

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
ON APPEAL FROM THE COUNTY COURT AT BARNSTAPLE**

Claim No. L00BP152

BETWEEN

**MARK JOHN MAYO
Respondent**

-and-

**Miss E
Appellant**

REQUEST FOR TRANSFER OF APPEAL TO LONDON

To: The President of the King's Bench Division or nominee

Application: Transfer under Practice Direction 52B, paragraph 2.3

1. The Appellant has filed the appeal through the prescribed Western Circuit appeal route and requests its transfer to the Royal Courts of Justice in London. This request is not based upon a general allegation against the judges or staff of the Bristol appeal centre. It arises from the documented handling of this Appellant's two previous, closely connected matters through that centre and the resulting objectively grounded loss of confidence that this appeal will receive independent and timely administration there.
2. The first matter was an appeal concerning a disputed costs order, reference KA-2025-BRS-000045. The Appellant states that it remained without substantive progression for more than four months, including without determination of permission to appeal, and was later recast and disposed of in a manner which did not determine the appeal as lodged. She had challenged an order requiring her to pay the Claimant's costs although the disputed fraud and document issues had been deferred to trial. The delay deprived her of the opportunity to obtain appellate determination of that costs issue before trial. She further states that the dismissed appeal reference has subsequently appeared on material connected with the separate writ application; the underlying notices and CE-File record will follow.
3. The second matter was the Appellant's separately filed High Court application concerning a writ of control, CE-File reference KB-2026-BRS-000052. The application sought, as fundamental preliminary relief, an order requiring production of the documents relied upon to obtain and enforce the writ, including the N260 which Mr Mayo stated at the hearing before Master Dagnall had been sent on 17 March 2025 but which has never been produced. The application was filed and paid for through CE-File and received its own High Court reference. The Appellant states that it was thereafter removed from the procedural route in which it had been filed, associated instead with County Court claim L00BP152, retitled "Mayo v Miss E and Mr J" although the writ was pursued against her alone, and listed without first determining the disclosure relief sought in her draft order. The requested preliminary disclosure remained undetermined until after trial; the matter was then listed for a 30-minute hearing on 19 August 2026 while the underlying documents remained outstanding.
4. The Appellant's concern is focused upon the repeated involvement and administrative control of HHJ Blohm KC in those connected matters. Court staff informed the Appellant, in substance, that matters submitted to the Bristol appeal office were referred through HHJ Blohm and that staff could not allocate them to another judge independently of his directions. The Appellant will

provide the underlying orders, filings, correspondence and contemporaneous attendance notes in the transfer evidence bundle.

5. On the basis of that documented experience, the Appellant has lost confidence that HHJ Blohm could determine this appeal, its permission application or its urgent interim applications impartially, or that the papers would necessarily be considered and determined in the form in which they were filed. This is not founded merely upon an anticipated adverse result. It is founded upon the prolonged non-determination, recasting and disposal of the first appeal without determination of the appeal as lodged, and the reassignment and alteration of the procedural identity of the second application without determination of its essential disclosure relief. In those circumstances, referral of the present appeal through the same judge would not provide the objective independence, or appearance of independence, required for confidence in the appellate process.
6. The present appeal challenges a judgment of HHJ Walsh following proceedings managed within the same regional structure. The lower court refused permission to appeal, but that refusal is itself subject to the ordinary appellate process and does not diminish the Appellant's entitlement to seek permission from the appeal court. The proposed appeal raises serious issues of apparent bias, procedural injustice, disputed costs and enforcement, and seeks an urgent stay before 19 August 2026. Independent consideration through London is therefore necessary to ensure that the permission application, stay application and appeal are considered on their filed merits and to maintain confidence both in the actuality and appearance of impartial justice.
7. The Appellant does not ask the transfer decision-maker to determine a complaint of misconduct against HHJ Blohm. Nor does she rely upon unsupported allegations of personal association or improper financial motive. She relies upon the documented sequence, delay, recasting and non-determination of relief in her previous matters, together with what court staff told her about the allocation process. Any separate complaint concerning personal conduct will be pursued through the proper channel.
8. The transfer would cause no material prejudice to the Respondent. The appeal can be administered electronically; the central issue is confidence, independence and effective access to the appellate jurisdiction. In light of the history above, refusal of an independent route without proper engagement with that evidence would compound the appearance that the Appellant has been denied effective appellate scrutiny. The Appellant therefore requests an urgent direction transferring the appeal to London and, pending that decision, that no step be taken which prejudices the filing date or the urgent stay application.

Documents to accompany or follow

1. Orders, filings and CE-File history in KA-2025-BRS-000045
2. Original writ-of-control application and draft order filed under KB-2026-BRS-000052; CE-File receipt and payment record; subsequent orders, retitling/reallocation documents, correspondence and listing for 19 August 2026
3. Documents concerning the unproduced N260 and other underlying enforcement material, including the record of the hearing before Master Dagnall
4. Correspondence, automated CE-File notifications and contemporaneous notes concerning the handling and allocation of both matters
5. The order under appeal and the Appellant's Grounds and Section 11 statement

Signed: _____ Miss E

Dated: 12 August 2026