that (i) it is not entitled to payment in respect of the same, and (ii) there is no lawful basis for any further invoices to be rendered.
- 12 If WL does not accept these matters, please provide a full explanation of the legal and factual basis on which it resists them. In the absence of a full response within the timescales requested, we expect to be instructed to issue and serve proceedings without further notice seeking a declaration that neither Thwaites nor any of its affiliates is liable to WL in the amounts claimed by WL (or at all), and that WL has no legal basis to render any further invoices to Thwaites (or any of its affiliates).
- 13 All of Thwaites' rights are reserved in full. In particular, Thwaites' rights arising from or relating to the numerous derogatory web pages or other publicly displayed material which have been created by or at the instigation of WL and/or its officers and employees are expressly reserved.
- 14 As set out above, ignoring this letter may lead to our client starting proceedings against you and may increase your liability for costs.

Yours sincerely



### **Addleshaw Goddard LLP**

Direct line +44 (0)113 209 7595  
Email [gareth.jones@addleshawgoddard.com](mailto:gareth.jones@addleshawgoddard.com)

cc: Martin John Duggan (by email only to [john.duggan@web4orce.co.uk](mailto:john.duggan@web4orce.co.uk))

**APPENDIX****Part A**

Invoice Ref	Invoice Date	Date Paid	Invoice Amount (£)
920/26926	2023-01-23	-	1,140.00
919/26925	2023-01-23	-	1,140.00
918/26921	2022-12-02	-	2,280.00
917/26920	2022-11-30	-	3,420.00
916/26919	2022-11-29	-	95.00
911/26890	2022-04-19	-	475.00
910/26889	2022-04-26	-	475.00
909/26888	2022-04-11	-	285.00
908/26887	2022-04-11	-	285.00
907/26886	2022-04-05	-	475.00
906/26885	2022-03-30	-	475.00
905/26884	2022-03-30	-	475.00
903/26876	2022-03-28	-	285.00
901/26875	2022-03-22	-	285.00
900/26874	2022-03-22	-	285.00
897/26869	2022-03-25	-	475.00
896/26868	2022-03-20	-	570.00
894/26867	2022-03-17	-	285.00
893/26866	2022-03-14	-	570.00
892/26865	2022-03-14	-	2,280.00
889/26862	2022-03-14	-	475.00
888/26861	2022-03-09	-	285.00
772/26860	2022-04-03	-	95.00
771/26859	2022-04-03	-	95.00
887/26855	2022-03-06	-	285.00
884/26853	2022-02-15	-	285.00
183/26688	2020-06-10	-	750.00
182/26687	2020-06-10	-	750.00
178/26681	2020-05-10	-	275.00
177/26680	2020-05-10	-	275.00
<b>TOTAL</b>			<b>19,265.00</b>

**Part B**

Invoice Ref	Invoice Date	Date Paid	Invoice Amount (£)
856/26787	2021-06-15	2021-06-15	560.00
855/26786	2021-06-12	2021-06-15	275.00
772/26785	2021-04-03	2021-06-15	95.00
771/26784	2021-04-03	2021-06-15	95.00
854/26783	2021-04-01	2021-06-15	275.00
771/26766	2020-04-03	2021-06-15	95.00
772/26745	2020-04-03	2021-06-15	95.00
<b>TOTAL</b>			<b>1,490.00</b>

From: John Duggan <john.duggan@web4orce.co.uk>  
Sent: 06 March 2023 15:33  
To: Jones, Gareth  
Subject: 6 March 2023 : WL Response to your letter dated

---

Dear Mr Jones

RESPONSE TO ADDLESHAW GODDARD LETTER – dated 08 February 2023

This is to confirm receipt of your letter the content of which has been carefully noted.

My first reaction on reading your letter was one of satisfaction because the default notices have done their job by encouraging Thwaites to seek whatever legal options are available to bring our dispute to a final conclusion. Needless to say it would have been better if Thwaites had instructed your firm to act on their behalf some 12 months ago as they threatened to do in writing at the time as this would have saved the 84 year old defendant from a lot unwarranted stress and even more importantly unwarranted loss of his precious time. Of course it could be argued that is what Thwaites deliberately intended to happen knowing full well that every passing month would pile on the pressure even more.

After careful consideration and company funds being what they are WL cannot afford the luxury of employing solicitors and barristers in court therefore it has been decided that I will be acting as a Litigant in Person on behalf of WL. That being so it would be appreciated if you proceeded with your court action without further ado as the sooner this matter is resolved the quicker I can return to enjoying my retirement.

In answer to points raised in paragraph 4, WL takes issue with a number of them but this is best argued in court.

In answer to points raised in paragraph 5, WL developed a novel approach to recovering outstanding debts following a productive meeting in 2003 with Trading Standards. In the following 20 years WL has published countless default notices naming recalcitrant clients and consequently recovered £1,000's without ever having to go to court. In fact every solicitor employed by the said clients have threatened court action but so far it has never materialised opting instead to settle out of court.

#### Relevant Documents

It would be appreciated if you provided copies of all correspondence passing between Thwaites and WL but we do not require copies of invoices. The contractual terms between Thwaites and WL that we rely on are published on our website at [www.web4orce.com](http://www.web4orce.com).

#### Action required

WL does not accept the lawful basis laid out in paragraph 11 including items (i) and (ii) but again this is best argued in court.

From 3 April 2020 WL provided a service to Thwaites and it was in accordance with our terms and conditions as published on our website. The said service as requested by Thwaites has continued unabated until Thwaites sold the Harts Head hotel in 2022. Had Thwaites not been happy with the service or indeed with the conditions of service they should have voiced their concerns at the earliest opportunity but they never did. Thwaites Richard Bailey in a written allegation stated they had cancelled the contract but to date WL has not received any such cancellation that complied with our terms and conditions.

#### Out of Court Settlement Proposal

WL and Thwaites have been in this situation before, it occurred on 17 May 2022 and perhaps both parties can learn from that failed opportunity. If Richard Bailey will recall he phoned me on that occasion but at the start of our discussion I insisted that Thwaites had to pay all their outstanding invoices before negotiations leading to settlement could take

place, Richard Bailey countered by saying he couldn't accept that condition and as a consequence our first chance ended in failure.

Please note from WL's viewpoint this maybe our last chance so let's not waste it.

Therefore with that in mind and in the spirit of reconciliation whereby both parties behave in a reasonable and constructive manner WL will require :

1. Payment in full of all outstanding invoices, this is not open to negotiation.
2. £48,000 payment in compensation for unwarranted stress, this is open to negotiation.
3. £480,000 payment in compensation for unwarranted loss of my precious time, this is open to negotiation.

It should be noted that according to the 2023 life expectancy statistics for UK males this is 81.77 years which means I am already living on borrowed time and why WL places such a high value on it.

Action required

Please confirm within 21 days of this email (namely 27 March 2023) Thwaites response to WL's Out of Court settlement proposal.

On a note of caution

Earlier last month WL increased the fees it charges for my time and it is now set at £200 per hour. One other factor that should also be taken into consideration is that because of my advancing years everything takes a lot longer both to process and carry out especially since I stopped working full-time some 2 years ago.

Yours sincerely

John Duggan - Director  
Web4orce Limited

From: John Duggan <john.duggan@web4orce.co.uk>  
Sent: 18 April 2023 17:11  
To: Jones, Gareth  
Subject:

---

Dear Mr Jones

One of the advantages of launching so many default notices on the Internet is that it gives local people lots of opportunities to voice their concerns in relation to what has been published within these sites. Occasionally it can be a little unpleasant but more often it can be uplifting and sometimes of great benefit.

Not so long ago we uncovered some surprising evidence that concerns Daniel Thwaites PLC which suffice to say could not have come at a better time for my company. As a result it was decided to create the following site :

[www.addleshawgoddardinplainsight.2yu.uk](http://www.addleshawgoddardinplainsight.2yu.uk)

and a number of other sites hoping it will speed up the judicial process as I imagine the last thing your client will want is for their dirty washing to be aired in public any longer than necessary.

An unforeseen benefit is that solicitors are usually quite happy when clients deliberately prolong disputes as they are doing now. In order to apply pressure on their opponents as it often culminates in much higher fees. However perhaps in this particular scenario Addleshaw Goddard's senior partners won't mind too much if this dispute was resolved as quickly as possible.

As hinted earlier people can often be helpful but disenchanted ex employees are in a different league altogether. Consequently we now have evidence that your client Daniel Thwaites PLC is not only duplicitous but also negligent and it is our intention to make the public aware of this in due course. Even more importantly prima facie evidence (as shown in the above image) has recently been unearthed that confirms your client acknowledges the existence of a contract with our company as far back as 2020. Incidentally, that same contract is still in place today and your client is still benefitting from it financially even though the last time they paid for this service was 2021.

The following evidence proves that your client is profiting from the use of our domain name. If you click on the following underlined link :

[findapub.thwaites.co.uk/pubs-and-pub-finder/pubs/settle/harts-head](http://findapub.thwaites.co.uk/pubs-and-pub-finder/pubs/settle/harts-head)

Then scroll down until you see the red icon titled VISIT OUR WEBSITE and when you click on that icon you will discover it takes you to <https://hartsheadhotel.co.uk> and this proves your client is still gainfully making use of the service provided in Invoice No 26946 dated 03/04/2023. It should be added this does belie what Rick Bailey wrote in his email dated 15 March 2022 quote "we no longer require it and do not want it in the future".

Please confirm by email asap that Daniel Thwaites PLC will take proper and appropriate steps to ensure the above underlined link, that is in your client's control is not, altered, lost, destroyed or disposed of pursuant to paragraph 7 of CPR Practice Direction 31B.

Yours sincerely

John Duggan – Director

Web4orce Limited

# ADDLESHAW GODDARD

IN PLAIN SIGHT

TH LAKES HOTEL BAD REVIEWS    ROACHES LOCK INN BAD REVIEWS    ROYAL OAK BAD REVIEW

## ADDLESHAW GODDARD NOTE DEFENDING THE INDEFENSIBLE MEANS RESULT IS INEVITABLE



ADDLESHAW GODDARD  
DEFENDING THE  
INDEFENSIBLE

ADDLESHAW GODDARD  
REVIEWS

ADDLESHAW GODDARD  
VERSUS 84 YEAR OLD  
LITIGANT

DANIEL THWAITES PLC  
PUBLICLY DISGRACED

DANIEL THWAITES PLC  
PUBLICLY HUMILIATED

DANIEL THWAITES PLC  
PUBLICLY SHAMED

## ON THE 8 FEBRUARY 2023

LETTER BEFORE CLAIM.

Synopsis of Lawyer's letter.

Daniel Thwaites PLC's Rick Bailey acting as Executive Chairman & Chief Executive finally decided to instruct their lawyers Addleshaw Goddard, to launch a high court action citing their Creditors company alleging that Daniel Thwaites PLC is not obliged to pay the Creditor's invoices. The solicitor's letter was posted on the above date to the Creditor's registered office.

The main thrust of Thwaites argument is there was no contract between themselves and the Creditor's company and that being so there was no obligation to pay the said invoices.

The Creditor responded some 21 days later and as invited included a proposed Out of Court settlement offer.

## 8 JUNE 2023

The Creditor patiently waiting.

Addleshaw Goddard are one of UK's top international law firms and their head office is in London. In 2022 its global revenue was reported to be £377 million whilst profits topped £155 million and equity partner profits were around £690,000.

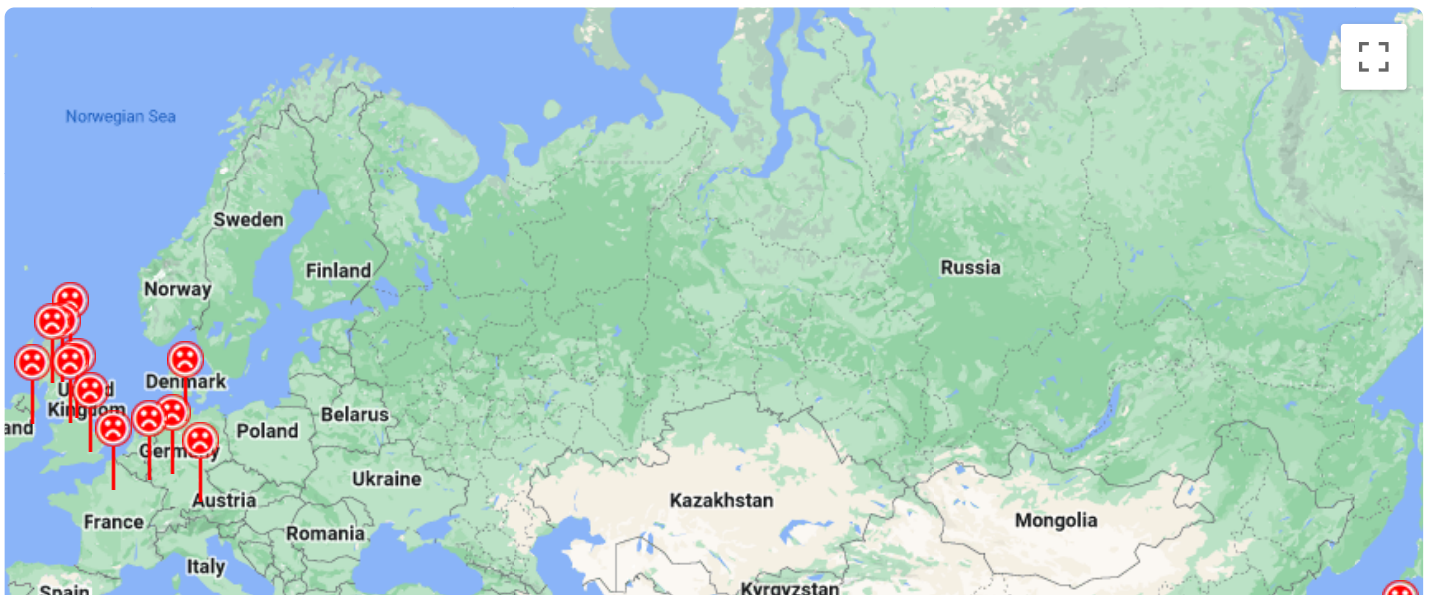
Clearly they are a very busy practice and one would have thought that once they accept instructions from a trusted client they would waste no time ensuring their lucrative fees commenced rolling in but, in this particular case 3 months has passed and its as quiet as a grave!

