

## Exhibit KF6

**From:** Lewis, Gary  
**Sent:** Monday, October 23, 2023 12:24 PM  
**To:** Parry1, James (Litigation Lawyer) <[James.Parry1@trafford.gov.uk](mailto:James.Parry1@trafford.gov.uk)>  
**Subject:** AMG : VICTORIA WAREHOUSE - PNs 3465 & 3466

Dear Mr Parry

Thank you for your email.

The Council's proposed method of disposing of the Prohibition Notices is not agreed, as the mechanism for disposal is contrary to the Supreme Court Judgment in *Chevron*.

Accordingly, we will be filing written submissions with the Employment Tribunal by close of business on 30 October 2023, as required by the letter from the Employment Tribunal, dated 16 October 2023. The written submissions will be sent to the Council at the same time.

The Employment Tribunal can then determine the correct method of disposing of the Prohibition Notices at the preliminary hearing on 7 November 2023 at 10.00am.

Regards

*Gary Lewis*

**Gary Lewis**  
Director  
Squire Patton Boggs (UK) LLP

  
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**From:** Parry1, James (Litigation Lawyer) <[James.Parry1@trafford.gov.uk](mailto:James.Parry1@trafford.gov.uk)>  
**Sent:** Friday, October 20, 2023 4:28 PM  
**To:** Lewis, Gary <[gary.lewis@squirepb.com](mailto:gary.lewis@squirepb.com)>  
**Subject:** [EXT] VICTORIA WAREHOUSE

Dear Mr Squire

Thank you for your email in respect of this matter. I can confirm that I have received confirmation of its issue before the Employment Tribunal.

As the notices have now been complied with, we are content for clients to be given liberty to withdraw their appeal. I attach amended consent orders to that effect

You will of course note from the judgment that you kindly provided that:

*“There is no provision for an immediate notice to be withdrawn; it appears that the only way, under the statutory scheme, in which such a notice can be dislodged is by an appeal. A prohibition notice is not automatically suspended by an appeal.”*

In such circumstances, the difficulty for your client's in prolonging this matter would appear to be that they will prolong the effect of the prohibition notice.

Kind regards

James Parry, Litigation Lawyer (Locum)  
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