

Shell U.K. Limited
Legal Division



9 July 1998

P480

Mr J Donovan
Managing Director
Don Marketing UK Limited
St Andrews Castle
33 St Andrews Street South
Bury St Edmunds IP33 3PH
(By Fax: 01284 388308)

Direct lines:
Tel: +44 171 257 1868
Fax: +44 171 257 3303

Your ref: JAD/A174
Our ref: UKLG

Dear Mr Donovan

I am replying to you direct because, despite the heading on your draft letter, I note that you have asked the OSS to investigate my conduct as well as that of Mr Joseph. You are correct when you say that I was admitted in 1974. I hold a current Practising Certificate.

I do not intend to comment in detail on your letter; this should not be taken as an admission of anything it contains – on the contrary, all of your assertions other than that referred to below are denied. I should have thought, however, that it would be in your interest to balance your account by two relevant (and undeniable) facts:

1. Both Mr Joseph and I have denied any Shell involvement in any of the intimidation you allege. The activities of Mr Phillips have, of course, been admitted.
2. Our offer to co-operate with the police is in no way negated by our refusal to deal with them through you or Royds Treadwell. The offer still stands.

Finally, it occurs to me that it is more convenient for you to claim that potential witnesses fear intimidation than to admit that you cannot find credible witnesses to support your case. Neither you, your family, nor any potential witness, has any cause for physical fear as a result of your prosecuting this case with all the vigour we have come to expect. I would find it difficult to regard the fear of intimidation as a plausible explanation for any failure on your part to produce credible witnesses to support your case.

Yours sincerely
Shell U.K. Limited

R M Wiseman
Legal Director

cc: C Joseph – D J Freeman (by fax: 0171 556 4590)
R Woodman – Royds Treadwell (by fax: 0171 583 2034)

Shell-Mex House
Strand
London WC2R 0DX
DX 473 LONDON

Registered in England: No. 140141
Registered office: Shell-Mex House, Strand,
London WC2R 0DX
DX 473 London
VAT Reg. No. GB 235 763 255

Tel: +44 171 257 3000
Web: <http://www.Shell.co.uk>
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