

**GROSS & CO.**  
S O L I C I T O R S

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Your ref

Our ref JCC/JS/wp4

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24 September 1998

J Donovan Esq  
Don Marketing (UK) Ltd  
St Andrews Castle  
33 St Andrews Street South  
Bury St Edmunds  
Suffolk

Dear Mr Donovan

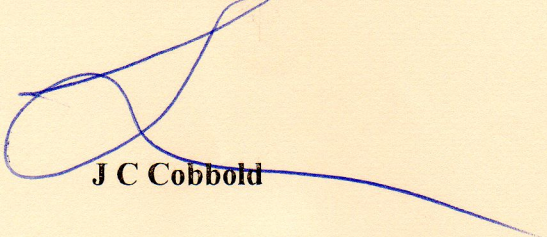
I am sorry for the delay, but I now enclose the original of the Affidavit which I have just had sworn.

Hope it all goes well!

If you could please let me have a cheque to settle my account I would be most grateful.

With kind regards

Yours sincerely,



**J C Cobbold**



A QUALITY SERVICE  
*Approved by The Legal Aid Board*



**AFFIDAVIT OF JONATHAN CHARLES COBBOLD**

I JONATHAN CHARLES COBBOLD Solicitor a Partner in Messrs Gross & Co Solicitors of 84 Guildhall Street, Bury St Edmunds, Suffolk MAKE OATH and say as follows:-

1. On 8th September 1998 I attended a meeting at my above offices, to act as an independent observer in connection with the opening of replies to a Shell Retailer Survey undertaken by the Shell Corporate Conscience Pressure Group.
2. Those present when the envelopes were opened and the results collated were myself and John Alfred Donovan ("Mr Donovan").
3. Prior to 8th September 1998, my firm had not acted for Mr. Donovan in his personal capacity. In addition, I had only met Mr Donovan once (on the 13th April 1995) prior to the 8th September 1998. My firm had on the 23rd March 1995 and 13th April 1995 previously acted as an independent observer in a similar transaction for the Shell Corporate Conscience Pressure Group.
4. The envelopes I was to observe opening contained completed response forms in the same form as that now produced to me and marked "JCC1". The envelopes were all opened in front of me and were stapled to the respective response form. These were then handed to me for verification.
5. I confirmed that each response had been completed correctly and checked the postmark on the envelope against the address of the particular respondent; there were only four post-marks that I was unable to read.
6. Following such verification I placed each form in two corresponding piles according to their validity making a note of whether the response was A or B.
7. The forms were all counted by me.

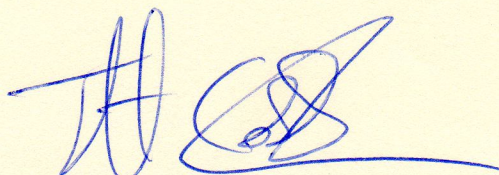


8. The total number of responses was 110 of which 19 were incorrectly completed and were judged by myself as "spoils". Of the remaining replies, the responses were as follows:-

first question      A - 45 B - 45

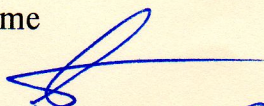
second question    A - 41 B - 50

SWORN by the above named deponent  
at 84 Guildhall Street  
Bury St Edmunds in the County of Suffolk



this 21<sup>st</sup> day of September 1998

before me



C.J. Thomson.

.....  
Solicitor/~~Commissioner~~ for Oaths



# SHELL RETAILER SURVEY

SOURCE

We are conducting a survey to assess whether Shell UK does in practice, abide with the pledges made in the STATEMENT OF GENERAL BUSINESS PRINCIPLES published by the Royal Dutch Shell Group. Please totally disregard the information supplied about our dealings with Shell. It only represents one side of the story. Study the options set out below, then, for each question, mark A or B in the corresponding box – whichever, based on **YOUR DEALINGS** with Shell UK, is the most appropriate answer.

