

Criminal Cases Review Commission
23 Stephenson Street
Birmingham
B2 4BH

The Rt Hon Alex Chalk KC MP
Lord Chancellor and Secretary of State for Justice
Ministry of Justice
102 Petty France
London SW1H 9AJ

Your Ref
RPM/Thompson
Our Ref
CYG/ENB/RJL/104312.0002
Date
3 April 2024

By Email and By Post: info@ccrc.gov.uk; mojas@Justice.gov.uk

Dear Sirs and Mesdames

Proposed Claim for Judicial Review

We are instructed by Professor René Weis in relation to the decision letter from Siobhan Heywood of the Ministry of Justice dated 13 February 2024 in response to our client's application dated 7 July 2022 (the **Application**) for the Royal Prerogative of Mercy (**RPM**) to be exercised in favour of Edith Jessie Thompson (**Edith**) in respect of her conviction and execution for the murder of her husband, Percy Thompson (**Percy**).

This letter is a letter before claim sent in accordance with the Pre-Action Protocol for Judicial Review (the **Pre-Action Protocol**).

1 The Proposed Claimant

- 1.1 The Proposed Claimant is Professor René Weis of 55 Chiswick High Road, London W4 2LT.
- 1.2 Professor Weis is Emeritus Professor of English Literature at University College London. He is the author of *Criminal Justice: The true story of Edith Thompson* (Hamish Hamilton 1988 / Penguin 2001). His website <https://edithjessithompson.co.uk/> is the standard reference work for information about Edith's case. It is a free online resource which features complete and

Registered Office

One Bartholomew Close
London
EC1A 7BL
DX 339401 London Wall

50/60 Station Road
Cambridge
CB1 2JH
DX 339601 Cambridge 24

The Anchorage
34 Bridge Street
Reading, RG1 2LU
DX 146420 Reading 21

Grosvenor House
Grosvenor Square
Southampton, SO15 2BE
DX 38516 Southampton 3

T +44 (0)345 222 9222

W www.bdbpitmans.com

accurate transcripts of all of Edith's letters, the authorised transcript of the trial, the autopsy and post-mortem reports on her murdered husband, and other relevant source materials.

- 1.3 Edith's living descendant bestowed on Professor Weis the honorary title of Edith's heir and executor.¹ However, Professor Weis has not been formally appointed as personal representative of Edith's estate within the meaning of section 55(1)(xi) of the Administration of Estates Act 1925.

2 The Proposed Defendants and their case reference details

- 2.1 The Proposed Defendants are:-

2.1.1 Criminal Cases Review Commission (**CCRC**), 23 Stephenson Street, Birmingham, B2 4BH – case reference Rex v Edith Thompson (deceased); and

2.1.2 Secretary of State for Justice, Ministry of Justice, 102 Petty France, London SW1H 9AJ - case reference RPM/Thompson.

3 Details of the Proposed Claimant's legal advisers and their case reference details

- 3.1 The Proposed Claimant's legal advisers are BDB Pitmans LLP, One Bartholomew Close, London EC1A 7BL and their case reference is 104312.0002.

4 The decisions being challenged

- 4.1 On 6 February 2023, the Secretary of State for Justice referred the Application to the CCRC for consideration under section 16(1) of the Criminal Appeal Act 1995.

- 4.2 Professor Weis seeks to challenge the decision of the Secretary of State conveyed in the letter dated 13 February 2024 (**SofS Decision**) not to recommend the exercise of the RPM.

- 4.3 In addition, Professor Weis seeks to challenge the statement made by the CCRC dated 8 December 2023 (**the CCRC Decision / the CCRC Report**) setting out its response to the reference made to it by the Secretary of State, which statement was first disclosed to Professor Weis with the SofS Decision.

- 4.4 The challenge is brought on the basis that it is founded on an incorrect understanding and application of the law and established conventions on the exercise of the RPM. The specific grounds for challenging the Decision are set out below.

¹ See enclosed note from John Painter to René Weis dated 28 November 2012.

4.5 The Proposed Claimant reserves the right to add to, or substitute, the proposed grounds of claim following receipt of the Pre-Action Protocol response.

5 Reply date

5.1 In accordance with the Pre-Action Protocol, the Proposed Defendant must provide a substantive response within 14 days, namely by **17 April 2024**.

