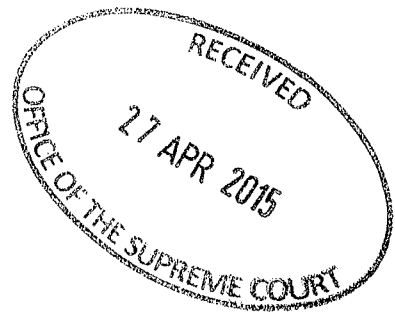


SUPREME COURT
Respondent's Notice



Supreme Court record number 247 / 2013 12/2015

[Title and record number as per the High Court proceedings]

1798 A 2003 MARGARET BRENNAN V THOMAS FLANNERY AND CATHERINE FLANNERY / TJC DEVELOPMENT LIMITED.

Date of filing	
Name of respondent	
Respondent's solicitors	
Name of appellant	<u>THOMAS FLANNERY.</u>
Appellant's solicitors	

1. Respondent Details

Where there are two or more respondents by or on whose behalf this notice is being filed please also provide relevant details for those respondent(s)

Respondent's full name

The respondent was served with the application for leave to appeal and notice of appeal on date 13 APRIL 2015

The respondent intends :

to oppose the application for an extension of time to apply for leave to appeal

not to oppose the application for an extension of time to apply for leave to appeal

to oppose the application for leave to appeal

not to oppose the application for leave to appeal

to ask the Supreme Court to dismiss the appeal

to ask the Supreme Court to affirm the decision of the Court of Appeal or ~~the High Court on grounds other than those set out in the decision of the Court of Appeal or the High Court~~

Other (please specify)

If the details of the respondent's representation are correct and complete on the notice of appeal, tick the following box and leave the remainder of this section blank; otherwise complete the remainder of this section if the details are not included in, or are different from those included in, the notice of appeal.

Details of respondent's representation are correct and complete on notice of appeal:

Respondent's Representation

Solicitor			
Name of firm			
Email			
Address		Telephone no.	
		Document Exchange no.	
Postcode		Ref.	
<p>How would you prefer us to communicate with you?</p> <input type="checkbox"/> Document Exchange <input type="checkbox"/> E-mail <input type="checkbox"/> Post <input type="checkbox"/> Other (please specify)			

Counsel			
Name			
Email			
Address		Telephone no.	
		Document Exchange no.	
Postcode			

Counsel			
Name			
Email			
Address		Telephone no.	
		Document Exchange no.	
Postcode			

If the Respondent is not legally represented please complete the following

Current postal address	LAKE VIEW, COUGHA ALLEN, CAMPICK-ON-SHANNON CO, WEXFORD
Telephone no.	
e-mail address	

<p>How would you prefer us to communicate with you?</p> <input type="checkbox"/> Document Exchange <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Post <input type="checkbox"/> Other (please specify)			
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2. Respondent's reasons for opposing extension of time

If applicable, set out concisely here the respondent's reasons why an extension of time to the applicant/appellant to apply for leave to appeal to the Supreme Court should be refused

20 YEARS ON GOING THEREFORE,
AN EXTENSION TIME SHOULD BE REFUSED

3. Information about the decision that it is sought to appeal

Set out concisely whether the respondent disputes anything set out in the information provided by the applicant/appellant about the decision that it is sought to appeal (Section 4 of the notice of appeal) and specify the matters in dispute: THE RESPONDENT COMPLETELY REJECTS THE APPELLANT LEAVE TO APPEAL. THE APPELLANT HAS CONTINUOUSLY USED "SELECTIVE" INFORMATION AND HAS NOT PROVIDED THE COURT WITH THE CLEAR FACTS OF THE CASE. FURTHERMORE THE CASE IS 20 YEARS ONGOING. IN ADDITION HOMEBOND HAS HONOURIED ITS GUARANTEE TO REMEDY THE ALLEGED DEFECTS. IT SEEMS Ms BRENNAN DOES NOT WANT TO REACH A CONCLUSION ON THIS MATTER, LEAVING HUGE ANXIETY AND DEPRESSION TO CONSUME THE FAMILY OF THE RESPONDENT.

4. Respondent's reasons for opposing leave to appeal

If leave to appeal is being contested, set out concisely here the respondent's reasons why:

In the case of an application for leave to appeal to which Article 34.5.3° of the Constitution applies (i.e. where it is sought to appeal from the Court of Appeal)-

- * the decision in respect of which leave to appeal is sought does not involve a matter of general public importance
~~it is not, in the interests of justice,~~ necessary that there be an appeal to the Supreme Court

In the case of an application for leave to appeal to which Article 34.5.4° of the Constitution applies (i.e. where it is sought to appeal to the Supreme Court from the High Court)-

- * the decision in respect of which leave to appeal is sought does not involve a matter of general public importance)
- * ~~it is not, in the interests of justice,~~ necessary that there be an appeal to the Supreme Court

there are no exceptional circumstances warranting a direct appeal to the Supreme Court. Without PREJUDICE.

WE ASK THIS MOST HONOURABLE COURT TO STRIKE OUT LEAVE OF APPEAL AND AFFIRM THE DECISION OF THE 9th MARCH 2015 THE NEWLY ESTABLISHED COURT OF APPEAL. JUSTICE HAS SERVED US ALL. I TRUST THIS COURT WILL REACH A RIGHT FULL CONCLUSION ON THIS MATTER FOR GOOD.

*delete where inapplicable

5. Respondent's reasons for opposing appeal if leave to appeal is granted

Please list (as 1, 2, 3 etc in sequence) concisely the Respondent's grounds of opposition to the ground(s) of appeal set out in the Appellant's notice of appeal (Section 6 of the notice of appeal): THE JUDGES OF THE COURT OF APPEAL WERE CORRECT IN SETTING ASIDE PREVIOUS JUDGEMENT OF THE HIGH COURT. THEY FOUND THE BUILDING AGREEMENT WAS IN THE COMPANYS NAME T.C DEVELOPMENTS LTD. THEY FOUND WITH ESSENTIAL EVIDENCE THE INNOCENCE OF THE FIRST & SECOND HOME DEFENDANT.

Name of counsel or solicitor who settled the grounds of opposition (if the respondent is legally represented), or name of respondent in person:

[Empty box]

6. Additional grounds on which decision should be affirmed

Set out here any grounds other than those set out in the decision of the Court of Appeal or the High Court on which the Respondent claims the Supreme Court should affirm the decision of the Court of Appeal or the High Court:
In REFERENCE TO THE Building Agreement No Direct Evidence Associating the First and Second Named Defendants With Dwelling in Question.

Are you asking the Supreme Court to: v
depart from (or distinguish) one of its own decisions? Yes No
If Yes, please give details below:
AFFIRM JUDGEMENT OF COURT OF APPEAL 9th March 2015
make a reference to the Court of Justice of the European Union? Yes No
If Yes, please give details below:

Will you request a priority hearing? Yes No
If Yes, please give reasons below:

Signed: THOMAS FLANNERY.
(Solicitor for) the respondent

Please submit your completed form to:

The Office of the Registrar to the Supreme Court
The Four Courts
Inns Quay
Dublin

This notice is to be lodged and served on the appellant and each other respondent within 14 days after service of the notice of appeal.