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Our Ref CSJ/105457/rnt4

24 June 1998

Dear Sirs

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

Thank you for your letter of 23 June. A copy of our letter of 19 June to your client was intended to be sent to you and we apologise if it was not. In any event you will see that our letter to your client dealt with the substantive question raised in your letter of 18 June.

Your client may not welcome the enquiries that our client has instituted but such enquiries are perfectly legitimate as long as they are properly conducted. There does not appear to have been any impropriety on the part of Mr Phillips but if the police feels it necessary to investigate his involvement further, our clients will as previously indicated cooperate fully.

The financial status of the companies associated with your client seems to us to be highly relevant to this litigation in a number of ways, some of which must be readily apparent to you.

We have already indicated that our clients have no involvement in the other incidents complained of by your client but we are happy to reiterate that assurance. Our clients are as anxious as yours to establish who was behind the threatening anonymous call to your client.

We note the comments in your final paragraph but would point out that the procedure we have adopted with our summons is intended to shorten libel proceedings rather than to extend them and the delay in hearing that summons is at your request, not ours.

Yours faithfully



LB143437.1

Colin Joseph
Tony Laifer
Stephen Keeble
Toby Greenbury
Edward Toppin
Jonathan Lewis
Morwyn Warburton
Paul Clark
Richard Spiller
Vivien Syrett
Alan Maguire
Simon Hill
Anthony Munnah
David Coupe
Teresa Dwyer
Christopher Coopers
David Kendall
James Jones
Alan Terry
Barbara Nettle
David Johnson
Peter Taylor
Andrew Sanders
Marta Jones
Christine Dwyer
Sally Mac
Simon Adam
Dorinda Coop-Wright
Clive Davis
Sarah Outh
David Topley
Joni Woodman
Richard Stapley
Henry Thomas-Davis
Lorraine Hunt
Alexander Curran-Gill
Lesley Anne Ayn
Michael Weber
Cecilia James
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