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J Donovan Esq
Don Marketing UK Ltd
St Andrews Castle
33 St Andrews Street South
Bury St Edmunds
Suffolk
IP33 3PH

Your Ref **JAD**

Our Ref **CSJ/JXM/105457/SB1**

19 June 1998

Dear Mr Donovan

Shell Smart Card Consortium

Thank you for your letter dated 18 June 1998. We have also received a letter from your solicitors Royds Treadwell of today's date.

You have asked whether my clients have knowledge of any investigations that have been carried out in connection with the litigation. Routine credit enquiries have been made which are normal in litigation of this kind. The purpose of the inquiry was, quite reasonably, to establish whether my clients would be covered to receive all their costs from you if they are successful in this action. Mr Phillips who visited the registered office of Don Marketing was acting in the course of these enquiries. We are satisfied that the other incidents mentioned in your letter of 15 June 1998 have nothing to do with the limited enquiries made. No instruction has been given by this firm or my client which could conceivably have lead to the other incidents which have occurred and we have been assured by the company that they have no knowledge of the incidents (other than the visit of Mr Phillips) to which you refer. In view of the great sensitivity with which all those who are aware of this litigation know my clients are exercising, we consider that it is not impossible that the call made by an anonymous caller from a pay-phone in London E1 was made maliciously to damage Shell's reputation. No-one knowing Shell's position in this litigation and wanting to assist my clients could have made such a telephone call.

My clients believe that it would be in their interest as well as your own to identify the person who made this call and would like to work with you and the police to assist. Do you have any further information which may help my client identify the caller? For example, was the telephone conversation recorded and if so, could you supply us with a copy of the audio tape?

LB142650.1

Colin Joseph
Tony Leifer
Stephen Koehne
Toby Greenbury
Edward Totman
Jonathan Lewis
Marcus Rutherford
Paul Clark
Richard Spiller
Vivien Tyrell
Alan Magnus
Susan Hall
Anthony Edwards
David Coupe
Timothy Daniel
Christopher Comyn
David Kendall
James Innes
Alan Perry
Barbara Naftalin
David Johnson
Peter Taylor
Andrew Sanders
Moirra Fraser
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Susan Aslan
Dorothy Cory-Wright
Clive Davies
Simon Corke
David Tiplady
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Monica Blake
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Ashwani Kochhar
Richard Max
Susan Charles
Graham Chase
Mark Everiss
Elizabeth Goss
James Pilgrim-Morris
Ann Robson
Jonathan Martin

Associate
John Skrimshire*

Consultants
David Freeman
Christopher Hancock
Mahir Jalili†

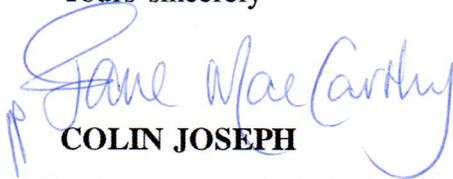
* Non-solicitor
† US Attorney

J Donovan Esq
Don Marketing UK Ltd

19 June 1998

I look forward to hearing from you.

Yours sincerely


COLIN JOSEPH