

B E T W E E N:-

Ms A Bailey

(Claimant)

-and-

Stonewall Equality Limited

(First Respondent)

Garden Court Chambers Limited

(Second Respondent)

Rajiv Menon QC and Stephanie
Harrison QC, sued as
representatives of All Members of
Garden Court Chambers except
the Claimant

(Third Respondent)

**Claimant's Supplementary Witness
Statement**

I, Allison Bailey of Garden Court Chambers, 57-60 Lincoln's Inn Fields, Holborn, London WC2A 3LJ, am the Claimant in this matter. I shall say as follows:

- (1) This is a supplementary statement made subsequent to my Witness Statement of 14 April 2022, ("**the First Statement**") and following receipt of the Second and Third Respondent's Witness Evidence, including that of Rajiv Menon QC.
- (2) I draw the Tribunal's attention to the definitions of Primary, Secondary and Non-clerking given at Paragraphs 211 (a) to (c) (Pages 68-9) of the First Statement. In brief, **Primary clerking** is where a solicitor says to clerk: "I need a barrister". **Secondary clerking** is where solicitor says to clerk "I need Allison Bailey" and **Non-clerking** is where Allison Bailey says to a clerk "I have a murder coming in".
- (3) The following therefore breaks down my work into primary and second clerking from 2017-19, both legal aid and private.

- (4) **During 2017** I did the following trials under legal aid:
- (a) 13 January 2017, Theft, MF [REDACTED]. **Primary.**
 - (b) 13 February 2017, Firearms. AH [REDACTED] **Primary.**
 - (c) 9 March 2017, Conspiracy to Rob, DM [REDACTED] *Secondary.*
 - (d) 13 March 2017, GBH, RP [REDACTED]. **Primary.**
 - (e) 31 March 2017, PONE MM [REDACTED] **Primary.**
 - (f) 6 April 2017, Fraud, KO [REDACTED]. *Secondary.*
 - (g) 19 April 2017, Assisting an Offender, TC [REDACTED] *Secondary.*
 - (h) 22 May 2017, Threats to Kill, TI [REDACTED] **Primary.**
 - (i) 27 June 2017, Firearm, RS [REDACTED] **Primary.**
 - (j) 4 July 2017, Conspiracy to Rob. DM [REDACTED] *Secondary.*
 - (k) 13 November 2017, Drugs Supply, AC [REDACTED]
Secondary.
 - (l) 4 December 2017, Firearms Importation, MN [REDACTED]
Secondary.
- (5) **During 2017** I was offered and accepted the following new instructions – legal aid:
- (a) Fraud, KO [REDACTED] *Secondary.*
 - (b) Fraud, FT [REDACTED] **Primary.**
 - (c) GBH, JB [REDACTED] *Secondary.*
 - (d) Offensive Weapon, MW [REDACTED]. *Secondary.*
 - (e) Drugs Supply, FS [REDACTED]. **Primary.**

- (6) **During 2017** I was offered and accepted the following private criminal work:
- (a) 3 January 2017, Racially Aggravated Assault, LL [REDACTED]
Primary.
- (7) **During 2017** I was offered and accepted sentence hearings where the plea was guilty and there was no trial – legal aid:
- (a) 18 January 2017, Unknown. **Primary.**
- (8) **During 2018:** I did the following trials under legal aid:
- (a) 8 January 2018, Conspiracy to Rob, DM [REDACTED] *Secondary*
(from 2017)
 - (b) 12 February 2018, ABH, JB [REDACTED]. *Secondary.*
 - (c) 12 March 2018, GBH, HM [REDACTED] *Secondary.*
 - (d) 9 April 2018, Conspiracy to Rob, DM [REDACTED] *Secondary.*
 - (e) 23 April 2018, Drugs Importation, SS [REDACTED]
Primary.(RETURN)
 - (f) 8 May 2018, C G-J [REDACTED] Perverting the Course of Justice
Primary.
 - (g) 6 June 2018, Firearms Importation, MN [REDACTED]. *Secondary.*
 - (h) 16 July 2018, GBH, MH [REDACTED] *Secondary.*
 - (i) 3 September 2018, BW [REDACTED]. Aggravated Burglary.
Secondary.
 - (j) 10 October 2018, Conspiracy to Rob, DM [REDACTED] *Secondary*
(from 2017).

(9) **During 2018** I was offered and accepted the following new instructions – legal aid:

(a) Attempt Murder, XX [REDACTED] (juvenile). **Primary**.

(b) Drugs, BD [REDACTED] *Secondary*.

(10) **During 2018** I was offered and accepted the following private criminal work:

(a) 14 February 2018, Threats to Kill, AT [REDACTED]. *Secondary*.

(11) **During 2018** I was offered and undertook the following sentence hearings where guilty pleas were offered without a trial:

(a) None.

(12) **During 2019** I did the following trials under legal aid:

(a) 7 January 2019, Drugs Importation, SS [REDACTED] [REDACTED]
Secondary (from 2018)

(b) 13 February 2019, Fraud. KO [REDACTED] *Secondary* (from 2017)

(c) 11 March 2019, GBH, XX [REDACTED] (juvenile). *Secondary*.

(d) 11 March 2019, GBH, XX [REDACTED] (juvenile). *Secondary*.

(e) 23 April 2019, GBH, BM [REDACTED] **Primary** (RETURN).

(f) 29 May 2019, RS [REDACTED] Drugs Possession. *Secondary*.

(g) 17 June 2019, Conspiracy to Rob. DM [REDACTED] *Secondary*
(from 2017).

(h) 14 October 2019, Fraud. KO [REDACTED] *Secondary* (from 2017)

(i) 25 November 2019 DC Murder. **Primary**

(13) **During 2019** I was offered and accepted the following new instructions – legal aid:

(a) GBH, BM [REDACTED]. **Primary** (RETURN).

(b) Burglary, XX [REDACTED] (Juvenile). *Secondary*.

(c) Firearms, TT [REDACTED]. *Secondary*.

(d) Murder, LK [REDACTED] *Non-Clerked*.

(e) Murder, DC [REDACTED] **Primary** (RETURN).

(f) JE [REDACTED]. Conspiracy to Supply Drugs *Secondary*.

(g) Murder subsequently given to James Scobie QC to choose junior of his choice. *Non-Clerked*.

(14) **During 2019** I was offered and accepted the following private criminal work:

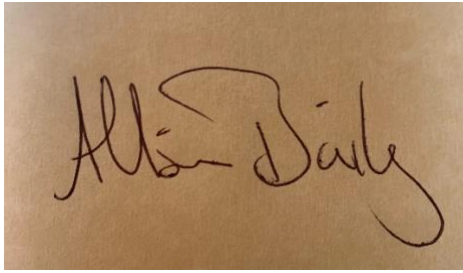
(a) None.

(15) **During 2019** I was offered and undertook the following sentence hearings where guilty pleas were offered without a trial:

(a) None.

Statement of Truth

I believe that the facts in this statement are true.

A photograph of a handwritten signature in dark ink on a piece of brown paper. The signature is written in a cursive style and reads "Alison Bailey".

14 April 2022

Signature

Date