

IN THE MATTER OF A LICENSING ACT 2003 REVIEW APPLICATION

TIMEPIECE, LITTLE CASTLE STREET, EXETER, DEVON, EX4 3PX

SECOND WITNESS STATEMENT OF [REDACTED]

1. I am [REDACTED], a director of Timepiece Ltd, [REDACTED] I make this second witness in response to David Dadds' 'Additional Information' and Witness Statements that we received on 5 November 2025.

Main Incident (19 September 2025)

2. In Para 2.1, Mr Dadds alleges "collapsing initially in Timepiece and again outside near to the premises and within sight of SIA staff". Complainant A did not collapse outside the premises in sight of SIA Staff. SK went to help Complainant A when she was doing a sweep of the premises outside.
3. In the same paragraph it alleges: *"security staff refused to call an ambulance, would not assist and instructed the complainant be moved away from the premises"*. As seen in submitted CCTV, at no point did SK (door supervisor) refuse to call an ambulance nor was this requested by the witnesses in Complainant A's group. Instead, SK on seeing the group asked *"Are we okay?..." 'Are we alright?'"* to which the response from the group was, *"I think she is fine, I think she is breathing", 'yes, she is fine"*. SK then states: *"I might get the street pastors just to come over and see her"*(SKi 11). SK then goes and finds the Street Pastors, who had already provided assistance to Complainant A, with the Street Marshall confirming that: Complainant A... *"was alright, she's with her friends and they're supposed to be taking her home'..... 'they were alright"* (Please see SKi 11 and the Street Marshall statements). SK then states: *"Guys the street pastors have said they have already been over, so its just a case really of trying to get her up, get her walking, get some air into her lungs, get some water into her and unfortunately you have to be a little bit firm and try get her up. Not really the best place to be"*. The final statement being greeted with giggles. Meanwhile the female in the dark hoodie states: *"that's fine...that's fine, don't worry"*. SK then goes on to state: *"Yes, I would try and sit her up...try and sit her up a bit"*. You then hear complainant A saying: *"I'm really sorry"* and SK responding by saying: *"you don't need to apologise, don't be silly, sit her up, that's it. I am going to leave you to it guys"*. To clarify, SK did not instruct the complainant be moved away from the venue. SK stated *"not really the best place to be"*, this being said on the basis that the Street Pastor had confirmed Complainant A *"was alright"* and that SK was attempting to carrel Complainant A's group into getting her home safely.

4. Para 2.1 states: “Witnesses, including medical students, observed signs of a life-threatening emergency (shallow breathing, foaming at the mouth, eye rolling and loss of consciousness)”. This statement is disingenuous given the relaxed nature of those friends in the group dealing with Complainant A, as can be seen from the footage in SKi 11 CCTV. In addition, as the CCTV evidences, Complainant A, walked into the ambulance.

Incident 2 (19 September 2025)

5. Mr Dadds has provided no further identification of the individual involved in his email dated 5 November 2025. As stated in our lawyer’s correspondence with him contained in our bundle of supporting documents we believe the main incident and Incident 2 are the same incident given the descriptions.

Incident 3 (16 September 2025)

6. CCTV has been provided which shows a true version of events that do not align with Mr Dadds’ allegations, nor those or [REDACTED] own representation. This matter is dealt with in my first witness statement, with supporting CCTV. It should be noted that we are aware that [REDACTED] has since returned to the venue on multiple occasions:
- Tuesday 21 October 2025 – Entered: 18:54 (SKi 31)
 - Friday 24 October 2025 – Entered: 20:39 (SKi 32).

Incident 4 (2 October 2024)

7. The date of this incident was 2 October 2024, not September as per Mr Dadds’ submission. Timepiece fully cooperated with the Police and assisted in their investigations, we provided all CCTV footage from this incident. Having assisted the Police with this material, there was no further follow up from the Police with us. The male was found on private property that was secured with electric gates. He had gained entry and fallen from a boundary wall. A member of the Timepiece Team, who lives at the private residence Exeter Castle, was in fact the individual who called the ambulance when on their way home.

Incident 5 (29 January 2025)

8. There is no record nor incident report for this allegation. We do not hold CCTV for this length of time and so have no comment.

Para 2.7

9. The strength of Tiki Fire Rum was listed in our weights and measures and priced accordingly to its strength, at approximately 60% more than a single shot of 40% Abv. This drink was on sale and served for many years without incident and students are aware of its strength. However, working with Police Licensing, we have removed this from product from sale at the premises.