1. The purpose of the Standards of General Business Principles published by Shell, is...

- A. A genuine attempt to set high standards of business ethics.  
B. A charade - nothing more than a public relations gimmick.

Mark your answer clearly, as A or B

☐

2. Which option, A or B, most accurately describes your experience of Shell UK's business practices...

- A. Shell UK operates in an honest, open, and ethical manner.  
B. Shell UK operates in an unethical manner.

Mark your answer clearly, as A or B

☐

Your Name:.....

Station Name:..... Address:.....

Postcode:..... Telephone:.....

Please Tick As Appropriate: Shell Dealer ☐ Shell Licensee ☐ Shell Employee ☐

Please complete the name and address panel above, then fold and return this whole form in the FREEPOST envelope provided.

**ALL NAME, ADDRESS, AND TELEPHONE  
INFORMATION SUPPLIED, WILL BE TREATED IN  
STRICTEST CONFIDENCE**





# Sales Promotion Specialists

Don Marketing UK Ltd.  
St. Andrews Castle  
33, St. Andrews Street South  
Bury St. Edmunds IP33 3PH  
Tel: 01284 386016  
Fax: 01284 388308  
Web: [www.don-marketing.com](http://www.don-marketing.com)

14 August 1998

Dear Shell Retailer

I would like to send you a **FREE Marks & Spencer £10 Gift Voucher...**

**There's no catch...**

If you have not yet participated in our survey of Shell retailers, just complete the survey form printed overleaf and pop it back in the post to us **TODAY** in the FREEPOST SAE. We only want you to provide your honest assessment of Shell UK in regard to the questions on the survey form.

Irrespective of the options you pick, provided we receive your completed **response by return post**, we will be delighted to send you the Gift Voucher – one per site. All earlier respondents will also receive a £10 voucher. You will know from the letter circulated to Shell outlets by Mr Harley Bernard of Shell UK Limited, that Shell does not object to Shell sites participating in the survey.

Please note that all name and address information supplied will be treated in absolutely strictest confidence and will not be disclosed to Shell under any circumstances. The only information that will be published is the number of stations invited to participate, the survey questions, and the results of the survey.

## THE LATEST NEWS ON MY LEGAL BATTLES WITH SHELL UK...

1. As you may recall, I recently wrote to every MP. I am delighted with the amazing response and the comments, advice, and support I have received from across the political spectrum, including positive action taken by the Prime Minister and a personal response from The Right Hon Paddy Ashdown. My local MP kindly raised matters with Mr Peter Mandelson, the Secretary of State for Trade and Industry. I subsequently received an official letter from Mr Kim Howells, the Parliamentary Under-Secretary of State for Competition and Consumer Affairs. He has instructed his staff at the DTI to examine the issue of voluntary "Codes-of Conduct" and respond further within 14 days. I would therefore like to be in a position to supply the DTI with the results of the survey A.S.A.P.
2. Shell has failed in its attempt to block my libel action against them. Mr Justice Eady ordered on 27<sup>th</sup> July that Shell's application be dismissed with costs.
3. Shell has carried out an internal investigation to try to discover the identity of the person who has made threats against Directors of Don Marketing and potential witnesses. Shell says it is satisfied that no one within Shell was involved in the threats.

Yours faithfully

John Donovan

**IMPORTANT:** All business undertaken in accordance with our Trading Conditions, a copy of which may be obtained on request

Registered Office : St. Andrews Castle, 33 St. Andrews Street South, Bury St. Edmunds, IP33 3PH. Registered in England No. 2442694





The last post: Have targeting techniques really improved so quickly?

receive a deluge of these so-called highly targeted mailpacks for the previous house-owner – on average more than ten letters a week. What-ever happened to list cleaning?

No wonder direct mail has an image problem with the average postman – they must realise that most of it is addressed to the wrong person anyway.

**William Rogers**  
Cheltenham  
Glos

## The high price of cinema ads

Over recent months a number of contributors to your magazine have commented on the way in which cinema has finally established itself as a credible advertising medium. However, there is little mention of the high price paid by

cinema-goers for this success.

