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From : "alfred donovan" <alfrededonovan@hotmail.com>

To : richard.m.wiseman@si.shell.com

CC : alfrededonovan@hotmail.com

Subject : JOHN ALFRED DONOVAN And SHELL UK LIMITED

Date : Tue, 26 Nov 2002 00:24:03 +0000

Attachment : ManuscriptNov02.doc (764k)

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Dear Mr. Wiseman

CH 1998 D No. 2149

As you may recall, just over a year ago, you acted in breach of the terms of the peace settlement approved by the Court in respect of the above action. In a letter sent to a third party company you maliciously made what could only be interpreted as derogatory comments about my son, John Donovan. You were subsequently notified by my son that you had acted in material breach and had thus repudiated the relevant agreements. For the reasons set out in the manuscript I believe the validity of the agreements was already questionable.

Because of these events and a gratuitous comment made by you about me in your extensive exchange of emails at that time, I decided to write my memoirs. Over the last 12 months I have carried out a considerable amount of research and now have a complete draft manuscript running to 103 pages (attached).

Since you and a number of your colleagues are personally mentioned in the manuscript you are all invited to supply any comments you wish to make as to the accuracy of what is stated about you, or about matters of which you have personal knowledge.

I would carefully consider any comments so supplied when preparing the final draft for publication, which will of course be promoted on an international basis with my customary vigour. Please supply any such comments no later than 9th December 2002. The same invitation is extended to D J Freeman and Mr Hobbs. I will leave it to you to circulate the draft manuscript and the offer.

Yours sincerely
Alfred Ernest Donovan

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To : richard.m.wiseman@si.shell.com
CC : alfrededonovan@hotmail.com
Subject : JOHN ALFRED DONOVAN & SHELLUK LIMITED
Date : Tue, 26 Nov 2002 19:29:23 +0000

Dear Mr Wiseman

Thank you for your email dated 26 November. Will you also be supplying the draft manuscript to Mr Malcolm Brinded and Mr Steve Miller, or should I send it to them direct?

When you mention "former Shell employees, I assume you are referring mainly to Mr Andrew Lazenby. I have no way of contacting him and I am sure you would be better placed in that regard. Indeed the same would apply to any other relevant former Shell employees.

Yours sincerely
Alfred Donovan

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From : "Wiseman, Richard RM SI-LSUK" <Richard.M.Wiseman@SI.shell.com>
To : 'alfred donovan' <alfrededonovan@hotmail.com>
Subject : RE: JOHN ALFRED DONOVAN & SHELLUK LIMITED
Date : Thu, 28 Nov 2002 10:17:28 +0100

Dear Mr Donovan.

I am not prepared to speculate about the further distribution of your manuscript. You must make your own judgement.

In the circumstances I hope you will forgive my declining your invitation to be either your legal adviser or post office.

As a matter of interest, has Mr Woodman seen the manuscript?

Regards

Richard Wiseman
UK General Counsel
Shell International Limited
Shell Centre
London
SE1 7NA

Tel: +44 20 7934 5544
Fax: +44 20 7934 7171
Email: Richard.M.Wiseman@SI.Shell.com
Internet: <http://www.shell.com>
Company number 3075807

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To : richard.m.wiseman@si.shell.com

CC : alfrededonovan@hotmail.com

Subject : JOHN ALFRED DONOVAN & SHELL UK LIMITED

Date : Thu, 28 Nov 2002 14:15:17 +0000

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Dear Mr. Wiseman.

Fair comment. I am grateful for the trouble you have taken to distribute the draft manuscript.

As you say, I will use my own judgement in regard to the various other names that you have mentioned.

Regards
Alfred Donovan

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From : "Wiseman, Richard RM SI-LSUK" <Richard.M.Wiseman@SI.shell.com>
To : 'alfred donovan' <alfrededonovan@hotmail.com>
Subject : RE: JOHN ALFRED DONOVAN & SHELL UK LIMITED
Date : Thu, 28 Nov 2002 15:41:56 +0100

Dear Mr Donovan

I have now had a chance to read some of your manuscript. You must know that we take exception to virtually everything you say about the previous cases to the extent that you repeat material we have seen or heard before.

In addition, the new allegations are totally without foundation and contain libels of the most serious kind. You must be aware of the legal risks you are running and so, no doubt, will anyone sufficiently ill-advised to publish them.

I really do suggest you take advice before proceeding.

I do not propose to correspond further on this. In any event I shall be out of the country for the week beginning 2 December.

Regards

Richard Wiseman
UK General Counsel
Shell International Limited
Shell Centre
London
SE1 7NA

Tel: +44 20 7934 5544
Fax: +44 20 7934 7171
Email: Richard.M.Wiseman@SI.Shell.com
Internet: <http://www.shell.com>
Company number 3075807

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As you say, I will use my own judgement in regard to the various other names that you have mentioned.

