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IN THE BOW COUNTY COURT OF MIDDLESEX

No. 27929

B E T W E E N THOMAS SMITHIES TAYLOR Plaintiff

and
WALTER KEMSLEY & OTHERS Defendants

I, THOMAS SMITHIES TAYLOR of 2 Newarke Street, Leicester

in the County of Leicester Captain Army Service Corps
Territorial Forces Leicester the above named Plaintiff

make Oath and say as follows:-

1. I have in my possession or power the Documents
relating to the matters in question in this Suit set
forth in the First and Second Schedules hereto.

2. I object to produce the documents set forth in the
Second Schedule hereto on the ground that the same are
from their nature privileged from inspection.

3. According to the best of my knowledge information
and belief I have not now, and never had in my possession
custody or power, or in the possession, custody or power
of my Solicitors or Agents, Solicitor or Agent, or in the
possession custody or power of any other persons or person
on my behalf, any deed, account, book of account, voucher,
receipt letter memorandum, paper or writing, or any copy
of or extract from any such Document, or any other Document
whatsoever, relating to the matters in question in this
Action, or any of them, or wherein any entry has been made
relative to such matters, or any of them, other than and
except the Documents set forth in the said First and Second
Schedules hereto.

THE FIRST SCHEDULE.

Description of Document

Date

No. 27929

IN THE BOW COUNTY COURT OF MIDDLESEX

Ticket for meeting Row F. No.25

29th June 1912

Front page of Annual Report of Walthamstow Division Central Liberal Radical Association for 1911.

Copy letter Plaintiff to President etc. of above Association.

1st July 1912

Copy letter Plaintiff's Solicitors to Defendant F. Bristow.

26th July 1912

Letter F.T.C. Bristow to Plaintiff's Solicitors.

1st August 1912

Copy letter Plaintiff's Solicitors to Defendant F.T.C. Bristow.

6th August 1912

Correspondence between Plaintiff's Solicitors and Defendant's Solicitors since action.

set forth in the First and Second Schedules hereto.

THE SECOND SCHEDULE

Correspondence between Plaintiff and his Solicitors and between Plaintiff's Solicitors and witnesses, proofs of witnesses and notes and memoranda made by Plaintiff's Solicitors solely for the purpose of the prosecution of this action.

SWORN at

in the

of

the day of 1912

Before me *M. Mark Lane*

A Commissioner for Oaths.

This Affidavit is filed on behalf of the Plaintiff.

THE FIRST SCHEDULE

Date

Description of Document

IN THE COUNTY COURT OF MIDDLESEX

29th June 1913

Ticket for meeting Row F. No. 25

Front page of Annual Report of
Welhamston Division Central Liberal
Radical Association for 1911.

1st July 1913

Copy letter Plaintiff to President
etc. of above Association.

28th July 1913

Copy letter Plaintiff's Solicitors to
Defendant F. Bristow.
R O L Y A T

1st August 1913

Letter F.T.C. Bristow to Plaintiff's
Solicitors KEMSLEY & YELMERS

6th August 1913

Copy letter Plaintiff's Solicitors to
Defendant F.T.C. Bristow.

Correspondence between Plaintiff's
Solicitors and Defendant's Solicitors
since action. as documents

Filed on behalf of Plaintiff

Correspondence between Plaintiff and his Solicitors and between
Plaintiff's Solicitors and witnesses, proofs of witnesses and notes
and memoranda made by Plaintiff's Solicitors solely for the purpose
of the prosecution of this action.

SWORN at

of in the

1913
LALHAM & GOOD, BISGOOD & MARSHALL
HATCHETT JONES, Solicitors

Before me
48 Mark Lane, E.C.

A Commissioner for Oaths.

This Affidavit is filed on behalf of the Plaintiff.

T. S. T.