

Amended Claim Form under CPR 17.1(1) dated 24 July 2013

Re-Amended Claim Form under CPR 19.4 and by Order of Mr Justice Hildyard dated 20 September 2013

Re-Re-Amended Claim Form under CPR 19.4 and by Order of Mr Justice Hildyard dated 19 March 2014

Re-Re-Re-Amended Claim Form under CPR 19.4 and by Order of Mr Justice Hildyard dated 19 March 2014 and by Order (by consent) of Chief Master Marsh dated 13 May 2014



Claim Form

In the High Court of Justice
Chancery Division

	<i>for court use only</i>
Claim No.	HC13D01192
Issue date	28 March 2013

Claimant(s) name(s) and address(es) including postcode

Trustees of the Mineworkers' Pension Scheme Limited
and others as listed in Schedule 1



Defendant(s) name

The Royal Bank of Scotland Group Plc

Brief details of claim

See attached.

Value

Claimants expect to recover more than £300,000.

You must indicate your preferred court for hearings here (*see notes for guidance*)

Defendant's name and address, including postcode
The Royal Bank of Scotland Group
Plc
36 St Andrew Square
Edinburgh
EH2 2YB

£

Amount claimed	Unspecified
Court fee	£1670
Solicitor's costs	TBA
Total amount	Unspecified

When corresponding with the court, please address forms or letters to the Court Manager and quote the claim number.

N1 Claim form (CPR Part 7) (03.12)

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Claim No.	HC13D01192
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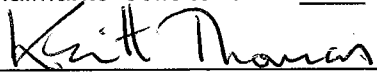
Does, or will, your claim include any issues under the Human Rights Act 1998? [] Yes [X] No

Particulars of Claim (~~attached~~)(to follow)

Statement of Truth
 *(I believe)(The Claimants believe) that the facts stated in this claim form are true.
 * I am duly authorised by the claimants to sign this statement

Full name Keith Thomas

Name of claimants' solicitor's firm Stewarts Law LLP

signed  position or office held Partner
 *(Claimant)(Litigation friend)(Claimants' solicitor) (if signing on behalf of firm or company)

**delete as appropriate*

Stewarts Law LLP
 5 New Street Square
 London
 EC4A 3BF
 DX 368 London Chancery Lane
 Telephone: 0207 822 8000
 Fax: 0207 822 8080
 Ref: CHZ/KGT/100362.1

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.

IN THE HIGH COURT OF JUSTICE

CHANCERY DIVISION

BETWEEN:

TRUSTEES OF THE MINEWORKERS' PENSION SCHEME LIMITED AND
OTHERS AS LISTED IN SCHEDULE 1

Claimants

-and-

THE ROYAL BANK OF SCOTLAND GROUP PLC

Defendant

BRIEF DETAILS OF CLAIM

1. The Defendant (**RBS**) is, and was in 2008, the holding company for the RBS Group of banking and financial services companies, operating in the United Kingdom, the United States of America and worldwide. At all relevant times its shares have been listed and traded on the London Stock Exchange and elsewhere.

2. On 22 April 2008 RBS announced a rights issue (**the Rights Issue**). RBS proposed to issue 6,123,010,462 New Shares to existing shareholders at 200 pence per share, on the basis of 11 New Shares for every 18 existing shares. By these means RBS sought to raise some £12 billion of new capital, net of expenses.
3. On 30 April 2008 RBS issued a prospectus (**the Prospectus**) for the Rights Issue under Part VI of the Financial Services and Markets Act 2000 (**FSMA**) and the UK Listing Authority's Prospectus Rules. Under Prospectus Rules r. 5.5.3(2) RBS, as the issuer of the New Shares, was a person responsible for the Prospectus, within the meaning of FSMA section 90.
4. The Claimants acquired New Shares to which the Prospectus applied.
5. The Claimants have suffered loss in respect of the New Shares as a result of untrue and misleading statements in the Prospectus and of the omission from the Prospectus of matters required to be included by FSMA section 87A.
6. Under FSMA section 90, RBS is liable to pay compensation to each of the Claimants for its losses, amounting to the difference between the price paid

for the New Shares and their actual value. The Claimants will say that such difference was the whole or a substantial part of the price paid.

7. The Claimants are also entitled to be paid interest on the amount of the compensation recovered, to be assessed pursuant to s.35A of the Senior Courts Act 1981.

