

6009910/2024: Without Prejudice [DLAP-UKMATTERS.FID5770845]

From Beverley Ensor

To legal@niallhorn

Date Tuesday, 14 April 2026 at 11:56

Without Prejudice

Release Note:

* Claimant contests WP status on multiple grounds.

* Redaction of phone number.

Dear Mr Horn,

We write further to the Tribunal's postponement of the hearing until tomorrow morning.

Whilst we are aware that you have previously not been interested in settlement, ordinarily, at the start of a hearing, the parties would have a window of opportunity during which to discuss the possibility of settlement in-person should they be interested in such a discussion.

We have discussed this with Apple and they would be interested in such a discussion. Therefore, we considered it prudent to use the time today to explore with you whether you would also be interested in settlement.

We are conscious that, having lost a day of the hearing, we are now unlikely to get judgment on Monday and, therefore, judgment is likely to be reserved, which means it will be sent out to the parties in writing at a later time. As we both know, a core issue in this case is the reasonableness or otherwise of the adjustments (including whether they would be effective even if offered), which could go either way. We are also conscious that, even if you win on any of your claims, there would need to be a further hearing on remedy to determine how long you would have remained in the job and the likelihood of you being able to relocate to London etc, as mentioned by EJ Spencer in the February 2025 PH. It is, of course, currently unclear what the timescales of either of these things might look like.

In addition, as you know, the High Court proceedings are currently due to be revisited in October 2026.

Accordingly, in the interests of finality and bringing a conclusion to all proceedings as soon as possible, our client would be prepared to offer, on the basis of no admission of liability, **£100,000** in full and final settlement of all of your claims, including those in the Employment Tribunal and the High Court, without any orders for costs.

In real terms, whilst we have not done the maths, this equates to roughly one years' pay, as well as removing the risk of costs being awarded against you in the High Court.

If you are interested in this offer or have a counter proposal for us to take back to our client, please do let me know as soon as possible. We would be happy to draft up a standard COT3 agreement, which we could send across to you to review.

Please note that this offer is being made on a without prejudice basis which means that it is strictly confidential and you should not publicise it or refer to it in any of your dealings with the Tribunal. We would be content for you to discuss this offer with your family or other appropriate support person on the basis that they also agree not to publicise it or discuss it with anyone else.

If it would be easier to discuss this over a call, please feel free to telephone me on [REDACTED]

We look forward to hearing from you.

Kind regards

Beverley Ensor

Legal Director

[REDACTED]

[REDACTED]

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DLA Piper UK LLP