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6 September 2016

**Our Ref: KU1/96R/0372664**

Ms. Angel Garden & Mr. Steve Paris  
9, Lon Bryngwyn  
Sketty  
Swansea  
Wales  
SA2 0TX

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*In association with Bryan Cave LLP, a Missouri limited liability partnership organised under the laws of the United States*

Dear Sirs,

**Claim No. C00SA374: Lewis & Byng v. Paris & Garden**

Many thanks for your correspondence. We understand that the position is as follows:

1. You are not willing to sign a consent order because you have been informed and believe that this will prejudice your application for social housing if you do so;
2. You object to the application for an order for sale that has been made by our clients because it states that the full debt is due and outstanding, and does not consider the the sale of the house as full and final settlement of the £240,000 you owe our client (the "**Debt**"), as had been discussed earlier this year.

Our clients' position is as follows:

1. They require an order for sale to avoid being liable for the stamp tax arising from the sale of your property (the "**Property**"). This is on the basis that though you are willing to transfer the property to our clients to settle the Debt, you have not been able to sell the Property in the past year.

2. Although they were willing to consider the proceeds of the sale of the house as full and final settlement of the Debt, this is or was only on the basis that you did not oppose an order for sale and that you vacated the Property by 31 August 2016.

On the basis of the above, it seems that the simplest way forward appears to be as follows:

1. The Parties agree as follows:
  - (a) that Angel Garden and Steve Paris will not object at the hearing on 26 September 2016 to an Order for Sale being made against the Property, provided that it allows them until 31 September 2016 to vacate the Property.
  - (b) that Melanie Byng and Andrew Lewis agree to amend the Order for Sale sought at the hearing to the form attached which makes clear that should the Property sell at auction for in excess of £180,000, they will accept whatever the proceeds of the sale of the Property in full and final settlement of the Debt.

Please could you confirm by return that you agree to the above so that we can present this exchange of correspondence to the Judge at the hearing, and avoid the costs of a disputed hearing. If a disputed hearing takes place, our clients will seek to recover the debt in full, with interest.

We regret that you are unwilling to make any payment to settle any part of the outstanding Debt though you confirm that you have funds available to do so. Should you refuse to accept the terms suggested above we will draw this to the attention of the Court at the appropriate time.

Yours faithfully,



**BRYAN CAVE**