

Claim Form

In the High Court of Justice Queens Bench Division Middlesbrough District Registry
Claim No: MB 105208

Claimant:

Ms CAROLE A BELL
3053 FILLMORE STREET #238
SAN FRANCISCO
CALIFORNIA USA 94123

Defendant(s):

MENSA INTERNATIONAL LIMITED
15 THE IVORIES
6-8 NORTHAMPTON STREET
ISLINGTON
LONDON N1 2HY

Brief details of claim:

AN INTERIM INJUNCTION
INJUNCTIVE RELIEF, DECLARATION AND JUDGEMENT FOR MONEY DUE

Value:

I expect to recover more than £5,000 but not more than £15,000.

I wish my claim to issue in the High Court because by law my claim must be issued in the High Court. The Act which provides this is
INJUNCTION CAN ONLY BE GRANTED IN HIGH COURT

Defendant' name and address:

MENSA INTERNATIONAL LIMITED
15 THE IVORIES
6-8 NORTHAMPTON STREET
ISLINGTON
LONDON N1 2HY

Amount claimed	
Court fee:	£350.00
Solicitor's costs:	(blank)
Total amount:	(blank)
Issue date:	3 Oct 2001

Particulars of Claim (attached)(to follow)

1. ON THE 1 JULY 2001 THE CLAIMANT WAS ELECTED INTERNATIONAL DIRECTOR OF DEVELOPMENT OF THE DEFENDANT PURSUANT TO AN ELECTION DULY HELD IN ACCORDANCE WITH THE PROVISIONS OF THE COMPANIES ACT 1985 AND THE CONSTITUTION OF THE DEFENDANT,
2. ON OR ABOUT THE 8 SEPTEMBER 2001 THE BOARD OF DIRECTORS OF THE DEFENDANT PURPORTED TO 'SUSPEND' THE CLAIMANT FROM HER POSITION AS INTERNATIONAL DIRECTOR OF DEVELOPMENT. THE CLAIMANT STATES THAT SUCH SUSPENSION IS CONTRARY TO LAW.
3. ON THE 6 OCTOBER 2001 THE DEFENDANTS TO HOLD A GENERAL MEETING AND A RESOLUTION APPEARS ON THE AGENDA OF SUCH MEETING TO REMOVE THE CLAIMANT FROM HER POSITION AS DIRECTOR. NOTICE OF SUCH RESOLUTION HAS NOT BEEN PROPERLY GIVEN IN ACCORDANCE WITH THE PROVISIONS OF THE COMPANIES ACT 1985.
4. THE DEFENDANT HAS WRONGFULLY REFUSED TO PAY TO THE CLAIMANT EXPENSES IN ACCORDANCE WITH ITS RULES AND CUSTOM AND THE CLAIMANT REQUIRES AN ACCOUNT OF ALL SUMS DUE TO HER.
5. THE CLAIMANT SEEKS INTERIM INJUNCTIONS TO FORBID THE DEFENDANT FROM ACTING CONTRARY TO LAW AND ULTRA VIRES ITS CONSTITUTION, SUCH RELIEF BEING MORE PARTICULARLY SET OUT IN THE DOCUMENT ANNEXED

Statement of Truth

*(I believe)(The Claimant believes) that the facts stated in these particulars of claim are true.

*I am duly authorised by the claimant to sign this statement

Full name CAROLE A BELL

Name of claimant's solicitor's firm:
Hodgsons & Mortimer

Signed: [signature Carole A Bell]

Hodgsons & Mortimer
16 Duke Street
DARLINGTON
Co. Durham DL3 75A

DX 60122 DARLINGTON

Claimant's or claimant's solicitor's address to which documents or payments should be sent if different from overleaf including (if appropriate) details of DX, fax or e-mail.

The Claimant would like an Order declaring:

1. That the attempt to suspend her is null and void and that she has been a Director continually from July 1, 2001, to the Present, without interruption, and that she be granted interim relief by way of injunction forbidding the Defendant from further acting in respect of the said alleged suspension.
2. That Defendant nor any of its National Mensas nor any other group using the name Mensa shall recriminate, retaliate, or act against the Claimant, within or without the Mensa organization, for her conduct in bringing this action in an English Court.
3. That Defendant grant to the Claimant all the rights and privileges of any other elected Defendant Director of Defendant, and that the Claimant be granted interim relief by way of mandatory injunction in this respect.
4. That since the Claimant has been without reimbursement for her services as a Director which began with the announced election results on June 12, 2001, and as of that date the immediate need to vote in email, make and receive telephone calls, and undergo other expenses before taking office on July 1, 2001, she be immediately reimbursed for her proper and legitimate expenses, the amount of such expenses to be ascertained by this Honourable Court in accordance with the rules, practise and procedures of the Defendant.
5. That a statement be prominently published in all Mensa Media, including but not limited to the Mensa International Journal (on page 14), Isolated M, Mensa World, and all Mensa electronic media, including but not limited to the Mensa International website, stating:

"Carole Bell, International Director of Development, Mensa, was not suspended from this office. The claimed suspension attempt by the 5 Directors of Mensa was not legal and was improper. This was decided by The High Court of Justice, Middlesbrough District Registry, England.", and that the Claimant be granted interim relief by way of mandatory injunction in this respect.
6. That the Claimant be seated at the Board Table and in all other ways be treated as one of the four chief elected Directors of Defendant, and that the Claimant be granted interim relief by way of mandatory injunction in this respect.

7. That since the Claimant's attendance was required by Mensa's Constitution at the Meeting of the Board of Directors in Budapest, Hungary, beginning October 3, 2001, and that she was denied a proper air ticket to the Board Meeting, that she be immediately reimbursed to the amount of \$4450.00 US Dollars, which was the lowest unrestricted airfare on the date she attempted to have Mensa purchase the air ticket as called for in the ASIE 99-14 Expense Guidelines, to be deposited into her Bank of America account by Friday, October 5, 2001.

8. That a specific Order should issue that the Defendant rescind and retract statements to made to any and all National Mensas and their Chairmen that they were not to cooperate with the Claimant in her role as International Director of Development, and any other statements which would incline such National Mensas and Chairmen toward non-cooperation with Claimant, and that the Claimant be granted interim relief by way of mandatory injunction in this respect.

9. That Ed Vincent, a servant of the Defendant, be ordered to cooperate with the Claimant in her proper requests as a Director for information and assistance from the Executive Director, and that the Claimant be granted interim relief by way of mandatory injunction in this respect.

10. That the Defendant be ordered to provide the Claimant with all communications, whether by hard copy written or electronic mail, generated or transmitted during the time of her alleged suspension, and that the Claimant be granted interim relief by way of mandatory injunction in this respect.

11. That the Defendant be ordered to publish, use, and accept in all media, the Claimant's own email address, rather than one assigned to Claimant by the Defendant which is acknowledged by the Executive Director to be insecure and may be seen by persons outside the Board of Directors and their immediate employees.

12. That the Defendant be required to provide the Claimant with a one month Classic Eurailpass, or equivalent value, for its failure to provide her with an air ticket to the Board Meeting in Budapest as and when requested, causing her to lose the use of the Eurailpass which she possessed.