Regards
Alfred Donovan

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From : "alfred donovan" <alfrededonovan@hotmail.com>
To : richard.m.wiseman@si.shell.com
CC : alfrededonovan@hotmail.com
Subject : JOHN ALFRED DONOVAN & SHELL UK LIMITED
Date : Thu, 28 Nov 2002 15:29:53 +0000

Dear Mr. Wiseman

I note that you have now read part of the draft manuscript. I also note your comments and advice. With instant global communications, I do not understand why your trip would impede correspondence.

I also note your sweeping denial of wrongdoing. I on the otherhand have been specific about all of my assertions and stand by them. I very much doubt that a libel action would prove very appetising to Shell even if brought by a third party.

Leaving all of the posturing to one side, am I to assume that Shell and the related people to whom you have circulated the draft manuscript will not be taking up my invitation to make comments by 9th December and that my correspondence with Shell on this matter is concluded? In other words, are you speaking on behalf of the various relevant parties to whom you have circulated the manuscript?

Regards
Alfred Donovan

Hotmail[®] alfrededonovan@hotmail.com[Inbox](#) | [Previous Page](#)

From : "Wiseman, Richard RM SI-LSUK" <Richard.M.Wiseman@SI.shell.com>
To : 'alfred donovan' <alfrededonovan@hotmail.com>
Subject : RE: JOHN ALFRED DONOVAN & SHELL UK LIMITED
Date : Thu, 28 Nov 2002 16:31:58 +0100

Dear Mr Donovan

I speak only for the Shell Companies concerned. I do not act or speak for any of the individuals concerned.

Regards

Richard Wiseman
UK General Counsel
Shell International Limited
Shell Centre
London
SE1 7NA

Tel: +44 20 7934 5544
Fax: +44 20 7934 7171
Email: Richard.M.Wiseman@SI.Shell.com
Internet: <http://www.shell.com>
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Dear Mr. Wiseman

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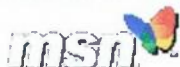
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Alfred Donovan

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To : richard.m.wiseman@si.shell.com

Cc : alfred@purplex.net

Bcc :

Subject : JOHN ALFRED DONOVAN & SHELL UK LIMITED

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Dear Mr Wiseman

From what you have said I will assume that my correspondence with Shell on my invitation to make comments on the draft manuscript has concluded.

I will however wait until 9 December to see if any of the individuals involved want to take up my offer.

I hope that you have a safe trip.

Regards

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From : "alfred donovan" <alfrededonovan@hotmail.com>
To : psmith.patent.rcj@gt.net.gov.uk
CC : alfrededonovan@hotmail.com
Subject : JOHN ALFRED DONOVAN & SHELL UK LIMITED
Date : Thu, 28 Nov 2002 18:38:47 +0000

Dear Mr Smith

I have no idea how the message was sent again. My apologies - it certainly was not intentional.

I did supply a copy of the draft manuscript to Shell Legal Director, Richard Wiseman on 26th November. He has circulated it to various parties including D J Freeman inviting any comments. He has also promised to try to supply a copy to former Shell employee Mr Andrew Lazenby, on the same basis.

After reading my email exchange with you Mr Wiseman asked if I had supplied a copy of the draft manuscript to Mr Justice Laddie. I said that I thought that Mr Justice Laddie might take offence given that he has already declined to make any comment on the subject I raised relating to the manuscript. However, since Mr Wiseman has posed the question in writing, I want you to know that I am very willing to supply a copy of the complete manuscript to Mr Justice Laddie. If I hear nothing from you, I will assume that Mr Justice Laddie does not want to see or make any comment on the manuscript and I will not trouble you further.

Yours sincerely
Alfred Donovan

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From : "Wiseman, Richard RM SI-LSUK" <Richard.M.Wiseman@SI.shell.com>
To : 'alfred donovan' <alfrededonovan@hotmail.com>
Subject : RE: JOHN ALFRED DONOVAN & SHELL UK LIMITED
Date : Fri, 29 Nov 2002 09:59:58 +0100

Dear Mr Donovan

For the record, I have received a request from Sir Mark that I send a copy of your manuscript to his son. As you have already consented to my doing so, I will put this in hand.

Regards

Richard Wiseman
UK General Counsel
Shell International Limited
Shell Centre
London
SE1 7NA

Tel: +44 20 7934 5544
Fax: +44 20 7934 7171
Email: Richard.M.Wiseman@SI.Shell.com
Internet: <http://www.shell.com>
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Dear Mr Wiseman

From what you have said I will assume that my correspondence with Shell on my invitation to make comments on the draft manuscript has concluded.

I will however wait until 9 December to see if any of the individuals involved want to take up my offer.

I hope that you have a safe trip.

Regards
Alfred Donovan

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To : richard.m.wiseman@si.shell.com
CC : alfrededonovan@hotmail.com
Subject : JOHN ALFRED DONOVAN & SHELL UK LIMITED
Date : Fri, 29 Nov 2002 12:41:24 +0000

Dear Mr Wiseman

Thank you for letting me know that Mr Tom Moody-Stuart is being supplied with a copy. For your information I have supplied a copy to Mr Woodman and suggested that he may wish to forward a copy to Mr Cox. I have also been in contact again with Mr Peter Smith and asked whether Mr Justice Laddie would like a copy so that he can make any comments if he so desires. I will advise you of the response if that is okay with you.