So with time on his hands the Creditor decided to investigate Addleshaw Goddard and publish a small network recording what he had discovered and so far and it has been most enlightening. One particular discovery was so heartbreaking it left the Creditor in tears and that is something that rarely happens. This event concerned a female lawyer who was employed by their parent organisation, Addleshaw Booth & Co and it is arguably the worst miscarriage of justice ever recorded in UK legal history concerning a lawyer when an English court handed down 2 life sentences for murder. Just over 3 years later her sentences were quashed by the Court of Appeal and she was released from prison. After her release, her husband said she would "never be well again" and sadly he proved to be right because just 4 years later at the age of 42 she died of alcoholic poisoning, though the coroner stressed that there was no evidence that she

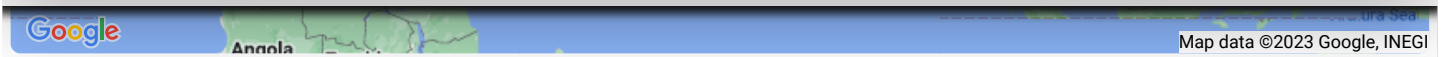
One might be forgiven for wondering why it is alleged that Addleshaw Goddard are 'Defending the Indefensible' well the answer is quite simple really. The Creditor maintains that AG's client Daniel Thwaites PLC doesn't have a leg to stand on in their dispute and perhaps the reason why they've not been in touch since February 2023?

### ADDLESHAW GODDARD OFFICE MARKERS

To examine the map in fullscreen view - **click on the white square icon in the top right corner of the map.** In the event the **red markers** in the map are overlapping then click on the plus icon in the bottom right corner of the map until they are separated, click on the same markers to discover Addleshaw Goddard office title, address, phone number, email / website links plus an image.



By using our services you agree to our use of cookies [Accept all Cookies](#) [Read Privacy Policy](#)



[Addleshaw Goddard Edinburgh](#)



[Addleshaw Goddard Doha](#)



[Addleshaw Goddard Dubai](#)



[Addleshaw Goddard Dublin](#)



[Addleshaw Goddard Edinburgh](#)



[Addleshaw Goddard Frankfurt](#)



[Addleshaw Goddard Glasgow](#)



[Addleshaw Goddard Hamburg](#)



[Addleshaw Goddard Leeds](#)



[Addleshaw Goddard London](#)



[Addleshaw Goddard Luxembourg](#)



[Addleshaw Goddard Manchester](#)



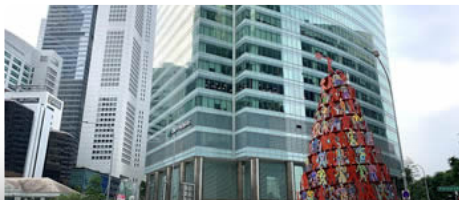
[Addleshaw Goddard Munich](#)



[Addleshaw Goddard Muscat](#)



[Addleshaw Goddard Paris](#)



By using our services you agree to our use of cookies [Accept all Cookies](#) [Read Privacy Policy](#)

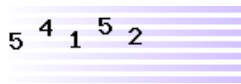
## ADDLESHAW GODDARD REVIEWS FORM

Your Full Name

Valid Email Address

Your Review

If you have any reviews concerning Addleshaw Goddard and feel strongly enough to air your views please fill in this form and we will publish them in the Latest Reviews section below, and please be assured all reviews will be dealt with anonymously when requested.



Type Security Code Here

Submit

## ADDLESHAW GODDARD LATEST REVIEWS

Reviewed : 23 Jul 2023

### **Addleshaw Goddard requires improvement**

Pros - Competitive salary, pleasant office location

Cons - Poor leadership, HR management and performance review processes, toxic culture.

Reviewed : 19 Jul 2023

### **Addleshaw Goddard worst decision I ever made.**

Pros - None. Potentially only the fact it was a 35 hour week

Cons - Clueless management. Bullying. A sense of no ownership is instilled throughout the IT department.

Reviewed : 19 Jul 2023

### **Made very difficult for you to get promoted at AG**

Pros - Decent work life balance and nice people

Cons - Very little perks. Salary below market.

Reviewed : 10 Jul 2023

### **Addleshaw Goddard high stress, little reward**

Pros - Good name to have on your CV for legal experience, exposure to technical work as you have a fair bit of responsibility from the start

Cons - Extremely high pressure and little training making the job very stressful, unrealistic targets, hierarchical culture, little reward or recognition for your work, very underpaid paralegals with absolutely no guarantee or encouragement of progression.

Reviewed : 07 Jul 2023

## **Worst experience of my career!**

Pros - Nice offices and friendly support staff

Cons - I consider myself a robust/resilient person. Egotistical partners who lack the ability to forward plan for resources and take it out on their staff. Uninspiring work. Disgruntled staff.

Reviewed : 29 Jun 2023

## **Standard big law firm.**

Pros - Decent money, partners are pretty approachable

Cons - Long hours, money doesn't make up for it, standard mid market issues.

Reviewed : 22 Jun 2023

## **Addleshaw Goddard Good Name, bad experience**

Pros - Having AG on your CV can open up a lot of doors in the industry

Cons - As a paralegal, your line manager is unqualified and rarely has a detailed enough knowledge of the work you undertake to provide you with relevant guidance. Paralegals are often used as mass admin for projects rather than given opportunities to gain knowledge.

Reviewed : 16 Jun 2023

## **Addleshaw Goddard nothing special**

Pros - Flexible working and good team

Cons - Poor salary and development opportunities.

Reviewed : 16 Jun 2023

## **Unhappy Paralegal at Addleshaw Goddard**

Pros - Good work, great resources and some good perks (parties, subsidies etc)

Cons - Promotions process is not done fairly and you can face resistance from TST leadership team if you try to expand your experience/do what is best for you.

Reviewed : 08 Jun 2023

## **No sense of self worth!**

Pros - Good clients and deals, not much else

Cons - People, hours, demands, rudeness.

Reviewed : 28 Apr 2023

## **Treat your staff with respect.**

Pros - Flexible working Salaries are on par Opportunities are available

Cons - Very Risk adverse. Segregation between Legal Tech and IT - they need to work together not apart. The firms needs to allow IT devise a technical strategy that underpins the capabilities of the firm, not Partners controlling.

Reviewed : 24 Mar 2023

## **Addleshaw Goddard More Cons than Pros!**

Pros - Achievable targets Managers are generally friendly and down to earth as are the people

Cons - Low pay and little chance of progression, dull and repetitive work unless you're passionate about PI.

Reviewed : 08 Mar 2023

## **Addleshaw Goddard badly run**

Pros - Does have nice people but they all seem to be leaving

Cons - Becoming a toxic place to work. Used to be flat structured across business services but now very hierarchical and just unpleasant. Passive aggressive HR clearly

## ADDLESHAW GODDARD IN PLAIN SIGHT AND SEARCH ENGINES

The following phrases are examples of what people type into search engines such as Ask, Bing, Google, Yahoo, Dogpile, DuckDuckGo, Wow and Yandex when searching for Addleshaw Goddard in plain sight. To check them out click on your chosen search engine links below :

ADDLESHAW GODDARD IN PLAIN SIGHT - [DOGPILE](#)    ADDLESHAW GODDARD IN PLAIN SIGHT

# Invoice



# Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: Hartshead Hotel  
Belle Hill, Giggleswick, Settle  
North Yorkshire, BD24 0BA

*Pd 15/6*

Invoice Date: 2020-04-03  
Invoice Number: 771 / 26766  
Due Date: 2020-04-17

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><a href="https://hartsheadhotel.co.uk">https://hartsheadhotel.co.uk</a></p> <p>Annual Cost: £95.00</p> <p>Period of Service: 2020-04-03 to 2021-04-02</p> <p><b>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</b></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

# Invoice



001807

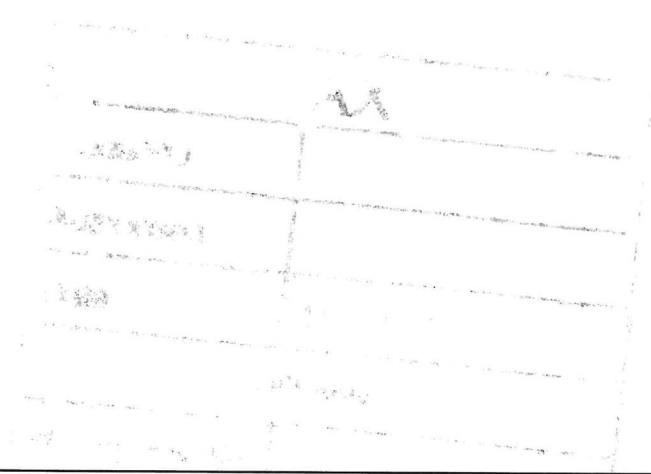
# Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: Hartshead Hotel  
 Belle Hill, Giggleswick, Settle  
 North Yorkshire, BD24 0BA

*Pa 15/6*

Invoice Date: 2020-04-03  
 Invoice Number: 772 / 26745  
 Due Date: 2020-04-17

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: 2020-04-03 to 2021-04-02</p> <p><b>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</b></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

# Invoice


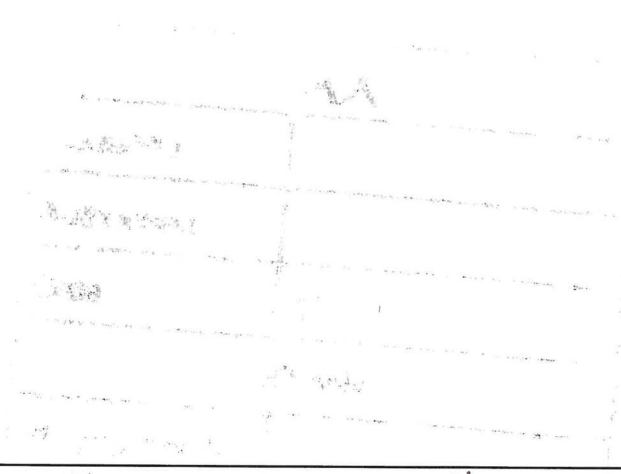
# Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: Hartshead Hotel  
Belle Hill, Giggleswick, Settle  
North Yorkshire, BD24 0BA

*Pa 15/6*

Invoice Date: 2021-04-03  
Invoice Number: 771 / 26784  
Due Date: 2021-04-17

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><a href="https://hartsheadhotel.co.uk">https://hartsheadhotel.co.uk</a></p> <p>Annual Cost: £95.00</p> <p>Period of Service: 2021-04-03 to 2022-04-02</p> <p><b>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</b></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

# Invoice



001807

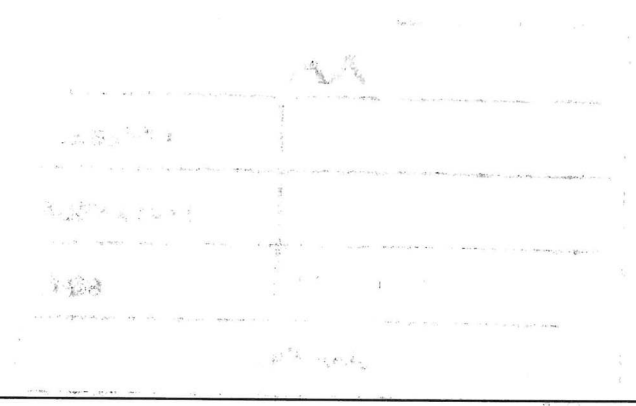
# Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Hartshead Hotel**  
 Belle Hill, Giggleswick, Settle  
 North Yorkshire, BD24 0BA

*Pa 15/6*

Invoice Date: 2021-04-03  
 Invoice Number: 772 / 26785  
 Due Date: 2021-04-17

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: 2021-04-03 to 2022-04-02</p> <p><b>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</b></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

# Invoice



# Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: Hartshead Hotel  
 Belle Hill, Giggleswick, Settle  
 North Yorkshire BD24 0BA

*pd 15/6*

Invoice Date: 2021-04-10  
 Invoice Number: 854 / 26783  
 Due Date: 2021-04-24

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>The following costs were incurred when email / website services in connection with</p> <p>Thwaites Plc were de-activated as a consequence of failure to pay outstanding invoices concerning Hartshead Inn</p> <p>In addition, to hosting and publishing a holding page at :</p> <p><a href="https://www.hartsheadinn.co.uk">https://www.hartsheadinn.co.uk</a></p> <p>Costs : £275.00</p> <p>This is a one off payment</p> <p><b>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</b></p>	<p>£275.00</p>
Total Cost:	£275.00

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

# Invoice



001807

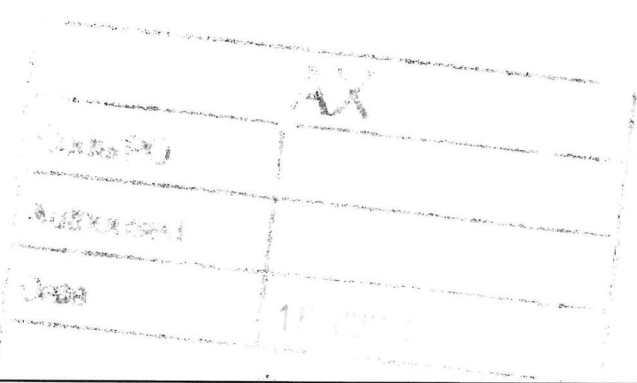
# Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: Hartshead Hotel  
Belle Hill, Giggleswick, Settle  
North Yorkshire BD24 0BA

*Pa 15/6*

Invoice Date: 2021-06-12  
Invoice Number: 855 / 26786  
Due Date: 2021-04-24

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>The following costs were incurred when email / website services in connection with</p> <p>Thwaites Plc were de-activated as a consequence of failure to pay outstanding invoices concerning Hartshead Hotel</p> <p>In addition, to hosting and publishing a holding page at : <a href="https://www.hartsheadhotel.co.uk">https://www.hartsheadhotel.co.uk</a></p> <p>Costs : £275.00</p> <p>This is a one off payment</p> <p><b>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</b></p> 	<p>£275.00</p>
Total Cost:	£275.00

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

Close

Print Invoice

*ea*

5286609

# Invoice



# Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: Hartshead Hotel  
Belle Hill, Giggleswick, Settle  
North Yorkshire BD24 0BA

Pd 1516

Invoice Date: 2021-06-15  
Invoice Number: 856 / 26787  
Due Date: 2021-06-04

Description	Cost						
<p>In accordance with our terms and conditions concerning Very Late Payments clause about Default Notices :</p> <p>To creating a specific Default Notice for Hartshead Hotel</p> <p>The one off cost is £465.00</p> <p>To monitoring a mailbox set up to receive complaints posted by people wishing to air their grievances concerning Hartshead Hotel</p> <p>To publishing the said complaints in date order and displaying them within the said Default Notice</p> <p>Currently we have published 1 complaint priced at £95.00 per complaint</p> <p>The one off cost is £95.00</p> <p><b>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</b></p> <div style="border: 1px solid black; padding: 5px; margin: 10px auto; width: fit-content;"> <p style="text-align: center; font-size: 2em;">AX</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Case No</td> <td></td> </tr> <tr> <td>Authorised</td> <td></td> </tr> <tr> <td>Date</td> <td style="text-align: center;">15 JUN 2021</td> </tr> </table> </div>	Case No		Authorised		Date	15 JUN 2021	£560.00
Case No							
Authorised							
Date	15 JUN 2021						
<b>Total Cost:</b>	<b>£560.00</b>						

