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5 May, 2016

Bankruptcy Court
Rolls Building
7 Rolls Buildings
Fetter Lane
London EC4A 1NL

Dear Sir,

Re: In the matter of Keison International Limited (Registered No. 01964559) and in the matter of the Insolvency Act 1986.

Petition No: CR-2016-001440.

The creditors statutory demand delivered to Keison International Limited did not comply with the Insolvency Rules 1986 rule 4.6(1)(d) as amended by the Insolvency (Amendment) Rules 2010.

https://www.insolvencydirect.bis.gov.uk/technicalmanual/Ch37-8/chapter45/part3/part_3.htm

**45.36 Format of statutory demand and information to be included
(Amended October 2010)**

The statutory demand must be dated and be authenticated either by the creditor himself or a person authorised to act for him. It must be in the prescribed form and state the amount of the debt and the consideration for it [Note 4] [Note 5].

In order that a company has every opportunity to respond, information must be given in the statutory demand as to its purpose, the fact that if it is not complied with winding up proceedings may result and the time and methods for compliance. Also to be provided is the name, address and telephone number of a person with whom contact can be made with a view to securing or compounding the debt to the creditor's satisfaction [Note 6].

For post 6 April 2010 petition cases, the statutory demand must also state that the company has the right to make an application to the court for an injunction restraining the creditor from presenting or advertising a petition for the winding up of the company [Note 7]. An application for such an injunction must be made to a court having jurisdiction to wind up the company [Note 8].

A facsimile of the statutory demand delivered to Keison International Limited at their registered office is produced in the creditors bundle of documents and is evidence that the section relating to the right of the company to obtain an injunction restraining the creditor from presenting a petition appears to have been deliberately omitted.

As a result of this omission, **the statutory demand is fundamentally defective and a nullity**, as it does not comply with the statutory requirement.

Failure to comply with a statutory requirement includes rules made pursuant to a statute. (Smurthwaite v Hannay [1894] A.C. 494).

Keison International Limited will rely on the issue of nullity as a defence to this claim.

A 'fundamental defect' includes a failure to serve process where service of process is required (Lord Greene in Craig v Kanssen [1943] 1 KB 256); or where service of proceedings never came to the notice of the defendant at all (e.g. he was abroad and was unaware of the service of proceedings); or where there is a fundamental defect in the issuing of proceedings so that in effect the proceedings have never started;

It is never too late to raise the issue of nullity and a person can ignore the void order or claim and raise it as a defence when necessary (Wandsworth London Borough Council v. Winder [1985] A.C. 461; Smurthwaite v Hannay [1894] A.C. 494; Upjohn LJ in Re Pritchard (deceased) [1963]; Lord Denning in MacFoy v United Africa Co. Ltd. [1961]).

As this claim is **void ab initio**, an application for an injunction restraining the creditor from presenting a winding up petition is unnecessary.

In Bellinger v Bellinger [2003] UKHL 21 the House of Lords confirmed that a void act is void from the outset and no Court – not even the House of Lords (now the Supreme Court) – has jurisdiction to give legal effect to a void act no matter how unreasonable that may seem, because doing so would mean reforming the law which no Court has power to do because such power rests only with Parliament. The duty of the Court is to interpret and apply the law not reform or create it.

In Wiseman v Wiseman [1953] 1 All ER 601 – Lord Denning confirmed that:

- (i) The issue of natural justice does not arise in a void order because it is void whether it causes a failure of natural justice or not;
- (ii) a claimant or defendant should not be allowed to abuse the process of Court by failing to comply with a statutory procedure and yet keep the benefit of it and for that reason also a void act is void even if it affects the rights of an innocent third party.

In light of all this **we request that this matter is struck out and the creditor be de-barred** from resubmitting his claim.

As there is **no valid statutory claim**, the paperwork submitted to the court by Solicitor D. Frame Solicitor Regulation Authority (SRA) ID# 426799 are **void ab initio**. This includes but is not limited to paperwork received with case numbers CR-2016-001440 and CR-2016-002292.

As it is in the Public Interest to end this abuse of power by Solicitor D. Frame and the use of Chancery Division by powers foreign to the living constitution of Our Sovereign Lady, the living woman known as Her Majesty Queen Elizabeth II, we are pursuing justice in a **Court of Record**. Statutory support for a Court of Record can be found in the 1770 Parliamentary Privileges Act, which curbs the abuse of authority by Parliament and the courts.

To our knowledge the solicitor, his client and the Chancery Division have failed to respond to the claims pursued in full view of the international de-facto World Powers where the Court of Record has demonstrated jurisdiction. The published claims are at www.courtrecord.org.uk.

We would ask the court to excuse our non attendance in this matter and no disrespect is intended to this honourable court.

All communication regarding this matter should be addressed and served at our registered office at 32 Writtle Road, Chelmsford, Essex CM1 3BX.

Yours faithfully,
KEISON INTERNATIONAL LTD

A handwritten signature in blue ink that reads "K. Argent". The signature is written in a cursive, slightly slanted style.

Keir Argent
Managing Director