Regards
Alfred Donovan

From : "alfred donovan" <alfrededonovan@hotmail.com>
To : tom.moodystuart@8newsquare.co.uk
CC : alfrededonovan@hotmail.com
Subject : DRAFT MANUSCRIPT
Date : Wed, 04 Dec 2002 04:00:18 +0000

Dear Mr Tom Moody-Stuart

As you may be aware, I have been in correspondence with Shell Legal Director, Mr Richard Wiseman in his capacity as UK General Counsel of Shell International Limited. He has kindly circulated my draft manuscript to various interested parties including the following:-

Mr Phil Watts, Group Chairman, Royal Dutch Shell Group
Mr Malcolm Brinded, Group Managing Director, Royal Dutch Shell Group
Mr Steve Miller, Chairman, President and Chief Executive Officer, Shell Oil USA
Mr Clive Mather, Chairman, Shell UK Limited
Sir Mark Moody-Stuart, Director, Shell Transport and Trading Co plc
Mr Andrew Lazenby, former Shell UK Limited Promotions Manager
D J Freeman (Shell UK solicitors)

Those parties named above who are mentioned in the manuscript have been invited via Mr Wiseman to let me have any comments they may wish to make by 9th December 2002 on the basis that I would then carefully consider them. After Mr Wiseman raised the matter, I offered via Mr Peter Smith on 28 November 2002 to supply a complete copy of the manuscript to Mr Justice Laddie on the same basis.

Mr Wiseman also notified me on 29 November that your father, Sir Mark Moody-Stuart, had asked him to send you a copy and that he had supplied it because he had my permission to do so (having previously raised the question with me).

I am aware that Mr Justice Laddie had an ongoing connection/association with your chambers (his former chambers) and has co-authored a legal text book with your colleagues at 8 New Square. I would like to know if that association extended to you personally. If you are able to confirm that you had no existing contact professional or otherwise with Mr Justice Laddie and never discussed the case with him or colleagues, then I will make that absolutely plain in a revised manuscript.

Even if Mr Justice Laddie had forgotten any connection/association then he would surely have realised this when he saw the letter from your mother at an early stage in the trial and/or one of the many references in documentary evidence to your father. "Moody-Stuart" is obviously a rare and distinctive surname and consequently instantly recognisable. When the name first came to the attention of Mr Justice Laddie it would surely have rung immediate alarm bells in terms of a potential conflict of interest if he did know you at that time. This is why I have assumed for the purpose of the draft manuscript that this could not have been the case, bearing in mind how scrupulous Mr Justice Laddie was in declaring his participation in the Smart scheme.

I would however like to obtain confirmation so that it can be accurately stated in the manuscript instead of having to make assumptions. I hope that you will feel able to assist even if Mr Justice Laddie still feels unable to do so himself. If you did not know him at the time and have never discussed the case then please confirm that information in unequivocal terms. It would mean a major rewrite but I would much prefer for the published information to be unambiguous and accurate.

If you want to take up this invitation but need more time to respond then please let me know. There is some haste because I am nearly 86 and will not live forever (Shell executives may at least be encouraged by this thought).

Yours sincerely
Alfred Donovan


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From : "Colin Joseph" <ColinJoseph@djfreeman.com>

To : alfredonovan@hotmail.com

Subject : JOHN ALFRED DONOVAN AND SHELL UK LIMITED

Date : Fri, 06 Dec 2002 16:07:07 +0000

Attachment : LTRALFREDDONOVAN0612021060898v1.DOC (37k), smime.p7s (2k)

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Colin Joseph
Partner
colinjoseph@djfreeman.com
t: 020 7556 4434
f: 020 7716 3672

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JOHN ALFRED DONOVAN AND SHELL UK LIMITED

From: **Colin Joseph** (ColinJoseph@djfreeman.com)

Sent: 06 December 2002 08:08:25

To: alfrededonovan@hotmail.com

I attachment

LTR ALFRED DONOVAN 061202 1060898v1.DOC (27.0 KB)

Please see attached letter.

Colin Joseph

Partner

colinjoseph@djfreeman.com

t: 020 7556 4434

f: 020 7716 3672

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Fax 020 7353 7377
DX 103 London
www.djfreeman.com
Direct line 020 7556 4434
Direct fax 020 7716 3672
ColinJoseph@djfreeman.com

Alfred Donovan

6 December 2002

By e-mail

Our ref CSJ/MD/01120045

Dear Sir

Richard Wiseman of Shell UK Limited has passed to me your e-mail to him of 26 November 2002, together with the draft manuscript attached to that e-mail. We are instructed to respond to you on behalf of Shell and current Shell employees.