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

RBS.  
Sort code 16-14-32 £1490  
Acc no 10036593

# Invoice

## Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Harts Head Hotel**  
**Belle Hill, Giggleswick, Settle**  
**North Yorkshire BD24 0BA**

Invoice Date: **2020-05-10**  
Invoice Number: **177 / 26680**  
Due Date: **2020-05-17**

Description	Cost
<p>In accordance with our terms and conditions concerning Late Payments clause about Final Reminder Notices :</p> <p>To creating a specific Final Reminder Notice for Harts Head Hotel as follows :</p> <p><a href="https://www.thwaites.01.uk-hotel.org.uk">https://www.thwaites.01.uk-hotel.org.uk</a></p> <p>The one off cost is £275.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£275.00</p>
<b>Total Cost:</b>	<b>£275.00</b>

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

# Invoice

## Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Harts Head Hotel**  
**Belle Hill, Giggleswick, Settle**  
**North Yorkshire BD24 0BA**

Invoice Date: **2020-05-10**  
Invoice Number: **178 / 26681**  
Due Date: **2020-05-17**

Description	Cost
<p>In accordance with our terms and conditions concerning Late Payments clause about Final Reminder Notices :</p> <p>To creating a specific Final Reminder Notice for Harts Head Hotel as follows :</p> <p><a href="https://www.thwaites.02.uk-hotel.org.uk">https://www.thwaites.02.uk-hotel.org.uk</a></p> <p>The one off cost is £275.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£275.00</p>
<b>Total Cost:</b>	<b>£275.00</b>

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

# Invoice

## Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Harts Head Hotel**  
**Belle Hill, Giggleswick, Settle**  
**North Yorkshire BD24 0BA**

Invoice Date: **2020-06-10**  
Invoice Number: **182 / 26687**  
Due Date: **2020-06-17**

Description	Cost
<p>In accordance with our terms and conditions concerning Very Late Payments clause about Default Notices :</p> <p>To creating a specific Default Notice for Harts Head Inn as follows :</p> <p><a href="https://www.thwaites.03.uk-hotel.org.uk">https://www.thwaites.03.uk-hotel.org.uk</a></p> <p>The one off cost is £465.00</p> <p>To monitoring a mailbox set up to receive complaints posted by people wishing to air their grievances concerning Harts Head Hotel</p> <p>To publishing these complaints within the above Default Notice</p> <p>Currently we have published 3 complaints at a cost of £95.00 per complaint</p> <p>The current one off cost is £285.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£750.00</p>
<b>Total Cost:</b>	<b>£750.00</b>

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

# Invoice

## Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Harts Head Hotel**  
**Belle Hill, Giggleswick, Settle**  
**North Yorkshire BD24 0BA**

Invoice Date: **2020-06-10**  
Invoice Number: **183 / 26688**  
Due Date: **2020-06-17**

Description	Cost
<p>In accordance with our terms and conditions concerning Very Late Payments clause about Default Notices :</p> <p>To creating a specific Default Notice for Harts Head Hotel as follows :</p> <p><a href="https://www.thwaites.04.uk-hotel.org.uk">https://www.thwaites.04.uk-hotel.org.uk</a></p> <p>The one off cost is £465.00</p> <p>To monitoring a mailbox set up to receive complaints posted by people wishing to air their grievances concerning Harts Head Hotel</p> <p>To publishing these complaints within the above Default Notice</p> <p>Currently we have published 3 complaints at a cost of £95.00 per complaint</p> <p>The current one off cost is £285.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£750.00</p>
<b>Total Cost:</b>	<b>£750.00</b>

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

# Invoice

## Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Hartshead Hotel**  
**Belle Hill, Giggleswick, Settle**  
**North Yorkshire BD24 0BA**

Invoice Date: **2022-02-15**  
 Invoice Number: **884 / 26853**  
 Due Date: **2022-02-22**

Description	Cost
<p>For providing the following services :</p> <p>To responding to a phone call and email from Toni Naylor your Pub Marketing Manager in January 2022. It was about the leasing arrangements concerning the following domain names :</p> <p>hartsheadhotel.co.uk and hartsheadinn.co.uk</p> <p>She also requested a copy of the agreement between Thwaites and Web4orce and despite our best efforts which involved our Accountants we did not find any such agreement. For what it is worth there was such an agreement with a previous owner of the Hartshead Hotel but we were not able to locate that either.</p> <p>The time involved was conservatively calculated to be between 2 and 3 hours and priced at £95 per hour or part thereof.</p> <p>Balance outstanding is £285.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£285.00</p>
<b>Total Cost:</b>	<b>£285.00</b>

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

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

# Invoice

## Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Hartshead Hotel**  
**Belle Hill, Giggleswick, Settle**  
**North Yorkshire BD24 0BA**

Invoice Date: **2022-03-06**  
 Invoice Number: **887 / 26855**  
 Due Date: **2021-03-13**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>The following costs were incurred when email / website services in connection with</p> <p>Hartshead Hotel were de-activated as a consequence of failure to pay outstanding invoice number 26853</p> <p>In addition, to hosting and publishing a holding page at :</p> <p><a href="http://www.hartsheadhotel.co.uk">http://www.hartsheadhotel.co.uk</a></p> <p>Costs : £285.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY. IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£285.00</p>

Total Cost:	£285.00
-------------	---------

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

# 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: **2022-04-03**  
 Invoice Number: **771 / 26859**  
 Due Date: **2022-04-10**

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><a href="https://hartsheadhotel.co.uk">https://hartsheadhotel.co.uk</a></p> <p>Annual Cost: £95.00</p> <p>Period of Service: 2022-04-03 to 2023-04-02</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£95.00</p>
<b>Total Cost:</b>	<b>£95.00</b>

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

# 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: **2022-04-03**  
Invoice Number: **772 / 26860**  
Due Date: **2022-04-10**

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: 2022-04-03 to 2023-04-02</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£95.00</p>
<b>Total Cost:</b>	<b>£95.00</b>

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

# Invoice

## Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Hartshead Hotel**  
**Belle Hill, Giggleswick, Settle**  
**North Yorkshire BD24 0BA**

Invoice Date: **2022-03-09**  
 Invoice Number: **888 / 26861**  
 Due Date: **2022-03-16**

Description	Cost
<p>For providing the following services :</p> <p>To responding to phone calls and emails from Toni Naylor your Pub Marketing Manager on 08/03/2022. It was about outstanding invoices concerning the following domain names :</p> <p>hartsheadhotel.co.uk and hartsheadinn.co.uk</p> <p>The time involved was conservatively calculated to be between 2 and 3 hours and priced at £95 per hour or part thereof.</p> <p>Balance outstanding is £285.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£285.00</p>
<b>Total Cost:</b>	<b>£285.00</b>

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

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

# 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: **2022-03-14**  
Invoice Number: **889 / 26862**  
Due Date: **2022-03-21**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26853</p> <p>The Very Late Payment clause triggered a Default Notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Default Notice 01</u></b></p> <p>Costs : £475.00</p> <p>To monitoring a mailbox set up to receive complaints posted by people wishing to air their grievances concerning Daniel Thwaites</p> <p>To publishing these complaints within the above Default Notice</p> <p>Currently we have published 0 complaints at a cost of £95.00 per complaint</p> <p>The current one off cost is £0.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£475.00</p>
<b>Total Cost:</b>	<b>£475.00</b>

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

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

# 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: **2022-03-14**  
Invoice Number: **892 / 26865**  
Due Date: **2022-03-21**

Description	Cost
<p>For providing the following services :</p> <p>To costs incurred developing a more effective Defaulters network designed to publicise the shameful treatment being meted out to my company by Daniel Thwaites plc. The first part of the network can be viewed at the following website address :</p> <p><a href="https://www.danielthwaites.default-notice.uk">https://www.danielthwaites.default-notice.uk</a></p> <p>The time involved was conservatively calculated to be a minimum of 24 hours and priced at £95 per hour or part thereof.</p> <p>Balance outstanding is £2,280.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£2280.00</p>
<b>Total Cost:</b>	<b>£2280.00</b>

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

# 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: **2022-03-14**  
Invoice Number: **893 / 26866**  
Due Date: **2022-03-21**

Description	Cost
<p>For providing the following services :</p> <p>To costs incurred developing a more effective Defaulters network designed to publicise the shameful treatment being meted out to my company by Daniel Thwaites plc. The second part of the network can be viewed at the following website address :</p> <p><a href="https://www.richardbailey.2yu.uk">https://www.richardbailey.2yu.uk</a></p> <p>The time involved was conservatively calculated to be a minimum of 6 hours and priced at £95 per hour or part thereof.</p> <p>Balance outstanding is £570.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£570.00</p>
<b>Total Cost:</b>	<b>£570.00</b>

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

# 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: **2022-03-14**  
Invoice Number: **892 / 26865**  
Due Date: **2022-03-21**

Description	Cost
<p>For providing the following services :</p> <p>To costs incurred developing a more effective Defaulters network designed to publicise the shameful treatment being meted out to my company by Daniel Thwaites plc.</p> <p>The time involved was conservatively calculated to be a minimum of 24 hours and priced at £95 per hour or part thereof.</p> <p>Costs : £2,280.00</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>
<b>Total Cost:</b>	<b>£2280.00</b>

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

# 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: **2022-03-14**  
 Invoice Number: **893 / 26866**  
 Due Date: **2022-03-21**

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><b><u>Richard Bailey 01</u></b></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>	<p>£570.00</p>
<b>Total Cost:</b>	<b>£570.00</b>

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

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

# 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: **2022-03-17**  
Invoice Number: **894 / 26867**  
Due Date: **2022-03-24**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26861</p> <p>The Late Payment clause triggered a Final Reminder notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Final Reminder 02</u></b></p> <p>Costs : £285.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£285.00</p>

Total Cost:	£285.00
-------------	---------

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

Close

Print Invoice

# 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><b><u>Richard Bailey 02</u></b></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>	<p>£570.00</p>

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](#)

# 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: **2022-03-25**  
 Invoice Number: **897 / 26869**  
 Due Date: **2022-04-01**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26861</p> <p>The Very Late Payment clause triggered a Default Notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Default Notice 02</u></b></p> <p>Costs : £475.00</p> <p>To monitoring a mailbox set up to receive complaints posted by people wishing to air their grievances concerning</p> <p>To publishing these complaints within the above Default Notice</p> <p>Currently we have published complaints at a cost of £95.00 per complaint</p> <p>The current one off cost is £.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£475.00</p>

Total Cost:	£475.00
-------------	---------

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

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

# 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: **2022-03-22**  
 Invoice Number: **900 / 26874**  
 Due Date: **2022-03-29**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26865</p> <p>The Late Payment clause triggered a Final Reminder notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Final Reminder 03</u></b></p> <p>Costs : £285.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£285.00</p>
<b>Total Cost:</b>	<b>£285.00</b>

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

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

# 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: **2022-03-22**  
 Invoice Number: **901 / 26875**  
 Due Date: **2022-03-29**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26866</p> <p>The Late Payment clause triggered a Final Reminder notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Final Reminder 04</u></b></p> <p>Costs : £285.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£285.00</p>
<b>Total Cost:</b>	<b>£285.00</b>

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

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

# 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: **2022-03-28**  
 Invoice Number: **903 / 26876**  
 Due Date: **2022-04-04**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26868</p> <p>The Late Payment clause triggered a Final Reminder notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Final Reminder 05</u></b></p> <p>Costs : £285.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£285.00</p>
<b>Total Cost:</b>	<b>£285.00</b>

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

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

# 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: **2022-03-30**  
 Invoice Number: **905 / 26884**  
 Due Date: **2022-04-06**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26865</p> <p>The Very Late Payment clause triggered a Default Notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Default Notice 03</u></b></p> <p>Costs : £475.00</p> <p>To monitoring a mailbox set up to receive complaints posted by people wishing to air their grievances concerning</p> <p>To publishing these complaints within the above Default Notice</p> <p>Currently we have published complaints at a cost of £95.00 per complaint</p> <p>The current one off cost is £.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£475.00</p>
<b>Total Cost:</b>	<b>£475.00</b>

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

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

# 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: **2022-03-30**  
 Invoice Number: **906 / 26885**  
 Due Date: **2022-04-06**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26866</p> <p>The Very Late Payment clause triggered a Default Notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Default Notice 04</u></b></p> <p>Costs : £475.00</p> <p>To monitoring a mailbox set up to receive complaints posted by people wishing to air their grievances concerning</p> <p>To publishing these complaints within the above Default Notice</p> <p>Currently we have published complaints at a cost of £95.00 per complaint</p> <p>The current one off cost is £.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£475.00</p>
<b>Total Cost:</b>	<b>£475.00</b>

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

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

# 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: **2022-04-05**  
Invoice Number: **907 / 26886**  
Due Date: **2022-04-12**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26868</p> <p>The Very Late Payment clause triggered a Default Notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Default Notice 05</u></b></p> <p>Costs : £475.00</p> <p>To monitoring a mailbox set up to receive complaints posted by people wishing to air their grievances concerning</p> <p>To publishing these complaints within the above Default Notice</p> <p>Currently we have published complaints at a cost of £95.00 per complaint</p> <p>The current one off cost is £.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£475.00</p>
<b>Total Cost:</b>	<b>£475.00</b>

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

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

# 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: **2022-04-11**  
 Invoice Number: **908 / 26887**  
 Due Date: **2022-04-18**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26859</p> <p>The Late Payment clause triggered a Final Reminder notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Final Reminder 06</u></b></p> <p>Costs : £285.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£285.00</p>
<b>Total Cost:</b>	<b>£285.00</b>

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

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

# 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: **2022-04-11**  
Invoice Number: **909 / 26888**  
Due Date: **2022-04-18**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26860</p> <p>The Late Payment clause triggered a Final Reminder notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Final Reminder 07</u></b></p> <p>Costs : £285.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£285.00</p>
<b>Total Cost:</b>	<b>£285.00</b>

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

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

# 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: **2022-04-19**  
Invoice Number: **910 / 26889**  
Due Date: **2022-04-26**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26859</p> <p>The Very Late Payment clause triggered a Default Notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Default Notice 06</u></b></p> <p>Costs : £475.00</p> <p>To monitoring a mailbox set up to receive complaints posted by people wishing to air their grievances concerning</p> <p>To publishing these complaints within the above Default Notice</p> <p>Currently we have published complaints at a cost of £95.00 per complaint</p> <p>The current one off cost is £.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£475.00</p>

Total Cost:	£475.00
-------------	---------

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

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

# 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: **2022-04-19**  
Invoice Number: **911 / 26890**  
Due Date: **2022-04-26**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>As a consequence of failure to pay an overdue invoice No : 26860</p> <p>The Very Late Payment clause triggered a Default Notice that has been published on the Internet and to check it out click below :</p> <p><b><u>Daniel Thwaites Default Notice 07</u></b></p> <p>Costs : £475.00</p> <p>To monitoring a mailbox set up to receive complaints posted by people wishing to air their grievances concerning</p> <p>To publishing these complaints within the above Default Notice</p> <p>Currently we have published complaints at a cost of £95.00 per complaint</p> <p>The current one off cost is £.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£475.00</p>
<b>Total Cost:</b>	<b>£475.00</b>

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

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

# Invoice 916/26919

# Invoice 917/26920

# Invoice 918/26921

# Invoice 919/26925

# Invoice 920/26926

**Archived:** 31 July 2023 12:20:09

**From:** [Web4orce](#)

**Mail received time:** Wed, 8 Mar 2023 21:37:19

**Sent:** Wed, 8 Mar 2023 21:37:05

**To:** [Hello; Accounts Payable](#)

**Subject:** Invoice from Web4orce - Inv No. 26939

**Sensitivity:** Normal

---

To view your latest invoice from Web4orce please make a note of the following User Name and Password:

Login details:

User Name: inv924

Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv924>

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

Thank you for your time.