6 Details of any interested parties

6.1 None (so far as we are aware).

7 Factual Background

7.1 Edith was unhappy in her marriage to Percy and became close to Frederick Bywaters (**Bywaters**), who was a family friend. In June 1921, Edith entered into an extra-marital relationship with Bywaters. Between September 1921 and September 1922, Bywaters was often at sea and Edith wrote to Bywaters frequently.

7.2 Shortly after midnight on the 4 October 1922, Edith and Percy were walking home from Ilford station when they were confronted by Bywaters on Belgrave Road. Bywaters engaged in a fight with Percy and stabbed Percy multiple times. Percy died at the scene. The post-mortem results concluded that Percy died as a result of stab wounds to his neck.

7.3 The police arrested Edith and Bywaters, and charged them both with Percy's murder. Bywaters made a voluntary statement dated 5 October 1922 in which he admitted to fatally wounding Percy and he confirmed that "*Mrs Edith Thompson was not aware of my movements on Tuesday night, 3rd October*". In that statement, Bywaters explained the reason for his actions: "*The reason I fought with Thompson was because he never acted like a man to his wife. He always seemed several degrees lower than a snake. I loved her and I could not go on seeing her leading that life*". Edith consistently denied having had any involvement in Percy's murder.

7.4 Between 6 and 11 December 1922, Edith and Bywaters were tried together for the indictment of wilful murder. Both Bywaters and Edith were found guilty of Percy's murder and convicted on 11 December 1922. Bywaters and Edith appealed their convictions, but their appeals were dismissed on 21 December 1922. Edith was executed by hanging at Holloway prison on 9 January 1923.

8 The Application for the exercise of the RPM

8.1 The Application explained in detail why Edith's trial was grossly unfair and prejudicial, why she was morally and technically innocent of Percy's murder, why her conviction and execution for the wilful murder of Percy amounted to a grave miscarriage of justice and why a posthumous free pardon should be granted under the RPM in respect of the consequences of her conviction.

8.2 In particular, the Application detailed how Edith's trial had been tainted by the Judge's decision to admit irrelevant letters between Edith and Bywaters, by the Judge's prejudicial treatment of the evidence and by the Judge's moral condemnation of Edith's marital infidelity. In summary:-

8.2.1 Edith's letters did not provide any evidence that she had incited Bywaters to murder Percy. Instead, they contained expressions of Edith's affection for Bywaters, fantastical tales of poison and glass and suicidal ideations which the prosecution and the Judge used to advance a narrative to the jury of Edith as an immoral adulterer preying on a younger man and inducing him to kill her husband. The letters were the only evidence adduced against Edith in the case and yet were not relevant to the indictment being tried.

8.2.2 The post-mortem results concluded that Percy died due to a loss of blood from stab wounds in his neck and that there were no signs of poisoning or ingestion of glass. Despite this objective evidence, in his summing up the Judge referred 27 times to Edith's alleged intention to poison Percy and did not once mention the post-mortem results which showed that Percy had not in fact been poisoned.

8.2.3 In summing up, the Judge dismissed the important testimony of an independent witness, John Webber, who overheard Edith crying "*oh don't, oh don't!*" in the most piteous manner" at the time of the fatal attack. Instead the Judge asserted to the jury that "*the love of a woman for her lover*" would make "*you, like any other right-minded persons...be filled with disgust*".

8.3 The Application summarised the legal principles underpinning the exercise of the RPM. In short:-

8.3.1 The Justice Secretary can recommend the exercise of the RPM to grant a pardon to civilians convicted of crimes in England and Wales. The RPM is a broad and flexible doctrine which acts as a constitutional safeguard against mistakes. The effect of a free pardon is not to quash a conviction but to relieve a person of "*all pains, penalties, and punishments whatsoever that from the said conviction may ensue*" (*R v Foster (Barry)* [1985] QB 115). The exercise of the power can be subject to Judicial Review

by the Divisional Court (*R v Secretary of State for the Home Department, ex parte Bentley* [1994] Q.B. 349).

8.3.2 The traditional approach has been to grant a free pardon pursuant to the RPM if the individual is “*morally and technically innocent of the crime*”.

8.3.3 Watkins LJ confirmed in *Bentley* that the power is more flexible than had been understood traditionally and should be adapted to meet the particular circumstances of the case in order to provide civil redress for miscarriages of justice. At 365C-365D, Watkins LJ held that:

“it is an error to regard the prerogative of mercy as a prerogative right which is only exercisable in cases which fall into specific categories. The prerogative is a flexible power and its exercise can and should be adapted to meet the circumstances of the particular case. We would adopt the language used by the Court of Appeal in New Zealand in Burt v. Governor-General [1992] 3 N.Z.L.R. 672 , 681: “the prerogative of mercy [can no longer be regarded as] no more than an arbitrary monarchical right of grace and favour.” It is now a constitutional safeguard against mistakes. It follows, therefore, that, in our view, there is no objection in principle to the grant of a posthumous conditional pardon where a death sentence has already been carried out. The grant of such a pardon is a recognition by the state that a mistake was made and that a reprieve should have been granted.”