You are plainly well aware of the confidentiality obligations contained in the Settlement Agreement entered into at the conclusion of the court proceedings in 1999. Your suggestion that Shell is somehow in repudiatory breach of the terms of that Settlement Agreement is completely without foundation, and was not pursued by your son at the time it was made last year.

Your proposed publication of the manuscript would amount to a most serious breach of the provisions of the Settlement Agreement, putting you in potential contempt of court, and subject to all the consequences which would flow from that. Our clients reserve all their rights in respect of any such publication.

In those circumstances we do not propose to undertake the laborious task of correcting the numerous inaccuracies that appear in your manuscript. These relate not only to the dealings which you and your son had with Shell prior to the most recent litigation, but also in relation to the trial which concluded that litigation. As you acknowledge, you attended only a very small part of that trial and your version of what took place during that trial is in many instances simply wrong. You will appreciate that the publication of inaccurate and defamatory material may leave you liable to further legal action in respect of which our clients also reserve their rights.

In addition to those whom we represent there are, of course, a number of third parties who may also have claims as a result of any publication of your manuscript. You will no doubt wish to take account of the fact that they may seek to pursue their own legal remedies in the event of such publication.

Yours faithfully

PCL2/1060898/1

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THE MANUSCRIPT

From: colinjoseph@djfreeman.com (colinjoseph@djfreeman.com)

Saved: 09 December 2002 14:48:36

To: colinjoseph@djfreeman.com

Cc: richard.m.wiseman@si.shell.com

Bcc: alfrededonovan@hotmail.com

Dear Mr Joseph

I acknowledge receipt of your letter dated 6th December 2002.

You say that D J Freeman is instructed to respond on behalf of Shell and current Shell employees. Since these are serious matters can you please be more precise and identify the relevant Shell companies and Shell employees. For example do you act for Mr Steve Miller, the Chairman of Shell Oil USA?

Contrary to what you say, my son did at the time of the breach notify Mr Phil Watts, the Group Chairman of Royal Dutch Shell Group and Mr Malcolm Brinded, the then Country Chairman of Shell UK Limited. Please read the letters faxed by my son to both gentleman on 19th & 20th September 2001. He also notified Shell Legal Director Mr Richard Wiseman. My son decided not to take legal action at the time because of other non-related events but this does not change the fact that Shell was properly notified of its repudiatory breach. It follows that the Settlement Agreement is no longer in force. If your client disputes this, then the courts are available to settle the matter.

The whole point of contacting Shell and other relevant parties was to invite detailed comment on the accuracy of the manuscript, not blanket denials (by Mr Wiseman) or sweeping generalisations (by you). If you wish to point out any "instances" in regards to the trial which are allegedly incorrect, then I will double-check those instances with various other individuals who were in court at the relevant times. Alternatively you may wish to make available to me relevant extracts from the court transcript. That could surely settle any areas of contention about who said what.

Surely we can agree on at least one incontestable fact; you personally admitted in writing that your firm DJ Freeman, hired private investigators, Cofton Consultants, whose undercover operative, Mr Christopher Philips, was caught red-handed examining private mail at our offices. As you are aware he gave an entirely false explanation for his being on the premises. Do you take issue with this account? I wonder what Mr Watts attitude will be if D J Freeman is caught again acting sleazily on behalf of Shell.

The threats about defamation, breach of contract, contempt of court, potential action by third parties etc are also duly noted; a fairly typical variety of seasonal greetings from Shell. Is this part of the policy of dealing with me "sympathetically" as promised

in writing by Mr Wiseman on 26th November 2002? If this is the compassionate approach, it is frightening to speculate on what I could expect if Shell decided to take a hardline; perhaps a gift-wrapped bomb-tipped walking stick, or an Ebola infected fairy queen to hang on my Xmas Tree?

If Shell or any other party wishes to sue for defamation, I would welcome the opportunity to bring these matters to the attention of the public in such a forum. As you know, I have sued Shell in the High Court for libel and accepted a very substantial consideration from Shell partly to withdraw that action. It is Shell's turn to sue me and I would willingly come back to the UK for that event. I suspect that McDonald's bosses would caution Shell that a "McShell" libel trial might not be a particularly appetising way forward.

Yours sincerely
Alfred Donovan

Saved: 15 December 2002 07:16:56

To: colinjoseph@jhrman.com

Cc: nicholas.wiseman@shell.com

Re: alfred.donovan@bt.com

Dear Mr Joseph

If I do not receive any further communication from you by 15th December 2002, I will conclude that all communication with Shell concerning my recent invitation in respect of my draft manuscript has ended.

Yours sincerely
Alfred Donovan

From : "alfred donovan" <alfrededonovan@hotmail.com>
To : colinjoseph@djfreeman.com
CC : richard.m.wiseman@si.shell.com
Subject : JOHN ALFRED DONOVAN & SHELL UK LIMITED
Date : Sun, 15 Dec 2002 15:16:56 +0000

Dear Mr Joseph

If I do not receive any further communication from you by 20th December 2002, I will conclude that all communication with Shell concerning my recent invitation in respect of my draft manuscript has ended.

