

Portner and Jaskel
Solicitors
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Ms N K-Dit-Rawé
3 Jefferson House
11, Basil Street
London SW3 1AX

(By Fax to +44 20 7258 8520)

5 October 2006

The ISP nonetheless caved in.
(I found my current (priceless) US website Host, HostDime in Oct 06, and relaunched my site on 25 Dec 06...after adding some 'fortifications' to it)

Dear Sirs

Your 3 October 2006 fax to Wt

Dear Sirs

Further to your fax transmission of 3 October 2006 to whom you demand:

my ISP, from

- 1) *"an apology", as well as*
- 2) *"suggestion for damages, which must be substantial and which"*
- 3) *"must reflect the seriousness of the allegations that you have published against our client"*

for hosting my website, www.leasehold-outrage.com, because – drawing from the content of your correspondence – you assess the contents of my site as containing:

1. Against your client

- 1) *"a significant number of unsubstantiated allegations against our client which are"*
- 2) *"wholly false"*
- 3) *"clearly highly defamatory and"*
- 4) *"actionable in law"*
- 5) *"Suggestions that our client is guilty of criminal activities and fraud"*
- 6) *"all of which are totally unsubstantiated"*
- 7) *"outrageous and"*
- 8) *"false"*

Furthermore, that:

- 9) *"Our client's reputation has been severely damaged by the allegations that [] has chosen to publish on the internet"*

2. Against other parties

- *"the site also contains other defamatory allegations...against a number of law firms and other professional advisors to Steel Services"*

Having made these statements, you have then stated, "Our client requires that within 48 hours you remove the offending web site from the internet..."

3. Actions required by you

Given the very broad-brush nature of all of the above, I draw your attention to legal precedents that require that you provide *me* with evidence in support of each of your claims.

Consequently:

- Firstly, specifically identify **each** of the individual item for which you consider your above assessment applies
- Secondly, in **each** instance, provide evidence to substantiate your counter-claim

In relation to your comments against 'other parties':

- Firstly, identify which "law firms and other professional advisors to Steel Services" you are referring to
- Secondly, in **each** instance - identify **each** item for which you consider your above assessment applies
- Thirdly, in **each** instance, provide evidence to substantiate your counter-claim.

Until you can – specifically – substantiate your claims, you are in no position to make any demands whatsoever.

I reserve my rights in full.

Yours faithfully



N K-DI-Rawé

cc.

MEMORY TRANSMISSION REPORT

TIME : 05-OCT-06 17:09
TEL NUMBER: 020-
NAME :

FILE NUMBER : 925
DATE : 05-OCT 17:08
TO : 972588520
DOCUMENT PAGES : 02
START TIME : 05-OCT 17:08
END TIME : 05-OCT 17:09
SENT PAGES : 02
FILE NUMBER : 925

*** SUCCESSFUL TX NOTICE ***

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5 October 2006

Dear Sirs

Your 3 October 2006 fax to [redacted] re [redacted] [redacted] [redacted] [redacted] to [redacted].

Dear Sirs

Further to your fax transmission of 3 October 2006 to [redacted] Verio Inc. my ISP, from whom you demand:

- 1) "an apology", as well as
- 2) "suggestion for damages, which must be substantial and which"
- 3) "must reflect the seriousness of the allegations that you have published against our client"

for hosting my website, www.leasehold-outrage.com, because of drawing from the content of your correspondence – you assess the contents of my site as containing:

- 1. **Against your client**
 - 1) "a significant number of unsubstantiated allegations against our client which are"
 - 2) "wholly false"
 - 3) "clearly highly defamatory and"
 - 4) "actionable in law"
 - 5) "Suggestions that our client is guilty of criminal activities and fraud"
 - 6) "all of which are totally unsubstantiated"
 - 7) "outrageous and"
 - 8) "false"

Furthermore, that:

- 9) "Our client's reputation has been severely damaged by the allegations that [Verio] has chosen to publish on the internet"
- 2. **Against other parties**
 - "the site also contains other defamatory allegations...against a number of law firms and other professional advisors to Steel Services"