8.4 Applying the traditional approach and the broader approach in *Bentley*, the Application concluded that a free pardon should be granted because:-

8.4.1 Edith was morally and technically innocent of the crime of the wilful murder of Percy; and

8.4.2 the Judge’s oversight and summing up of the trial were so prejudicial that Edith’s conviction was clearly unsafe and no reasonable appeal court would have allowed the conviction against Edith to stand. In short, a mistake was made and a reprieve should be granted.

9 Details of the CCRC’s Decision which the SofS has endorsed

9.1 According to the CCRC’s Report, the CCRC’s Decision in respect of the Application has been based on guidance set out in a summary document supplied to the CCRC by the Ministry of Justice (**MOJ**) entitled “*Royal Prerogative of Mercy – Free and Conditional Pardons*” (**MOJ’s Summary Document**) - which was not enclosed with the CCRC’s Decision – providing that:-

“by longstanding convention the Secretary of State will generally only recommend the exercise of the prerogative if:

- *it is impractical for the case to be referred to an appellate court; and*
- *new evidence has come to light which demonstrates conclusively that no offence was committed or that the defendant did not commit the offence”;* and

“it has been said that a person must be ‘morally and technically innocent’ to be deserving of a free pardon”.

9.2 The CCRC also had regard to *R.(on the application of Shields) v Secretary of State for Justice* [2008] EWHC 3102 (Admin) and to the decision of 24 December 2013 to grant a posthumous free pardon to Alan Turing.

9.3 The CCRC applied the “*three-limb test*” it derived from the MOJ’s Summary Document and refused to recommend that the RPM be exercised to grant Edith a free pardon for the following reasons:-

9.3.1 **First Limb:** The CCRC held that the RPM cannot be exercised unless there is no other available route through the court system. Applying that limb to the facts, the CCRC held that Professor Weis, as Edith’s heir and executor, was likely to be viewed by the Court of Appeal as an approved person under section 44A(3)(b) of the Criminal Appeal Act 1968 and so he could make an application to the CCRC to refer Edith’s conviction to the Criminal Court of Appeal. The CCRC held that the Application for the exercise of the RPM would fail on this limb, notwithstanding that the CCRC might, on any application under s44A(3)(b), exercise its discretion not to refer the matter based on factors such as the age of the conviction and the fact that the convicted person was deceased.

9.3.2 **Second Limb:** The CCRC held that there “*must be new evidence which indicates that the defendant is innocent of the crime, or that no crime was in fact committed.*” Applying that limb to the substance of the Application, the CCRC accepted that “*by modern standards of fairness, the letters written by Mrs Thompson to Mr Bywaters may have been ruled inadmissible by the court*” and that “*by modern standards of fairness it could be argued that the trial judge’s summing up contained inappropriate judicial comment and lacked fairness and impartiality*”. The CCRC held that the argument that the letters were inadmissible was not new as it was raised at Edith’s trial and on appeal. The CCRC “*acknowledged that the argument the trial judge’s summing up was lacking in balance and fairness is new*” but held that in any event

“admissibility and fairness arguments, whilst potentially going to the safety of the conviction, are not indicators of Mrs Thompson’s innocence. In conclusion, the application for RPM would fail under this limb”.

9.3.3 **Third Limb:** The CCRC held that the *“defendant must be technically and morally innocent of this crime”*. Applying that limb to the substance of the Application, the CCRC noted that Edith was convicted of being “a secondary participant to the murder of Mr Thompson, by offering help and encouragement to Mr Bywaters, who carried out the act” and that the *“case against her rested on the letters she had sent to Mr Bywaters”*. The CCRC acknowledged that “by modern standards of fairness, the letters may have been ruled inadmissible by the trial court, which would have impacted the strength of the prosecution case against Mrs Thompson. Had this happened, the case against her may not have proceeded. However, it is the view of the CCRC that this does not establish she was morally or technically innocent for the purposes of this test. Equally, the CCRC also accepted that by modern standards of fairness, it could be argued that the trial judge’s summing up contained inappropriate judicial comment and lacked fairness and impartiality. However, this also does not establish that Mrs Thompson was morally or technically innocent for the purposes of this test.