Yours sincerely
Alfred Donovan

Shell

From: **Colin Joseph** (ColinJoseph@djfreeman.com)

Sent: 16 December 2002 07:51:06

To: alfrededonovan@hotmail.com

1 attachment

LTR TO ALFRED DONOVAN 161202 1063204v1.DOC (24.5 KB)

Colin Joseph

Partner

colinjoseph@djfreeman.com

t: 020 7556 4434

f: 020 7716 3672

The information in this e-mail is confidential and is intended solely for the addressee. If you are not the intended recipient please contact

D J Freeman, Solicitors, 43 Fetter Lane, London EC4A 1JU, +44 (0)20 7583 4055

The partnership is regulated by The Law Society.

A list of partners is available at this address

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DX 103 London
www.djfreeman.com
Direct line 020 7556 4434
Direct fax 020 7716 3672
ColinJoseph@djfreeman.com

Alfred Donovan

16 December 2002

Our ref CSJ/MD/01120045

Dear Mr Donovan

Thank you for your e-mail of 9 December 2002. We confirm that we are instructed on behalf of all of the companies within the Shell Group as well as all current Shell employees.

I have nothing to add to what was said in my e-mail of 6 December. Shell's position in relation to all these matters should now be perfectly clear to you, as should the risks that you would be undertaking by publication of this manuscript.

Yours sincerely

Colin Joseph

EMAIL RECEIVED FROM DJ FREEMAN 16th December 2002

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*Yours sincerely
Colin Joseph*

My Response on 23rd December 2002

Dear Mr Joseph

Thank you for your letter dated 16th December 2002. It is of course significant that you do not deny that letters were faxed to Mr Phil Watts, Mr Brinded, and Mr Wiseman in September 2001 properly notifying them of the repudiatory breach. I have reprinted below extracts from one such letter that my son sent by email to Mr Wiseman (and by fax to Mr Watts, Mr Malcolm Brinded, Sir Mark Moody-Stuart and Mr Steve Miller).

17 September 2001

Dear Mr Wiseman

I have been supplied with a copy of your astonishing email to XXXXXX XXXXXX dated 7th September and your subsequent communications. I note your usual trade mark tactics – a willingness to distort the truth and bully and intimidate smaller companies.

It is plain that you replied to XXXXXX XXXXXX but deliberately ignored my email of 30th August, having calculated that if you could bully him and his co-director into submission, then anything that I said on the matter would be rendered irrelevant.

It is difficult to interpret the comments in the last paragraph as anything other than a triumphant boast that Shell taught us a lesson – a distortion calculated to create the impression that Shell came out on top. This misrepresentation was designed to intimidate the directors of XXXXXX. As you must be painfully aware, the reality was rather different.

In relation to clandestine activities, my father brought to my attention a recent front-page story in The Sunday Times revealing that Shell had been forced to admit that it hired an undercover operative (and serving Secret Service agent) to infiltrate and inform on people and organisations campaigning against Shell - so apparently nothings changed.

I also noted the article published in The Sunday Telegraph on 2nd September in which Judy Boynton, the new Chief Financial Officer of the Royal Dutch/Shell Group, was asked how she felt about "joining a company facing a possible lawsuit in the US courts alleging involvement in the torture and murder of Nigerian environmentalists by the Country's former military regime". Ms Boynton indicated in her reply that "when you have any mishaps you have to respond to them responsibly".

While I have no idea if there is any substance to those particular allegations, what is undeniable is that Shell has routinely turned a blind eye to the corruption in Nigeria - a policy which, as you and the most senior management of Royal Dutch/Shell know full

well, it also applied in the UK market. Indeed, Mr Lazenby who deliberately hoodwinked and defrauded a host of companies, proudly boasted at the end of his Witness Statement that he had the support of Shell senior management at the very highest level.

Bearing all of the above in mind - corruption, intrigue, intimidation, secret agents, infiltration, clandestine operations (leaving to one side the allegations of involvement in torture and murder), perhaps you should consider changing your company name to Spectre – it would be much more fitting. Under the circumstances Shell's multi-million pounds investment in the propaganda line of "Profits & Principles" must be the most dishonest advertising claim of all time.

You have admitted in writing that the Judges comments have no relevance whatsoever to the issues being discussed. Why then in addition to making comments to a third party that could only be described as being derogatory in nature, did you offer the transcript to that third party. I am afraid that there can be only one possible motive; to deliberately further denigrate my father and myself. It is also clear from your comment about being "happy" to supply the transcript, that you derived some twisted personal satisfaction from so doing.

Further evidence of this deliberate course of action is provided by your request today for an address to send the transcript even though you had my address (and had sent a letter to my address on 17th August 2001). In other words, you knew that you were dealing with a third party and were intent on poisoning my relationship with the directors of the company.

