

IN THE MATTER OF IRISH LIFE AND PERMANENT GROUP HOLDINGS PLC ("ILPGH" OR THE "COMPANY")
 AND IN THE MATTER OF IRISH LIFE AND PERMANENT PLC ("ILP" OR "PTSB" OR THE "BANK")
 AND IN THE MATTER OF THE CREDIT INSTITUTIONS (STABILISATION) ACT, 2010 (THE "2010 ACT")
 AND IN THE MATTER OF THE SETTING ASIDE, PURSUANT TO SECTION 11 OF THE 2010 ACT, OF THE
 DIRECTION ORDER IN RELATION TO ILPGH AND ILP, WHICH WAS MADE ON 26 JULY 2011 PURSUANT TO
 SECTION 9 OF THE 2010 ACT (THE "JULY 2011 DIRECTION ORDER")
 AND IN THE MATTER OF SECOND COUNCIL DIRECTIVE 77/91/EEC
 AND IN THE MATTER OF DIRECTIVE 2001/34/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL
 AND IN THE MATTER OF DIRECTIVE 2009/101/EC OF EUROPEAN PARLIAMENT AND OF THE COUNCIL
 AND IN THE MATTER OF DIRECTIVE 2004/25/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL
 AND IN THE MATTER OF DIRECTIVE 2004/39/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL
 AND IN THE MATTER OF ARTICLE 63 OF THE TREATY ON THE FUNCTIONING OF THE EUROPEAN UNION
 AND IN THE MATTER OF ARTICLE 267 OF THE TREATY ON THE FUNCTIONING OF THE EUROPEAN UNION

BETWEEN

Gerard Dowling, Pdraig McManus, Piotr Skoczylas and Scotchstone Capital Fund Ltd

Applicants

AND

The Minister for Finance (the "Minister")

Respondent

AND

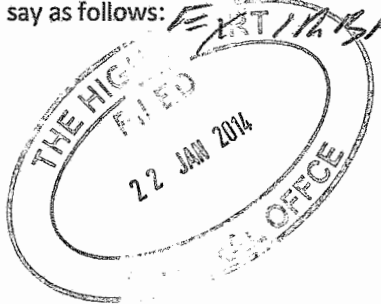
Permanent TSB Group Holdings plc and Permanent TSB plc

Notice Parties

AFFIDAVIT OF FINTHIAN FLEMING

Gerard Dowling, address: 51 WOODVALE AVE.
COONSILLA D15

occupation: PENSIONER, aged eighteen years and upwards, MAKE OATH and
 say as follows: FERTILISHT LIFE ASS



1. I make this Affidavit from facts within my own knowledge save where otherwise appears and where so appearing I believe the same to be true and accurate.
2. I understand that my duty in providing this Affidavit is to the Court to help in adjudicating upon the case.
3. I make this Affidavit of my own volition. I have not been paid and I will not be paid any fees for making this Affidavit.
4. I know of no conflict of interest of any kind regarding my making this Affidavit, other than any which I have disclosed in this Affidavit.
5. I was a shareholder in Permanent TSB Group Holdings plc (previously Irish Life & Permanent Group Holdings plc) ("ILPGH" or the "Company") at the time of the ILPGH annual general meeting (the "AGM") on 18 May 2011.
6. I attended the ILPGH AGM on 18 May 2011.
7. The following statements, which were quoted widely in the national press, were made by the ILPGH Chairman, Alan Cook, at the ILPGH AGM on 18 May 2011:
 - i. ILP has a "strong, viable and sustainable future" and "can provide healthy competition to the two larger pillar banks";
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 - iii. The finances of ILP are "not materially different from last September" [when ILP was required to raise only €100m in new capital above and beyond its then current requirements, amounting to a total of €243m], but that the Central Bank applied a far tougher set of conditions; "They have applied a killer punch";
 - iv. The stress test results seem "profoundly unfair";
 - v. The PCAR/PLAR assumptions by Blackrock were "a set of artificial assumptions";
 - vi. "The goalposts have been moved";
 - vii. The €4bn capital requirements is "astonishing" and the rise in ILP's capital requirements from €243m to €4bn in less than half a year is "an amazing conundrum".

SIGNED:



FINBAR FLEMING

Name (Print):

Sworn by the said (Name Print):

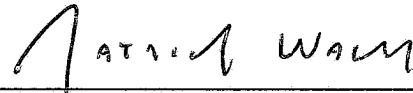
FINBAR FLEMING

Who has been identified to me by Piotr Skoczylas who is personally known to me and who has certified to me his personal knowledge of the deponent.

