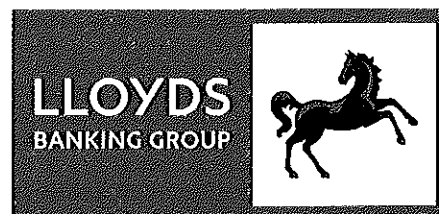


Benedict Brogan  
Group Public Affairs Director



Kevin Hollinrake MP  
Co-chair of the APPG on Fair Business Banking  
House of Commons  
London  
SW1A 0AA

Lloyds Banking Group plc  
25 Gresham Street  
London  
EC2V 7HN

29 April 2019

Thank you for your letter of 28 March to António Horta-Osório. I've discussed it in detail with my colleagues and we have reflected with care on the points you make. I regret, however, that we continue to disagree with you both on the specific case you raise and on the wider issue. This is not, I should stress, because we do not recognise the fundamental importance of having reliable legal processes to support litigation of any kind, or the need to ensure that public confidence in those processes is upheld. Rather, we have a different view of the case in question, and, having examined the matter, we do not see grounds for drawing a parallel between the American 'robo-signature' issue and the situation in the UK.

Let me take those two points in turn.

You focused on the case of [REDACTED] who is represented by her husband [REDACTED]. This is a long-running matter which, as you know, follows from a court decision to allow the repossession of their property after [REDACTED] was unable to keep up with her mortgage payments. Repossessions and the proceedings surrounding them are always difficult decisions, ones we never take lightly and always with regret. There are ongoing court proceedings between Lloyds Bank plc and [REDACTED] in relation to shortfall debt, in which she has raised the forged signature allegations as part of her defence. We reject the allegations. More importantly so does the law firm against which they are made. The letter from the partner of TLT which I copied to you with my previous reply sets out the position, and I attach it again for convenience.

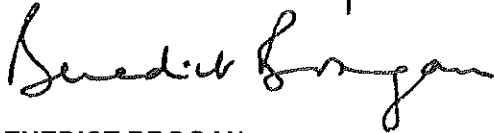
The proceedings were put on hold until 31 October 2018 to allow the parties to explore mediation and settlement options. We greatly regret that we have so far been unable to reach an agreement with [REDACTED] and continue to look for opportunities to do so. At a case management hearing last week the judge adjourned proceedings and ordered a further case management hearing at a future date. It may well be that the measures you suggest will be called for at that point, but that is rightly a matter to be decided by the court. As these issues are the subject of live legal proceedings, it would be inappropriate for us to suggest what the court might wish to do next.

With regard to your wider point suggesting that the American experience might in some way signpost a similar issue in the UK, we respectfully disagree. We entirely recognise that the

bank 'robo-signature' issue was a significant one for the American banking industry. But, having looked into it, it remains the case that we have no indication, from either our records, our law firms or the authorities, that there is evidence to suggest a similar issue exists in the UK. Indeed there are fundamental structural differences between how repossession law works in the United States and the UK which suggest it would be difficult for a similar situation to arise here.

There is no room for complacency however. Experience teaches us that we should pay attention to evidence put to us. We therefore stand ready to consider any material you can provide that would suggest there is more to this issue than we currently believe to be the case. You say for example there have been 'numerous' cases of forged signatures, and that the Bank Signature Forgery Campaign claims to have identified nine UK cases, of which four are said to be with Lloyds. Given the seriousness of these allegations, it would be helpful if you could reassure us that these have been raised with the police or any other appropriate authorities. It would also help if you could arrange for these cases to be brought to our attention so that we might look into them.

Finally, on the wider points you make I can assure you that everyone holding senior management accountability at Lloyds Banking Group takes their obligations very seriously. We work closely with our regulators and other stakeholders to ensure that we continue to build a culture at Lloyds Banking Group that puts our customers first. We believe the culture of Lloyds today – and indeed of the wider UK banking industry – is fundamentally different to what it was a decade or more ago. As you and I have discussed previously, we have learned many lessons from the financial crisis and the mistakes of the past. Our Board is committed to ensuring that we both respond to mistakes when they are made and are held accountable for them through our internal governance processes and through our statutory and regulatory obligations.