The Web4orce Accounts Team  
-----

**Archived:** 31 July 2023 12:21:10

**From:** [Web4orce](#)

**Mail received time:** Wed, 8 Mar 2023 21:37:42

**Sent:** Wed, 8 Mar 2023 21:37:31

**To:** [Hello; Accounts Payable](#)

**Subject:** Invoice from Web4orce - Inv No. 26940

**Sensitivity:** Normal

---

To view your latest invoice from Web4orce please make a note of the following User Name and Password:

Login details:

User Name: inv925

Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv925>

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

Thank you for your time.

The Web4orce Accounts Team  
-----

---

**From:** Web4orce <john.duggan@web4orce.co.uk>  
**Sent:** 08 March 2023 21:38  
**To:** Hello; Accounts Payable  
**Subject:** Invoice from Web4orce - Inv No. 26941

To view your latest invoice from Web4orce please make a note of the following User Name and Password:

Login details:  
User Name: inv926  
Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv926>

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

Thank you for your time.

The Web4orce Accounts Team

---

---

**From:** Web4orce <john.duggan@web4orce.co.uk>  
**Sent:** 08 March 2023 21:38  
**To:** Hello; Accounts Payable  
**Subject:** Invoice from Web4orce - Inv No. 26942

To view your latest invoice from Web4orce please make a note of the following User Name and Password:

Login details:  
User Name: inv927  
Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv927>

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

Thank you for your time.

The Web4orce Accounts Team

---

---

**From:** Web4orce <john.duggan@web4orce.co.uk>  
**Sent:** 12 March 2023 16:15  
**To:** Hello; Accounts Payable  
**Subject:** Invoice from Web4orce - Inv No. 26947

To view your latest invoice from Web4orce please make a note of the following User Name and Password:

Login details:  
User Name: inv928  
Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv928>

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

Thank you for your time.

The Web4orce Accounts Team

---

---

**From:** Web4orce <john.duggan@web4orce.co.uk>  
**Sent:** 12 March 2023 16:16  
**To:** Hello; Accounts Payable  
**Subject:** Invoice from Web4orce - Inv No. 26948

To view your latest invoice from Web4orce please make a note of the following User Name and Password:

Login details:  
User Name: inv929  
Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv929>

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

Thank you for your time.

The Web4orce Accounts Team

---

---

**From:** Web4orce <john.duggan@web4orce.co.uk>  
**Sent:** 12 March 2023 16:17  
**To:** Hello; Accounts Payable  
**Subject:** Invoice from Web4orce - Inv No. 26949

To view your latest invoice from Web4orce please make a note of the following User Name and Password:

Login details:  
User Name: inv930  
Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv930>

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

Thank you for your time.

The Web4orce Accounts Team

---

---

**From:** Web4orce <john.duggan@web4orce.co.uk>  
**Sent:** 12 March 2023 16:16  
**To:** Hello; Accounts Payable  
**Subject:** Invoice from Web4orce - Inv No. 26950

To view your latest invoice from Web4orce please make a note of the following User Name and Password:

Login details:  
User Name: inv929  
Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv929>

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

Thank you for your time.

The Web4orce Accounts Team

---

---

**From:** Web4orce <john.duggan@web4orce.co.uk>  
**Sent:** 20 March 2023 21:00  
**To:** Hello; Accounts Payable  
**Subject:** Invoice from Web4orce - Inv No. 26951

To view your latest invoice from Web4orce please make a note of the following User Name and Password:

Login details:  
User Name: inv931  
Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv931>

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

Thank you for your time.

The Web4orce Accounts Team

---

---

**From:** Web4orce <john.duggan@web4orce.co.uk>  
**Sent:** 20 March 2023 21:00  
**To:** Hello; Accounts Payable  
**Subject:** Invoice from Web4orce - Inv No. 26952

To view your latest invoice from Web4orce please make a note of the following User Name and Password:

Login details:  
User Name: inv932  
Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv932>

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

Thank you for your time.

The Web4orce Accounts Team

---

**Archived:** 31 July 2023 12:23:35

**From:** [Web4orce](#)

**Mail received time:** Wed, 5 Apr 2023 20:51:52

**Sent:** Wed, 5 Apr 2023 20:51:32

**To:** [Hello; Accounts Payable](#)

**Subject:** Invoice from Web4orce - Inv No. 26959

**Sensitivity:** Normal

---

To view your latest invoice from Web4orce please make a note of the following User Name and Password:

Login details:

User Name: inv934

Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv934>

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

Thank you for your time.

The Web4orce Accounts Team  
-----

**Archived:** 31 July 2023 12:24:17

**From:** [Web4orce](#)

**Mail received time:** Wed, 5 Apr 2023 20:46:05

**Sent:** Wed, 5 Apr 2023 20:45:55

**To:** [Hello; Accounts Payable](#)

**Subject:** Invoice from Web4orce - Inv No. 26966

**Sensitivity:** Normal

---

To view your latest invoice from Web4orce please make a note of the following User Name and Password:

Login details:

User Name: inv928

Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv928>

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

Thank you for your time.

The Web4orce Accounts Team  
-----

**Archived:** 31 July 2023 12:24:35

**From:** [Web4orce](#)

**Mail received time:** Wed, 5 Apr 2023 20:55:33

**Sent:** Wed, 5 Apr 2023 20:45:56

**To:** [Hello; Accounts Payable](#)

**Subject:** Invoice from Web4orce - Inv No. 26967

**Sensitivity:** Normal

---

To view your latest invoice from Web4orce please make a note of the following User Name and Password:

Login details:

User Name: inv929

Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv929>

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

Thank you for your time.

The Web4orce Accounts Team  
-----

**From:** [Web4orce](#)

**Mail received time:** Wed, 8 Mar 2023 21:20:28

**Sent:** Wed, 8 Mar 2023 21:20:13

**To:** [Hello; Accounts Payable](#)

**Subject:** 2nd reminder from Web4orce - Inv No. 26937

**Sensitivity:** Normal

---

Accepting the fact that you may not have received our previous email please be aware that an invoice still remains unpaid.

To view your latest invoice firstly make a note of the following User Name and Password:

Login details:

User Name: inv923

Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv923>

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

Thank you for your time.

The Web4orce Accounts Team  
-----

**From:** [Web4orce](#)

**Mail received time:** Mon, 20 Mar 2023 17:19:13

**Sent:** Mon, 20 Mar 2023 17:19:04

**To:** [Hello; Accounts Payable](#)

**Subject:** 2nd reminder from Web4orce - Inv No. 26939

**Sensitivity:** Normal

---

Accepting the fact that you may not have received our previous email please be aware that an invoice still remains unpaid.

To view your latest invoice firstly make a note of the following User Name and Password:

Login details:

User Name: inv924

Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv924>

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

Thank you for your time.

The Web4orce Accounts Team  
-----

**From:** [Web4orce](#)

**Mail received time:** Mon, 20 Mar 2023 17:19:16

**Sent:** Mon, 20 Mar 2023 17:19:04

**To:** [Hello; Accounts Payable](#)

**Subject:** 2nd reminder from Web4orce - Inv No. 26940

**Sensitivity:** Normal

---

Accepting the fact that you may not have received our previous email please be aware that an invoice still remains unpaid.

To view your latest invoice firstly make a note of the following User Name and Password:

Login details:

User Name: inv925

Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv925>

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

Thank you for your time.

The Web4orce Accounts Team  
-----

**From:** [Web4orce](#)

**Mail received time:** Mon, 20 Mar 2023 17:19:14

**Sent:** Mon, 20 Mar 2023 17:19:04

**To:** [Hello; Accounts Payable](#)

**Subject:** 2nd reminder from Web4orce - Inv No. 26941

**Sensitivity:** Normal

---

Accepting the fact that you may not have received our previous email please be aware that an invoice still remains unpaid.

To view your latest invoice firstly make a note of the following User Name and Password:

Login details:

User Name: inv926

Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv926>

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

Thank you for your time.

The Web4orce Accounts Team  
-----

**From:** [Web4orce](#)

**Mail received time:** Mon, 20 Mar 2023 17:19:14

**Sent:** Mon, 20 Mar 2023 17:19:05

**To:** [Hello; Accounts Payable](#)

**Subject:** 2nd reminder from Web4orce - Inv No. 26942

**Sensitivity:** Normal

---

Accepting the fact that you may not have received our previous email please be aware that an invoice still remains unpaid.

To view your latest invoice firstly make a note of the following User Name and Password:

Login details:

User Name: inv927

Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv927>

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

Thank you for your time.

The Web4orce Accounts Team  
-----

**From:** [Web4orce](#)

**Mail received time:** Wed, 8 Mar 2023 21:20:23

**Sent:** Wed, 8 Mar 2023 21:20:12

**To:** [Hello; Accounts Payable](#)

**Subject:** 3rd reminder from Web4orce - Inv No. 26925

**Sensitivity:** Normal

---

This is our 3rd email reminding you that an invoice still remains unpaid, please attend to it asap.

To view your latest invoice firstly make a note of the following User Name and Password:

Login details:

User Name: inv919

Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv919>

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

Thank you for your time.

The Web4orce Accounts Team  
-----

**From:** [Web4orce](#)

**Mail received time:** Wed, 8 Mar 2023 21:20:24

**Sent:** Wed, 8 Mar 2023 21:20:13

**To:** [Hello; Accounts Payable](#)

**Subject:** 3rd reminder from Web4orce - Inv No. 26926

**Sensitivity:** Normal

---

This is our 3rd email reminding you that an invoice still remains unpaid, please attend to it asap.

To view your latest invoice firstly make a note of the following User Name and Password:

Login details:

User Name: inv920

Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv920>

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

Thank you for your time.

The Web4orce Accounts Team  
-----

**From:** [Web4orce](#)

**Mail received time:** Wed, 8 Mar 2023 21:20:23

**Sent:** Wed, 8 Mar 2023 21:20:13

**To:** [Hello; Accounts Payable](#)

**Subject:** 3rd reminder from Web4orce - Inv No. 26927

**Sensitivity:** Normal

---

This is our 3rd email reminding you that an invoice still remains unpaid, please attend to it asap.

To view your latest invoice firstly make a note of the following User Name and Password:

Login details:

User Name: inv921

Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv921>

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

Thank you for your time.

The Web4orce Accounts Team  
-----

**From:** [Web4orce](#)

**Mail received time:** Mon, 20 Mar 2023 17:19:16

**Sent:** Mon, 20 Mar 2023 17:19:03

**To:** [Hello; Accounts Payable](#)

**Subject:** 3rd reminder from Web4orce - Inv No. 26937

**Sensitivity:** Normal

---

This is our 3rd email reminding you that an invoice still remains unpaid, please attend to it asap.

To view your latest invoice firstly make a note of the following User Name and Password:

Login details:

User Name: inv923

Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv923>

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

Thank you for your time.

The Web4orce Accounts Team  
-----

**From:** [Web4orce](#)

**Mail received time:** Wed, 8 Mar 2023 21:20:20

**Sent:** Wed, 8 Mar 2023 21:20:11

**To:** [Hello; Accounts Payable](#)

**Subject:** Final reminder from Web4orce - Inv No. 26919

**Sensitivity:** Normal

---

Despite our best efforts, this is the 4th email reminding you that an invoice still remains unpaid. It is with regret therefore, that unless we hear from you within the next few days all email and website services will automatically be suspended without further notice.

Please be aware that if our company suspends your account, an additional cost will be incurred should you require it to be re-activated at some future date.

To view your latest invoice firstly make a note of the following User Name and Password:

Login details:

User Name: inv916

Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv916>

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

Thank you for your time.

The Web4orce Accounts Team  
-----

**From:** [Web4orce](#)

**Mail received time:** Wed, 8 Mar 2023 21:20:21

**Sent:** Wed, 8 Mar 2023 21:20:11

**To:** [Hello; Accounts Payable](#)

**Subject:** Final reminder from Web4orce - Inv No. 26920

**Sensitivity:** Normal

---

Despite our best efforts, this is the 4th email reminding you that an invoice still remains unpaid. It is with regret therefore, that unless we hear from you within the next few days all email and website services will automatically be suspended without further notice.

Please be aware that if our company suspends your account, an additional cost will be incurred should you require it to be re-activated at some future date.

To view your latest invoice firstly make a note of the following User Name and Password:

Login details:

User Name: inv917

Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv917>

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

Thank you for your time.

The Web4orce Accounts Team  
-----

**From:** [Web4orce](#)

**Mail received time:** Wed, 8 Mar 2023 21:20:24

**Sent:** Wed, 8 Mar 2023 21:20:12

**To:** [Hello; Accounts Payable](#)

**Subject:** Final reminder from Web4orce - Inv No. 26921

**Sensitivity:** Normal

---

Despite our best efforts, this is the 4th email reminding you that an invoice still remains unpaid. It is with regret therefore, that unless we hear from you within the next few days all email and website services will automatically be suspended without further notice.

Please be aware that if our company suspends your account, an additional cost will be incurred should you require it to be re-activated at some future date.

To view your latest invoice firstly make a note of the following User Name and Password:

Login details:

User Name: inv918

Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv918>

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

Thank you for your time.

The Web4orce Accounts Team  
-----

**From:** [Web4orce](#)

**Mail received time:** Mon, 20 Mar 2023 17:19:19

**Sent:** Mon, 20 Mar 2023 17:19:03

**To:** [Hello; Accounts Payable](#)

**Subject:** Final reminder from Web4orce - Inv No. 26925

**Sensitivity:** Normal

---

Despite our best efforts, this is the 4th email reminding you that an invoice still remains unpaid. It is with regret therefore, that unless we hear from you within the next few days all email and website services will automatically be suspended without further notice.

Please be aware that if our company suspends your account, an additional cost will be incurred should you require it to be re-activated at some future date.

To view your latest invoice firstly make a note of the following User Name and Password:

Login details:

User Name: inv919

Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv919>

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

Thank you for your time.

