

Your ref:
Our ref: JWS/TMC
dd: 01223 559224
df: 01223 559119
e: James.squier@bidwells.co.uk
Date: 29 April 2010

BIDWELLS

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Dear Mr Miles

**Without Prejudice
Save as to Costs**

Disputed Matters with Mr Friend

I have been instructed by Mr Friend to propose comprehensive terms to you with the objective of settling the matters in dispute between you.

I have inspected the property and have considered the options available to the parties, including the proposed Mediation and, if this is not successful, a Court Hearing, together with the substantial potential costs for each party.

As a result of this review, I attach proposed Heads of Terms for the settlement of the Disputed Matters between you, Mr Friend and the "Friend Family".

If you would like to meet to review these proposals please let me know.

The objectives of this initiative are as follows:-

- 1 To settle the matters in dispute by compromise acceptable to all parties.
- 2 To avoid further costs and, in particular, the substantial costs of further litigation.
- 3 To provide the possibility for all parties to benefit if Planning Permission can be gained for the residential development of The Orchard.
- 4 To simplify the means of making contributions to the cost of repairs to East Northdown Farm Lane, which will also limit the potential cost contribution for your property.

My client reserves the right to present to the Court this letter and the Heads of Terms offering settlement in making a representation on the allocation of Costs, following a Hearing.

Please note that the terms of the proposed settlement are to be agreed as a whole and not in isolation.

EG Property Adviser of the Year 2009 - Eastern Region.

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**INVESTORS
IN PEOPLE**



Disputed Matters with Mr Friend
29 April 2010
Page 2

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I look forward to hearing from you in due course. I should mention that if the costs of the Mediation are to be avoided a settlement will need to be agreed quite quickly, in order to allow time for solicitors to deal with the legal side of the Agreement.

Yours sincerely


James Squire
Partner
Land & Business

Enc.

Copy: W Friend Esq
D Hall Esq – Furley Page