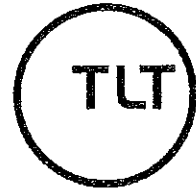
*You sincerely,*  


**BENEDICT BROGAN**  
Group Public Affairs Director

Cc  
John Glen MP, Economic Secretary to HM Treasury  
Andrew Bailey, Chief Executive, Financial Conduct Authority  
Stephen Jones, Chief Executive, UK Finance

TLT LLP

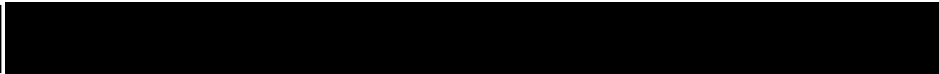
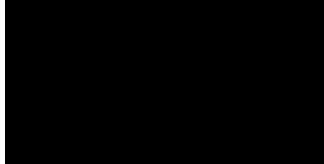
3 Hardman Square  
Manchester M3 3EB  
T +44 (0)333 006 0700  
F +44 (0)333 006 0711  
DX 14402 Manchester 2



www.TLTsolicitors.com

Our ref [REDACTED]  
Your ref [REDACTED]

**Strictly private and confidential**



Dear [REDACTED]

**Our Client: Lloyds Bank Plc**

I further refer to your numerous letters dated 16 June 2018 addressed to various partners of this firm, including myself.

Most, if not all, of the allegations which you raise were referred to at the hearing of our client's claim for money judgment to be awarded against [REDACTED] (the Claim) on 5 July 2018, at which we were both present. However, as the supervising partner overseeing this matter, I respond to your correspondence as follows.

**1 Systemic forgery of signatures on Banks' Court documents**

Your allegations that TLT systemically forges signatures to court documents (or indeed any documents) are denied in their entirety.

You and/or [REDACTED] (whom you are representing in the Claim) have sought to allege that the signature on [REDACTED] of this firm to various documents are not her own, to include that [REDACTED] was absent from the office on the dates when the documents were signed by her. I have reviewed your allegations against our confidential absence records and I inform you that these have no merit.

The claim form and particulars of claim were sent to the court electronically for issuing on 28 June 2010. [REDACTED] was not absent from the office on that date, or indeed any other date in June 2010.

The pre-action protocol checklist was signed by [REDACTED] on 7 July 2010 and her witness statement was signed by her on 14 July 2010. The only date in July 2010 upon which [REDACTED] was absent from the office was 16 July 2010, being two days' later.

Our client was awarded a Possession Order over [REDACTED] former property at [REDACTED] on 3 August 2010. Notwithstanding that [REDACTED] did not file or serve any further documents subject to a statement of truth following her witness statement of 14 July 2010, she was not absent from the office from 16 July 2010 to the date of the hearing. [REDACTED] absence from the office from the date the Possession Order was awarded is irrelevant given that she ceased to have conduct of the Claim upon [REDACTED] filing her Appellant's Notice.

**2 Instruction of TLT LLP in the Claim**

Your allegations that we/our client amended/concealed evidence from the court and/or that our client's former solicitors, Shoosmiths ceased to act for reasons relating to dishonesty, are denied in their entirety. Our client instructed this firm to take over conduct of the Claim on its behalf in view of our knowledge of the background as to how the shortfall on [REDACTED] mortgage account accrued and also the allegations which were previously raised during the possession proceedings relating to [REDACTED] former property at [REDACTED].

**3 Allegations of dishonesty by TLT LLP**

Your allegations that we/our client have persistently deceived and/or misled the court are denied in their entirety. We are aware of our professional obligations and we deny that we have acted with a lack of integrity or that we have deliberately misled the court. Accordingly, we are not prepared to enter into any correspondence in the manner you request.

As you are aware, directions in the Claim were set down by District Judge [REDACTED] at the hearing on 5 July 2018. Therefore, any further allegations (if any) will be responded to by our client formally as part of its Reply to [REDACTED] Amended Defence, which we await.

Yours sincerely

[REDACTED]  
Partner  
for TLT LLP