

ATTENDANCE MEMO

Date: 24 September 2003

Client: RAWE

LM engaged receiving a voicemail from Noelle simply confirming that she was going into a meeting at 4.30 and would not be free again until 6.30 and if I needed anything to be done by her I should let her know.

Thereafter receiving a voicemail from Aysha of CKFT Solicitors, unconnected with the current County Court proceedings when she said that she had been instructed that there was now an issue with the Section 20C LVT application insofar as we would not confirm that there was an agreement. If that was the case, she was then instructed to commence proceedings in the County Court for specific performance. She wanted to discuss the matters with me at first.

NKDR Note:

1st reference to 'threat of proceedings'

LM relaying that to Noelle when she said that the reason that the letter had gone out was because she had been stressed for the last 18 months in relation to this matter. That is the reason why perhaps the letter had gone out. I said to her in essence she wanted to continue and she had said in her earlier email she would be instructing a City firm to act for her. I said that I would ask Counsel how long it would be before we get his written advice. I would then confirm to CKFT that I could not confirm that we had an agreement and then we would have to deal with matters thereafter.

I also told her that I had not done the List of Documents but I was not too troubled about that because although today was the day for exchange, and indeed our time had been extended until today, there was nothing we could do if we didn't file it and I would deal with it in the next couple of days.

NKDR Note:

2nd reference to 'threat of proceedings'

(See below for reminder of my comments)

LM thereafter attending Aysha of CKFT when she confirmed that she could be writing to us asking us to send a confirmatory letter to LVT that the agreement had been reached within 48 or 72 hours. On the expiry of that time they would then be proposing to issue proceedings. I confirmed to her that we were still instructed at the moment by Miss Rawe in respect of the LVT proceedings. I could not confirm that there was an agreement for reasons that I didn't think I needed to go into at the moment but on the basis that she would be sending a letter to us giving 48 hours or so to confirm then that was fine, I would simply wait until I had received the letter.

Time engaged: On telephone 3 Units

LM

NKDR Note (cont'd):

Consider this also in light of the fact that the **previous day** i.e. 24 Sep 03, in her 10h30 email to me, Ms McLean **had already made 2 references to the 'threat of proceedings'**:

One apparently made by Mr Barrie Martin, Martin Russell Jones

The second one, of her own making as she stated: "*He is obviously thinking about taking action on the "agreement"...*"

I view this as **'bullying in overdrive'** – a concerted effort between her, Ms Ayesha Salim, CKFT and Mr Barrie Martin