



IN THE SUPREME COURT OF THE UNITED KINGDOM

12 May 2025

UKSC/2025/0028

Before:

Lord Hodge
Lord Stephens
Lady Rose

**Commissioners for His Majesty's Revenue and Customs (Respondent) v
BlueCrest Capital Management (UK) LLP (Appellant)**

AFTER CONSIDERATION of the application filed on behalf of the Appellant seeking permission to appeal the order made by the Court of Appeal on 17 January 2025 and of the notice of objection filed by the Respondent

AND AFTER CONSIDERATION of the Supreme Court Rule 16 Intervention Submissions filed on behalf of the Alternative Investment Management Association Limited and the Managed Funds Association

THE COURT ORDERED that

- 1) Permission to appeal be GRANTED on grounds 1 and 2: ie submissions on Conditions B and A.
- 2) The two interveners are given permission to intervene in writing. Their submissions are not to exceed 20 pages in length.



Court Angus

Registrar
15 May 2025