IN THE EMPLOYMENT TRIBUNAL (SCOTLAND) AT EDINBURGH

Case No: 4102016/2017 Issued Following Open Preliminary Hearing Held at Edinburgh on 21 February 2019

Employment Judge J G d'Inverno, QVRM, TD, VR, WS

Miss B Robinson	**Claimant** **In Person**
Fife Health Board	**Respondent** **Represented by:-** **Mr A Watson, Solicitor**

JUDGMENT OF THE EMPLOYMENT TRIBUNAL

The judgment of the Employment Tribunal is:

(First) The respondent's application for strike out of "all or any of the complaints of discrimination" is refused.

(Second) The complaint of constructive dismissal and a complaint of section 26 Equality Act 2010 harassment restricted to that given notice of by the averments appearing at paragraph 44 on page seven and in the third, fourth and fifth sentences of the unnumbered bullet pointed paragraph on page 8 of, the paper apart to the initiating application ET1 in the terms which are expressly set out at paragraph 40 of the note attached to this

judgment, are appointed to a final hearing to proceed at Edinburgh on dates to be afterwards fixed by date listing stencil.

(Third) The respondent's application for the making of a deposit order in respect of the complaint of disability discrimination is refused.

Employment Judge: Joseph d'Inverno
Judgment Date: 14 June 2019
Entered into the Register: 17 June 2019
And Copied to Parties

Procedural Background

1. This case called for Open Preliminary Hearing at Edinburgh on 21 February 2019 for the purposes of:-

The Issues

2. The Preliminary Issues before the Tribunal for investigation and determination at Open Preliminary Hearing were:-

(First) Whether all or part of the claimant's complaints of discrimination should be struck out for reason of non-compliance with the Tribunal's orders and or on the ground that they enjoy no reasonable prospect of success; and or that it is not possible to have a fair hearing in respect of those claims, for want of specification and fair notice; respectively in terms of section 37(1)(a) and or (c) and or (e) of the Employment Tribunals (Constitution and Rules of Procedure) Regulations 2013 Schedule 1.

(Second) In the alternative, let it be assumed that the Tribunal declined to strike out all the complaints of discrimination, whether there be allowed to proceed to final hearing, along with the complaint of constructive dismissal a complaint only of harassment in terms of section 26 of the Equality Act 2010

and being restricted to that given notice of in the initiating Application ET1 at paragraph 44 and at the unnumbered paragraph appearing at the top of page 8, both of the paper apart to the initiating Application; and

(Third) In the event that the complaint of discrimination is restricted as proposed in terms of Issue **(Second)** above whether a deposit order should be made in respect of that restricted discrimination claim in terms of Rule of Procedure 39 on the grounds that it has little reasonable prospect of success.

Submissions for the Respondent

3. For the respondent Mr Watson submitted as follows:-

(a) The respondent's primary position is that any claim of discrimination should be struck out;

(b) In the alternative, the respondent seeks an order directing that only the specific claim of discrimination, which is given notice of in the ET1, should proceed to a hearing on the merits together with the claim of constructive dismissal.

Strike Out of the Discrimination Claim

4. The respondent's representative confirmed that the respondent seeks strike out of all and any claim of discrimination for non-compliance with the Tribunal's orders, in accordance with Rule 37(1)(c) of the Employment Tribunals (Constitution and Rules of Procedure) Regulations 2013.

5. That, as at the date of the Open Preliminary Hearing on strike out, there had been three opportunities afforded to the claimant to adequately particularise

her discrimination claims respectively in compliance with the Rules of Procedure and with the Orders of the Tribunal:-

(a) At first instance in her initiating Application ET1

(b) In response to Judge Atack's orders of 18/23 August 2017, and,

(c) In response to the judgment and orders of 5 July 2018 (reaffirmed on 15 August 2018)

6. At paragraph 57 and 58 of the Note of Reasons attached to the judgment of 5 July the Tribunal had articulated that in declining, at that stage, to strike out all of the claims against which the respondent's Application was directed it had done so for the purposes of according to the claimant "*one last opportunity to provide the necessary specification*"; and had further stated that failure to comply, without exculpatory reason, with the fresh orders pronounced in that regard of even date and issued in conjunction with the judgment would open the door to amongst other matters the potential remedies at that time being sought by the respondent of Strike Out and a deposit order.

