#### THE CIRCUIT FAMILY COURT

### CORK CIRCUIT

## **COUNTY OF CORK**

## IN THE MATTER OF THE FAMILY LAW (DIVORCE) ACT, 1996

BETWEEN/

## **GARVAN LYNCH**

**Applicant** 

AND/

### SHEENA CONFREY

**Applicant** 

### SUPPLEMENTAL AFFIDAVIT

I, Sheena Confrey of Balmoral, Victoria Road, Cork in the County of Cork aged 18 years and upwards MAKE OATH and say as follows:-

- 1. I am the Respondent in the above entitled proceedings and I make this Affidavit from facts within my own knowledge save where so otherwise appears and otherwise appearing I believe same to be true. I make this Affidavit further to the Affidavits of your Deponent sworn on the 14<sup>th</sup> day of August, 3<sup>rd</sup> day of October and 14<sup>th</sup> day of November 2024 and in reply to the Affidavit of the Applicant sworn on the 13<sup>th</sup> day of February 2025.
- 2. I say that your Deponent can confirm that the Applicant paid to her the sum of €20,000.00 on the 9<sup>th</sup> day of December 2024 and a further sum of €3,693.00 on the 10<sup>th</sup> day of December 2024. However, I say that the Applicant has not paid maintenance since that date and the arrears now stand at €1,738.00 outstanding since 2024 and €17,499.00 outstanding in 2025. I say that this is despite a balance of €13,745.08 being visible in the Applicant's Revolute account on 22<sup>nd</sup> day of January 2025 and being the Applicant being able to make a payment of €225.00 to a Princess Thando Mabena on 19<sup>th</sup> December last.
- 3. I say that the Applicant's Bank of Ireland account also throws up some issues around this time. I say that the Applicant has averred to receiving monies from his wife but I say that on the face of his statements it appears that the following monies come from transactions in his own name:-

(a) 9 <sup>th</sup> December Garvan James Lynch SP	€20,000.00
(b) 10 <sup>th</sup> December Garvan James Lynch SP	€17,000.00
(c) 11th December Garvan James Lynch SP	€15,000,00

I say that your Deponent believes that the corresponding account sending the said monies should be provided to vouch the transactions in the name of transparency. I say that this is even more appropriate in circumstances whereby a payment marked "Marguerite" was made in the sum of €14,000.00 on 11<sup>th</sup> day of November at a time when the Applicant was not paying any maintenance. I say that, further, it appears that the Applicant has been preferring Hayes Solicitors over his maintenance obligations and the sums of €8,004.22 and €4,920.00 were paid in December 2024 when the Applicant was aware that he had an upcoming obligation to pay maintenance in January 2025.

- I say that your Deponent remains extremely concerned about the Applicant's ability and/or 4. intention to pay maintenance into the future and now seeks security for the maintenance. I say that the Applicant was a pharmacist and he had the benefit of a substantial income for many years through his own pharmacy. I say that it is correct to state that there was a fire at the pharmacy but the creditor's terms are for 30 day payment so the majority of stock at that date was already paid for. I say that it is also correct that there was a HSE audit in respect of fraudulent dispensing and that the HSE indicated in later correspondence that payment would only be reinstated if the Applicant signed an admission of wrongdoing. I say that technically, the pharmacy did not close but rather the dispensary did on the Applicant's leaving, and caretaker owners came in a number of weeks later. I say that it is the acts of the Applicant that have caused the financial difficulties herein both in terms of his dealings with HSE prescriptions, his relinquishment of his membership of the Pharmaceutical Society of Ireland and his dishonesty in filling in his professional indemnity insurance resulting in its retrospective cancellation. I say that all of this could have been, and should have been, avoided by the Applicant and it is this behaviour that has led to him not having any income and the placing of the family in a perilous financial situation. I say that your Deponent understands that the Applicant turned down a job offer in September last and he appears to have paid membership to the Royal Pharmaceutical Society and the Royal Society of Chemists in January 2025.
- 5. I say that, by contrast, your Deponent suffers from Systemic Lupus Erythematosis with associated conditions including Small-Vessel Vasculitis, Small Fibre Neuropathy, Small Bowel Colitis, Ehler Danlos Syndrome (Type 3) with associated conditions including Postural Orthostatic Tachycardia Syndrome (POTS), Dysautonomia and Migraine, Thyroid disease and Parathyroid disease and she has not been in a position to work for many years and she will not be able to work into the future. I beg to refer to copy medical report annexed hereto and upon which marked with the letter "A" I have signed my name prior to the swearing hereof. I say that this has always been accepted by the Applicant both during the currency of the Judicial Separation and Divorce and as her dispensing pharmacist for many years.
- 6. I say that it is correct for the Applicant to state that the pharmacy has been sold but your Deponent has been provided with a blank unsigned and undated agreement between Bronze Trail Limited and Westlands Holding Limited. I say that it appears from that document that there was an agreement that the sum of €350,000.00 less the sum of €188,364.00 was to be paid on an effective date but no date is provided. I say that there is another effective date on which the sum of €200,000.00 is to be paid with a further payment of €200,000.00 twelve