As you know XXXXXX Limited was not a party to the Deed of Compromise; as far as I know the company did not even exist at that time. Consequently, your malicious comments made to a third party company of which you knew I was neither a director, shareholder or employee were in breach of clause 4 of the Deed of Compromise, which no doubt you are now studying with some considerable trepidation.

The "tactics" mentioned in a derogatory way in your email were the subject of the Writs, pleadings, witness statements and written submissions of Counsel and consequently, as you have now realised, a matter of controversy.

I therefore consider that Shell is in repudiatory breach of the Deed of Compromise dated 5th July 1999 and as a result, I hereby terminate that agreement. It follows that the corresponding terms of the associated Deed dated 5th July 1999 are also rendered null and void.

On a personal note, I am shocked at the vindictive and nasty nature of your remarks bearing in mind that you knew that the XXXXXX project represented an opportunity for me to resume my career. I had no idea that you hated my father and me as much as you clearly do. You knew exactly what you were doing. It is plain that you are itching for a rematch - though I doubt that your more senior colleagues will share your enthusiasm.

I have noted your view that my father's adverse reaction to this incident is "irrelevant". We will see if you maintain this relaxed stance if he publishes the autobiography which he now plans to write as a result of your malicious actions. I am sure that if and when his autobiography comes to fruition you will have a starring role.

Yours sincerely
John Donovan

END OF EXTRACTS

My son's action in taking the trouble to notify in writing several senior executives of the Royal Dutch Shell Group is completely at odds with your assertion on the matter.

Readers will be able to draw their own conclusions as to why Shell lawyers have chosen to ignore this irrefutable documentary evidence.

I am impressed with your clear statement that DJ Freeman acts for ALL of the companies and employees within the Shell Group. These instructions must obviously have come from the very highest level of the Royal Dutch Shell Group.

It is notable that there has been no comment by you on the factors which undermined the validity of the settlement agreements from the outset e.g. the fact that although I was over 80 years old, I did not receive independent legal advice as is required by law. Shell also knew that I was unwell at the time that I was pressurised into signing the litigation settlement documents – a settlement which directly benefited every party to the action, except me.

Readers will also have to draw their own conclusions on why Mr Tom Moody-Stuart chose to ignore my letter to him after his father, Sir Mark Moody-Stuart, had asked Shell Legal Director Richard Wiseman to ensure that a copy of the manuscript should be sent to his son. If Tom Moody-Stuart did not know Mr Justice Laddie professionally or socially at the time of the trial and had never discussed our case with him, why did he not simply say so? A categorical statement could have removed any doubt or suspicion. I do not understand the reticence on his part. It is of course his right to remain silent if he so desires.

I will now act on the basis of your notification that you have nothing further to say on these matters.

If however you would like to see a copy of the final manuscript in advance of publication in January 2003 please let me know.

Yours sincerely
Alfred Donovan

JOHN ALFRED DONOVAN & SHELL UK LIMITED

From: colinjoseph@djfreeman.com (colinjoseph@djfreeman.com)

Saved: 23 December 2002 14:58:23

To: colinjoseph@djfreeman.com

Cc: richard.m.wiseman@si.shell.com

Bcc: tom.moodystuart@8newsquare.co.uk

Dear Mr Joseph

Thank you for your letter dated 16th December 2002. It is of course significant that you do not deny that letters were faxed to Mr Phil Watts, Mr Brinded, and Mr Wiseman in September 2001 properly notifying them of the repudiatory breach. I have reprinted below extracts from one such letter that my son sent by email to Mr Wiseman (and by fax to Mr Watts, Mr Malcolm Brinded, Sir Mark Moody-Stuart and Mr Steve Miller).

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I also noted the article published in The Sunday Telegraph on 2nd September in which Judy Boynton, the new Chief Financial Officer of the Royal Dutch/Shell Group, was asked how she felt about "joining a company facing a possible lawsuit in the US courts alleging

involvement in the torture and murder of Nigerian environmentalists by the Country's former military regime". Ms Boynton indicated in her reply that "when you have any mishaps you have to respond to them responsibly".

While I have no idea if there is any substance to those particular allegations, what is undeniable is that Shell has routinely turned a blind eye to the corruption in Nigeria - a policy which, as you and the most senior management of Royal Dutch/Shell know full well, it also applied in the UK market. Indeed, Mr Lazenby who deliberately hoodwinked and defrauded a host of companies, proudly boasted at the end of his Witness Statement that he had the support of Shell senior management at the very highest level.

Bearing all of the above in mind - corruption, intrigue, intimidation, secret agents, infiltration, clandestine operations (leaving to one side the allegations of involvement in torture and murder), perhaps you should consider changing your company name to Spectre - it would be much more fitting. Under the circumstances Shell's multi-million pounds investment in the propaganda line of "Profits & Principles" must be the most dishonest advertising claim of all time.

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If however you would like to see a copy of the final manuscript in advance of publication in January 2003 please let me know.