7. In response, the claimant had intimated an 83 page document in tendered compliance and which, following on its initial consideration at Closed Preliminary Hearing on 20 November 2018, the Tribunal, in terms of its order and note dated 26 November 2018, recorded:-

- Was difficult and onerous to read for the purposes of extracting the directed specification

- Failed to provide the specification directed by the Tribunal in its orders

- Appeared to seek to introduce new claims not given notice of in the ET1, and which would require Leave to Amend (which was not sought)

- Would, if allowed to be received, substantially render more obscure and widen the scope of any enquiry; would place an unduly onerous burden on the respondent and would result in a hearing of several weeks (contrary to the Overriding Objective).

- Was not compliant with the Tribunal's orders and as such, was not received by the Tribunal as Further Particulars of Claim.

8. Against that background the respondent had applied for, and at Open Preliminary Hearing seeks strike out of all and any claims of discrimination.

9. Discrimination claims require clear specification if they are to be litigated. The respondent was entitled to know the case it has to defend. The claimant had been given ample opportunity to adequately specify her discrimination claim but has been unable or has declined to do so. The opportunity to pursue such a claim had, in the respondent's submission fairly been lost.

10. The claim of discrimination is given scant notice in the paper apart to the initiating Application ET1. The respondent considers that ultimately and objectively construed, constructive dismissal constitutes the main thrust of the claimant's complaint. The respondent's application for strike out of the discrimination claims did not impact upon the complaint of constructive dismissal; and as such, in the respondent's representative's submission it would be proportionate to strike out any claim of discrimination and allow only the constructive dismissal claim to proceed.

Authorities referred to

11. Mr Watson for the respondent relied upon certain authorities in support of the Application.

    (a) In ***Weir Valves and Control (UK) Limited v Armitage*** [2004] ICR 371, the EAT set out the principles for Tribunals to apply

when considering whether to strike out a claim for non-compliance with Tribunal orders. The guiding consideration is the Overriding Objective to do justice between the parties. A Tribunal should therefore consider all the circumstances when deciding whether to strike out or whether a lesser remedy would be an appropriate sanction. Relevant factors will include:-

- The magnitude of default
- Whether the default is that of a party or their representative
- What disruption, unfairness or prejudice has been caused; and whether a fair hearing is still possible.

(b) ***Essombe v Nandos Chickenland Limited*** UKEAT/0550/06 is an example of a claim being struck out due to the claimant's willful disobedience of an order. The EAT upheld the strike out of Mr Essombe's claims as he had deliberately refused to comply with the Tribunal's order to disclose tape recordings he had made during a disciplinary hearing. The EAT acknowledged that strike out is a draconian order which should only be deployed in a clear and obvious case but held that this was such a case. The EAT noted that as a matter of public policy orders are there to be obeyed, otherwise cases cannot be properly case managed and fairness achieved between the parties.

(c) In ***EB v BA*** UKEAT/0139/08 and UKEAT/0138/08 a claimant complied with a "literal construction" of the Tribunal's order but, having understood the intention behind the order, was found to have "deliberately flouted" it. The EAT upheld the Tribunal's decision to strike out her claim. The claimant had alleged that her employer's failure to consider her for over 900 work projects was sex discrimination. The Tribunal ordered her to narrow down the list as otherwise the case would be unmanageable. However, the claimant then told the Tribunal that she still

wished to pursue all 900 projects. Since the Tribunal had explained why it was making the order, and the claimant had failed to make the case slightly more manageable, she was found to have breached the order, resulting in the striking out of her case.

12. These cases, submitted Mr Watson concerned the striking out of a case *in its entirety*; whereas the respondent's Application is only aimed at an aspect of the claimant's claim given little regard in her ET1. As such, the respondent believed that strike out is not as severe an order as may be in other cases.

13. In terms of addressing other matters to be gleaned from case law, Mr Watson further submitted;

(a) **The Overriding Objective.** Each time the claimant produces documentation, ostensibly in response to the Tribunal's orders, the respondent is required to incur (at times considerable) expense in reviewing the particulars and cross referencing these with the Tribunal's order, the ET1, the ET3 and other related documentation. What has been produced by the claimant in the past has been lengthy and onerous to read. It has not been specification, as that would ordinarily be understood, but instead had the effect of a broadening of the issues. The resultant Preliminary Hearing and correspondence with the Tribunal also incurs cost for the respondent.