This 21st day of January 2014 at

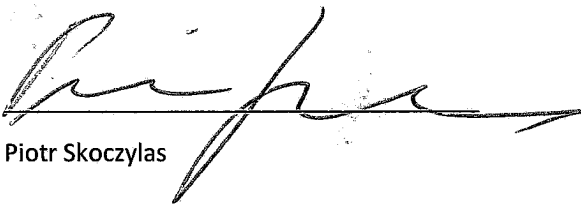
High Court, Four Courts, Inns Quay, Dublin 7

Before me, a Commissioner for Oaths / Practising Solicitor



Commissioner for Oaths / Practising Solicitor

I hereby certify that the deponent is personally known to me:


Piotr Skoczylas

Filed on behalf of the Applicants on the _____ day of _____ 2014.

The High Court

Record No.: 2011 239 MCA

IN THE MATTER OF IRISH LIFE AND PERMANENT GROUP HOLDINGS PLC ("ILPGH" OR THE "COMPANY")
 AND IN THE MATTER OF IRISH LIFE AND PERMANENT PLC ("ILP" OR "PTSB" OR THE "BANK")
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 AND IN THE MATTER OF ARTICLE 267 OF THE TREATY ON THE FUNCTIONING OF THE EUROPEAN UNION

BETWEEN

Gerard Dowling, Padraig McManus, Piotr Skoczylas and Scotchstone Capital Fund Ltd

Applicants

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The Minister for Finance (the "Minister")

Respondent

AND

Permanent TSB Group Holdings plc and Permanent TSB plc

Notice Parties

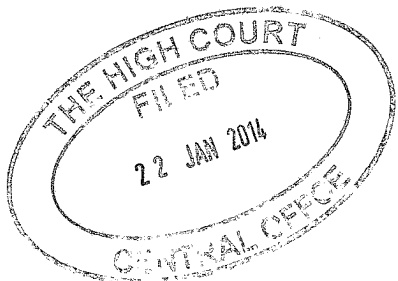
AFFIDAVIT OF

JOHN LANGGAD

JOHN LANGGAD, address: 25 MURCHFIELD AVE

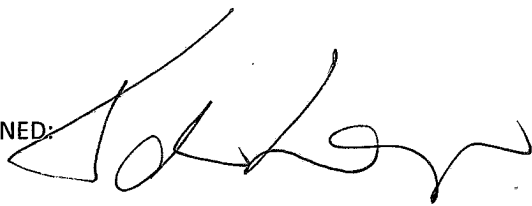
KILKILIN CC - PUBLIC

occupation: IT CONSULTANT aged eighteen years and upwards, MAKE OATH and say as follows:



1. I make this Affidavit from facts within my own knowledge save where otherwise appears and where so appearing I believe the same to be true and accurate.
2. I understand that my duty in providing this Affidavit is to the Court to help in adjudicating upon the case.
3. I make this Affidavit of my own volition. I have not been paid and I will not be paid any fees for making this Affidavit.
4. I know of no conflict of interest of any kind regarding my making this Affidavit, other than any which I have disclosed in this Affidavit.
5. I was a shareholder in Permanent TSB Group Holdings plc (previously Irish Life & Permanent Group Holdings plc) ("ILPGH" or the "Company") at the time of the ILPGH annual general meeting (the "AGM") on 18 May 2011.
6. I attended the ILPGH AGM on 18 May 2011.
7. The following statements, which were quoted widely in the national press, were made by the ILPGH Chairman, Alan Cook, at the ILPGH AGM on 18 May 2011:
 - i. ILP has a "strong, viable and sustainable future" and "can provide healthy competition to the two larger pillar banks";
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 - iii. The finances of ILP are "not materially different from last September" [when ILP was required to raise only €100m in new capital above and beyond its then current requirements, amounting to a total of €243m], but that the Central Bank applied a far tougher set of conditions; "They have applied a killer punch";
 - iv. The stress test results seem "profoundly unfair";
 - v. The PCAR/PLAR assumptions by Blackrock were "a set of artificial assumptions";
 - vi. "The goalposts have been moved";
 - vii. The €4bn capital requirements is "astonishing" and the rise in ILP's capital requirements from €243m to €4bn in less than half a year is "an amazing conundrum".

SIGNED:



Sworn by the said (Name Print):

JOHN LANGAN

JOHN LANGAN

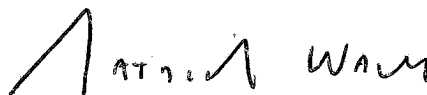
Name (Print):

Who has been identified to me by Piotr Skoczylas who is personally known to me and who has certified to me his personal knowledge of the deponent.

This 21st day of January 2014 at

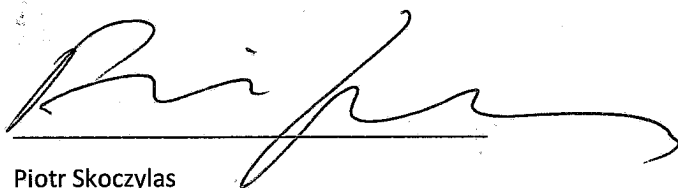
High Court, Four Courts, Inns Quay, Dublin 7

Before me, a Commissioner for Oaths / Practising Solicitor



Commissioner for Oaths / Practising Solicitor

I hereby certify that the deponent is personally known to me:


Piotr Skoczylas

Filed on behalf of the Applicants on the _____ day of _____ 2014.