The Web4orce Accounts Team  
-----

**From:** [Web4orce](#)

**Mail received time:** Mon, 20 Mar 2023 17:19:16

**Sent:** Mon, 20 Mar 2023 17:19:03

**To:** [Hello; Accounts Payable](#)

**Subject:** Final reminder from Web4orce - Inv No. 26926

**Sensitivity:** Normal

---

Despite our best efforts, this is the 4th email reminding you that an invoice still remains unpaid. It is with regret therefore, that unless we hear from you within the next few days all email and website services will automatically be suspended without further notice.

Please be aware that if our company suspends your account, an additional cost will be incurred should you require it to be re-activated at some future date.

To view your latest invoice firstly make a note of the following User Name and Password:

Login details:

User Name: inv920

Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv920>

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

Thank you for your time.

The Web4orce Accounts Team  
-----

**From:** [Web4orce](#)

**Mail received time:** Mon, 20 Mar 2023 17:19:13

**Sent:** Mon, 20 Mar 2023 17:19:03

**To:** [Hello; Accounts Payable](#)

**Subject:** Final reminder from Web4orce - Inv No. 26927

**Sensitivity:** Normal

---

Despite our best efforts, this is the 4th email reminding you that an invoice still remains unpaid. It is with regret therefore, that unless we hear from you within the next few days all email and website services will automatically be suspended without further notice.

Please be aware that if our company suspends your account, an additional cost will be incurred should you require it to be re-activated at some future date.

To view your latest invoice firstly make a note of the following User Name and Password:

Login details:

User Name: inv921

Password: mJ9mQ33D

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv921>

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

Thank you for your time.

The Web4orce Accounts Team  
-----

Witness Statement on behalf of the Claimant

Witness: Toni Naylor

Number of Statement: 1

Exhibits: TN1

Date: 8 August 2023

**IN THE COUNTY COURT AT LEEDS**

**BUSINESS AND PROPERTY WORK**

**B E T W E E N:-**

**DANIEL THWAITES PLC**

**Claimant**

**And**

**WEB4ORCE LIMITED**

**Defendant**

---

**FIRST WITNESS STATEMENT OF  
TONI NAYLOR**

---

I, **TONI NAYLOR**, of Myerscough Road, Mellor Brook, Blackburn, Lancashire, England, BB2 7LB, wish to rely on the following evidence in support of this claim.

1. I am employed by the Claimant in the capacity of Pub Marketing Manager. I have been employed by the Claimant in this role since 4 September 2017.
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 and shown to me a paginated bundle of copy documents marked **TN1**. References appearing in square brackets are to pages within **TN1**.

4. This statement has been prepared by the Claimant's solicitors and counsel based on written instructions provided by me, email correspondence and telephone conversations. This statement was then reviewed by me prior to signature.

### **Overview**

5. I understand that Richard Bailey has produced a statement which details the Claimant's first interactions with the Defendant, which I was not involved in, and matters post-dating my involvement, as detailed below. Accordingly, this statement is limited to my personal dealings with the Defendant between January and March 2022.

### **January 2022**

6. On or around 11 January 2022, I telephoned the Defendant's director, Mr Duggan, to understand what service he was currently providing the Claimant. I asked him what we had paid him for, what our agreement with the Defendant was and whether we could purchase the URLs in question:

6.1. hartsheadhotel.co.uk; and

6.2. hartsheadinn.co.uk.

7. I explained that the reason why the Claimant was interested in purchasing the URLs was because we were in the process of arranging an alternative solution regarding the Harts Head Hotel's website. Unfortunately, Mr Duggan refused to answer any of my questions.
8. I subsequently followed up with the email appearing at [TN1 003]. I asked Mr Duggan to confirm that the two invoices attached (772/26785 [TN1 011] and 771/26784 [TN1 012]) related to leasing certain domains and redirecting them up until 2 April 2022.
9. On 21 January 2022, Mr Duggan responded with the email appearing at [TN1 004]. He confirmed that my understanding regarding the above-mentioned invoices was correct.

With regards the existence of any agreement between the Claimant and Defendant, Mr Duggan stated:

*“After extensive research there does not appear to be any formal agreement between Thwaites Plc and my company.”*

### **March 2022**

10. On 8 March 2022, I was informed by a colleague, Caroline Cockshott, that Mr Duggan had called her to discuss outstanding invoices relating to the Harts Head Hotel. Caroline asked Mr Duggan to forward her the invoices, which had apparently been sent to Jen Riley who no longer works for the Claimant. A link to an invoice was sent to Caroline the previous morning (7 March 2022) via the email at [TN1 007]. The link was not accessed due to security concerns.

11. It was discovered later that day that the Claimant had published the following message on the Harts Head Hotel’s website:

*“06/03/2022 - for the attention of Hartshead Hotel - invoice number : 26853 has missed the deadline for payment by the due date - hence the reason for this final reminder notice - to avoid further notices please ensure all outstanding invoices are paid before the 13/03/2022”*

12. I tried to contact Mr Duggan via telephone but received no answer. I then sent him the email at [TN1 006], in response to which Mr Duggan called me at 10:43 am. I asked Mr Duggan to send pdf copies of the invoices he had been chasing, which he agreed to. I went on to ask him what they related to. His response was that the first invoice, £285, was raised in response to the telephone conversation referred to above at §§6 and 7, “research” and emails. He added that a further sum, £285, had been charged because the payment deadline in respect of the first invoice had been missed.

13. I told Mr Duggan that we have not, at any time, been told we would be charged for calls nor had Mr Duggan made that clear during our first conversation. I went on to state that we did not have any agreement with the Defendant and that Mr Duggan had confirmed this

previously. He insisted that we were accountable to the terms and conditions on his website, without explaining his reasons for that assertion.

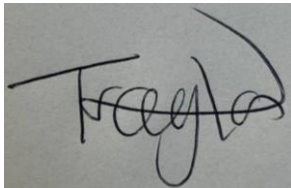
14. I followed the conversation with the email at [TN1 005], having first agreed with Andrew Buchanan that we would pay the two invoices on the condition that the above-mentioned notice would be removed and understanding that the URL lease would come to an end on 2 April 2022. Mr Duggan duly provided pdf copies of the invoices via the email at [TN1 005]. The invoices provided by Mr Duggan appear at [TN1 013 and TN1 014].
15. Shortly after receiving Mr Duggan's email, I sent him the email at [TN1 009] offering to make payment of the two invoices and confirming that we would not be renewing the URL leases with the Defendant.
16. In response to my email, Mr Duggan called me. He asked me why we would not be renewing with him. I reminded him that we had an alternative solution in place. I also stated that we would be willing to purchase the URLs from the Defendant. Mr Duggan refused to sell them. Mr Duggan stated that he did not think this was the right decision but agreed, nonetheless, that he would remove everything from the Harts Head Hotel website if the outstanding invoices were paid. He added that two further invoices were due which related to the renewal of the URLs leases. I reiterated, as I had previously, that we had no intention of renewing in April. In response, Mr Duggan argued that the invoices had already been raised and any cancellation should have been given in accordance with the terms on his website; which, for the avoidance of doubt, I have never seen, let alone agreed to.
17. Later that evening, Mr Duggan sent me the email at [TN1 009]. In addition to the four invoices referred to immediately above, Mr Duggan was now proposing to charge us for the telephone conversation earlier that day and his follow-up email.
18. I ultimately offered Mr Duggan £760 during a telephone call on 9 March 2022, with a view to resolving the emerging dispute. My offer was rejected. Mr Duggan followed with the email at [TN1 010], wherein he demanded payment of the four invoices referred to above, together with a fifth relating to our conversation the previous day. A copy of the invoice appears at [TN1 015].

19. I did not have any further dealings with Mr Duggan and/or the Defendant after that date.

20. We went live with a new website in respect of the Harts Head Hotel on 6 May 2022. For the avoidance of doubt, the new website is not hosted on the URLs previously leased from the Defendant.

**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.

A square image containing a handwritten signature in black ink. The signature is cursive and appears to read 'Treylo'.

.....

Dated: 8 August 2023

Witness Statement on behalf of the Claimant

Witness: Toni Naylor

Number of Statement: 1

Exhibits: TN1

Date: 8 August 2023

**IN THE COUNTY COURT AT LEEDS**

**BUSINESS AND PROPERTY WORK**

**B E T W E E N:-**

**DANIEL THWAITES PLC**

**Claimant**

**And**

**WEB4ORCE LIMITED**

**Defendant**

---

**TN1**

---

**IN THE COUNTY COURT AT LEEDS**

**BUSINESS AND PROPERTY WORK**

**B E T W E E N:-**

**DANIEL THWAITES PLC**

**Claimant**

**And**

**WEB4ORCE LIMITED**

**Defendant**

---

**TN1**

---

<b>Tab</b>	<b>Document</b>	<b>Date</b>	<b>Page(s)</b>
<b>Correspondence</b>			
1.	Email from Toni Naylor to John Duggan	11 January 2022	003
2.	Email from John Duggan to Toni Naylor	21 January 2022	004
3.	Emails between John Duggan and Daniel Thwaites Plc	7 - 8 March 2022	005 - 008
4.	Emails between John Duggan and Toni Naylor	08 March 2022	009
5.	Email from John Duggan to Toni Naylor	09 March 2022	010
<b>Invoices</b>			
6.	Invoice 772/26785	03 April 2021	011

7.	Invoice 771/26784	03 April 2021	012
8.	Invoice 887/26855	06 March 2022	013
9.	Invoice 884/26853	15 February 2022	014
10.	Invoice 888/26861	09 March 2022	015

## Toni Naylor

---

**From:** Toni Naylor  
**Sent:** 11 January 2022 12:19  
**To:** john@duggan.me.uk  
**Subject:** Harts Head, Giggleswick  
**Attachments:** 772\_26785.pdf; 771\_26784.pdf

Hello,

I am doing some work for the Harts Head in Giggleswick.

I have located a number of invoices from Web4orce Limited for domain leasing of hartsheadhotel.co.uk and hartsheadinn.co.uk.

I have attached two invoices dated 3<sup>rd</sup> April 2021 and I wondered if you could please confirm that these relate to leasing these domains and redirecting them up until 2<sup>nd</sup> April 2022?

I am unable to locate a copy of the agreement between Thwaites and Web4orce and I wondered if you would be kind enough to please forward me a copy?

Thanks

**Toni Naylor**  
**Pub Marketing Manager**

M: 07970 197 193  
T: 01254 686 868  
E: [toninaylor@thwaites.co.uk](mailto:toninaylor@thwaites.co.uk)  
W: [www.thwaites.co.uk](http://www.thwaites.co.uk)

## Toni Naylor

---

**From:** John Duggan <john@duggan.me.uk>  
**Sent:** 21 January 2022 11:51  
**To:** Toni Naylor  
**Subject:** RE: Harts Head, Giggleswick

Hi Toni

Further to your recent phone call when I requested you to submit your request by email this is to acknowledge receipt of the said email dated 11/01/2022 the content of which has been carefully noted.

In answer to your question concerning the invoices mentioned I can confirm the details stated.

After extensive research there does not appear to be any formal agreement between Thwaites Plc and my company.

I hope this helps.

Regards

John Duggan

**From:** Toni Naylor [mailto:toninaylor@thwaites.co.uk]  
**Sent:** 11 January 2022 12:19  
**To:** john@duggan.me.uk  
**Subject:** Harts Head, Giggleswick



Hello,

I am doing some work for the Harts Head in Giggleswick.

I have located a number of invoices from Web4orce Limited for domain leasing of [hartsheadhotel.co.uk](http://hartsheadhotel.co.uk) and [hartsheadinn.co.uk](http://hartsheadinn.co.uk).

I have attached two invoices dated 3<sup>rd</sup> April 2021 and I wondered if you could please confirm that these relate to leasing these domains and redirecting them up until 2<sup>nd</sup> April 2022?

I am unable to locate a copy of the agreement between Thwaites and Web4orce and I wondered if you would be kind enough to please forward me a copy?

Thanks

**Toni Naylor**  
**Pub Marketing Manager**

M: 07970 197 193  
T: 01254 686 868  
E: [toninaylor@thwaites.co.uk](mailto:toninaylor@thwaites.co.uk)

## Toni Naylor

---

**From:** John Duggan <john.duggan@web4orce.co.uk>  
**Sent:** 08 March 2022 12:36  
**To:** Toni Naylor  
**Subject:** RE: Invoice from Web4orce - Inv No. 26855  
**Attachments:** 2022-03-08\_115741.pdf; 2022-03-08\_120017.pdf

Hi Toni

As requested I have attached pdf's of the 2 outstanding invoices as promised.

Once these invoices have been paid I will remove the final reminder notice and reinstate the Hartshead Hotel website asap.

The quickest way to proceed is to click on the following link and enter the Username and Password below into the appropriate boxes and either pay by credit/debit card as Jen Riley did last year. Alternatively, you can pay by bacs or cheque as you so wish.

<https://www.web4orce.co.uk/user/>

Username=inv887  
Password=tJ9mQ33R

Once you enter your Account Management area you will notice there are 2 further invoices for £95 that are due for payment in April.

John Duggan

**From:** Toni Naylor [mailto:toninaylor@thwaites.co.uk]  
**Sent:** 08 March 2022 11:54  
**To:** john.duggan@web4orce.co.uk  
**Subject:** FW: Invoice from Web4orce - Inv No. 26855



Hi John,

Thanks for calling me back earlier.

Please can you send me PDF copies of the invoices you refer to as soon as possible in order that I can review them?

In the meantime, given that we have an open dialogue, please remove the website that you currently hold the below message on with immediate effect.

**Toni Naylor**  
**Pub Marketing Manager**

M: 07970 197 193

T: 01254 686 868  
E: [toninaylor@thwaites.co.uk](mailto:toninaylor@thwaites.co.uk)  
W: [www.thwaites.co.uk](http://www.thwaites.co.uk)

**06/03/2022 - for the attention of Hartshead Hotel - invoice number : 26853 has missed the deadline for payment by the due date - hence the reason for this final reminder notice - to avoid further notices please ensure all outstanding invoices are paid before the 13/03/2022**

**From:** Toni Naylor  
**Sent:** 08 March 2022 09:31  
**To:** [john.duggan@web4orce.co.uk](mailto:john.duggan@web4orce.co.uk)  
**Cc:** Caroline Cockshott <[carolinecockshott@thwaites.co.uk](mailto:carolinecockshott@thwaites.co.uk)>  
**Subject:** RE: Invoice from Web4orce - Inv No. 26855

Hi John,

I have tried to call you a couple of times this morning to try and resolve this but have been unable to get through.

I would be grateful if you could please call me back when you get a second on 07970 197 193 or 01254 68 68 68 and ask for myself at reception.