months after that. I say that the Applicant did, on the last occasion, state that the sum of €750,000.00 was being held in Bank of Ireland but your Deponent is wholly unaware of which Bank of Ireland, to whom this account belongs and whether the Applicant has any access to same. I say that the Applicant now introduces a figure of €830,000.00 and appears to suggest that the property held at Mallow is also included in this sale.

- 7. I say that there is also an email chain between the Applicant and a Ms. Nicola Walsh, Solicitor, whereby the following figures were discussed:
  - (a) The balance of the initial consideration of €161,636.00
  - (b) Stock in the sum of €92,901.00
  - (c) A deduction from (a) and (b) in the sum of €73,714.00 payable to the HSE in respect of October 2024

I say that the Applicant sought a payment of the monies less solicitors' costs into his Revolut account on 6<sup>th</sup> November last. I say that it is clear from the correspondence that the funds were to be held pending a lease issue and that they were in fact received by Byrne & Co. Solicitors on 7<sup>th</sup> November last. I say that Ms. Walsh sought confirmation from the Applicant that this was a company account and the Applicant enquired as to what was required to authorise the transfer to his Revolut account. I beg to refer to copy email chain annexed hereto and upon which marked with the letter "B" I have signed my name prior to the swearing hereof.

I say that the Applicant has indicated that your Deponent can take the proceeds of sale but 8. your Deponent does not see how any proceeds will be available for distribution to the Applicant in circumstances whereby Bronze Trail Limited owes significant debts. I say that the Applicant in his Affidavit under reply now refers to a sale price of €830,000.00 with debts of €1,089,194.51. Accordingly, I say that an offer by the Applicant to pay to your Deponent the net proceeds of sale after the payment of creditors does not provide your Deponent with any comfort in the circumstances. I say that the HSE have not confirmed the total amount due to them but your Deponent certainly, from her involvement with them last year, understands it to stand at circa €900,000.00 - €1,200,000.00. I say that your Deponent is aware that the HSE withheld certain payments last year but I say that the HSE must still be due substantial sums. I say that, further, there is the sum due to Unipharm and United Drug for the supply of drugs to the pharmacy and I say that such was the level of concern about the monies available for distribution that your Deponent understands that the Applicant has signed an indemnity in respect of the Uniphar debt such that he will be personally liable in the event that the monies are not paid by the limited company. I say that there also appears, from documentation furnished, to be a Debenture due to KBC and your Deponent is a stranger to same save for having sight of an undated document. addition, I say that your Deponent also understands that significant funds are due to the Revenue Commissions and she is certainly aware of liabilities of circa €124,814.54 in respect of which a Notice of Attachment issued on 5th day of November 2024 in respect of Bronze Trail Limited. I say that the Applicant has now exhibited a Final Demand in respect of 2021 and 2022 in the sum of €101,194.51. I beg to refer to copy letters received from

Revenue annexed hereto and upon which marked with the letter "C" I have signed my name prior to the swearing hereof. I say that given the difficulties experienced in 2024 your Deponent would be surprised if the Applicant's personal tax affairs are up to date and expects that there are personal liabilities for the years ending 2023 and 2024 also. I say that the Applicant has also now also averred to a significant number of debts in his Affidavit of Means albeit all of the said debts are unvouched. I say that the alleged personal debts amount to just under €800,000.00 with the, again unvouched, mortgages amounting to €519,446.51.