8. The Claimants expect to recover more than £25,000.

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Schedule 1 - Claimants

	Name	Address
1.	Trustees of the Mineworkers' Pension Scheme Limited	Ventana House 2 Concourse Way Sheaf St Sheffield S1 2BJ
2.	Coal Staff Superannuation Scheme Trustees Limited	Ventana House 2 Concourse Way Sheaf St Sheffield S1 2BJ
3.	Electricity Pensions Trustee Limited	c/o David Venus 7 Company Limited Thames House Portsmouth Road Esher Surrey KT10 9AD
4.	MNOPF Trustees Limited	Leatherhead House Station Road Leatherhead Surrey KT22 7ET
5.	Arca SGR S.p.A	Via Mose Bianchi, 6 20149 Milano ITALY
6.	Deka International S.A.	5, Rue des Labours L - 1912 Luxembourg LUXEMBOURG
7.	Deka Investment GmbH	Mainzer Landstr 16 60325 Frankfurt am Main GERMANY
8.	ING Global Advantage & Premium Opportunity Fund	ING Funds 7337 E. Doubletree Ranch Road, Suite 100 Scottsdale AZ 85258 USA
9.	ING Global Equity Dividend and Premium Opportunity Fund	ING Funds 7337 E. Doubletree Ranch Road, Suite 100 Scottsdale AZ 85258 USA

	Name	Address
10.	ING Investors Trust (the "Registrant") on behalf of the ING Templeton Global Growth Portfolio and the ING Index Plus International Equity Portfolio, each a series of the Registrant	ING Funds 7337 E. Doubletree Ranch Road, Suite 100 Scottsdale AZ 85258 USA
11.	ING Mayflower Trust (the "Registrant") on behalf of the ING International Value Fund, a series of the Registrant	ING Funds 7337 E. Doubletree Ranch Road, Suite 100 Scottsdale AZ 85258 USA
12.	ING Mutual Funds (the "Registrant") on behalf of the ING Global Opportunities Fund, ING Index Plus International Equity Fund, ING Global Equity Dividend Fund, ING International Value Opportunity Fund, and the ING International Equity Dividend Fund, each a series of the Registrant	ING Funds 7337 E. Doubletree Ranch Road, Suite 100 Scottsdale AZ 85258 USA
13.	ING Partners Inc. (the "Registrant") on behalf of the ING Artio Foreign Portfolio (nka Templeton Foreign Equity Portfolio) and the ING Oppenheimer Global Portfolio, each a series of the Registrant	ING Funds 7337 E. Doubletree Ranch Road, Suite 100 Scottsdale AZ 85258 USA
14.	ING Variable Portfolios, Inc. (the "Registrant") on behalf of the ING WisdomTree Global High Yielding Equity Index Portfolio, and the ING International Index Portfolio, each a series of the Registrant	ING Funds 7337 E. Doubletree Ranch Road, Suite 100 Scottsdale AZ 85258 USA
15.	International Fund Management S.A.	3, Rue des Labours L - 1912 Luxembourg LUXEMBOURG

	Name	Address
16.	John Hancock Variable Insurance Trust on behalf of its funds 2A32 JHVIT International Equity Index Trust B, 2A34 JHVIT International Equity Trust A, 2C35 JHVIT Global Trust, 2C64 JHVIT International Value Trust, 2CIG JHVIT Disciplined Divers Trust, and (6719) JHVIT Overseas Equity Trust merged into 2C64 JHVIT International Value Trust	601 Congress Street Boston MA 02210-2805 USA
17.	John Hancock Funds II on behalf of its funds 2CZ8 JHF II International Value Fund, and 2DBG JHF II International Equity Index	601 Congress Street Boston MA 02210-2805 USA
18.	Susquehanna International Group Limited	Georges Dock House IFSC, 4th Floor Dublin 1 IRELAND
19.	Susquehanna Ireland Ltd	Georges Dock House IFSC, 4th Floor Dublin 1 IRELAND
20.	Swisscanto Asset Management AG	Nordring 4 CH-3000 Bern 25 SWITZERLAND
21.	Teachers' Retirement System of the State of Illinois	2815 W. Washington Street PO Box 19253 Springfield Illinois 62794-9253 USA
22.	<u>Austin Fire Fighters Relief & Retirement Fund</u>	<u>4101 Parkstone Heights Drive</u> <u>Suite 270</u> <u>Austin</u> <u>Texas 78746</u> <u>USA</u>
23.	<u>Avalon Holdings Inc</u>	<u>National Bank Building</u> <u>Memorial Square</u> <u>P.O.Box 556</u> <u>Charlestown</u> <u>Nevis</u> <u>FEDERATION OF ST KITTS AND NEVIS</u>
24.	<u>BayernInvest Kapitalanlagegesellschaft mbH</u>	<u>Karlstraße 35,</u> <u>80333 München</u> <u>GERMANY</u>

