

Article Summary

Deliberation About Recklessness: Deliberate Concealment Again

Nicholas Davidson QC

Section 32 of the Limitation Act 1980 addresses the topics of fraud, concealment and mistake. Concealment is addressed with words which, according to the House of Lords, are plain and in need of no embellishment, but which have become the subject of complex judgments in the Court of Appeal. The recent formidable judgment of that Court in *Operations Canada Square Ltd v Potter* [2021] EWCA Civ 339 is to be considered by the Supreme Court. The appeal provides the opportunity for welcome simplification.