



Miss Noelle Rawe

18 November 2003

Our ref: LM.kj.R360/1

Ext. 229

Also by email – noelle.rawe

Your ref:

Dear Noelle,

Steel Services Limited –v- Yourself

Firstly, for your information, I enclose a copy of the receipted fee sheet of Mr Paul Staddon.

Secondly, I am writing in relation to the without prejudice correspondence and the draft Order which I note has not been sent to the other side and there appears to be just one point to clarify namely the interest point you have highlighted on the draft Consent Order. I have in fact spoken to Mr Gallagher and he confirms that were the matter to go to trial, the interest point is an argument that we would raise and we would argue that rather than pay them interest on sums, any interest should go into the trust fund. However, for the purposes of settling this case and giving the amount of interest, the advice would be to settle on the terms as set out in that order. No doubt we will have spoken by the time you receive the fax but if not, perhaps you can call me on receipt.

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Yours sincerely

LISA MCLEAN

e-mail: lisa.mclean@pipersmith.

Amounts to a complete change of position relative to what Mr Gallagher said on 28 Oct 03. This was 'conveniently' agree between Ms McLean, Mr Gallagher -- and (?) without consulting me
- see my 7 NOV 03 letter to Mr Twyman point # 5 - as evidence
+ my FAX of 20 NOV 03 to Ms McLean
+ her correspondence of 21 Nov 03 etc.

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