

Strictly Private & Confidential
Miss Noelle Rawe — — — —

12 December 2003

Our ref: LM. eh.R360/1

Ext. 229

Your ref:

Also by email – noelle.rawe

Dear Noelle,

Steel Services Limited –v- Yourself

Thank you for your letter of today copied to both Mr. Richard Berns and Mr. Ian Skuse

I enclose a copy of the letter sent to you by Mr. Skuse dated 9 December.

The purpose of a consent order is simply to set out the terms as agreed between the parties. It should not include a narrative of matters that one party is unhappy with but purely the substance of the agreement as to conclusion of the case. This has been done. The proper place for the comments you raise is in the covering letter and not in the consent order.

LIE (C) You go on in your letter to say that you are prepared to accept the offer of £6,350.85 but continue to make comments that suggest you are not entirely happy with it. The offer is either accepted as it stands or rejected. You have accepted it in accordance with our and Counsel's advise. The problem here is that the consent order has been sent to CKFT and they have asked for an endorsed copy (ie one signed by us on your behalf) and I am surprised that they have not chased for it before now. They will argue, correctly in my opinion, that we have an agreement. (A)

(B) In respect of the court directions dealing with witness statements and trial date, on the basis of the agreement we have not of course pursued the directions as they become irrelevant and serve no purpose whatsoever. I have not received and do not expect to receive a witness statement from CKFT. Your statement has not (and would not have in any event in its current form) been sent to CKFT. The matter is settled and there is simply no point or purpose to be gained in exchanging witness statements and even less point in having a hearing date.

(A) The only Agreement is between her, CKFT and S.G. Gallagher

(B) There is no Agreement, therefore I should have SS Withn. Statement

(C) LIE
See evidence – Among others – her 24 Nov 03 letter to me



S O L I C I T O R S

One final point to make is that whilst there is a current complaint against me personally and the firm it would not be appropriate for me to continue acting for you, our relationship having broken down.

Yours sincerely


LISA MCLEAN

e-mail:- lisa.mclean@pipersmith.co.uk

Compare this
with her letter
to me of
21 Jan 2004.