

In the FAMILY COURT

sitting at Norwich Combined Court Centre

Case No: 1756206544908210

BETWEEN:

LENNY TIMOG KAYE (Applicant)

- and -

MARK PETER KAYE (Respondent)

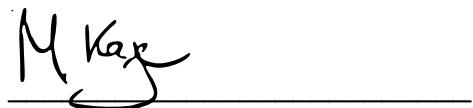
RESPONDENT'S STATEMENT OF ISSUES

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1. **Reactive Disclosure & Conduct:** That the Applicant has failed to provide full and frank disclosure, providing a sworn Form E (1 Dec) that explicitly denied cohabitation despite moving 18 days prior. Further omissions including a **£1,767 ISA** and **investment income** were only corrected on 30 Dec following Respondent's challenges.
2. **Lack of Financial Need:** That the Applicant's own figures demonstrate she is self-sufficient with a **£1,029.43 monthly surplus**. Her needs are further met by a cohabiting partner earning £27,000, rendering any claim on the Respondent's pension unnecessary.
3. **Non-Matrimonial Assets:** That circa **£130k** of the Respondent's pensions are pre-marital assets with no marital contributions. Under *Standish v Standish* [2025], these are non-matrimonial and excluded from the sharing principle.
4. **Negative Matrimonial Pot:** That there is significant marital debt of **£68,952.80** borne solely by the Respondent. After accounting for all assets, the net matrimonial pot is **negative**, leaving no surplus for division.

5. **Earning Capacity (Respondent):** That the Respondent (51) has **zero earning capacity** due to a 10-year SHPO and LCW status. He cannot rebuild his pension and requires it to avoid future state-dependency.
6. **Earning Capacity (Applicant):** That the Applicant (35) is in full-time employment with no debt and **32 years** to build her own pension provision.
7. **Unfairness of Pension Share:** That awarding a pension share to an Applicant with a significant income surplus from a Respondent who is permanently excluded from the labour market would be a gross departure from the "needs" principle.

Signed:



Mark Peter Kaye (Respondent in Person)

Dated: 30 December 2025