

DEBENHAMS OTTAWAY

SOLICITORS

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Also by email: jmt@samuels-solicitors.co.uk

Your Ref:

Our Ref: LAC/LAC/66644-1

Direct Dial: 01727 735615

E-Mail: lac@debenhamsottaway.co.uk

5th June 2019

Dear Sirs

Our client: Oliver Smith

We write further to recent correspondence.

As you are aware and as stated throughout the proceedings, our client does not have any significant assets and only receives benefits as income. There is no prospect at all of your client recovering any costs from him and so any victory, no matter how unlikely, will be pyrric.

Notwithstanding the above and in the interest of both parties saving costs and the court's time, our client sets out again that he is willing to settle this claim on the following terms which are subject to contract as we consider a settlement agreement appropriate:

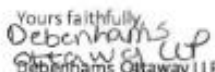
1. Both parties agree to drop hands and walk away from the claim and potential counterclaim;
2. Both parties to agree not to publish or cause to be published any further statements about the other party;
3. Both parties to agree to remove all statements in relation to the other party which can currently be viewed by third parties.

This offer remains open for acceptance until 4pm on 13 June 2019, following which time this offer will no longer be open for acceptance in principle. Our client will then commit to the preparations for the trial of this matter and following trial it will be his intention to pursue claims against your client in respect of harassment, defamation and breach of the Data Protection Act 1998 arising from the posts and tweets made by your client. He will do so with the benefit of crowd funding if necessary.

We will wait your response to this letter by 4pm on 13 June 2019.

Yours faithfully,

Debenhams Ottaway LLP

Yours faithfully,

Debenhams Ottaway LLP

Debenhams Ottaway Solicitors

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