- 9. I say that your Deponent would remind this Honourable Court that pursuant to the Order dated 24<sup>th</sup> day of March 2017 during the context of judicial separation proceedings and affirmed on the 8<sup>th</sup> day of December 2022 in the within proceedings the Applicant's maintenance obligations are as follows:-
  - (a) Spousal maintenance in the sum of €49,000.00 per annum in monthly instalments of €4,083.33 on the 1<sup>st</sup> of each month
  - (b) Child maintenance in the sum of €7,000.00 per child per annum in monthly instalments of €1,750.00 also on the 1<sup>st</sup> of each month.
- 10. Accordingly, I say that this places your Deponent and the dependent children in a very precarious position. I say that your Deponent is now aged fifty-two and her maintenance was not limited by any temporal limited either during the judicial separation or on divorce. I say that, accordingly, it was to continue for her lifetime and she does not have any other means on which to support herself. I say that at €49,000.00 per annum your Deponent could be expected to receive an additional €1,519,000.00 in spousal maintenance if she is to reach the average life expectancy of a woman in Ireland of eight-three years.
- 11. I say that your Deponent has calculated that periodic child maintenance to the end of dependency will amount to the following:-

(a) James €20,000.00 (b) Alannah €32,000.00 (c) Elvie €42,000.00

I say that these sums make no allowance for the extraordinary expenses of the children in general and for third level education in particular. I say that James is now in third year of Commerce in UCC and so he his final year to complete and he intends to do a masters in law and finance followed by the chartered taxation examinations. I say that Alannah is in sixth year and is planning on studying Commerce or Clinic Psychology next year and Elvie is in fifth year and is planning on studying Law or Commerce the following year. I say that, accordingly, the third level expenses of the children should amount to circa €100,000.00 if all studies are completed in Cork with the children residing in the family home. I say that, capitalised, this amounts to child maintenance of circa €194,000.00.

12. I say that the Applicant owns the following properties:-

- (a) 4 Beaumont Terrace, Blackrock
- (b) 141 Main Street, Mallow
- (c) Paris Cote Seine, 75015, Paris, 15, France
- (d) 12 Calle Angel Galdo, La Herradura, Grenada, Spain

I say that the Applicant resides in the property in Ballintemple and this appears to be encumbered. I say that the Applicant informed the Court on the last occasion that the property in Mallow had been extensively damaged in a recent storm and that it was uninsured. I say that the Applicant is now stating that this property forms part of the sale of the business. I say that it was agreed, when the matter was last before the Court, that the property in France would be sold and the net proceeds of sale held by your Deponent's solicitor pending further order. I say that the sale is in train but not completed. I say that it is hoped that this property will realise circa €320,000.00 net sale proceeds. I say that this is significantly more than the Applicant had valued the property at in his Affidavit of Means. I say that the Applicant has made no proposal in respect of a sale of the unencumbered Spanish property which he values at €280,000.00 in his Affidavit of Means.