Yours sincerely
Alfred Donovan

23 Dec Letter to Joseph

From: **John Donovan** (john@purplex.net)
Sent: 23 December 2002 15:03:48
To: alfrededonovan@hotmail.com

EMAIL RECEIVED FROM DJ FREEMAN 16th December 2002

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Yours sincerely

Alfred Donovan



Shell Shareholders Organisation
847a Second Avenue (bn 166)
New York
NY 10017 USA

4 April 2004

Mr Colin Joseph
Freeman Kendall
43 Fetter Lane
London EC4A 1JU

3 Pages By Fax Only To: 011 44 (0) 207 716 3672

Dear Mr Joseph

I sampled the waters on Friday 2 April 2004 by having leaflets distributed at the Shell Centre for a short test period to gauge reaction (which was positive).

A Shell official came down to greet my two distributors, presumably forewarned by you of the possibility of their arrival. He confirmed to these independent witnesses that Shell has no objection to the distribution of my leaflets (he mentioned me by name) provided the distributors do not obstruct people entering or leaving the Shell Centre buildings. This is perfectly reasonable advice which will of course be followed.

Taken together with the fact that no action has been forthcoming in respect of the information published for over a year on the Internet it is further confirmation that Shell accepts that it repudiated the SMART settlement.

Consequently arrangements are being made for a team to start activities on a daily basis as per previous arrangements. Distribution will continue until the AGM, when leaflets will be circulated inside and outside the QE2 Conference Centre. The content of the leaflets will, as always, be topical. Apparently most of the recipients on Friday read the leaflets on the spot. I have since noticed an upsurge in activity on the website and no doubt "word of mouth" will soon spread news of the innovative site around the Shell global community.

However, I have also arranged for a distribution of leaflets at The Hague HQ of Royal Dutch Petroleum in the coming days to hasten the process. Advertisements for the latest website will appear shortly in the national newspapers, Time Magazine, and in the trade press. This will be a reprise of the earlier campaign. Other actions mentioned on the website will also begin to be taken this coming week.

If I have misunderstood the situation in anyway and your client wishes to serve legal proceedings there is no need for Shell to use "cloak and dagger" tactics. You now have an address for service of proceedings and I will co-operate to bring matters before the courts. However, I will, at all costs, exercise my right to free speech. If Mr Wiseman had stood by the SMART settlement instead of flouting it, I might have let matters rest even though I was taken advantage of in an entirely improper way by the lawyers involved.

I made plain at the time my genuine desire to see an end to the long running acrimony but was manipulated and pressurised into signing a complex agreement which was a travesty of justice as far as my son was concerned and ignored my personal situation in terms of my health and my finances. The fact that the so called "independent solicitor" foisted on me was a solicitor previously intimately involved in the Shell/Smart litigation speaks for itself. Some lawyers involved knew what was going on but wanted my signature on the settlement documents at all costs so that legal fees were paid. Others perhaps turned a blind eye to the exploitation of my age and my stressed out state-of-mind caused by the admitted undercover activities. I refer to the avalanche of threats and the fortuitously timed professionally executed burglaries (according to Police analysis) whereby the perpetrators knew exactly what they were seeking.

I know that you and Mr Wiseman are capable of using undercover operatives against my family and I because you have both made written admissions. I appreciate that you have denied any knowledge of the burglaries but Shell has subsequently admitted hiring even more sinister characters than Christopher Phillips (if that was his real name), one of the undercover agents hired by you.

I refer you to the relevant front page story published in The Sunday Times on 17 June 2001 of which you are already aware. Serial burglary involved in a criminal conspiracy is a relatively minor matter compared with the events detailed in that story, which had a global impact on the reputation of Shell. If you had no knowledge of the extensive undercover operations on behalf of Shell UK detailed in The Sunday Times exposé, perhaps you were also kept in the dark about the pre-trial burglaries? We now know as a matter of fact that people at Shell UK (colleagues of Mr Wiseman) WERE capable of authorising sinister and oppressive covert operations using professional spies. Perhaps this explains Mr Wiseman's action in issuing a written assurance of our personal safety?

It is unsurprising (in view of today's bombshell news) that Shell Group Chairman Philip Watts took no notice of my protestations about Shell undercover activity targeting my family and me. I had no idea that in an alleged conspiracy with the former murderous military government of Nigeria, Philip Watts had previously personally helped to "organise and pay" for a "virtual Private Army" of 1400 police spies. I refer you to the "Mail On Sunday" article today headlined:-

"Shell chief had a private army".

The sub-headline says: *OIL GIANT'S EX-CHAIRMAN TO BE QUIZZED BY AMERICAN LAWYERS IN FIGHT FOR VICTIMS OF NIGERIAN BLOODBATH*". My complaints to Sir Philip about the various misdeeds in the UK must have seemed trivial in comparison with the shocking events which took place in Nigeria.

The entire backdrop of the trial - the attitude of the lawyers involved, the Judge, the witnesses and the media - would likely have been transformed if Shell's predilection towards using "cloak and dagger" activity had already been uncovered. Our arguments and claims would have been greatly strengthened and Shell's correspondingly weakened. It must have seemed highly improbable to detached observers at that time that our accusations against one of the world's most respected multi-nationals had any possible substance. I probably sounded like a crank. But we all know the truth now and no one is laughing. These hard to believe facts are now a matter of public record.