(b) **A fair hearing.** The respondent's representative submitted that it is not possible to have a fair hearing in relation to the discrimination claim given its lack of specification and that to proceed in those circumstances would put the respondent at a disadvantage.

(c) **The extent and magnitude of the claimant's non-compliance.** The respondent's representative submitted that the claimant's non-compliance had been in response to clear

direction from the Tribunal. The respondent accepted and the Tribunal had made allowance for the fact that the claimant was an unrepresented party. In consequence, considerable time and care had been taken both by the respondent in the criticisms advanced by it and by the Tribunal, to explain to the claimant what was required to achieve compliance and why. In particular, the criticisms directed by the respondent against what the claimant had previously tendered in response to Judge Atack's orders of 18/23 August 2017 had led to the provision by the Tribunal, in terms of its subsequently issued judgment and orders and orally in the course of Closed Preliminary Hearings, of clear guidance in relation to what was expected of the claimant when she availed herself of what she had been advised was likely to be a "last opportunity to provide the necessary specification". Under reference to paragraph 55 of the Tribunal's judgment of 5 July 2018 the claimant's representative submitted that the above included -

- Guidance that the claimant should only add factual details to allegations already given notice of in her ET1;

- That the claimant should not set out a lengthy narrative of events;

- That the claimant should give notice of the essential elements of each claim by reference to the relevant statutory provision; and should, if desired,

- Separately, guidance that if seeking leave to amend, the claimant should incorporate within a tendered Minute of Amendment, the actual words which she wished to add to her ET1

In the respondent's representative's submission that guidance had been largely disregarded.

Consideration of the lesser sanction

14. The respondent's representative respectfully submitted that the Tribunal could have, no confidence that further direction to provide specification in relation to the discrimination claim would be complied with. Nor, in the circumstances, would be reasonable to proceed in that way. Against that background the respondent's representative sought, in the alternative that a complaint of discrimination restricted to that said to arise out of terms of the Occupational Health referral of 13 April 2017, as given notice of at paragraph 44 of the paper apart and in the bullet pointed unnumbered paragraph which appears at the top of page 6 of the paper apart to the initiating Application ET1 and which was separately founded upon by the claimant as the last straw for the purposes of her constructive unfair dismissal claim be allowed to proceed to final hearing together with the constructive dismissal claim. He further submitted that that claim should proceed as an instance of alleged harassment in terms of section 26 of the EqA 2010 (albeit no specific reference to section 26 is made; and, given the absence of any averred causal link between any asserted detriment and any alleged protected act) not as a complaint of victimisation.

15. In the respondent's representative's submission the alternative outcome sought, let it be assumed the Tribunal declined to strike out all or any complaint of discrimination, namely that a complaint of section 26 EqA harassment restricted to circumstances given notice of at paragraph 44 and in the first paragraph on page 8, of the paper apart to the ET1 be admitted to hearing along with the constructive dismissal claim would accord with the Overriding Objective:-

    (a) Dealing with the case in a way that is proportionate to the complexity and importance of the issues and the limited emphasis afforded to the discrimination claims in the ET1;

(b) Would address the fact that any hearing dealing with discrimination on a wider basis would add disproportionate length and complexity (on the claimant's own assessment 21 days for the hearing of her own side of the claims and being in excess of 21 days)

(c) Saving expense associated with witness evidence and what would otherwise require to be disproportionately lengthy legal submissions; and,

(d) Ensuring that parties were on an equal footing (in terms of adequate specification and fair notice to the respondents of the claims which they require to meet).

16. In the event that the Tribunal was minded to determine and dispose of the issues in accordance with the alternative outcome proponed by the respondents, the respondent's representative invited the Tribunal to consider the making of a deposit order in terms of Rule of Procedure 39(1) in relation to the discrimination claim which on such a disposal would be admitted to hearing.

The Claimant's Submissions

17. With a view to doing justice to the claimant's submissions I set them out here fully as I have noted them.

18. Miss Robinson indicated, in outline, that her intention was first to respond to certain of the points made in submission by the respondent's representative and thereafter to proceed to her own submission. In the event she made a single submission which served both purposes.