The High Court

Record No.: 2011 239 MCA

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BETWEEN

Gerard Dowling, Pdraig McManus, Piotr Skoczylas and Scotchstone Capital Fund Ltd

Applicants

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The Minister for Finance (the "Minister")

Respondent

AND

Permanent TSB Group Holdings plc and Permanent TSB plc

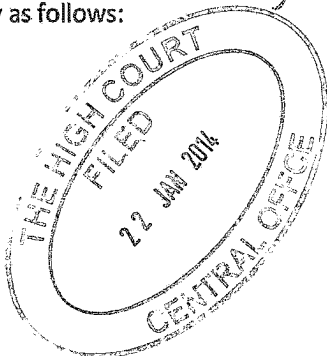
Notice Parties

AFFIDAVIT OF

SOHIV MORAN

I, John Moran, address: 93 Thornbury Drive
Willow Park, Athlone, Co. Westmeath

occupation: Printing, aged eighteen years and upwards, MAKE OATH and
say as follows:



1. I make this Affidavit from facts within my own knowledge save where otherwise appears and where so appearing I believe the same to be true and accurate.
2. I understand that my duty in providing this Affidavit is to the Court to help in adjudicating upon the case.
3. I make this Affidavit of my own volition. I have not been paid and I will not be paid any fees for making this Affidavit.
4. I know of no conflict of interest of any kind regarding my making this Affidavit, other than any which I have disclosed in this Affidavit.
5. I was a shareholder in Permanent TSB Group Holdings plc (previously Irish Life & Permanent Group Holdings plc) ("ILPGH" or the "Company") at the time of the ILPGH annual general meeting (the "AGM") on 18 May 2011.
6. I attended the ILPGH AGM on 18 May 2011.
7. The following statements, which were quoted widely in the national press, were made by the ILPGH Chairman, Alan Cook, at the ILPGH AGM on 18 May 2011:
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 - iv. The stress test results seem "profoundly unfair";
 - v. The PCAR/PLAR assumptions by Blackrock were "a set of artificial assumptions";
 - vi. "The goalposts have been moved";
 - vii. The €4bn capital requirements is "astonishing" and the rise in ILP's capital requirements from €243m to €4bn in less than half a year is "an amazing conundrum".

SIGNED: John Moran

Sworn by the said (Name Print):

JOHN MORAN

JOHN MORAN
Name (Print):

Who has been identified to me by Piotr Skoczylas who is personally known to me and who has certified to me his personal knowledge of the deponent.

This 21st day of January 2014 at

High Court, Four Courts, Inns Quay, Dublin 7

Before me, a ~~Commissioner for Oaths~~ / Practising Solicitor

[Signature]
~~Commissioner for Oaths~~ / Practising Solicitor

I hereby certify that the deponent is personally known to me:

[Signature]
Piotr Skoczylas

Filed on behalf of the Applicants on the _____ day of _____ 2014.

IN THE MATTER OF IRISH LIFE AND PERMANENT GROUP HOLDINGS PLC ("ILPGH" OR THE "COMPANY")
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BETWEEN

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Applicants

AND

The Minister for Finance (the "Minister")
Respondent

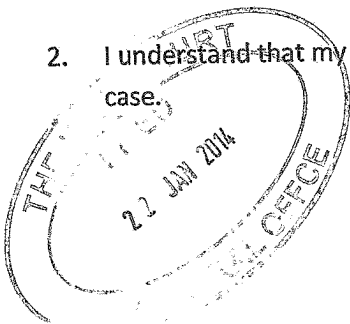
AND

Permanent TSB Group Holdings plc and Permanent TSB plc
Notice Parties

Affidavit of Clement McGann

I, Clement McGann, 14 Cabinteely Crescent, Cabinteely, Dublin 18, retired, aged eighteen years and upwards, MAKE OATH and say as follows:

1. I make this Affidavit from facts within my own knowledge save where otherwise appears and where so appearing I believe the same to be true and accurate.
2. I understand that my duty in providing this Affidavit is to the Court to help in adjudicating upon the case.