Thanks

**Toni Naylor**  
**Pub Marketing Manager**

M: 07970 197 193  
T: 01254 686 868  
E: [toninaylor@thwaites.co.uk](mailto:toninaylor@thwaites.co.uk)  
W: [www.thwaites.co.uk](http://www.thwaites.co.uk)

**From:** Caroline Cockshott <[carolinecockshott@thwaites.co.uk](mailto:carolinecockshott@thwaites.co.uk)>  
**Sent:** 08 March 2022 08:57  
**To:** [john.duggan@web4orce.co.uk](mailto:john.duggan@web4orce.co.uk)  
**Cc:** Toni Naylor <[toninaylor@thwaites.co.uk](mailto:toninaylor@thwaites.co.uk)>; IT Service Desk <[servicedesk@thwaites.co.uk](mailto:servicedesk@thwaites.co.uk)>  
**Subject:** FW: Invoice from Web4orce - Inv No. 26855

Good Morning

Further to your email below we are unable to access the link you have sent – please can you provide us with a PDF copy of the invoice in question  
Your email states it is invoice 26855 that is owed but the message you have posted on the Harts Head website states 26853 so please can you clarify which it is

Regards  
Caroline

**From:** Purchase Ledger <[purchaseledger@thwaites.co.uk](mailto:purchaseledger@thwaites.co.uk)>  
**Sent:** 07 March 2022 10:27  
**To:** Caroline Cockshott <[carolinecockshott@thwaites.co.uk](mailto:carolinecockshott@thwaites.co.uk)>  
**Subject:** FW: Invoice from Web4orce - Inv No. 26855

**From:** Hello <[hello@thwaites.co.uk](mailto:hello@thwaites.co.uk)>  
**Sent:** 07 March 2022 10:24  
**To:** Purchase Ledger <[purchaseledger@thwaites.co.uk](mailto:purchaseledger@thwaites.co.uk)>  
**Subject:** FW: Invoice from Web4orce - Inv No. 26855

Hi Caroline

As discussed, please see below received just now.

Many thanks

Kind Regards

Sandra

Sandra Snape  
Daniel Thwaites Reception

**From:** Web4orce <[john.duggan@web4orce.co.uk](mailto:john.duggan@web4orce.co.uk)>  
**Sent:** 07 March 2022 10:11  
**To:** Hello <[hello@thwaites.co.uk](mailto:hello@thwaites.co.uk)>  
**Subject:** Invoice from Web4orce - Inv No. 26855

To view your latest invoice from Web4orce please make a note of the following User Name and Password:

Login details:  
User Name: inv887  
Password: tJ9mQ33R

Then click on the blue underlined link below

<https://www.web4orce.co.uk/user/index.php?c1=inv887>

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

Thank you for your time.

The Web4orce Accounts Team  
-----

**Daniel Thwaites**  
Myerscough Road, Mellor Brook  
Lancashire  
BB2 7LB

## **Disclaimer**

The information in this email is confidential and may be legally privileged. It does not constitute an offer or an acceptance of an offer or a representation or warranty, nor shall it form any part of a legally binding contract. It is intended solely for the addressee. Access to this email by anyone else is unauthorised. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it, is prohibited and may be unlawful.

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.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**.

## Toni Naylor

---

**From:** John Duggan <john.duggan@web4orce.co.uk>  
**Sent:** 08 March 2022 22:46  
**To:** Toni Naylor  
**Subject:** RE: Invoice from Web4orce - Inv No. 26855

Hi Toni

This is to confirm receipt of your 2nd email earlier today the content of which has been carefully noted.

Thwaites Brewery are currently in arrears on payment of the following invoice :

Inv No : 884/26853 for £285 where the Due Date was 22/02/2022

The following invoice is also outstanding but currently not overdue :

Inv No : 887/26855 for £285 where the Due Date was 13/03/2022

Web4orce will also be invoicing you tomorrow for the telephone and email costs incurred today and it will amount to £285.

You also indicated that once our dispute is settled you required us to confirm removal of the Harts Head website entirely and anything linked with it with immediate effect and I can assure your instructions will be carried out by my company.

The total amount owing for all 5 invoices which includes the latest invoice will be £1,045 and once that debt is cleared we will proceed as indicated. That is of course assuming there are no more phone calls or emails that require a response.

Thank you for your time.

John

**From:** Toni Naylor [mailto:toninaylor@thwaites.co.uk]  
**Sent:** 08 March 2022 13:36  
**To:** John Duggan  
**Cc:** Karen Glachan; Caroline Cockshott; Carolyn Goodwin  
**Subject:** RE: Invoice from Web4orce - Inv No. 26855

Hi John,

Thank you for this.

Can you please confirm that if/when these two invoices (totalling £570) are paid you will remove the Harts Head website entirely and anything linked with it with immediate effect as we will not be renewing the lease of [hartsheadhotel.co.uk](http://hartsheadhotel.co.uk) and [hartsheadinn.co.uk](http://hartsheadinn.co.uk) from 2<sup>nd</sup> April when the current payment period expires?

Thanks

Toni

**From:** John Duggan <john.duggan@web4orce.co.uk>  
**Sent:** 08 March 2022 12:36

## Toni Naylor

---

**From:** John Duggan <john@duggan.me.uk>  
**Sent:** 09 March 2022 08:40  
**To:** Toni Naylor  
**Subject:** Latest Invoice  
**Attachments:** 2022-03-08\_232548.pdf

Hi Toni

As indicated in our email last night please find attached our latest invoice.

In the light of recent events there are now 5 outstanding invoices and to avoid a similar predicament that occurred with Thwaites Brewery last year you would be best advised to ensure that payment of all outstanding invoices reach our bank account later today.

In closing I wish you every success with the replacement Hartshead Hotel website.

Regards

John

# Invoice



001807

# Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Hartshead Hotel**  
 Belle Hill, Giggleswick, Settle  
 North Yorkshire, BD24 0BA

*Pd 15/6*

Invoice Date: 2021-04-03  
 Invoice Number: 772 / 26785  
 Due Date: 2021-04-17

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: 2021-04-03 to 2022-04-02</p> <p><b>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</b></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

# Invoice


## Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: Hartshead Hotel  
 Belle Hill, Giggleswick, Settle  
 North Yorkshire, BD24 0BA

*Pa 15/6*

Invoice Date: 2021-04-03  
 Invoice Number: 771 / 26784  
 Due Date: 2021-04-17

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><a href="https://hartsheadhotel.co.uk">https://hartsheadhotel.co.uk</a></p> <p>Annual Cost: £95.00</p> <p>Period of Service: 2021-04-03 to 2022-04-02</p> <p><b>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</b></p> 	<p>£95.00</p>
<p style="text-align: right;"><i>ca</i></p>	<p>Total Cost: £95.00</p>

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

Close Print Invoice

# Invoice

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

Invoice To: **Hartshead Hotel**  
**Belle Hill, Giggleswick, Settle**  
**North Yorkshire BD24 0BA**

Invoice Date: **2022-03-06**  
 Invoice Number: **887 / 26855**  
 Due Date: **2021-03-13**

Description	Cost
<p>In accordance with our terms and conditions :</p> <p>The following costs were incurred when email / website services in connection with</p> <p>Hartshead Hotel were de-activated as a consequence of failure to pay outstanding invoice number 26853</p> <p>In addition, to hosting and publishing a holding page at :</p> <p><a href="http://www.hartsheadhotel.co.uk">http://www.hartsheadhotel.co.uk</a></p> <p>Costs : £285.00</p> <p>This is a one off payment</p> <p>PLEASE INFORM US IMMEDIATELY. IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£285.00</p>

Total Cost:	£285.00
-------------	---------

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

# Invoice

## Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Hartshead Hotel**  
**Belle Hill, Giggleswick, Settle**  
**North Yorkshire BD24 0BA**

Invoice Date: **2022-02-15**  
 Invoice Number: **884 / 26853**  
 Due Date: **2022-02-22**

Description	Cost
<p>For providing the following services :</p> <p>To responding to a phone call and email from Toni Naylor your Pub Marketing Manager in January 2022. It was about the leasing arrangements concerning the following domain names :</p> <p>hartsheadhotel.co.uk and hartsheadinn.co.uk</p> <p>She also requested a copy of the agreement between Thwaites and Web4orce and despite our best efforts which involved our Accountants we did not find any such agreement. For what it is worth there was such an agreement with a previous owner of the Hartshead Hotel but we were not able to locate that either.</p> <p>The time involved was conservatively calculated to be between 2 and 3 hours and priced at £95 per hour or part thereof.</p> <p>Balance outstanding is £285.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£285.00</p>
<b>Total Cost:</b>	<b>£285.00</b>

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

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

# Invoice

## Web4orce Limited

Aireside House, Royd Ing Avenue, Keighley BD21 4BZ

Invoice To: **Hartshead Hotel**  
**Belle Hill, Giggleswick, Settle**  
**North Yorkshire BD24 0BA**

Invoice Date: **2022-03-09**  
 Invoice Number: **888 / 26861**  
 Due Date: **2022-03-16**

Description	Cost
<p>For providing the following services :</p> <p>To responding to phone calls and emails from Toni Naylor your Pub Marketing Manager on 08/03/2022. It was about outstanding invoices concerning the following domain names :</p> <p>hartsheadhotel.co.uk and hartsheadinn.co.uk</p> <p>The time involved was conservatively calculated to be between 2 and 3 hours and priced at £95 per hour or part thereof.</p> <p>Balance outstanding is £285.00</p> <p>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</p>	<p>£285.00</p>
<b>Total Cost:</b>	<b>£285.00</b>

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

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

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 1<sup>st</sup> sentence.
  - (b) We admit the 2<sup>nd</sup> sentence.
  - (c) We deny the 3<sup>rd</sup> 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 1<sup>st</sup> part of the allegations.
  - (b) The Claimant failed to mention the payment included payment of the following 2 invoices see [RB1 ] 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](http://www.web4orce.com) and see **[JD1 001-003]** 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 001-003]** 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 004-007]**.
  12. (2) On the 20 March 2022 the Defendant published the said email in full at the following website [www.richardbailey.02.2yu.uk](http://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 008]**.
  12. (4) It was in fact the Claimants 1<sup>st</sup> email to the Defendant and it was the Defendants 1<sup>st</sup> 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' see **[JD 008-1]** and the important part it plays with regard to the Defendant's terms and conditions. This can also be viewed at the following URL [www.web4orce.co.uk/user/](http://www.web4orce.co.uk/user/) - 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 009-011]** and **[JD1 0012]**.
13. Quite recently I have discovered 3 emails that I thought had been lost for good nonetheless I have now found them.

14. The 1<sup>st</sup> email is from Denise Routh and I direct the court's attention to **[JD1 013]** 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 014-015]** 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/](http://www.web4orce.co.uk/user/)
16. I direct the court's attention to **[JD1 016]** 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 017]**.
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 018-112]** that in total amount to £1,081,295 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.



.....

Dated 18 September 2023

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**

**JDI**

**IN THE COUNTY COURT AT LEEDS**

**BUSINESS AND PROPERTY WORK**

**BETWEEN:-**

**DANIEL THWAITES PLC**

**Claimant**

**And**

**WEB4ORCE LIMITED**

**Defendant**

-----  
**JD1**  
-----

<b>Tab</b>	<b>Document</b>	<b>Date</b>	<b>Page(s)</b>
<b>Correspondence and Images</b>			
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](http://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](mailto: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](mailto: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

The information in this email is confidential and may be legally privileged. It does not constitute an offer or an acceptance of an offer or a representation or warranty, nor shall it form any part of a legally binding contract. It is intended solely for the addressee. Access to this email by anyone else is unauthorised. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken is reliance on it, is prohibited and may be unlawful.

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.

This email has been scanned for viruses and malware, and may have been automatically archived by Mimecast Ltd,.

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><b><u>Richard Bailey 02</u></b></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>	<p>£570.00</p>
<b>Total Cost:</b>	<b>£570.00</b>

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

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

008

# 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](mailto:info@web4orce.com)

Cc: Andrew Buchanan <[andrewbuchanan@thwaites.co.uk](mailto: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

BB2 7LB

## Disclaimer

The information in this email is confidential and may be legally privileged. It does not constitute an offer or an acceptance of an offer or a representation or warranty, nor shall it form any part of a legally binding contract. It is intended solely for the addressee.

Access to this email by anyone else is unauthorised. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken is reliance on it, is prohibited and may be unlawful.

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.

This email has been scanned for viruses and malware, and may have been automatically archived by Mimecast Ltd.

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](http://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](mailto:john@duggan.me.uk)>  
**Sent:** 15 June 2021 12:31  
**To:** Denise Routh <[deniserouth@thwaites.co.uk](mailto: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](mailto:jaynekirkham@thwaites.co.uk)

---

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

---

**From:** John Duggan <[john@duggan.me.uk](mailto:john@duggan.me.uk)>  
**Sent:** 15 June 2021 12:31  
**To:** Denise Routh <[deniserouth@thwaites.co.uk](mailto: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**

The information in this email is confidential and may be legally privileged. It does not constitute an offer or an acceptance of an offer or a representation or warranty, nor shall it form any part of a legally binding contract. It is intended solely for the addressee. Access to this email by anyone else is unauthorised. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it, is prohibited and may be unlawful.

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.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**.

## John Duggan

---

**From:** Jen Riley [jenriley@thwaites.co.uk]  
**Sent:** 03 August 2020 11:16  
**To:** john.duggan@web4orce.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](mailto:jenriley@thwaites.co.uk)  
Tel: 01254 686886

**Daniel Thwaites**  
Myerscough Road, Mellor Brook  
Lancashire  
BB2 7LB

### Disclaimer

The information in this email is confidential and may be legally privileged. It does not constitute an offer or an acceptance of an offer or a representation or warranty, nor shall it form any part of a legally binding contract. It is intended solely for the addressee. Access to this email by anyone else is unauthorised. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it, is prohibited and may be unlawful.

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.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**.

