

**This is Exhibit JL1 referred to in the  
Statement of Leon Andrew James Litchfield dated 19 December 2019**

# Grenfell Tower Inquiry

26 September 2019

Mr Leon Andrew James Litchfield  
Litchfield Group Limited  
Firs Works  
Nether Heage  
Belper  
Derbyshire  
DE56 2JJ

By post only

Dear Mr Litchfield,

## **Leon Andrew James Litchfield - Request for Evidence under Rule 9 of the Inquiry Rules 2006 ("the Rules")**

In his Opening Statement, the Chairman indicated that he will conduct the Inquiry in two phases. In the first phase, the Inquiry will investigate the development of the fire itself, where and how it started, how it spread from its original seat to other parts of the building and the chain of events that unfolded during the course of the hours before it was finally extinguished.

Phase 2 of the Inquiry will be concerned with the balance of issues identified in the List of Issues, a copy of which is available on our website. The current List of Issues on our website in an updated version of the provisional List which was published by the Inquiry on its website on 13 September 2017. This List will continue to be updated as the Inquiry's investigation proceeds.

### **Request for evidence**

We note that you have already provided written witness statements to the Metropolitan Police Service (the "MPS"), dated 14 March 2018 and 28 March 2018 (the "MPS Statements"). If you are not in possession of copies of the MPS Statements, please contact the Inquiry directly. We have reviewed the content of the MPS Statements, but we do not consider that it covers all of the issues in respect of which we believe you may have evidence to give to the Inquiry, and which is relevant to the Inquiry's investigation. In order to progress the Inquiry's investigation of the Phase 2 issues, I am now writing on behalf of the Chairman with a formal request under rule 9 of the Rules for you to provide a written witness statement which addresses (a) the particular issues identified below and (b) any other issues in relation to which you consider that you have evidence which will be relevant to the Inquiry's investigation (a "Rule 9 Statement").

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0800 1214282

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The deadline for provision of your Rule 9 Statement is **4 p.m, 31 October 2019**.

When preparing your Rule 9 Statement you may choose:

1. To rely on the MPS Statements and supplement your evidence in your Rule 9 Statement;  
or
2. Not to rely on the MPS statements but make a Rule 9 Statement for the Inquiry without reference to your MPS statement.

Whichever option is chosen, please make this clear in your Rule 9 Statement.

## Issues to be addressed by your Rule 9 Statement

Please address or include the following in your witness statement:

1. Please set out your role and responsibilities at LB Plastics Limited ("**LB Plastics**") and how you fulfilled that role from the date of purchase of Manse Masterdor Limited ("**Manse Masterdor**") until November 2014.
2. Please set out your role and responsibilities at Manse Masterdor and how you fulfilled that role.
3. Please set out the legal relationship between LB Plastics, Manse Masterdor and the Litchfield Group of companies.
4. Please set out your role at the Litchfield Group of companies from the date of purchase of Manse Masterdor to November 2014.
5. Between 2006 and 2014 what was your understanding of the testing requirements for doors sold as FD30 and as FD30S?

### *LB Plastics and Manse Masterdor*

6. When did LB Plastics purchase Manse Masterdor?
7. Please describe how the relationship between LB Plastics and Manse Masterdor worked on a daily basis, including any crossover between the two companies in areas of administration, design, testing, manufacture, sales and supply.
8. Other than yourself, were there any common directors or employees to both LB Plastics and Manse Masterdor? If so, who were they and what were their roles.

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9. Did staff at Manse Masterdor ever report directly to managers or directors of LB Plastics? If so, in what circumstances did this occur.
10. Please list any shared resources between LB Plastics and Manse Masterdor, including:
  - a. those required for:
    - i. developing the business and marketing;
    - ii. designing and testing doors; and
    - iii. manufacturing;
  - b. manufacturing plants, office space and transportation.
11. Please list all sites where door manufacturing was carried out for either LB Plastics and/or Manse Masterdor between 2006 and November 2014, and for each site:
  - a. which company had direct control of the site (including any changes to control which took place);
  - b. whether composite doors were produced; and
  - c. whether doors trademarked with the name 'Suredor' and sold as FD30 or FD30S doors ("**Suredor Fire Doors**") were produced.
12. Please give details of any rationalisation of, or changes made to, the production of Suredor Fire Doors between 2006 and 2014, whether by Manse Masterdor and/or LB Plastics, including:
  - a. the moving of production from one site to another;
  - b. the closing of sites;
  - c. changes to the production process itself;
  - d. changes to the position and number of intumescent strips;
  - e. when those changes were made; and
  - f. who took the decision to make those changes.
13. When were the following employed by Manse Masterdor and/or LB Plastics, who employed them and what were their roles:
  - a. Jim Duncan;
  - b. Gary Fox; and
  - c. Dan Jones.

## *LB Plastics*

14. Please describe LB Plastics' core business, at the time it purchased Manse Masterdor, and any changes made to the core business up until November 2014.
15. In relation to the door slabs purchased from Distinction Doors, known as 'Nan Ya', please give details of how LB Plastics ensured that doors it purchased:
  - a. were of consistent quality and composition; and
  - b. were, and continued to be, suitable for use as FD30 and FD30S doors.

