Your Ref:RBAR01/SS/0413300003Direct Dial:0115 976 6208E-Mail:Richard.Barlow@brownejacobson.com

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PRIVATE & CONFIDENTIAL

Mr Amit Matalia 15 Moreall Meadows Coventry CV4 7HL

BY E-MAIL ONLY

24 March 2015

WITHOUT PREJUDICE SAVE AS TO COSTS

Dear Mr Matalia

The Lawrence Sheriff School Trust - Injunction hearing

We have made numerous attempts to resolve these matters without the need for a court hearing.

Your Barrister advised that you should have no difficulty in agreeing undertakings which reflect that which at law you are required to do / not do in any event. We are unclear as to how undertakings "could be used against you" if they simply reflect that which at law you are obliged to do.

In a final bid to compromise this matter, our client offers to:

- 1. Consider any undertakings you are prepared to make;
- 2. Pay a contribution toward your legal costs of £5,000.00;
- 3. Draw up this agreement by way of Tomlin Order on condition of confidentiality.

We have invited you through your Counsel to suggest a wording for undertakings if you are not prepared to agree the measures included on the Draft Order filed with the Claim Form.

This offer is open for acceptance until **12pm on Wednesday 25 March 2015**, after which time it will be withdrawn without further notice. The fact of this offer may be referred to the Court at the conclusion of the hearing when the issue of conduct and costs falls to be considered.

We look forward to hearing from you by return.

Yours faithfully

Browne Jacobson LLP

Birmingham Exeter London Manchester Nottingham

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Dear Mr Matalia

The Lawrence Sheriff School Trust - Injunction hearing

We have made numerous attempts to resolve these matters without the need for a court hearing.

If you are not prepared to agree undertakings, and in a final attempt to resolve matters without the need for a hearing, the School offers to discontinue proceedings on a "drop-hands basis" on the agreement that both sides bear their own legal costs of the proceedings, and that the matter is stayed by way of Tomlin Order, the terms of which are to remain confidential.

This offer is open for acceptance until **12pm on Wednesday 25 March 2015**, after which time it will be withdrawn without further notice. The fact of this offer may be referred to the Court at the conclusion of the hearing when the issue of conduct and costs falls to be considered.

We look forward to hearing from you by return.

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