

February 22, 2026

## Matters Arising - A measured conversation on Lloyds Developments Ltd v Accor S.A [2026] EWHC 232 (TCC)

*Lloyds Developments Ltd v Accor S.A* [\[2026\] EWHC 232 \(TCC\)](#)

Five pages. Six months. No jurisdiction.

George and Archie discuss service.

**GEORGE:**

The claim form was issued on 20 December.

**ARCHIE:**

Yes.

**GEORGE:**

Service out of the jurisdiction required service within six months.

**ARCHIE:**

Correct.

**GEORGE:**

It was not served within six months.

**ARCHIE:**

An extension had been obtained.

**GEORGE:**

On what basis?

**ARCHIE:**

Uncertainties.

**GEORGE:**

About?

**ARCHIE:**

Permission to serve out.

The time required for service in France.

Alignment of pleadings with parallel proceedings.

**GEORGE:**

Did developments elsewhere affect the wording of the claim form?

**ARCHIE:**

No.

**GEORGE:**

How long was the claim form?

**ARCHIE:**

Five pages.

**GEORGE:**

What required translation?

**ARCHIE:**

Approximately three thousand pages.

**GEORGE:**

Mostly?

**ARCHIE:**

The Particulars of Claim.

**GEORGE:**

Could the five-page claim form have been translated and served promptly?

**ARCHIE:**

Yes.

**GEORGE:**

Could particulars have followed?

**ARCHIE:**

Yes.

**GEORGE:**

The extension carried service beyond the primary limitation period.

**ARCHIE:**

It did.

**GEORGE:**

Was that drawn clearly to the court's attention on the without-notice application?

**ARCHIE:**

No.

**GEORGE:**

Was there an arguable limitation defence?

**ARCHIE:**

Yes.

**GEORGE:**

Was the court told that granting the extension would remove it?

**ARCHIE:**

It was not.

**GEORGE:**

So the matter was reheard.

**ARCHIE:**

Yes.

**GEORGE:**

Was there a good reason to extend time for serving the claim form?

**ARCHIE:**

No.

**GEORGE:**

Was there material non-disclosure?

**ARCHIE:**

Yes.

**GEORGE:**

The consequence?

**ARCHIE:**

The extension was set aside.

**GEORGE:**

Service?

**ARCHIE:**

Out of time.

**GEORGE:**

Jurisdiction?

**ARCHIE:**

None.

**GEORGE:**

Five pages.

**ARCHIE:**

Five pages. Yes.