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### *Manse Masterdor*

16. Please describe Manse Masterdor's core business at the time it was purchased by LB Plastics, and any changes that were made to that core business up to November 2014.
17. How were decisions about the direction of the Manse Masterdor's core business made and who was involved in such decisions?
18. In relation to Mike Hudson and John Tapscott:
  - a. what were their roles and responsibilities; and
  - b. what degree of autonomy did they have in the running of Manse Masterdor?

### *Suredor Fire Doors*

19. For the period between 2006 and 2014, please give details of which company, LB Plastics and/or Manse Masterdor, was responsible for or involved in:
  - a. the design and development of Suredor Fire Doors;
  - b. the supply of parts for Suredor Fire Doors;
  - c. the manufacture of Suredor Fire Doors;
  - d. the delivery of Suredor Fire Doors; and
  - e. the testing for fire resistance or cold smoke leakage of Suredor Fire Doors.

### *Testing*

20. In relation to testing for fire resistance of Suredor Fire Doors, please give details of:
  - a. individuals, and their roles, who were responsible for ensuring that doors were tested:
    - i. when the door was first designed;
    - ii. when their design was modified; and
    - iii. on a regular basis;
  - b. what testing was carried out on glazed doors;
  - c. how, and by whom, was the hardware and glazing to be used on a door deemed appropriate for use on a FD30 or FD30S door;
  - d. under what circumstances, and by whom, field of application tests were deemed appropriate;
  - e. all companies who carried out fire resistance or field of application tests;
  - f. all the test results; and
  - g. how details of all testing information were shared between LB Plastics and Manse Masterdor.
21. Please provide all fire test reports for Nan Ya doors or Suredor Fire Doors that LB Plastics hold, for the period 2006 to 2014 .

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22. How did LB Plastics and/or Manse Masterdor ensure that Suredor Fire Doors of all styles, including glazed doors, met the testing requirements for doors to be sold as FD30 and FD30S.
23. In relation to testing for cold smoke leakage from Suredor Fire Doors please give details of:
  - a. individuals, and their roles, who were responsible for ensuring that doors were tested;
  - b. any companies who carried out cold smoke leakage tests;
  - c. all test results; and
  - d. how details of all testing information were shared between LB Plastics and Manse Masterdor.
24. Were you aware of any changes to the design, including hardware, intumescent strips and glazing, of the Suredor Fire Door between 2006 and 2014? If so:
  - a. what were the changes? and
  - b. what consideration was given to reflecting those changes in marketing material?
25. Are the fire test reports [MAS000000001 and MAS000000002] the only test reports or certification which Manse Masterdor relied upon to satisfy itself that the doors it was selling complied with the requirements for FD30S doors? If no, please indicate what other reports or certification are relevant.
26. Does the fire test report [MAS000000001] show a representative door, from which Manse Masterdor and/or LB Plastics assumed that by association other patterns or styles of doors would be compliant with fire safety regulations?
27. Please explain whether and in what circumstances Manse Masterdor and/or LB Plastics extrapolated from a test with a half-glazed door that other styles of glazing, with reduced amounts of glazing, would be compliant with fire safety regulations?
28. Please explain whether and in what circumstances Manse Masterdor and/or LB Plastics relied upon field of application tests for variations to style and hardware?
29. Please explain whether and in what circumstances Manse Masterdor and/or LB Plastics made minor changes to style of hardware, intumescent strips and or/glazing without carrying out specific testing, extrapolating from available test reports that minor changes would be compliant with fire safety regulations?
30. Please explain whether and in what circumstances Manse Masterdor and/or LB Plastics relied on certification provided by the manufactures of hardware, including self-closing

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devices and letter plates, to satisfy themselves that hardware could be used on an untested door set?

31. Where a purchaser of a Suredor Fire Door wanted to use different hardware, including self-closing devices, to that tested how did Manse Masterdor and/or LB Plastics satisfy themselves that alternative hardware could be used on a FD30 or FD30S fire door.

In the event you are unable to give full answers to any questions please give details of who was responsible at the time or who would be able to give a full answer.

## Format etc. of witness statements

The Inquiry has given detailed guidance on the style, format and content of witness statements. In this regard, you are referred to the Witness Statement Protocol, a copy of which can be found on the Inquiry's website (Documents/Key Documents/Protocols).

If you wish to refer to any documents these should be identified in the witness statement and a copy should be provided to the Inquiry with the statement.

## Disclosure of Phase 2 witness statements

Similar requests, under rule 9 of the Rules, have been made to various corporate and governmental bodies, and other individuals. Once your witness statement has been provided in response to this request, the Chairman will consider when and to what extent your statement will be circulated to these individuals and if it will also be published on the Inquiry's website.

## Next Steps

In order to access the documents referred to in paragraphs 25 and 26 of this letter, please sign and return a copy of the **enclosed** confidentiality undertaking as well as providing the Inquiry with your preferred email address, by **10 October 2019**.

If you do not have legal representation, you may wish to seek legal advice in respect of the content of this letter. Once you have done that, please promptly advise the Inquiry of the identity of any legal advisors that are acting on your behalf.

Yours faithfully

*E. Schwikkard*

**Emily Schwikkard**

**Assistant Solicitor to the Inquiry**

**Email: [emily.schwikkard@grenfelltowerinquiry.org.uk](mailto:emily.schwikkard@grenfelltowerinquiry.org.uk)**

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