- 13. I say that your Deponent seeks an Order directing that the net proceeds of sale of the property in France are paid to your Deponent on repatriation. I say that your Deponent believes that the property in Spain should also be placed on the market for sale and the sale handled in the same manner as the French sale. Furthermore, I say that, if the Applicant is to be believed, then it is abundantly clear that his debts outweigh his assets and he is without his income and, accordingly, your Deponent expects that other debtors including Revenue, HSE, Unipharm, an accountant and two firms of solicitors as well as private individuals will come after the said assets. I say that your Deponent seeks priority over the other debts and would ask this Honourable Court to grant an Order pursuant to Section. 13 securing the balance of maintenance against the property at 4 Beaumont Place, Blackrock in the City of Cork so that her claim can be first in time.
- 14. I say that your Deponent understands that this is a significant ask of the Court but it is the only mechanism now available to protect your Deponent and the dependent children going forward. I say that the history of this matter is such that the Applicant, disposed of gold coins in the currency of the judicial separation proceedings in direct contravention of a Court Order. I say that he continued to maintain their existence at trial and their absence was only discovered by your Deponent's physical attendance at the Merrion Vaults. I say that the Applicant also allowed two days of accounting evidence at trial whereby accountants on both sides were working from outdated figures, without correction, or being informed that the Applicant had, in fact, withdrawn significant company funds which he had misappropriated for his own benefit. I say that none of this bodes well for either his ability to tell the truth or be trusted where the future is concerned. I therefore pray this Honourable Court to grant the relief now sought.

Theen Confrey.

SWORN on this 10th day of March 2025

at Sheares Street, Fenn's Quay, Cork before me a practising solicitor by the said Sheena Confrey who is identified to me by Patricia Mallon, Solicitor, who is personally known to me.

Practising Solicitor

I, Patricia Mallon, Solicitor herein certify that I know the Declarant.

Signed:

Bellow At H

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# Exhibit "A"

Signed	Sheena	Confreg.	
_	Sheena Confrey		

Signed

**Practising Solicitor** 

PRACTISING SOLICITOR

## Broadale, Douglas, Cork

### Dr Paul O'Keeffe

MB, MRCGP, DCH, MMedSc. (Sports)
MCN: 19301

Phone: 021 4891111 Fax: 021 4891110 email: office@broadalemc.ie

#### 27/01/2025

RE.

SHEENA CONFREY

"BALMORAL"
VICTORIA ROAD
Blackrock Road

Cork

800

17/11/1972

Tel

087 2050277 0872050277

### Dear SHEENA CONFREY.

The above named is a patient of the practice. The below is an extensive list of her medical conditions along with her list of treatment. Due to the below Shenna is unable to work

#### Past Medical History:

EUA and Injection of haemorrhoids-2014

L99 - MUSCULOSKELETAL DISEASE OTHER Neuropsychiatric Lupus - still active Apr 2014

Vasculius -

173.0 - Raynaud's syndrome

E03 - Other hypothyroidism

SLE

medical history: acne

medical history aone rosacea

medical history anaemia

medical history hyperthyroidism - Rx Neo-mercazole 1992- 1994

medical history hypothyroidism

medical history migraine

medical history systemic erythematosis SLE

surgical history appendectomy

### **Current Medications:**

Date	Onig	Type
07/11/2024	84 x CELLCEPT CLEAR PHARMA 500 MG TABLETS 2 tabs mane 1 tab	Repeal
	nocle	
08/01/2025	30 × PALEXIA 50MG FC TABS	Repeat
08/01/2025	60 x PALEXIA SR 50 MG MODIFIED RELEASE TABLET 1 bd	Repeat
24/03/2025	8 x VAGIFEM VAGINAL TABLETS + APPLICATOR 10	Repeat
21/04/2025	28 x ELTROXIN DONCASTER 25 MCG TABLETS total dose 75 mcg	Repeat
21/04/2025	28 x ELTROXIN 50 MCG TABLETS 1 tabs daily	Repeat
21/04/2025	28 x UTROGESTAN BESI 200 MG VAGINAL ČAPSULES po nocte 200mg	Repeat
21/04/2025	2 x LENZETTO TRANSDERMAL 1 53 MG / SPRAY SPR 4 sprays daily	Repeat
23/04/2025	28 x PROVIGIL 200 MG TABLETS DAILY	Repeat

# Broadale, Douglas, Cork

# Dr Paul O'Keeffe

MB, MRCGP, DCH, MMedSc. (Sports)

