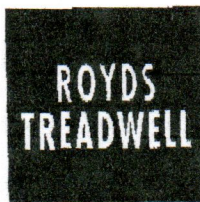


OUR REF: RMW/ts/
YOUR REF: CSJ/105457/mt4



SOLICITORS
PRIVY COUNCIL AGENTS

2 CRANE COURT
FLEET STREET
LONDON EC4A 2BL

TEL: 0171 583 2222
DX102 CHANCERY LANE
FAX: 0171 583 2034

Email: rmw@royds.law.co.uk

Messrs D J Freeman
LDE 103

25 June 1998

Dear Sirs,

Re: John Donovan -v- Shell UK Limited - 1998-D-No.224

Thank you for your fax of 24th June.

Mr Phillips enquiries at the business centre involved a straightforward deception of the receptionist. Since this is probably normal behaviour for enquiry agents it may or may not be that those enquiries were "improper".

Other than this we have no comment to make on the substantive position which we have already set out.

We would, however, take substantial issue with your final paragraph. We have already made it clear that your summons should have been issued shortly after the service of our statement of claim. Instead you delayed until more or less the last possible minute before serving it. You then issued it in the wrong list and gave it a wholly inadequate time estimate. Indeed, we did not hear from you as to your Counsel's time estimate but you never suggested that Mr Hinchcliffe's estimate was anything other than appropriate.

To suggest that the foregoing facts amount to a request on our part to delay the hearing is a distortion more in keeping with tabloid journalism than inter-solicitor correspondence.

Yours faithfully,

Royds Treadwell