19. In response to the respondent's representative's submission:-

> that her originally created documents, intimated in tendered compliance with the Tribunal's orders of (Judge Atack) of 18/23 August 2017 and the Tribunal's reiterated orders (**Ninth** and **Eleventh**) of 5 July 2018, represented respectively a second and third opportunity afforded the claimant to specify her claims and further, were,
>
> - Onerous and difficult to read
> - Sought in part to introduce new claims not heralded in the ET1
> - Did not disclose or give any fair notice of, in relation to the putative complaint of victimisation, causal connection between any particular protected act on the one hand and any alleged detriment suffered on the other; and, being documents which the Tribunal had already determined were not compliant with the terms of the respective orders and had not been received by the Tribunal and therefore did not form part of the claimant's case;

The claimant responded in terms of the following submission:-

> (a) that the previously tendered documents were not onerous and were simple to read
>
> (b) That the detriments she had suffered were known to the respondent's representatives
>
> (c) That the allegations which she said would go to establish discrimination were levelled in part at least against some witnesses from whom evidence would also be heard in respect of the constructive unfair dismissal claim and thus shouldn't be regarded as introducing new claims and thus, she submitted,

the admission of the discrimination claim should not be regarded as productive of any additional burden for the respondent

(d) That the individuals whom she identified were Lana Clacher, Charmaine Bremner and Isla Barton.

20. The claimant then confirmed in relation to her previously provided estimate of requirement of 21 days to hear her case, let it be assumed all of her discrimination claims were allowed to go to Hearing, that that 21 day estimate previously provided by her related only to the hearing of her own side of the case including hearing evidence from the approximately 12 witnesses whom she had identified and did not include the hearing of the respondent's case.

21. Regarding the length of hearing and any question of proportionality or prejudice to the respondent the claimant submitted that the solution lay in the respondents' own hands. She submitted that:-

(a) the respondents should have been and should be prepared to concede material elements of her claims such as conceding that they did not follow their policy;

(b) to concede that they ought not to have done "this act or that act" as their doing so would avoid the need for the claimant to prove those material matters and would save time.

(c) She stated that this was something that the respondent should be expected to do especially when the "evidence is clearly there".

(d) The making of such concessions by the respondents would avoid the need for a lengthy hearing and would also result in a fair hearing.

22. The claimant stated that she had required to expend time and disclose documents to persuade the respondents and to satisfy the Tribunal that she was, at the material times, a disabled person for the purposes of presenting discrimination claims whereas, she submitted, the respondent should simply have conceded that matter without the need for her to expend time and effort persuading them or to produce documentary evidence vouching her position to satisfy the Tribunal.

23. In response to the criticism advanced by the respondents that she had deliberately or willfully failed to obtemper the Tribunal's orders, the claimant stated that that was not the case but rather that she had sought to comply with the orders and provide specification in the way that she considered appropriate and to the best of her ability. She had been of the view and remained of the view (contrary to the earlier Determination of the Tribunal) that what she had tendered (sought to provide) in compliance with Judge Atack's Orders of 18/23 August 17 and in response to the judgment and orders of 5 July 2018, was sufficient and that no more was required and, that being her view, that she did not understand why the respondents had asserted and continued to assert that it was not compliant with the respective orders.

24. Reading from pages 11 and 12 of the 166 page bundle which she had lodged, the claimant submitted in summary as follows:-

    (a) Strike out is not meant to be punitive, which it will be if the Tribunal struck out for non-compliance. The decision to strike out is draconian.

    (b) She believes "that a fair trial will not be held and there is clear evidence that disability discrimination had occurred throughout my employment and that disability discrimination continued after I resigned my post".

(c) In deciding whether to strike out a party's case for non-compliance Tribunals must have regard to the Overriding Objective

(d) "I am unrepresented"

(e) "I believe my case will not be heard fairly. I wish to appeal against the decision not to include reasonable adjustments and discrimination arising from disabilities".

Discussion

25. The procedural history of the Tribunal's orders directing further specification of the discrimination claims is as set out by the respondent's representative in his submission. The claimant's position in 2017 was that what she had elected to produce and tender in response to Judge Atack's orders was sufficient and that no more was required by her and that the same should be regarded as compliant with the Tribunal's orders. The claimant's position in that regard had not changed as at the date of this Open Preliminary Hearing on 21 February 2019. That remains the claimant's position notwithstanding the intervening:-

(a) Orders and judgment of the Tribunal at the previous Open Preliminary Hearing of 8/9 March 2018,

(b) The Tribunal's Determination of the claimant's Application for review of that judgment (issued 15 August 2018), and

(c) The Tribunal's orders of 20 November 2018.