Witness Statements – Complainant A

10. In relation to Paras 3 & 4 and the male buying Complainant A, a drink, this CCTV footage has been provided to the Police when they requested it on 27 September 2025.
11. Complainant A has revisited Timepiece on multiple occasions:
- Saturday 4 October 2025 - Entered: 22:39 - Please see SKi 15
 - Thursday 9 October 2025 - Entered 00:08 - Please see SKi 17
 - Monday 13 October 2025 - Entered 21:45 - Please see SKi 19
 - Friday 31 October 2025 – Entered 20:34 - Please see SKi 33
 - Saturday 1 November 2025 – Entered 20:19 - Please see SKi 34
 - Wednesday 5 November 2025 – Entered 18:13 - Please see SKi 35
12. Complainant A alleges: *'I am very upset that none of the staff members of Timepiece came to assist or help me'*. This allegation simply is not true. Four SIA door supervisors assisted Complainant A and her friends from inside the club to a bench in the safe area. She was offered water, and then Complainant A's friends asked the door supervisor SK to speak with a taxi driver, which she did. Complainant A's friend then left the club saying *'Thanks for your help'* and shakes SK's hand (SKi 6 – CCTV SK Cam). SK then outside the premises specifically came to assist her. Seeking out the Street Marshalls and trying to assist her friends to get her home safely.
13. Complainant A in her Paragraph 13 suggests that 'safety caps' be made available. This to me seems ironic as we have CCTV evidence (SKi 14 and) and evidence of a manager [REDACTED] confirming Complainant A drinking without using the safety caps, within Timepiece.

Witness 1

- 14.** Paragraph 3 - The group never attempted to alert door supervisors or bar staff of Complainant A's condition in the toilets.
- 15.** Para 4 is factually incorrect. Please see CCTV SKi 4, 5 & 6 for the real version of events and as described in our supporting witness statements. In summary, on their way out of the ladies' toilets, a male door supervisor assisted them once they reached the middle room landing. Complainant A, having been dropped by her friends on the stairs, was assisted by ST who notified a female door supervisor of the need to attend to Complainant A and meet him on the ground floor. The CCTV contradicts Witness 1's version of events and the allegation '*the security member offered no assistance*'. Furthermore, it is alleged that Complainant A fell at the bottom of the stairs, but this did not happen. SK, the female door supervisor, helped get Complainant A to a seated area, offered water, helped communicate with a taxi driver and helped escort the group safely to the exit.
- 16.** Witness 1 alleges in Para 9 that Complainant A was taken through the fire exit in order to get '*Complainant A off the premises as quickly as possible*'. In fact, Complainant A was already on a set of stairs and the door supervisor ST guided the group to the nearest exit in order to get her seated and to a safe area as quickly as possible, avoiding going through the main dancefloor. The primary concern was Complainant A's safety and the safest and quickest route to the safe area. Complainant A was taken to a bench near the exit to be assessed, whereby SK even assisted by speaking with a taxi driver.

Witness 2

- 17.** At Para 3 it states that: '*I began to panic and started to look around for help. A female member of Timepiece security then walked over to us. I was relieved as I thought she would help us. Instead, she said 'you need to pick her up and move her away from here*'. Witness 2 allegedly replied: '*we can't, she can't move, she's unconscious, she needs an ambulance*'. At no point was this said. As seen in SKi 11 CCTV Street Pastor Liaison, SK's first interaction with the group was to say "Are we okay?..." 'Are

we alright?'. At no stage did Witness 2 state: "we can't, she can't move, she's unconscious, she needs an ambulance".

18. Witness 2 states at Para 4 that Complainant A remained unconscious, you can clearly hear Complainant A apologising to SK and so was not unconscious at 23:36 (SKi 11 CCTV). SK left the group at 23:36.57 and an ambulance arrived at 23:44, some 7 minutes after. Complainant A can be seen walking into the Ambulance (SKi 13 CCTV).

19. The allegations made by Witness 2 against Timepiece door supervisors simply are not true and their version of events are simply fanciful.

Witness 3

20. My response above and the CCTV footage in SKi 11 simply shows that Witness 3 version of events simply isn't true.

21. Witness 3's assessment that the: *'female security member I encountered showed absolutely no care whatsoever to Complainant A. I would go as far as saying she showed less care than any average person'*. This statement is unfair and untrue. This has already been highlighted and is evidenced in the CCTV footage.

Witness 4

22. Witness 4 Para 8 simply again is untrue, their recollection of events and of SK's dealing with the incident is manifestly untrue.

Witness 5

23. Alleges that in order to provide a cash payment for the upstairs area, you have 'to leave the venue alone to get cash'. All customers are able to request free cashback from the downstairs bars, a facility that is well-used and well-known by customers.

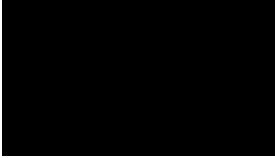
Summary

24. The suggestion that Timepiece has endangered vulnerable patrons, especially young women, is particularly upsetting. We have a long-standing relationship with the University of Exeter, with a particular focus on providing safe and inclusive nightlife. Timepiece worked in close partnership with the University of Exeter on the SWAN initiative (Safety of Women At Night). This charter pledged to provide a safe and secure environment for women in Exeter. Please see the letter from [REDACTED] [REDACTED] (SKi 30).

Statement of truth

The contents of this statement are true to the best of my knowledge and belief.

Name: 

Signed: 

Dated: 6 November 2025