

John Donovan, Maplebank, Ixer Lane, Bradfield Combust, Suffolk IP30 0LR

Tel: 01284 388816 Fax: 01284 388308

19th May 1999

**Mr Malcolm Brinded
Country Chairman
Shell UK Limited
Shell-Mex House**

17 Pages by Fax Only To:
0171 257 3939

Dear Mr Brinded

I am grateful to you for the friendly approach that you took during our brief discussion at the AGM. Mr Wiseman will confirm that you are perfectly free to discuss or correspond with me regarding the pending trial without either of us breaching any sub judice rules.

Before I turn to the SMART claim, I would just like to say that I was pleased to learn that you will be looking into the grievances of the former and current agent operators who contacted me. They seem to be decent hard working people. I understand that Mr Moody-Stuart has asked to be kept informed. I will have no further involvement in the matter.

As you may be aware, all of our current and past litigation revolves around Mr Andrew Lazenby. We have alleged in the current case that Mr Lazenby deliberately misused confidential information supplied to him in good faith. I know that it must seem unlikely to you that a Shell Manager would behave in this way. If I did not know the background I would think the same.

I could point you to all the relevant evidence in documents and witness statements and describe the history in depth. However, I know you are busy and have little time to read lots of paperwork. I have therefore decided to enclose just two documents. I do hope you will read them.

They are witness statements from highly reputable independent people. One is from Mr Mike McMahon and the other from Mr John Armstrong-Holmes. I traced these gentlemen recently after finding information about them in the discovery documents supplied by Shell. Please note when reading the statements the Options to which both make reference must be the one Shell took from Don Marketing – there is no suggestion that Shell ever took any other Option on a loyalty scheme.

In the concluding paragraph of his Witness Statement, Mr Lazenby testifies to the “unreserved support” that he has “received from Shell management to the highest levels”. I can draw only one conclusion. Shell senior management at the highest levels cannot possibly be aware of the self-incriminating documents written by Mr Lazenby, which provide a definitive answer to the question mark over his honesty and scruples, which has been the fundamentally important core issue in all of our claims.

Although you have probably been led to believe that Mr Lazenby is an innocent victim of an obsessive serial litigant, the truth of the matter is that Mr Lazenby used underhand business practices during the Smart project on a “predatory” basis, exactly as Mr Armstrong-Holmes has stated. The Shell documents provide absolute proof. Mr Lazenby is convicted by his own words.

I would be grateful for your permission to supply a copy of this letter and the attached document to Mrs Judy Moody-Stuart, who has recently been in correspondence with my father at her own initiative. Mrs Moody-Stuart is aware that I am making this request. As a result of her intervention, my father decided to cease all campaigning activity on 7th May pending the outcome of the trial. The websites have also been suspended as a result of the same development.

Yours sincerely

John Donovan