26. In terms of all of above the Tribunal determined and affirmed; that the documents tendered by the claimant are not compliant with the Tribunal's orders, were not received by the Tribunal as Further Particulars of Claim and that their content was not incorporated into and does not form part of the claimant's pleadings in the case. Parties are referred to the Note of Reasons

attached respectively to that judgment, to the Determination of Application for Reconsideration and to those orders in which the Tribunal's reasoning for so determining is fully set out and which is incorporated by reference here for reasons of brevity.

27. The claimant appeared to be reluctant to accept, or to be incapable of accepting, the Tribunal's earlier Determinations issued following full hearings and her submissions at Open Preliminary Hearing proceeded, in large part, upon an assertion that the respondents:-

    (a) were wrong not to have simply agreed to the previously tendered 168 page document being received and to its forming part of her case,

    (b) Had been wrong to assert that the introduction of some elements contained within those documents, if they were to be insisted upon, would require to be the subject of an Application for Leave to Amend, and, by implication, that the orders, guidance and judgments previously issued by the Tribunal variously in July, November and December 2018 and following Determination on 15 August 2018 of the claimant's Application for Reconsideration of the Tribunal's earlier judgment, had not been accepted by the claimant and were being disregarded by her.

28. The claimant's Application for Reconsideration of the Tribunal's judgment of 24 July 2018, issued following Open Preliminary Hearing held on 8/9 March, having been determined by the Tribunal on 15 August 2018, the Tribunal is unaware of any Appeal against the Tribunal's original judgment being on the dependence.

29. I consider that no requirement arises to strike out any complaint of discrimination which is not that given notice of in the initiating Application ET1 and its relative paper apart. This because the documents tendered by the

claimant purporting to expand the discrimination claims have not been accepted by the Tribunal and neither have the pleadings been the subject of amendment. Accordingly the complaint of discrimination which is currently before the Tribunal is that given notice of at paragraph 44 on page 7 and in the first (bulleted but unnumbered) paragraph appearing on page 8 of the paper apart to the initiating Application ET1 and upon which the claimant separately relies as the "last straw" for the purposes of a constructive dismissal claim.

30. Although neither paragraph in the ET1 paper apart referred to above contains any identification of the statutory provision relied upon, I consider that the complaint given notice of falls to be reasonably construed as a complaint of victimisation in terms of section 26 of the Equality Act 2010. A reading of the paragraphs together, and along with the claimant's description of the second sentence of paragraph 4 of the OH Report (in truth referral) as "*offensive, degrading and containing false allegations against me*" and the first sentence of the unnumbered paragraph of page 8 appearing under the heading Disability Discrimination (DD) which is in the following terms: "*I suffered disability discrimination (DD) with the constant reference about my admission to a mental health hospital and cfs supports that conclusion and £The degrading work environment, bullying and false allegations caused CFS flare ups*".

31. That complaint, albeit giving notice of only one specified incidence of harassment namely, that said to arise from the wording of the Occupational Health referral of 13 April 2017, has formed part of the claimant's case from the outset. Clear notice of it is given at the already mentioned paragraphs of the paper apart to the ET1. I consider that sufficient notice is given to that specified complaint such that the respondents know the case they are to respond to in relation to the terms of the Occupational Health Report.

32. The Tribunal having construed and determined, at Open Preliminary Hearing, that it falls to be construed as a complaint of section 26 EqA 2010 harassment, it does not require to be further specified.

33. The references, in the first sentence of the bulleted unnumbered paragraph first paragraph on page 8 of the paper apart to "*I suffered disability discrimination (DD) with the constant reference about my admission to a mental health hospital and cfs.*", remain unparticularised and do not give fair notice to the respondents of the claim which they are to meet. A fair Hearing in respect of such a general and unparticularised allegation would not be possible or practicable, the respondents being entitled, as their representative confirmed they would be required to object to any attempts to lead evidence under such a general averment about other instances which are unparticularised and which are other than, or which relate to matters other than the content of the Occupational Health Report, for the purposes of supporting the disability discrimination claim.

