

Portner and Jaskel  
Solicitors  
63/65 Marylebone Lane  
London W1U 2RA

Ms N K-Dit-Rawé  
3 Jefferson House  
11, Basil Street  
London SW3 1AX

**(By Fax to +44 20 7258 8520)**

5 October 2006

Dear Sirs

**Your 3 October 2006 fax to Wt**

Dear Sirs

Further to your fax transmission of 3 October 2006 to whom you demand:

my ISP, from

- 1) *"an apology", as well as*
- 2) *"suggestion for damages, which must be substantial and which"*
- 3) *"must reflect the seriousness of the allegations that you have published against our client"*

for hosting my website, [www.leasehold-outrage.com](http://www.leasehold-outrage.com), because – drawing from the content of your correspondence – you assess the contents of my site as containing:

**1. Against your client**

- 1) *"a significant number of unsubstantiated allegations against our client which are"*
- 2) *"wholly false"*
- 3) *"clearly highly defamatory and"*
- 4) *"actionable in law"*
- 5) *"Suggestions that our client is guilty of criminal activities and fraud"*
- 6) *"all of which are totally unsubstantiated"*
- 7) *"outrageous and"*
- 8) *"false"*

Furthermore, that:

- 9) *"Our client's reputation has been severely damaged by the allegations that [ ] has chosen to publish on the internet"*

**2. Against other parties**

- *"the site also contains other defamatory allegations...against a number of law firms and other professional advisors to Steel Services"*

Having made these statements, you have then stated, "Our client requires that within 48 hours you remove the offending web site from the internet..."

### 3. Actions required by you

Given the very broad-brush nature of all of the above, I draw your attention to legal precedents that require that you provide *me* with evidence in support of each of your claims.

Consequently:

- Firstly, specifically identify **each** of the individual item for which you consider your above assessment applies
- Secondly, in **each** instance, provide evidence to substantiate your counter-claim

In relation to your comments against 'other parties':

- Firstly, identify which "law firms and other professional advisors to Steel Services" you are referring to
- Secondly, in **each** instance - identify **each** item for which you consider your above assessment applies
- Thirdly, in **each** instance, provide evidence to substantiate your counter-claim.

Until you can – specifically – substantiate your claims, you are in no position to make any demands whatsoever.

I reserve my rights in full.

Yours faithfully ,

N K-DT-Rawé

cc.

MEMORY TRANSMISSION REPORT

TIME : 05-OCT-06 17:09  
TEL NUMBER: 020-  
NAME :

FILE NUMBER : 925  
DATE : 05-OCT 17:08  
TO : 972588520  
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\*\*\* SUCCESSFUL TX NOTICE \*\*\*

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Ms N K-Dit-Rawe  
3 Jefferson House  
11, Basil Street  
London SW3 1AX

(By Fax to +44 20 7258 8520)  
5 October 2006

Dear Sirs

Your 3 October 2006 fax to [REDACTED]

Dear Sirs

Further to your fax transmission of 3 October 2006 [REDACTED] my ISP from whom you demand:

- 1) "an apology", as well as
- 2) "suggestion for damages, which must be substantial and which"
- 3) "must reflect the seriousness of the allegations that you have published against our client"

for hosting my website, [www.leasehold-outrage.com](http://www.leasehold-outrage.com), because of drawing from the content of your correspondence – you assess the contents of my site as containing:

- 1. **Against your client**
  - 1) "a significant number of unsubstantiated allegations against our client which are"
  - 2) "wholly false"
  - 3) "clearly highly defamatory and"
  - 4) "actionable in law"
  - 5) "Suggestions that our client is guilty of criminal activities and fraud"
  - 6) "all of which are totally unsubstantiated"
  - 7) "outrageous and"
  - 8) "false"

Furthermore, that:

- 9) "Our client's reputation has been severely damaged by the allegations that [Verio] has chosen to publish on the internet"
- 2. **Against other parties**
  - "the site also contains other defamatory allegations...against a number of law firms and other professional advisors to Steel Services"