	Name	Address
25.	<u>BP Pension Trustees Limited as Trustee of the BP Pension Fund</u>	<u>Chertsey Road Sunbury on Thames Middlesex TW16 7 BP</u>
26.	<u>Caisse de dépôt et placement du Québec</u>	<u>Centre CDP Capital 1000, place Jean-Paul-Riopelle Montréal (Québec) H2Z 2B3 CANADA</u>
27.	<u>Canada Pension Plan Investment Board</u>	<u>One Queen Street East Suite 2500 Toronto M5C 2W5 CANADA</u>
28.	<u>Chrysler Group LLC CBA Benefit Trust</u>	<u>1 Lincoln Street 1st Floor Boston, MA 02111 USA</u>
29.	<u>Chrysler Group LLC Master Retirement Trust</u>	<u>1 Lincoln Street 1st Floor Boston, MA 02111 USA</u>
30.	<u>Cumbria County Council as administering authority for the Cumbria Local Government Pension Scheme</u>	<u>The Lonsdale Building The Courts Carlisle CA3 8NA UNITED KINGDOM</u>
31.	<u>Glasgow City Council a Local Authority constituted under the Local Government etc (Scotland) Act 1994 as the Administrators of the Strathclyde Pension Fund</u>	<u>City Chambers George Square Glasgow G2 1DU UNITED KINGDOM</u>
32.	<u>Graphic Communications Conference of the International Brotherhood of Teamsters National Pension Fund</u>	<u>455 Kehoe Blvd., Suite 101 Carol Stream, IL 60188 USA</u>
33.	<u>Houston Municipal Employees Pension System</u>	<u>1201 Louisiana Suite 900 Houston Texas 77002 USA</u>

	Name	Address
34.	<u>Inter-Local Pension Fund of the Graphic Communications Conference of the International Brotherhood of Teamsters</u>	<u>455 Kehoe Boulevard, Suite 100 Carol Stream Illinois 60188 USA</u>
35.	<u>JO Hambro Investment Management Limited</u>	<u>21 St James's Square London SW1Y 4HB UNITED KINGDOM</u>
36.	<u>Kames Capital Management Limited as agent for Scottish Equitable plc.</u>	<u>Kames House 3 Lochside Crescent Edinburgh EH12 9SA UNITED KINGDOM</u>
37.	<u>Kames Capital plc as agent for Kames Capital ICVC</u>	<u>Kames House 3 Lochside Crescent Edinburgh EH12 9SA UNITED KINGDOM</u>
38.	<u>MFS Meridian Funds on behalf of European Value Fund</u>	<u>19 Rue de Bitbourg L-1273 Luxembourg GRAND DUCHY OF LUXEMBOURG</u>
39.	<u>MFS Series Trust X on behalf of MFS International Value Fund</u>	<u>111 Huntington Avenue Boston Massachusetts 02199 USA</u>
40.	<u>MFS Series Trust XV on behalf of MFS Diversified Target Return Fund</u>	<u>111 Huntington Avenue Boston Massachusetts 02199 USA</u>
41.	<u>MFS Variable Insurance Trust II on behalf of MFS International Value Portfolio</u>	<u>111 Huntington Avenue Boston Massachusetts 02199 USA</u>
42.	<u>Municipal Employees' Retirement System of Michigan</u>	<u>1134 Municipal Way Lansing MI 48917 USA</u>
43.	<u>Northern Ireland Local Government Officers' Superannuation Committee</u>	<u>Templeton House 411 Holywood Road Belfast BT4 2LP UNITED KINGDOM</u>

	Name	Address
44.	<u>Northwestern Mutual Series Fund, Inc on behalf of the International Equity Portfolio</u>	<u>720 E. Wisconsin Avenue Milwaukee WI 53202 USA</u>
45.	<u>Ontario Pension Board in its capacity as the administrator of the Public Service Pension Plan and administrator and manager of the Public Service Pension Fund, and not as Crown Agent</u>	<u>200 King St. W Suite 2200 Toronto, ON M5H 3X6 CANADA</u>
46.	<u>Orange County Employees' Retirement System</u>	<u>2223 Wellington Ave Santa Ana CA 92701 USA</u>
47.	<u>Premier Ltd</u>	<u>National Bank Building Memorial Square P.O.Box 556 Charlestown Nevis FEDERATION OF ST KITTS AND NEVIS</u>
48.	<u>Rathbone Investment Management Limited</u>	<u>Port of Liverpool Building Pier Head Liverpool L3 1NW</u>
49.	<u>Royal Borough of Kensington & Chelsea Pension Fund</u>	<u>16th Floor North City Hall Victoria Street London SW1E 6QP</u>
50.	<u>San Mateo County Employees' Retirement Association</u>	<u>100 Marine Parkway Suite 125 Redwood City CA 94065 USA</u>
51.	<u>Stichting Pensioenfonds ABP, through Algemene Pensioen Groep N.V.</u>	<u>APG Investments P.O. Box 75283 1070 AG Amsterdam THE NETHERLANDS</u>
52.	<u>The Mayor and Burgesses of the Royal Borough of Kingston upon Thames (as Scheme Employer of the Royal Borough of Kingston upon Thames Pension Fund)</u>	<u>Royal Borough of Kingston Guildhall Kingston Upon Thames Surrey KT1 1EU UNITED KINGDOM</u>