34. While as a matter of fact the claimant has failed on three occasions to tender Further Particulars which were compliant with the Tribunal's orders and while giving consideration to the respondent's representative's submission in this regard I have, on balance and at this juncture in proceedings, been unable to conclude that the claimant has deliberately flouted the Tribunal's orders and I decline to strike out the disability discrimination claim which is given notice of in their ET3 on that ground.

35. Nevertheless the form, volume and expanding nature of the non-compliant Further Particulars which the claimant has on each occasion tendered combined with what appears to be a disregard for the earlier Determinations of the Tribunal and, in consequence, the appearance of unwillingness to comply with its orders, have resulted in substantial procedure associated cost, both financial and in terms of time, to not only the claimant but also to the respondents whom she has convened to the proceedings.

36. Further delay progressing to a final hearing the claims given notice of in the ET1 to final hearing that is the complaint of constructive unfair dismissal together with the specified complaint of disability discrimination, (the section 26 EqA 2010 Harassment complaint) which is given particular notice of at

paragraph 44 and in the first and unnumbered paragraph on page 8 of the paper apart to the ET1, would not be in accordance with the Overriding Objective.

Disposal

37. Against the background set out above I dispose of the issues as follows.

38. In relation to the first issue I refuse the Application to strike out "all or any claim of discrimination" on the various grounds sought.

39. In relation to the second issue advanced by the respondent's representative in the alternative, I determine and direct that there now appointed to a final hearing:-

    (a) the complaint of constructive unfair dismissal in terms of section 95(1)(c) and section 98 of the Employment Rights Act 1996; and,

    (b) a complaint of disability discrimination being restricted to the section 26 Equality Act 2010 complaint of harassment said to have arisen in the particularised circumstances given notice of at paragraph 44 of page 7 and in the third, fourth and fifth sentences of first unnumbered and bullet pointed paragraph appearing, under the heading Disability Discrimination (DD), at the top of page 8 of the paper apart to initiating Application ET1.

40. For the avoidance of doubt and to assist parties in preparing for the final hearing the terms of the relevant averments which are remitted to final hearing are expressly reiterated below:-

    (a) From paragraph 44 on page 7 of the paper apart:-

"*44 On the 10th May 2017 I attended an OH appointment. Dr Blair (Dr B) showed me the report sent by CB dated 13th April 2017. It was offensive, degrading and contained false allegations against me. Dr B stated that it was heading towards a Disciplinary Hearing. This report did not create an environment towards mediation but rather dismissal. The OH report meant more procedures and policies. Due to what was happening at work my health was deteriorating and I was in fear of what was happening. I was feeling suicidal at work as I had no control over what was happening. There was no plan to move forward. This was the final straw.*"; and,

(b) In the 3rd, 4th, 5th and 6th sentences and appearing in lines 3, 4, 5, 6 and 7 of the unnumbered bullet pointed paragraph first appearing at the top of page 8 of the paper apart to ET1 under the heading Disability Discrimination (DD):-

"*All OH reports stated I was fit for NNU and OH recommendations such as Staff Resilience course was never followed. The degrading work environment, bullying and false allegations caused CFS flare ups, depression and WRS. The last event of DD was the OH appointment report dated 13th April 2017 which I saw on the 10th May 2017*"

41. For the avoidance of doubt it is made clear that the general and unparticularised averments contained in the first and second sentences of the first paragraph appearing on page 8, of the ET1 paper apart vis; "*I suffered Disability Discrimination (DD) with constant reference to my admission to a mental health hospital and cfs.*"; and "*there were constant inference that I would not be able to work in NU again due to my health issues.*",
are not remitted to final hearing.

42. In relation to the third issue I am not persuaded that the complaint of disability discrimination as restricted to the terms in which it is now remitted to final hearing enjoys little prospect of success to the extent that merits the making of a deposit order. I accordingly decline to do so, at this juncture in proceedings.

43. **Date listing stencils should now be issued to parties representatives for the purposes of identifying dates on which a final hearing, of appropriate duration, will be fixed.** As I have formed and expressed opinion on the issues of strike out and prospects of success, the final hearing, once fixed, should proceed before an Employment Judge other than myself. Pending final hearing I will remain the Case Managing Judge.

Employment Judge: Joseph d'Inverno
Date of Judgment: 14 June 2019
Entered into the Register: 17 June 2019
And Copied to Parties