MCN: 19301

Phone: 021 4891111 Fax: 021 4891110 email: office@broadalemc.ie

23/04/2025	28 x PLAVIX IMED 75 MG TABLETS DAILY	Repeat
23/04/2025	28 x TETRALYSAL 300MG CAPS 1 daily	Repeal
23/04/2025	56 x PLAQUENIL 200 MG TABLETS 2 tabs daily	Repeat
23/04/2025	28 x HALF INDERAL LA 80MG PRO REL CAPS PCO 1 daily	Repeat
23/04/2025	1 x BIOXTRA MOISTUISRING 40ML PAMEX GEL DAILY	Repeat
23/04/2025	56 x LYRICA B&S HEALTH 150 MG CAPSULES 1 bd	Repeat
23/04/2025	4 x ALTAVITA D3 7000 UNITS CAPSULES weekly after loading dose	Repeat
23/04/2025	28 x LIPITOR B&S HEALTH 20 MG TABLETS DAILY	Repeal
24/04/2025	84 x SLOW SODIUM QM SPECIAL 600 MG TABLETS THREE TIMES DAILY	Repeat
24/04/2025	84 x SERC 16MG TABS B&S THREE TIMES DAILY	Repeat
24/04/2025	1 x DYMISTA 137 MCG + 50 MCG / DOSE NASAL SP TWICE DAILY	Repeat
24/04/2025	56 x MIDON 5 MG TABLETS ONE TO BE TAKEN TWICE DAILY	Repeat

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anks

Yours aincerely,

Dr Lisa Sullivañ

# Broadale, Douglas, Cork

## Dr Paul O'Keeffe

MB, MRCGP, DCH, MMedSc. (Sports) MCN: 19301

Phone: 021 4891111 Fax: 021 4891110 email: office@broadalemc.ie

### 10/09/2024

RE:

SHEENA CONFREY

"BALMORAL"
VICTORIA ROAD
Blackrock Road

Cork

DOB:

17/11/1972

Tel:

087 2050277 0872050277

### To whom it concerns,

The above named woman is a patient of mine. She has a medical history as outlined below. In addition I have added a summary of her medications.

## Past Medical History:

SLE (LUPUS)
EHLERS DANLOS TYPE 3
POTTS SYNDROME
MIGRAINE
HYPOTHYROIDISM
VERTIGO/TINNITUS

### **Current Medications:**

	·	
Date	Drug	Type
25/06/2024	56 x LYRICA B&S HEALTH 150 MG CAPSULES 1 bd	Repeat
25/06/2024	1 x DYMISTA 137 MCG + 50 MCG / DOSE NASAL SP TWICE DAILY	Repeat
25/06/2024	28 x ELTROXIN DONCASTER 25 MCG TABLETS total dose 75 mcg	Repeat
25/06/2024	56 x MIDON 5 MG TABLETS .ONE TO BE TAKEN TWICE DAILY	Repeat
25/06/2024	28 x TETRALYSAL 300MG CAPS 1 daily	Repeat
25/06/2024	84 x CELLCEPT CLEAR PHARMA 500 MG TABLETS 2 tabs mane 1 tab	Repeat
	nocte	•
25/06/2024	28 x PROVIGIL 200 MG TABLETS DAILY	Repeat
25/06/2024	28 x PLAVIX IMED 75 MG TABLETS DAILY	Repeat
25/06/2024	28 x HALF INDERAL LA 80MG PRO REL CAPS PCO 1 daily	Repeat
25/06/2024	28 x ELTROXIN 50 MCG TABLETS 1 tabs daily	Repeat
25/06/2024	56 x PLAQUENIL 200 MG TABLETS 2 tabs daily	Repeat
25/06/2024	60 x PALEXIA SR 50 MG MODIFIED RELEASE TABLET 1 bd	Repeat
20/08/2024	84 x SLOW SODIUM QM SPECIAL 600 MG TABLETS THREE TIMES DAILY	Repeat
20/08/2024	28 x LIPITOR B&S HEALTH 20 MG TABLETS DAILY	Repeat
10/09/2024	28 x ARCOXIA 90 MG TABLETS DAILY	Acute
10/09/2024	28 x NEXIUM B&S HEALTH 40 MG GASTRO-RESISTANT DAILY	Acute

# Broadale, Douglas, Cork

Dr Paul O'Keeffe

MB, MRCGP, DCH, MMedSc. (Sports) MCN: 19301

Phone: 021 4891111 Fax: 021 4891110 email: office@broadalemc.ie

Allergies:

Many Thanks.

