

PORTNER AND JASKEL LLP

(INCORPORATING GUY DAVIS & CO)

S O L I C I T O R S

Our ref: AJ/vj/23208/2

Your ref:

Date: 7 February 2008

63/65 MARYLEBONE LANE

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Members

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Dear Madam

ROOTSTOCK OVERSEAS CORP -V- YOURSELF
WEST LONDON COUNTY COURT
CLAIM NO. 7WL00675

We enclose by way of service upon you our client's List of Documents in this matter.

Please acknowledge receipt of this letter.

Yours faithfully


PORTNER AND JASKEL LLP

Portner and Jaskel LLP is a limited liability partnership registered in England and Wales under number OC314049 and is regulated by the Solicitors Regulation Authority. Our registered office is at 63/65 Marylebone Lane London W1U 2RA.

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List of Documents: Standard Disclosure

Notes

- The rules relating to standard disclosure are contained in Part 31 of the Civil Procedure Rules.
- Documents to be included under standard disclosure are contained in Rule 31.6
- A document has or will have been in your control if you have or have had possession, or a right of possession, of it or a right to inspect or take copies of it.

Disclosure Statement

I, the above named

Claimant Defendant

Party (if party making disclosure is a company, firm or other organisation identify here who the person making the disclosure statement is and why he is the appropriate person to make it)

BARRIE MARTIN - MANAGING AGENT FOR THE CLAIMANT

state that I have carried out a reasonable and proportionate search to locate all the documents which I am

required to disclose under the order made by the court on (date of order)

I did not search for documents:-

pre-dating

located elsewhere than

in categories other than

for electronic documents

I carried out a search for electronic documents contained on or created by the following:
(list what was searched and extent of search)

In the WEST LONDON COUNTY COURT	
Claim No.	7WL00675
Claimant (including ref)	ROOTSTOCK OVERSEAS CORP
Defendant (including ref)	NOELLE YVONNE SLYVIE KLOSTEROTTER-DIT-RAWE
Date	4th February January 2008

I did not search for the following:-

documents created before

documents contained on or created by the Claimant Defendant

- | | |
|---|---|
| <input type="checkbox"/> PCs | <input checked="" type="checkbox"/> portable data storage media |
| <input type="checkbox"/> databases | <input checked="" type="checkbox"/> servers |
| <input checked="" type="checkbox"/> back-up tapes | <input checked="" type="checkbox"/> off-site storage |
| <input checked="" type="checkbox"/> mobile phones | <input checked="" type="checkbox"/> laptops |
| <input checked="" type="checkbox"/> notebooks | <input checked="" type="checkbox"/> handheld devices |
| <input checked="" type="checkbox"/> PDA devices | |

documents contained on or created by the Claimant Defendant

- | | |
|---|--|
| <input checked="" type="checkbox"/> mail files | <input checked="" type="checkbox"/> document files |
| <input checked="" type="checkbox"/> calendar files | <input checked="" type="checkbox"/> web-based applications |
| <input checked="" type="checkbox"/> spreadsheet files | <input checked="" type="checkbox"/> graphic and presentation files |

documents other than by reference to the following keyword(s)/concepts
(delete if your search was not confined to specific keywords or concepts)

I certify that I understand the duty of disclosure and to the best of my knowledge I have carried out that duty. I further certify that the list of documents set out in or attached to this form, is a complete list of all documents which are or have been in my control and which I am obliged under the order to disclose.

I understand that I must inform the court and the other parties immediately if any further document required to be disclosed by Rule 31.6 comes into my control at any time before the conclusion of the case.

I have not permitted inspection of documents within the category or class of documents (as set out below) required to be disclosed under Rule 31(6)(b) or (c) on the grounds that to do so would be disproportionate to the issues in the case.

Signed

(Claimant)(Defendant)(s-Litigation Friend)
Managing Agents for Claimant

Date

List and number here, in a convenient order, the documents (or bundles of documents if of the same nature, e.g. invoices) in your control, which you do not object to being inspected. Give a short description of each document or bundle so that it can be identified, and say if it is kept elsewhere i.e. with a bank or solicitor

I have control of the documents numbered and listed here. I do not object to you inspecting them/producing copies.

No.	Item Description	Date
1.	Service Charge Statement	13.02.07
2.	Original Lease Acrepost Ltd (1) and Defendant (2)	10.03.86
3.	Copy TR1 Form Steel Services Ltd to Rootstock Overseas	24.05.06
4.	Copy TR1 Form Steel Services Ltd to Rootstock Overseas	08.01.07
5.	Office Copy Entries Jefferson House 7-13 (odd) Basil Street SW3 1AX Title No. NGL373333 - Edition Date	02.08.06
6.	Office Copy Entries Jefferson House 7-13 (odd) Basil Street SW3 1AX Title No. NGL373333 - Edition Date	13.03.06
7.	Letter Martin Faulkner to Portner and Jaskel LLP	06.04.07
8.	Correspondence passing between Solicitors for the Claimant and Defendant	various
9.	Correspondence passing between the Claimant Solicitors and West London County Court	Various
10.	Pleadings	Various

List and number here, as above, the documents in your control which you object to being inspected. (Rule 31.19)

I have control of the documents numbered and listed here, but I object to you inspecting them:

1. Correspondence passing between Claimant, and its Solicitors/Agents.
2. Inter-Office Memorandums, Instructions to Counsel, Advice etc and other such like documents.

Say what your
objections are

I object to you inspecting these documents because:
they are privileged from production.

List and number
here, the documents
you once had in your
control, but which
you no longer have.
For each document
listed, say when
it was last in your
control and where it
is now.

I have had the documents numbered and listed below, but they are no longer in my control.
The originals of those copy documents referred to in the Schedule
overleaf (Page 3, 1 to 12).