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

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><b><u>Latest Default Notice Type 1</u></b></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><b>£3420.00</b></p>
<b>Total Cost:</b>	<b>£3420.00</b>

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

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

019

# 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><b>Latest Default Notice Type 2</b></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>
<b>Total Cost:</b>	<b>£2280.00</b>

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

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

020

# 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><b>In accordance with our terms and conditions :</b></p> <p><b>As a consequence of failure to pay a number of overdue invoices</b></p> <p><b>The Very Late Payments clause triggered a new Default notice that has been published on the Internet and to check it out click below :</b></p> <p><b><u>Latest Default Notice Type 3</u></b></p> <p><b>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.</b></p> <p><b>Costs : £1140.00</b></p> <p><b>This is a one off payment</b></p> <p><b>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</b></p>	<p><b>£1140.00</b></p>
<b>Total Cost:</b>	<b>£1140.00</b>

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

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

021

# 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><b>Latest Default Notice Type 4</b></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>
<b>Total Cost:</b>	<b>£1520.00</b>

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

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

022

# 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><b>Default Network Notices Type 21 - Updated</b></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><b>Latest Update : 20/02/2023.</b> 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>
<b>Total Cost:</b>	<b>£21470.00</b>

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

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

023

# 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><b>Default Network Notices Type 21</b></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>
<b>Total Cost:</b>	<b>£5600.00</b>

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

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

024

# 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><b>Default Network Notices Type 21</b></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>
<b>Total Cost:</b>	<b>£5600.00</b>

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

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

# 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><b><u>Default Network Notices Type 21</u></b></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>
<b>Total Cost:</b>	<b>£5600.00</b>

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

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

026

# 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>
<b>Total Cost:</b>	<b>£12510.00</b>

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

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

027

# 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: **771 / 26945**  
 Due Date:

Description	Cost
<p><b>For providing the following services :</b></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><a href="https://hartsheadhotel.co.uk">https://hartsheadhotel.co.uk</a></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>
<b>Total Cost:</b>	<b>£95.00</b>

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

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><b>For providing the following services :</b></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>
<b>Total Cost:</b>	<b>£95.00</b>

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

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

029

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

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

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><b>In accordance with our terms and conditions :</b></p> <p><b>For providing the following services :</b></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><b>Monthly Cost: £4000.00</b></p> <p><b>Period of Service: 2023-02-08 to 2023-03-07</b></p> <p>PLEASE REMEMBER TO INFORM US IMMEDIATELY IF YOU CHANGE YOUR EMAIL ADDRESS</p>	<p><b>£4000.00</b></p>

**Total Cost: £4000.00**

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

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

# 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>
<b>Total Cost:</b>	<b>£2400.00</b>

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

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

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><b>In accordance with our terms and conditions :</b></p> <p><b>For providing the following services :</b></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><b>£2000.00</b></p>
<p><b>Total Cost:</b></p>	<p><b>£2000.00</b></p>

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

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

033

# 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><b><u>Latest Default Notice Type 7</u></b></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>
<b>Total Cost:</b>	<b>£2400.00</b>

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

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

034

# 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><b>In accordance with our terms and conditions :</b></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><b>Latest Default Notice Type 4</b></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><b>£3200.00</b></p>
<b>Total Cost:</b>	<b>£3200.00</b>

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

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

# 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>
<b>Total Cost:</b>	<b>£3680.00</b>

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

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

036

# 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><b>In accordance with our terms and conditions :</b></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**

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

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

037

# 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: **2023-04-10**  
 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><b>Default Network Notices Type 21</b></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>
<b>Total Cost:</b>	<b>£5600.00</b>

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

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

038

# 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: **2023-04-15**  
 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><b>Default Network Notices Type 21</b></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>
<b>Total Cost:</b>	<b>£5600.00</b>

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

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

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

Description	Cost
<p><b>In accordance with our terms and conditions :</b></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><b><u>Latest Default Notice Type 4</u></b></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**

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

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

040

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

Description	Cost
<p><b>In accordance with our terms and conditions :</b></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><b>Latest Default Notice Type 4</b></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>
<b>Total Cost:</b>	<b>£3200.00</b>

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

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

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

Description	Cost
<p><b>In accordance with our terms and conditions :</b></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><b>Latest Default Notice Type 4</b></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>
<b>Total Cost:</b>	<b>£3200.00</b>

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

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

042

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

Description	Cost
<p><b>In accordance with our terms and conditions :</b></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><b>Latest Default Notice Type 4</b></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>
<b>Total Cost:</b>	<b>£3200.00</b>

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

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

043

# 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: **2023-05-08**  
 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><b><u>Latest Default Notice Type 8</u></b></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>
<b>Total Cost:</b>	<b>£3200.00</b>

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

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

044

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

Description	Cost
<p><b>In accordance with our terms and conditions :</b></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><b>Latest Default Notice Type 8</b></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>
<b>Total Cost:</b>	<b>£3200.00</b>

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

[Close](#)

[Print Invoice](#)

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

Description	Cost
<p><b>In accordance with our terms and conditions :</b></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><b><u>Latest Default Notice Type 8</u></b></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>
<b>Total Cost:</b>	<b>£3200.00</b>

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

[Close](#)

[Print Invoice](#)

046

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

Description	Cost
<p><b>In accordance with our terms and conditions :</b></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><b><u>Latest Default Notice Type 8</u></b></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>
<b>Total Cost:</b>	<b>£3200.00</b>

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

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

047

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

Description	Cost
<p><b>In accordance with our terms and conditions :</b></p> <p><b>As a consequence of failure to pay a number of overdue invoices</b></p> <p><b>The Very Late Payments clause triggered a new Default notice that has been published on the Internet and to check it out click below :</b></p> <p><b><u>Latest Default Notice Type 8</u></b></p> <p><b>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.</b></p> <p><b>Costs : £3200.00</b></p> <p><b>This is a one off payment</b></p> <p><b>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</b></p>	<p><b>£3200.00</b></p>
<b>Total Cost:</b>	<b>£3200.00</b>

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

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

C48

# 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><b>In accordance with our terms and conditions :</b></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><b><u>Latest Default Notice Type 8</u></b></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**

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

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

049

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

Description	Cost
<p><b>In accordance with our terms and conditions :</b></p> <p><b>As a consequence of failure to pay a number of overdue invoices</b></p> <p><b>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.</b></p> <p><b>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.</b></p> <p><b>Costs : £33600.00</b></p> <p><b>This is a one off payment</b></p> <p><b>PLEASE INFORM US IMMEDIATELY, IF YOU CHANGE YOUR REGISTERED EMAIL ADDRESS</b></p>	<p><b>£33600.00</b></p>
<b>Total Cost:</b>	<b>£33600.00</b>

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

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

050

# 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: **2023-09-18**  
 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>
<b>Total Cost:</b>	<b>£40800.00</b>

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

Close

Print Invoice

051

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

Description	Cost
<p><b>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.</b></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**

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

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

OSZ

# 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: **2023-05-06**  
 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>
<b>Total Cost:</b>	<b>£3680.00</b>

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

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

053

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

Description	Cost
<p><b>In accordance with our terms and conditions :</b></p> <p><b>For providing the following services :</b></p> <p><b>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.</b></p> <p><b>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.</b></p> <p><b>Monthly Cost: £1000.00</b></p> <p><b>Period of Service: 2023-05-08 to 2023-06-07</b></p> <p><b>PLEASE REMEMBER TO INFORM US IMMEDIATELY IF YOU CHANGE YOUR EMAIL ADDRESS</b></p>	<p><b>£1000.00</b></p>
<b>Total Cost:</b>	<b>£1000.00</b>

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

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

054

# 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: **2023-09-09**  
 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>
<b>Total Cost:</b>	<b>£780000</b>

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

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

055

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

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

056

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

Description	Cost
<p><b>In accordance with our terms and conditions :</b></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>
<b>Total Cost:</b>	<b>£1000.00</b>

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

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

057

Witness Statement on behalf of the Claimant

Witness: Richard Bailey

Number of Statement: 2

03 October 2023

Claim No: K80LS081

**IN THE COUNTY COURT AT LEEDS**

**BUSINESS AND PROPERTY WORK**

**Between**

**DANIEL THWAITES PLC**

Claimant

and

**WEB4ORCE LIMITED**

Defendant

---

**SECOND WITNESS STATEMENT OF  
RICHARD BAILEY**

---

I, **RICHARD BAILEY**, of Myerscough Road, Mellor Brook, Blackburn, Lancashire, England, BB2 7LB, wish to rely on the following evidence in support of this claim and in reply to the defensive evidence of John Duggan dated 18 September 2023.

1. I am employed by the Claimant in the capacity of Executive Chairman. I have been engaged in this role since 2019, prior to which I was Chief Executive Officer from 2011.

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. This statement has been prepared by the Claimant's solicitors and counsel following email exchanges between us. I have also provided instructions via email and over the phone. A draft of this statement was then reviewed by me prior to signature.
4. I refer in this statement to Exhibit RB1 to my First Witness Statement. References appearing in square brackets are to pages within RB1.
5. I have tried to assist the Court by addressing key factual allegations in the responsive witness statement of Mr Duggan dated 18 September 2023. The fact that I do not address each and every one of his individual allegations does not mean that they are accepted by the Claimant; any aspect of Mr Duggan's statement that I do not address directly will be addressed by the Claimant at trial.

**Was there a contract between the Claimant and the Defendant?**

6. Mr Duggan appears to rely on an alleged interaction between himself and the Claimant's "*Data Marketing Manager*" in February and March 2021 (see paragraphs 3 and 14 – 16 of Mr Duggan's witness statement). For example, Mr Duggan states in paragraph 3(e) of his first witness statement that he had email and telephone communications with the Claimant's "*Data Marketing Manager*", who he says confirmed that the Claimant would like to continue with the contract Web4orce had with the previous owners of the Harts Head Hotel, in approximately February 2021.
7. I do not accept that his account is a true characterisation of the relevant events or communications. Before addressing the substance of what Mr Duggan says, I need to make five initial points.
8. First, it is not clear who Mr Duggan is referring to when he refers to a "*Data Marketing Manager*" because that is not a defined position/role in the Claimant. However, I think he could be referring to Jen Riley, who was at the relevant time a Digital Marketing Manager but has since left the business.

9. Second, I note that, to the extent he relies on communications that were not in writing over email, Mr Duggan provides very few details as to what exactly was discussed and to what exactly he claims the person with whom he was dealing agreed on behalf of the Claimant.
10. Third, I should point out that Mr Duggan appears to have made an error in paragraphs 14 and 15 of his statement, where he refers to email exchanges he says he had with two employees at Daniel Thwaites plc **[013 and 014-015 JD1]**. Mr Duggan refers to dates in March 2021 but he must mean to refer to June 2021, which is when the payment to which he refers was made by the Claimant to the Defendant.
11. Fourth, I note that Mr Duggan mentions "Jayne Markham", who is not an employee of the Claimant. However, I believe, when looking at the email at 014-015 JD1 to which Mr Duggan refers, that this is a mistake and Mr Duggan meant to refer to Jayne Kirkham, (who I can confirm remains employed by the Claimant).
12. Fifth and finally, I take strong exception to Mr Duggan's attempt to suggest that I have in some way misled the Court because I did not in my first witness statement directly refer to certain email exchanges which Mr Duggan discusses in his witness statement:
  - a. As to the email exchanges at **[013 and 014-015 JD1]**, those emails exchanged between Mr Duggan and the employees of the Claimant concerned the payment made to the Defendant which was discussed in my first witness statement; there is no inconsistency between paragraph 10 of my first witness statement and the existence of the emails to which Mr Duggan refers.
  - b. As to the email sent by Mr Duggan on 22 March 2022 **[004-007 JD1]** in response to my email dated 15 March 2022 **[013 RB1]**, I can see that I did receive a response as Mr Duggan points out. This was an inadvertent omission from my first statement, and did not reflect an attempt to mislead anyone.
13. On matters of substance, the basis on which Mr Duggan seems to suggest that there was a detailed contract between the Claimant and Defendant (on which he relies

as entitling him to raise invoices in respect of the exorbitant charges which he now seeks to suggest are owed by the Claimant) seems to turn on those exchanges with members of the Claimant's staff in June 2021 to which Mr Duggan refers in his witness statement. I do not agree with his account, for the following reasons:

- a. I have set out my understanding of what transpired in June 2021 at paragraphs 12 to 16 of my first witness statement.
- b. I do not know whether any of the Claimant's employees "*accessed the Claimant's account area*" as Mr Duggan suggests. I cannot establish that any of our employees did so and, as noted in paragraph 16 of my first witness statement, I am not aware of any of our employees ever having agreed to any detailed "*terms and conditions*" with the Defendant (whether published on its website or otherwise).
- c. I note that the way Mr Duggan puts this allegation suggests that it is speculation on his part – he does not refer to any evidence establishing when and by whom, the "*Claimant's account area*" is alleged by Mr Duggan to have been accessed.
- d. In any event, even on Mr Duggan's analysis, any employee of the Claimant who did access "*Claimant's account area*" did so **before** any payments were made by the Claimant.
- e. That is important because, as I said in my first witness statement, any informal contract between the Claimant and Defendant can only have arisen as a result of the Claimant having offered to pay certain of the Defendant's invoices and the Defendant having reinstated the URLs accordingly.

### **Unpaid Invoices**

14. Incredibly, Mr Duggan seeks to suggest that the Claimant now owes over £1m to the Defendant. Mr Duggan's position is all the more remarkable when it is remembered that:

- a. the actual services from which this dispute arises are the subject of invoices totalling a mere £380; and

- b. As set out in paragraph 18 of Toni Naylor's first witness statement, the Claimant offered Mr Duggan, on an open basis (but intending no admissions), a full and final commercial settlement of £760. This offer was rejected by Mr Duggan, who instead chose to raise yet further invoices seeking to charge the Claimant for time spent discussing such settlement with him (see 009 TN1 and 014 TN1).
15. The vast majority of the invoices to which Mr Duggan refers relate to penalty and other charges seemingly levied with the intention of pressurising the Claimant to succumb to Mr Duggan's ever more ambitious payment demands.
16. In Exhibit JD1, Mr Duggan has included multiple invoices [038-057 JD1], which to the best of my knowledge the Claimant has either not received or not opened. I should note, in this regard, that Mr Duggan continues to raise invoices against the Claimant. For example, a further two invoice notifications were received after business hours (at 1911) on 2 October 2023, only the day before this witness statement was signed. I am not in a position to comment on these or any other additional invoices raised by Mr Duggan; the Claimant is not prepared to access any invoices such as these, which have been transmitted via the very same online portal through which Mr Duggan seeks to contrive that the Claimant 'agrees' to the onerous terms and conditions on which he relies and by which he claims the Claimant has become bound.
17. Having reviewed the invoices, I have prepared a summary table below which illustrates starkly the exorbitant charges that Mr Duggan has sought to levy in relation to disputed invoices worth a relatively modest value, rather than taking any legitimate steps to pursue the invoices themselves. Besides the invoices totalling £380 which relate to the (disputed) provision of services by the Defendant under the alleged contract, the remaining invoices fall into the following categories:

Category	Quantum
Creating default notices	£102,515
Deactivating the Harts Head Hotel website	£285

Charges for time taken in communicating with the Claimant	£665
Charges relating to maintaining the derogatory websites concerning myself and the Claimant	£64,820
Loss of income and costs incurred as a result of litigation	£55,200
Compensation for stress	£858,000

18. To be clear, the Claimant does not accept that it is obliged to pay the invoices of £380 relating to the delivery of any actual services:

- a. As set out at paragraph 23 of my first witness statement, we had made it very clear that the Claimant no longer required the Defendant's services after April 2022. Mr Duggan appears to have acknowledged this, particularly in his email at [010 TN1], where he says "*In closing I wish you success with the replacement Hartshead Hotel website*" [my emphasis].
- b. I also note that the Claimant has not, in fact, had the benefit of any of the services in respect of which Mr Duggan claims that the Defendant is entitled to be paid. It appears that Mr Duggan invoiced the Claimant for deactivating the Harts Head Hotel website on 6 March 2022 [132 RB1] as a result of the Claimant failing to pay an invoice. This invoice was for Mr Duggan speaking to Toni Naylor and looking for the agreement he had with the previous owner [131 RB1]. However, he raised an invoice the following month for the leasing of the domain at, what appears to be, the period renewal date [133 RB1]. In short, Mr Duggan has sought to charge the Claimant for a website he had already deactivated and has never reactivated.