Yours Sincerely,

Dr.Paul O'Keeffe

# Exhibit "B"

Signed	Sheena Confrey
_	Sheena Confrey
	lamer malin
Signed	
	Practising Solicitor

PRACTISING SOLICITORS

### Text message from Garvan Wednesday 4 December 2024

Sheena, there has been an update. David o Meara had a conversation with Matthew. I was standing beside him. I was unfairly treated- apparently- and they broke contract. We can get all the money, €850,000 - by taking them to high court. We initiate this once sale is finalised. They were Matthew's words to solicitor. It finally dawned on David o Meara, that there is actually €850,000 due. He also didn't believe me. But now it's fact. These are facts. Now, as I have been saying this since June, we collaborate. This is a life changing amount of money, and some can be accessed - as I said to David o Meara, the months dispensed by the new people. This is indisputable. You need to get a court order, or whatever, to access this money, otherwise we go to the high court. It's really that simple. We must stopping spending money now and put some agreement in place, around the €850,000, which, has now been verified by my solicitor, really exists. I'll say it again, you could have €200,000 in a week, if we now work together. What are we wasting time with court for? We all know where the money is, we now, all of us, go and get it, for your and kids benefit. This was always my plan, let's just do it.

## Text message from Garvan Wednesday 4 December 2024

I should add, David o Meara, after speaking with Matthew, did say to me, I can see why you need sheena to "unlock" this money. The penny literally dropped with him! Finally. The next move, we do together. That's a meeting, I have been waiting since June for.

### Text message from Garvan Wednesday 4 December 2024

Also, if it comes to it, because I can't finance high court case myself, obviously, and I am all borrowed out, I will sell my pension to fund the whole thing if I have to. So, FYI, this is happening, one way or the other, even if it means selling pension to fund it. The money will, eventually come, but in the meantime, go after the 200,000€ with your barrister.

### Text message from Garvan Wednesday 4 December 2024

Or get some of the money released. Make a case for judge, hardship etc. this is the conversation you need to have with PM.

### Text message from Garvan Wednesday 4 December 2024 20.06

Sheena, do you want to meet? Know that it's confirmed the hse money actually exists and we can recoup it all? I can't do this next bit on my own.

### Text message from Sheena Monday 9 December 2024 15.14

Garvan, I can meet you after I collect Elvie

## Text message from Garvan Monday 9 December 2024

For what? I'm paying what I owe, normalising maintenance, so I can concentrate on getting money from HSE.

## Text message from Garvan Monday 9 December 2024

Sheena, FYI- at the end of my fourth full day in court, which I told you to not initiate, my barrister said the following- after 4 full days!

"They want Spain, France and Beaumont"

To which I replied with "what about HSE money?"

And the last words to come out of my barristers mouth was "they don't believe there is any money from the HSE".

As I obviously can do everything myself, but it will be costly, I am borrowing short term money to initiate HSE case.

It will be likely January before I get around to this, as the whole family court battle has really distracted me from other jobs.

FYI - what I had envisioned for collaboration, is quite different to what happened.

In any case, I am selling Paris immediately, this is important-

And can you answer immediately please, there will be documentation for you to sign. Is this going to be a problem?

I have an alternative already underway, Herve is getting a notary in Paris to transfer property to my name. Of course, that will cost.

Any collaboration going forward will be done without solicitors. Period.

### Text message from Garvan Monday 9 December 2024

As is now obvious, there will be more than enough money coming from the HSE in due course, and is probably around the €1 million mark now, including October and November.

When the time comes, after we get the money, we sit down with James Byrne and decide how best to distribute funds. I will do this myself and without any solicitors.

### Text message from Sheena Monday 9 December 2024

Explain to me why you think there will be around a million coming back from the HSE.

## Text message from Garvan Monday 9 December 2024

I haven't been paid since last October 2023. And as Matthew told David o Meara, they broke the contract first.