3. I make this Affidavit of my own volition. I have not been paid and I will not be paid any fees for making this Affidavit.
4. I know of no conflict of interest of any kind regarding my making this Affidavit, other than any which I have disclosed in this Affidavit.
5. My son is one of the Plaintiffs in the proceedings record number 2013 2709P in respect of the alleged inconsistency of the 2010 Act with the Irish Constitution and the alleged incompatibility of the 2010 Act with EU law. My son is also a Petitioner in the proceedings 2013 36 COS in respect of alleged acts of oppression by directors of ILPGH.
6. I was a member of ILPGH at the time of the ILPGH annual general meeting (the "AGM") on 18 May 2011.
7. I attended the ILPGH AGM on 18 May 2011.
8. The following statements, which were quoted widely in the national press, were made by the ILPGH Chairman, Alan Cook, at the ILPGH AGM on 18 May 2011:
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 - v. The PCAR/PLAR assumptions by Blackrock were "a set of artificial assumptions";
 - vi. "The goalposts have been moved";
 - vii. The €4bn capital requirements is "astonishing" and the rise in ILP's capital requirements from €243m to €4bn in less than half a year is "an amazing conundrum".

SIGNED:

Clement McGann

Sworn by the said (Name Print):

CLEMENT MCGANN

CLEMENT
Name (Print): MCGANN

Who has been identified to me by Piotr Skoczylas who is personally known to me and who has certified to me his personal knowledge of the deponent.

This 21st day of January 2014 at

High Court, Four Courts, Inns Quay, Dublin 7

Before me, a Commissioner for Oaths / Practising Solicitor

[Signature]
Commissioner for Oaths / Practising Solicitor

I hereby certify that the deponent is personally known to me:

[Signature]
Piotr Skoczylas

Filed on behalf of the Applicants on the _____ day of _____ 2014.

IN THE MATTER OF IRISH LIFE AND PERMANENT GROUP HOLDINGS PLC ("ILPGH" OR THE "COMPANY")
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Applicants

AND

The Minister for Finance (the "Minister")

Respondent

AND

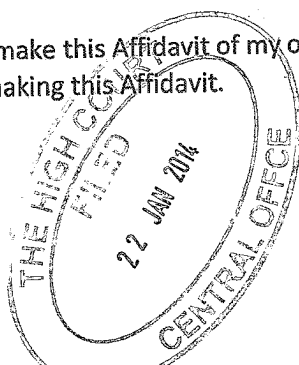
Permanent TSB Group Holdings plc and Permanent TSB plc

Notice Parties

AFFIDAVIT OF MURIEL SCORER

I, Muriel Scorer, 3, Westview Glade, Clonee, Co. Meath, company manager, aged eighteen years and upwards, MAKE OATH and say as follows:

1. I make this Affidavit from facts within my own knowledge save where otherwise appears and where so appearing I believe the same to be true and accurate.
2. I understand that my duty in providing this Affidavit is to the Court to help in adjudicating upon the case.
3. I make this Affidavit of my own volition. I have not been paid and I will not be paid any fees for making this Affidavit.



4. I know of no conflict of interest of any kind regarding my making this Affidavit, other than any which I have disclosed in this Affidavit.
5. I am one of the Plaintiffs in the proceedings record number 2013 2709P in respect of the alleged inconsistency of the 2010 Act with the Irish Constitution and the alleged incompatibility of the 2010 Act with EU law. I am also a Petitioner in the proceedings 2013 36 COS in respect of alleged acts of oppression by directors of ILPGH.
6. I am a member of Permanent TSB Group Holdings plc (previously Irish Life & Permanent Group Holdings plc) ("ILPGH" or the "Company").
7. I was a member of the Board of Irish Permanent Building Society from 1992 to 1994 and then a director of Irish Life & Permanent plc (currently Permanent TSB plc) ("ILP" or "PTSB") between 1994 and 2002, at the time when ILP was, in addition to being a credit institution, also the listed holding company for the companies in the Irish Life & Permanent group (before ILPGH replaced ILP in that role in 2010).
8. I was a member of ILPGH at the time of the ILPGH annual general meeting (the "AGM") on 18 May 2011.
9. I attended the ILPGH AGM on 18 May 2011.
10. The following statements, which were quoted widely in the national press, were made by the ILPGH Chairman, Alan Cook, at the ILPGH AGM on 18 May 2011:
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 - vi. "The goalposts have been moved";
 - vii. The €4bn capital requirements is "astonishing" and the rise in ILP's capital requirements from €243m to €4bn in less than half a year is "an amazing conundrum".

SIGNED:

Muriel Scorek.

MURIEL SCOREK

Name (Print):

Sworn by the said (Name Print):

MURIEL SCOREK

Who has been identified to me by Piotr Skoczylas who is personally known to me and who has certified to me his personal knowledge of the deponent.

This 21st day of January 2014 at

High Court, Four Courts, Inns Quay, Dublin 7

Before me, a Commissioner for Oaths / Practising Solicitor

Patrick Wain

Commissioner for Oaths / Practising Solicitor

I hereby certify that the deponent is personally known to me:

Piotr Skoczylas

Piotr Skoczylas

Filed on behalf of the Applicants on the _____ day of _____ 2014.