The tiresome ritual of being forced to sit through up to ten minutes of bloated, overproduced cinema ads really can take the edge off an otherwise enjoyable evening

If you are an infrequent cinema-goer then these extended commercial breaks are a mild irritant. If however you are, like me, a keen film-buff, the whole procedure can become intolerable, particularly when tacked on to the beginning of a film that may itself be upwards of three hours long.

These commercials seem to have been produced either by junior cre-

ative staff with pretensions that far outstrip their talent or more seasoned hands looking for a broader canvas on which to sketch their "masterpiece" The results rarely amount to more than a cack-handed attempt to grasp the zeitgeist.

If I have to again endure the Labatt's Ice burning canoe or Smirnoff's freeze frame epic I shall go mad.

Cease and desist, you are alienating your audience.

**Claude Evershott**  
Minotaur Services  
Hemel Hempstead  
Herts



Cinema: Overproduced advertisements can ruin a night out at the movies

**55% OF THE RESPONDENTS IN OUR SURVEY OF  
OVER 1,500 SHELL RETAILERS  
SAY THAT  
"SHELL UK OPERATES IN  
AN UNETHICAL MANNER"**

**we challenge Shell UK Ltd to commission and publish the results of independent research, asking the same question and offering respondents GUARANTEED anonymity.**

The survey was carried out by Don Marketing in connection with our interest in the ethical conduct of Shell UK. All of the responses were opened and authenticated by an independent solicitor who has supplied an Affidavit confirming the results.

**For further information see: [www.don-marketing.com](http://www.don-marketing.com)**



# 55% OF THE RESPONDENTS IN OUR SURVEY OF OVER 1,500 SHELL RETAILERS SAY THAT "SHELL UK OPERATES IN AN UNETHICAL MANNER"

**we challenge Shell UK Ltd to commission and publish the results of independent research, asking the same question and offering respondents **GUARANTEED** anonymity.**

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## from boardroom to....

Prince William Pottery have over forty year's experience of supplying promotional mugs to leading companies throughout the world.

To enhance the image of your company and its products, whether for promotional, premiums or incentives our mugs offer high perceived value without costing the earth.

We produce a top-class British product in a modern factory equipped with the latest computer-controlled machinery. We can print in up to six colours, and supply in quantities from 500 pieces upwards, in as little as three weeks when deadlines dictate.

## building site!

Imaginative design is guaranteed by our highly-skilled in-house art department, including appropriate packaging to suit most needs.

We are very proud of our reputation for personal service and reliability.

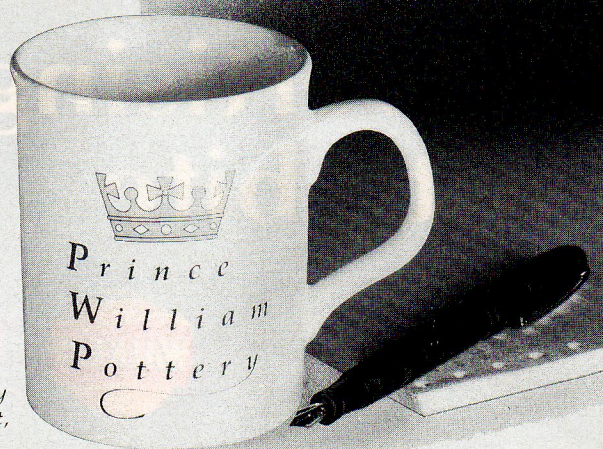
Production expertise is matched by efficiency in stock control and warehousing techniques, with YOUR order receiving immediate attention and delivered on time EVERY time. It's the only way we know.

When the kettle goes on in the boardroom or on the building site your name will be on everybody's lips.

For further information contact David Sanders or Peter Rogers who can give immediate answers to any queries.

