

Ms Lisa McLean
Piper Smith & Basham
31 Warwick Square
London SW1V 2AF
Fax: 020 7630 6976

Ms Noëlle K-Dit-Rawé
3 Jefferson House
11 Basil Street
London SW3 1AX

(By courier to L. McLean, R. Berns, I. Skuse and by fax – on the date written)

Ref: LM.R360/1

12 December 2003

Dear Lisa

1. **Your firm has not replied to my letter of 2 December**

On 4 December Mr Richard Berns and Mr Ian Skuse both received my letter of 2 December (on which you and Mr Twyman were copied). A week on, and I have not received a reply.

2. **Your draft letter dated 1st December to CKFT does not address my request**

While the contents of your draft letter to CKFT, dated 1st December (received 5th December), reflect the discussion that took place on 28 October with Mr Gallagher, Mr Brock and yourself, it does not reflect what was agreed at this meeting: these points were to be **included in the reply i.e in the 'notice of acceptance' – not** in a separate letter.

This is now the fifth time that I am pointing out to you/your firm that the reply does not reflect what we agreed. (Previously on 13 November, 20 November, 26 November and 2 December).

3. **I want you to write another 'notice of acceptance' as well as 'draft order'- cancelling those sent - which contain the points agreed at the 28 October meeting – and send these documents to me for review prior to sending them to CKFT – as well as your draft covering letter**

While I am prepared to accept the offer of £6,350.85 – even though it includes the sum of £1,735.74 which is not supported by specifications and cannot therefore be demanded under Section 20 – I want my reply to contain the points - we agreed - at the 28 October meeting, would be included.

4. **Please fax me the Claimant's ie. Steel Services Witness Statement by 16h00 today on 020 _____, as well as send me a copy by post**

In your letter of 27 October to CKFT you stated that the Witness Statements were to be exchanged by 12 December. On 3rd November you confirmed the date. This is today's date. (My Witness Statement was hand-delivered to you on 20 October).

5. **What is the date and time of the hearing?**

The County Court order of 2 September 2003 states, under point 12, that "The trial window do commence 16 February 2004 to expire 05 March 2004".

Please, confirm the date and time set for the hearing when you send me Steel Services' Witness Statement.

Yours sincerely

Noëlle K-Dit-Rawé

cc. Richard Berns, Ian Skuse

MEMORY TRANSMISSION REPORT

PAGE : 001
TIME : 12-12-03 09:58
TEL NUMBER: +020 ~~7630 6976~~
NAME : ~~XXXXXXXXXX~~ FX 900

FILE NUMBER : 179
DATE : 12-12 09:57
TO : ~~XXXXXXXXXX~~ 902076306976
DOCUMENT PAGES : 001
START TIME : 12-12 09:58
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FILE NUMBER : 179 *** SUCCESSFUL TX NOTICE ***

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4. Please fax me the Claimant's i.e. Steel Services Witness Statement by 16h00 today on 020 7311 4529, as well as send me a copy by post

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