19. In all of my 25 years working in business, I have never experienced a service provider like Mr Duggan. His behaviour is completely out of the ordinary for what I would expect from a professional relationship.



Claimant

R Bailey

2nd

RB2

Claim No: K80LS081

**IN THE COUNTY COURT  
AT LEEDS  
BUSINESS AND PROPERTY WORK**

**Between**

**DANIEL THWAITES PLC**

Claimant

and

**WEB4ORCE LIMITED**

Defendant

---

**SECOND WITNESS STATEMENT  
OF RICHARD BAILEY**

---

Witness Statement on behalf of the Defendant

Witness: John Duggan

Number of Statement: 2

Exhibits: JDI

Date: 13 October 2023

**IN THE COUNTY COURT AT LEEDS**

**BUSINESS AND PROPERTY WORK**

**BETWEEN:-**

**DANIEL THWAITES PLC**

**Claimant**

**And**

**WEB4ORCE LIMITED**

**Defendant**

-----  
**SECOND 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. I refer in this statement to Exhibit JD1 to my First Witness Statement. References appearing in square brackets are to pages within JD1.

4. I have tried to assist the Court by addressing key factual allegations in the responsive witness statement of Mr Bailey dated 3 October 2023. The fact that I do not address each and every one of his individual allegations does not mean that they are accepted by the Defendant; any aspect of Mr Bailey's statement 2 that I do not address directly will be addressed by the Defendant at trial

**Was there a contract between the Claimant and the Defendant?**

5. I do not accept Mr Bailey's account is a true representation of the relevant dates in paragraph 6 of statement 2. For example he quoted "February and March 2021" that should read February and March 2020. Later in the paragraph he quoted "in approximately February 2021" that should read in approximately February 2020.

6. In paragraph 8 I have no issue with what is stated here in fact I want to thank Richard Bailey for pointing out my error concerning Jen Riley's correct title.

7. In paragraph 9 again I have no issue with what is stated here. I would say in my defence I am very conscious of the serious implications of misleading the court which is why I could not record the exact details of the telephone conversation in question. In fact I would direct the court's attention to the email that I sent to Richard Bailey of the 22 March 2022 see [JD1 004-007] where I quoted "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".

8. In paragraph 10 and 11, I have no issue with what is stated here in fact I want to again thank Richard Bailey for pointing out my errors concerning the correct date June 2021 and Jayne Kirkham's correct surname.

**Did Richard Bailey accidentally or deliberately mislead the court?**

9. In Richard Bailey's statement 2 paragraph 12 he acknowledges his mistake concerning the Defendant's email dated 22 March 2022 see [JD1 004-007]. However instead of apologising and admitting he misled the court he plays semantics claiming it was an inadvertent omission. There is little doubt the content of that email was really damaging to the Claimant's claim. Is it credible therefore this was an inadvertent omission according to Richard Bailey or was it deliberate?

10. Apart from the reasons outlined in John Duggan's statement 1 paragraph 12. (1) to 12. (5), I respectfully ask the court to consider the following evidence.

11. In Richard Bailey’s statement 1 paragraph 4 he quoted “This statement has been prepared by the Claimant’s solicitor and counsel following a conference. I have also provided instructions via email and over the phone. This statement was then reviewed by me prior to signature.”
12. Is it likely therefore that in those circumstances Richard Bailey’s legal team failed to notice such an obvious omission because if they did it would have serious implications for Addleshaw Goddard? The more plausible scenario is they were not aware of the Defendant’s email at that point in time which explains why they didn’t intervene and prevent Richard Bailey misleading the court.

### **Unpaid Invoices**

13. Looking back at the set of circumstances that initiated this dispute, it was the Claimant’s failure to pay the 5 invoices totaling £1045 created by the Defendant between 15 February 2022 and 9 March 2022, see **[RB1 131]**, **[RB1 132]**, **[RB1 133]**, **[RB1 134]**, **[RB1 135]**. It’s also worth noting the following 11 invoices totaling £6460 created between 14 March 2022 and 30 March 2022 also apply **[RB1 136]**, **[RB1 137]**, **[RB1 138]**, **[RB1 141]**, **[RB1 142]**, **[RB1 143]**, **[RB1 144]**, **[RB1 145]**, **[RB1 146]**, **[RB1 147]** and **[RB1 148]**.
14. Even by the Claimant’s own admission they were still under contract to the Defendant at this point in time, see **[RB1 013]** where Richard Bailey quoted “It is my understanding we contracted for this service until April this year”.
15. Clearly **[RB1 013]** plays a pivotal role throughout this dispute.
16. In the light of this evidence I respectfully submit all the consequential final reminders, default notices and associated invoices that were triggered as a result of the Claimant’s failure to pay the invoices at paragraph 9 above were all subject to contract. Whilst not forgetting the Claimant’s failure to pay 4 invoices totaling £2040 created by the Defendant between 10 May 2020 and 10 June 2020, see **[RB1 127]** to **[RB1 130]**. These were also subject to contract because the Claimant set a precedence on the 15 June 2021 when paying 2 invoices dated 3 April 2020 see **[RB1 120]** and **[RB1 121]**.
17. I respectfully direct the court’s attention to Richard Bailey’s statement 1 paragraph 10 where he quoted “Thereafter, he proposes, seemingly by way of settlement” he then lists ad verbatim the 3 separate terms that were included in my email dated 6 March 2023, see **[RB1 108]**. This came as a surprise to me because I thought it was an out of court settlement offer. Nevertheless it’s what prompted the Defendant to create the 2 invoices, see **[JD1 051]** and **[JD1 055]**.

## **Toni Naylor**

18. In paragraph 14b Richard Bailey mentions Toni Naylor and I thought it an opportune moment to make the court aware of the following information. In her statement 1 paragraph 6 she discloses that she telephoned me in January 2022 but I refused to answer any of her questions and that is correct. My reasons for doing so was because I realised she was on a fishing expedition and suggested she email me instead outlining her requirements, that way I had a record of what was needed and sometime later I responded accordingly as she recalls in her statement.
19. In Toni's statement 1 paragraph 13 she quoted "we did not have any agreement with the Defendant and that Mr Duggan had confirmed this previously" actually she has misquoted me, you only have to look at paragraph 9 of her statement where she correctly recorded that John Duggan quoted "After extensive research there does not appear to be any formal agreement between Thwaites Plc and my company". Later on in paragraph 13 Toni confirms her awareness the Claimant was "accountable to the terms and conditions" on the Defendant's website.
20. In Toni's statement 1 paragraph 15 she refers the court to her email [TN1 009] which was dated 8 March 2022 where she quoted "we will not be renewing the lease of the hartsheadhotel.co.uk and hartsheadinn.co.uk from 2<sup>nd</sup> April". The fact is that according to our terms and conditions published at web4orce.com she had already missed the 30 day notice requirement in to cancel the leases in question and proper notice can only be served via Royal Mail recorded delivery.
21. I now refer the court to Toni Naylor's statement 1 paragraph 16 where she quoted "Mr Duggan argued that the invoices had already been raised and any cancellation should have been given in accordance with the terms and conditions on his website; which, for the avoidance of doubt, I have never seen, let alone agreed to". I'm not sure why she made such a statement because had she checked the Defendant's terms and conditions earlier she could have served proper notice.
22. The Defendant's website is at the following url :
- <https://www.web4orce.com>
23. This I believe is the ideal time to draw the court's attention to the business relationship that existed between the Defendant and the Claimant. The Defendant is the provider and the Claimant is the customer. The customer purchases our services in accordance with the terms and conditions as published on the Defendant's website at www,webforce.com. Contrary to what Richard Bailey alleges in his statement 2 paragraph 16 where he refers to our terms and conditions being "onerous" I rebut that by stating they are not overlong and are written in plain

English in contrast to the Claimant's (T & C)s on their website at thwaites.co.uk when they publish 2 sets of (T & C)s one for purchases and one for sales, wherein they also require notice of cancellation.

24. In Richard Bailey's statement 2 paragraph 14a he quoted "the actual services from which this dispute arises are the subject of invoices totaling a mere £380" at this point I must admit that has me baffled because it certainly isn't based on reality and it's not as if "£380" is even close to the actual amount which is £1045 especially when one realises he is a qualified accountant. See paragraph 13 above. The truth is Richard Bailey displayed a quite dismissive attitude in his first statement and he still hasn't grasped how important it is to be extra careful concerning Statements of Truth because once again he has misled the court.

25. In Richard Bailey's statement 2 paragraph 17 he quoted "Besides the invoices totaling £380 which relate to the (disputed) provision of services". Clearly my comments concerning the disputed "£380" must apply here as well. So having repeated the same amount once again it is clear the previous entry wasn't a typing error.

**Diary of missed opportunities**

1. 09 March 2022 – Invoices Outstanding = £1045 (Toni Naylor only offered £760)
2. 14 March 2022 - Invoices Outstanding = £4180 (letter to Richard Bailey)
3. 15 March 2022 - Invoices Outstanding = £4180 (email from Richard Bailey)
4. 22 March 2022 - Invoices Outstanding = £7275 (email from John Duggan)
5. 21 May 2022 - Invoices Outstanding = £11785 (email from Richard Bailey)
6. 08 February 2023 - Invoices Outstanding = £41475 (letter from Addleshaw Goddard)
7. 10 August 2023 - Invoices Outstanding = £215380 (countyclaim launch 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.



.....

Dated 13 October 2023

**DANIEL THWAITES PLC**

**Claimant**

**and**

**WEB4ORCE LIMITED**

**Defendant**

---

**CASE MEMORANDUM**

---

**(A) Case Summary**

1. The Claimant purchased the public house known as Harts Head Hotel, Belle Hill, Giggleswick, Settle BD24 0BA (**the Pub**) on 2 March 2020.
2. On 15 June 2021, the Claimant offered to lease the following uniform resource locators (**URL**) from the Defendant, a company engaged in the business of information technology consultancy:
  - 2.1. hartsheadhotel.co.uk; and
  - 2.2. hartsheadinn.co.uk.
3. The first URL hosted a website advertising the Pub (**the Website**) and the second URL redirected traffic to the Website.
4. On the Claimant's case, their offer was accepted by the Defendant when: (a) the Defendant accepted payment of certain invoices; and (b) reactivated the abovementioned URLs (the same having been deactivated on 12 June 2021).

5. The Defendant will need to clarify its case on the issue of offer and acceptance, by reason of ambiguities within its current case:

*“The Claimant’s payment constituted an offer to lease the URL’s (sic) between 3 April 2020 and April 2021 and if upheld does that mean all invoices for that period be paid?”*

(First Witness Statement of John Duggan, “Details of Claim”, §(6)(c))

6. As per the matters contained within the List of Issues, below, the principal dispute pertains to the terms on which the Parties contracted. The Claimant says this was a basic exchange: monetary consideration for use of, and access to, the URLs for a fixed period. The Defendant, however, says the Claimant is bound by the terms and conditions published at [www.web4orce.com](http://www.web4orce.com).
7. The Claimant says the URL leases expired on 2 April 2022 and were not renewed. The Defendant says that the Claimant failed to serve notice in accordance with its terms and, in consequence thereof, the leases automatically renewed.
8. The Defendant further asserts that it is entitled to recover from the Claimant the sums contained within a not-insignificant number of invoices which have been raised during the course of the last few years.
9. The Claimant denies any liability to discharge the “outstanding invoices” on the basis that:
  - 9.1. It is not contractually bound to do so;
  - 9.2. Alternatively, the provisions relied upon by the Defendant to justify the said invoices are unenforceable by reason of the rule against penalties.
10. The Claimant’s Solicitors sent a Letter of Claim to the Defendant on 8 February 2023. It was the Defendant’s position, in reply, that the content of the Claimant’s letter would be best argued in Court.

11. The Claimant applies to the Court accordingly, seeking the relief pleaded within the brief details of claim appearing on the second page of the Part 8 Claim Form.

**(B) Procedural Chronology**

<b>Date</b>	<b>Event</b>
08/02/2023	Proceedings Issued
26/08/2023	Acknowledgment of Service
18/09/2023	Defendant's evidence filed / served
27/09/2023	District Judge Shepherd lists direction hearing
03/10/2023	Claimant's rebuttal evidence filed / served
13/10/2023	Defendant's Second Witness Statement filed (inclusion disputed)
20/11/2023	Directions hearing

**(C) List of Issue**

12. As to the formation of the Parties' agreement:

- 12.1. Did the Claimant's payment of the Invoices (as defined at §3 of the brief details of claim) constitute an offer to lease the URLs from the Defendant for a 12-month period?
- 12.2. If so, did the Defendant accept that offer?
- 12.3. If not, on what basis did the Parties reach a concluded agreement, if at all?

13. As to the terms of the Parties' agreement:

- 13.1. What were the terms of the Parties' agreement?
- 13.2. Did the Parties' agreement incorporate any of the terms identified on the Defendant's website?

13.3. If so, how and when were any applicable terms incorporated?

14. As to the enforceability of terms relied upon by the Defendant:

14.1. Are the following terms enforceable?

*Late Payments*

*Very Late Payments*

*Auto Renewal Policy*

*Cancellation*

15. As to the invoices issued by the Defendant:

15.1. Is the Claimant liable to pay any of the invoices raised by the Defendant?

15.2. If so, which invoices?

16. As to the relief sought by the Claimant:

16.1. Is it, in all the circumstances, appropriate to grant the declaratory relief sought by the Claimant and articulated within the Draft Order appended to the Part 8 Claim Form?

16.2. Is it just and convenient to grant an injunction in the terms proposed by the Claimant within the Draft Order appended to the Part 8 Claim Form?

**Adam Gould | PLP  
Counsel for the Claimant**



3. The Defendant shall, by 4pm 14 clear days before the Disposal Hearing, serve upon the Claimant a schedule identifying all the invoices which it says are due from the Claimant (**the Schedule**) together with copies of all invoices identified within the Schedule.
4. The Claimant shall, by 4pm 7 clear days before the Disposal Hearing, file with the Court and serve upon the Defendant a hearing bundle which complies with the requirements of Civil Procedure Rule 39.5, paragraph 27 of Practice Direction 32 and Appendix C to The Circuit Commercial Court Guide, 11<sup>th</sup> Edition, 2022.
  - 4.1. The Disposal Hearing bundle shall, for the avoidance of doubt, include a copy of the Schedule.
5. The Parties shall exchange, and file with the Court, skeleton arguments by 4pm 3 clear days before the Disposal Hearing.
6. The Claimant shall file with the Court a combined authority bundle by 4pm 2 clear days before the Disposal Hearing.
7. The Defendant does not have permission to rely upon the Second Witness Statement of John Duggan dated 13 October 2023.
8. Costs in the case.

### **Service of this Order**

The Court has provided a sealed copy of this order to the serving party:

Addleshaw Goddard LLP  
3 Sovereign Street  
Leeds  
LS1 4ER  
Ref: 106795-23