**Prince  
William  
Pottery**

Prince William Pottery  
550 Edge Lane, Liverpool  
L13 1AJ England  
Telephone: 0151-259 1221  
E-Mail: Pottypots@AOL.Com.  
Fax: 0151-220 6856



**Fax us NOW for  
Full Information  
0151 220  
6856**



**55% OF THE RESPONDENTS  
IN OUR SURVEY OF OVER  
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SAY THAT  
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The Department of Health have placed a notice in the EC Journal Ref: 98/S 171-115892/EN dated 25/8/98 inviting companies to apply for consideration to tender for the Department's Storage, Distribution, Mailing services including Call Centre facility. The contract is for five years commencing July 1999.

**Expressions of interest by,  
8 October 1998, should be sent to:**

**Mr R L Paynter,  
Department of Health,  
Purchasing and Contract Management  
Unit, Room 589D, Skipton House,  
80 London Road, London SE1 6LW  
Tel: 0171 972 1668**

**MARKETING  
WEEK  
diary**

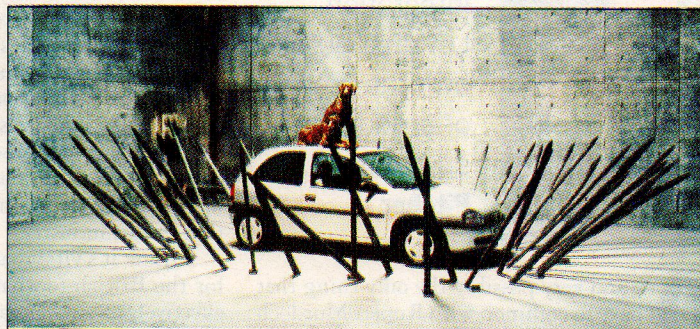
**LH-S' novel  
approach to  
creative ads**

A lot of very creative advertising comes out of Lowe Howard-Spink – and the Diary has discovered its origin.

Sarah Smith, head of creative ser-

vice for the agency, is married to none other than John Fowles, the world-renowned author of such works as *The French Lieutenant's Woman*, *The Magus* and *The Collector*.

So look out for Vauxhall ads set in Lyme Regis featuring love stories with double endings – one required and one thwarted. Or Smirnoff ads starring Anthony and Michael Quinn set on the exotic Greek island of Spetsai.



**Vauxhall: Car giant could soon make its mark on the cob in Lyme Regis**

**The Os launch search for a star**



**Oriental pursuit: Needing new blood**

Cable and satellite station Bravo is to sponsor Leyton Orient football club. The duo are teaming up with *The Sun* to hunt for a much-needed striker for the third division team, nicknamed the Os, and the search is to be broadcast on Bravo's magazine show, called *The Basement*.

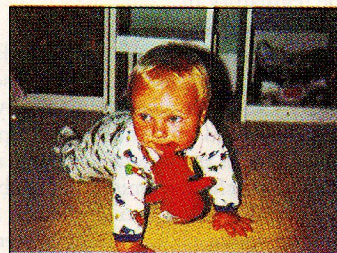
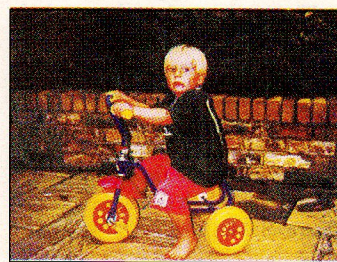
The Diary thinks this is a great opportunity for the UK's brand managers – an antidote to their usually sedentary lifestyle. So if you're ready for a change, contact Search for a Striker, PO Box 41 Ware, Hertfordshire.

**True nepotism  
in the ad world**

Carl Johnson, chief executive at advertising agency TBWA GGT Simons Palmer, knows how to please his clients.

He has just saved Virgin Direct the extortionate cost of hiring child models and the hassle of having them professionally photographed for its new ad campaign by using some informal snapshots of his own children.

One of Johnson's angelic-looking sons can be seen riding barefoot on a tricycle, while the other is pictured chewing a Teletubby toy. Let's hope they grow up to be as devilishly good-looking as their dad.



**Virgin Direct ad: Jobs for the boys**