Matthew always said I would get all money, if I take a high court case, but it would cost €100,000. I definitely told you this. I will get all money due. Period.

## Text message from Garvan Monday 9 December 2024

I thought the family court, would be effective in getting this money, instead of expensive high court case.

That's is why I have been suggesting meeting etc.

it probably wouldn't work/ using family court? Anyway, that is the question I wanted answered, instead, I ended up proving marguerite paid for wedding! They were all feeding at the trough! All of them.

## Text message from Garvan Monday 9 December 2024

Will you sign French documents? Without involving solicitors here? Otherwise I'll just pay French notary.

## Text message from Sheena Monday 9 December 2024

And what about the allegations? Is there a reason why you're not taking those into account?

## Text message from Garvan Monday 9 December 2024

If I use the high court, the allegations are meaningless with regard to money. They broke their contract with me. It's clear cut. Again - we knew all this during the summer, this is not new information.

In any case, I will never answer any questions. Not now and especially if I use high court.

If you had used family court to get money, then I probably would have to answer something, in which case I would give vague politicians response.

Matthew explained this to me, and I'm pretty sure to you as well.

This is why I wanted to sit down with you.

So, this is the situation.

### Text message from Garvan Monday 9 December 2024 19.45

Well? Will you go operate with France? Or do I pay a notary? This is the money you take hse to high court.

What were you trying to achieve with 4 days in court? I don't understand? How did it escalate to that?

### Text message from Sheena Tuesday 10 December 2024 13.23

Garvan, James says he wants snooker or pool balls for Christmas. Can you send me a photo of your pool table for the man in the shop so he'll know what size? Also he's wondering if you ordered from him as they have your details on file but can't find the order. It's The Billiard Co. in Dublin

### Text message from Garvan Tuesday 10 December 2024 14.28

Yes, I ordered from them.

Sheena, you have to take a Birds Eye view of my situation. I must take HSE to court which will cost in the order of €100k. This is obviously a very important case and will need my absolute full attention, given the money involved. I can not be mired in other legal battles or I will run out of money and in all likelihood have to declare bankruptcy. That is a fact, and one the HSE would no doubt like to see.

As I am about to start this journey, I need to know now, will you co operate in what ever way that means, I don't know yet what it entails, but I need to know now if you will co operate? I am not using solicitors any more. I have run up another legal bill of nearly 10k, and simply because you wouldn't listen to me. What was the point in bringing me to

court, when nothing has been resolved with the sake. You accomplished nothing in 4 days in court, but the solicitors and barristers were feeding at the trough. I told you that and you wouldn't listen and did it anyway. Now we are probably 20k lighter for it and none the wiser. Stop listening to who ever is advising you. There is no money yet, it could take 12 months to get it, but get it all I will.

First, I need to pay for high court, which is why I must sell France. It's that simple. There is nothing else to sell. Will you Co operate on this journey? I need to know now, before I spend more money on French notary.

Of course, I can do it alone, but you have unique perspective when researching problems and I believe I will need that expertise once the high court case is underway.

There is a life changing amount of money there, and imagine, the tax has been paid already because the HSE keep withholding tax each month, which must be off set against my tax bill. There is over 1 million now, and I think my chances of getting this money will increase if you are scanning all documents.

That's my opinion, and if you don't respond by next Monday, I will presume you don't want anything to do with this.

## Exhibit "C"

_	She and Conf.	rey:
SignedPı	ractising Solicitor	Malia

PRACTISING

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## Record No. M634/2019

## THE CIRCUIT FAMILY COURT

**CORK CIRCUIT** 

**COUNTY OF CORK** 

IN THE MATTER OF THE FAMILY LAW (DIVORCE) ACT, 1996

BETWEEN/

**GARVAN LYNCH** 

Applicant

AND/

**SHEENA CONFREY** 

Applicant

SUPPLEMENTAL AFFIDAVIT

Eoin C Daly Mallon LLP Solicitors 38 South Mall Cork

PM/BD/CON.OI 8/0005