


**From:** Dougans, Robert Robert.Dougans@BryanCave.com   
**Subject:** Claim C00SA374 - Lewis & Byng -v- Paris & Garden  
**Date:** 15 September 2016 at 6:22 pm  
**To:** ANM anmletters@gmail.com  
**Cc:** Cooke, Serena Serena.Cooke@bryancave.com

DR

Dear Sirs,

We regret that we have not been in a position to respond to your correspondence. We did not receive your application to strike out until 9 September 2016 and we have been preparing our evidence in response which we have had to prioritise.

Accordingly, please find enclosed the Second Witness Statement of Robert Dougans dated 15 September 2016 in response to your application. As you will see we consider that your application has no merit, and it will be opposed at the hearing tomorrow.

We have reviewed your amended draft order. We note that you have removed the recital that you do not object to the order being made. Whilst we can accept the removal of the recital this is only on the basis that you do, in fact, not object to the order being made and that you agree at the hearing tomorrow to the order being made in those terms. In the interests of drawing a line under this matter, and since you have assured us you have no other assets save for your house with which to satisfy the debt, we are willing to accept the remaining changes save for those made to the final paragraph. The debt will only be discharged as and when the property is sold. We do not consider that your concerns regarding your forwarding address are legitimate, particularly in circumstances where our clients have had access to your address for the past three years since the original claim was issued with no adverse effects to you.

Please can you confirm that you will agree to present the attached order as agreed at the hearing. If so, we will instruct our counsel that this is the case. We will not further negotiate on this document, particularly in light of the significant further legal costs we have been required to incur as a result of your application.

Yours faithfully,

Bryan Cave



**Robert Dougans**

*Partner*

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bcllp2016



Draft Order (final  
version)-v1.docx



Second Witness  
Statement ...ougans.pdf