

From: Lisa Mclean [lisa.mclean@pipersmith.co.uk]
Sent: 24 September 2003 10:30
To: Rawé, Noëlle
Subject: 20C Order Application

Dear Noelle

Further to our earlier telephone conversation, I confirm that I had added to the Instructions to Counsel, Oliver Fisher's letter of 7 April and your fax of 23 September.

I received a telephone call from Barrie Martin at MRJ which I did not return. He however spoke to my secretary and says, "His client wants to take action" but he wants to speak to you before going ahead with that". Fortunately my secretary told him that I out until lunchtime, but as a matter of professional courtesy, I am obliged to return his call. He is obviously thinking about taking action on the "agreement" and I am also sending to Counsel a copy of this email asking him to let us have his written advice as soon as possible so that we can revert to MRJ.

Yours sincerely
Lisa McLean

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NKDR subsequent note:

In the space of a 3 line paragraph – 2 references to the threat of proceedings:

2nd instance: "*His client wants to take action...*"

3rd instance: "*He is obviously thinking about taking action on the "agreement" ...*"

Note the 2nd one which is of her own making

+ the: "*I must return the call*"

= what I view as bullying by Ms McLean, putting pressure on me to agree