Logic suggests that the denials by Shell of the burglaries and of the intimidating tactics used during the litigation would have carried less or no weight if information about the covert missions by the Shell spy codenamed "Camus" (uncovered by The Sunday Times) and the massive spying operation in Nigeria personally involving Mr Watts, had already been in the public domain.

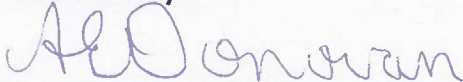
How on earth can the above horrendous activities - the dark side of Shell - be reconciled with the core principles of honesty, integrity and transparency proclaimed in Shell's State of General Business Principles?

To top it all we have the current criminal investigation by the US Department of Justice against Shell, associated probes by the SEC and other regulatory bodies, and the multi-billion dollar law suits against senior current and former Shell figures including Sir Philip, alleging fraud and misrepresentation. It sounds as if he will need every penny of his reported £8 million pension package to pay his lawyers. In that connection, can you confirm if you still represent Mr Watts, as if there is any further litigation, I may want to call him as a witness?

Shell's image regretfully seems to be moving closer to "SPECTRE" - the fictional Special Executive for Counterintelligence, Terrorism, Revenge and Extortion - than the justifiably proud company of which we could once all be sure.

For swift communication kindly use my email address: alfrededonovan@hotmail.com

Yours sincerely



Alfred Donovan

Chairman, Shell Shareholders Organisation

Cc Mr Malcolm Brinded, Group Managing Director, Royal Dutch Shell Group
Mr Richard Woodman, General UK Counsel, Shell International Limited



Shell Shareholders Organisation
847a Second Avenue (bn 166)
New York
NY 10017 USA

4 April 2004

Mr Richard Wiseman
UK General Counsel
Shell International Limited
Legal Services
Shell Centre
London SE1 7NA

4 Pages By Fax Only To: 011 44 (0) 207 934 8002

Dear Mr Wiseman

I attach for your information and file a self-explanatory letter faxed to Mr Colin Joseph at Kendall Freeman.

I was pleased to learn that Shell has apparently confirmed your repudiation of the SMART settlement and consequently is not intent on trying to prevent me having leaflets lawfully distributed at Shell HQ offices.

Yours sincerely

A handwritten signature in blue ink, which appears to read 'Alfred Donovan', is written below the 'Yours sincerely' text.

Alfred Donovan
Chairman, Shell Shareholders Organisation

Cc Mr Malcolm Brinded, Group Managing Director, Royal Dutch Shell Group



Shell Shareholders Organisation
847a Second Avenue (bn 166)
New York
NY 10017 USA

4 April 2004

Mr Malcolm Brinded
Vice-Chairman of Committee of Managing Directors
Royal Dutch Shell Group
Shell Centre
London SE1 7NA

4 Pages By Fax Only To: 011 44 (0) 207 934 7371

Dear Mr Brinded

I attach for your information and file a self-explanatory letter faxed to Mr Colin Joseph at Kendall Freeman.

As you will see Shell has confirmed its repudiation of the SMART settlement as notified to you personally in September 2001 and as a consequence is not trying to prevent me having leaflets lawfully distributed at Shell HQ offices and elsewhere.

Yours sincerely

Alfred Donovan
Chairman, Shell Shareholders Organisation

Shell

From: **Colin Joseph** (ColinJoseph@kendallfreeman.com)
Sent: 07 April 2004 15:16:13
To: alfrededonovan@hotmail.com
Cc: richard.wiseman@shell.com

Dear Mr Donovan,

I duly received your faxes of 4 and 5 April. I can assure you that Shell does not accept that it has repudiated the SMART settlement. On the contrary, we have on behalf of Shell expressly reserved their rights under the settlement agreement and continue to do so. Your version of the events leading up to the settlement is a parody of the truth and no doubt you do not need to be reminded of what the judge himself had to say about the matter.

So far as concerns your wider conspiracy theories, they are nonsensical and I do not propose to waste time responding to them in detail.

Yours sincerely,

Colin Joseph.

The information in this e-mail is confidential and is intended solely for the addressee. If you are not the intended recipient please contact

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The partnership is regulated by The Law Society.

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MY EARLIER EMAIL

From: **colinjoseph@djfreeman.com** (colinjoseph@djfreeman.com)

Saved: 14 April 2004 15:15:15

To: colinjoseph@djfreeman.com

Cc: richard.wiseman@shell.com; malcolm.brinded@shell.com

Bcc: jeroen.van.der.veer@shell.com

Dear Sirs

The previous commuincation is now published on shell2004.com

Please be advised that I corrected the misspelling in the subject line and added my signing capacity as Chairman of the Shell Shareholders Organisation in the appropriate place.

Yours sincerely

Alfred Donovan

Chairman Shell Shareholders Organisation.