9.4 The CCRC then acknowledged that the RPM has been exercised in circumstances *“where all three limbs have not been met”* but *“where there exists some extraordinary factor making the case exceptional”*. The CCRC acknowledged that the RPM was flexible and highlighted two cases that justified the exercise of the RPM despite not satisfying all three limbs, and sought to distinguish Edith’s case from those:

9.4.1 The case of Dr Alan Turing, who was convicted of the then offence of gross indecency but was granted a posthumous pardon in 2013 *“without the innocence requirement being met as a reflection of the exceptional nature of his achievements during World War 2”*. The CCRC distinguished Edith’s case from Dr Turing’s case on the basis that Edith’s conviction concerned murder and that *“there has been no moral transformation in society’s views on this, and there are no other apparent compelling circumstances in her case.”*

9.4.2 The case of Timothy Evans, who was convicted of the murder of his daughter and executed but was subsequently granted a royal pardon due to the *“combination of the new evidence and doubts about the confession evidence”*. The CCRC acknowledged that *“Mr Evans’ technical and moral innocence could not be conclusively established, and therefore he did not come with “clean hands””* but

distinguished Edith's case from Mr Evans' case because "*there was compelling new evidence that Mr Christie was guilty of the offence*".

10 Grounds for challenging the Decision

- 10.1 The CCRC erred in law by failing to recognise the wide scope of the RPM and failing to appreciate how the RPM should be exercised flexibly to meet the facts of the present case. It is not accepted that the three-limb test derived from the MOJ's Summary Document represents a full and accurate framework for applying the relevant law. To the extent that the CCRC treated it as such, it fell into error. The CCRC's Decision applied the criteria in the MOJ's Summary Document case in a prescriptive manner and, although the CCRC did go on to consider whether there were exceptional grounds for recommending RPM even though, in its view, the three-limb test had not been passed, the manner in which it did so was flawed and failed to remedy the error created by the overly-prescriptive application of the three-limb test. It failed to apply, or even have regard to, the dicta of Watkins LJ in *Bentley's case* and failed to ask itself the broader question of whether a mistake had been made which the state should recognise and whether a reprieve should be granted.
- 10.2 The CCRC failed to consider not just the law as set out by the Divisional Court in *Bentley* but also failed to consider the facts of Bentley's case. Accordingly, it failed to consider whether, like in the case of Bentley, a Conditional Pardon might be appropriate as recognition by the state that a mistake had been made and a reprieve should be granted.
- 10.3 Bentley's case has obvious parallels with Edith's case in that both were convicted of the murder of individuals who were fatally wounded at the hands of third parties, both were sentenced to death, both appealed their convictions at the time without success and both were executed by the state.
- 10.4 The CCRC failed to consider that in Bentley's case, the Court held that the "Home Secretary failed to recognise the fact that the prerogative of mercy is capable of being exercised in many different circumstances" and decided to remit the matter back to the Home Secretary in order to "devise some formula which would amount to a clear acknowledgment that an injustice was done". The CCRC failed to consider that the Home Secretary then decided to grant a posthumous Conditional Pardon to Mr Bentley, notwithstanding that there was no fresh evidence of Mr Bentley's innocence, as recognition that Mr Bentley's execution was wrong and as a form of reprieve.
- 10.5 The CCRC also erred in its application of the three-limb test it adopted.

- 10.6 **First Limb.** The CCRC was wrong to find that the RPM could not be exercised in Edith's case because there was an available route through the court system. In November 2012, Edith's last known living descendant, John Painter, named Professor Weis as Edith's heir and the rightful owner and heir to any of her possessions, but Professor Weis has not been appointed by the court as Edith's personal representative and would not fall within the definition of a personal representative under section 55(1)(ix) of the Administration of Estates Act 1925. Accordingly, Professor Weis is not likely to be considered by the Court of Appeal as an approved person under section 44A(3)(b) of the Criminal Appeal Act 1968 and therefore able to make an application to the CCRC to review Edith's conviction.
- 10.7 **Second Limb.** The CCRC erred in deciding that the Application for the exercise of the RPM must fail because there was no "*new evidence which indicates that the defendant is innocent of the crime, or that no crime was in fact committed*". The Application highlighted the unfairness of admitting the irrelevant but highly prejudicial letters as evidence and the grossly unfair and biased summing up of the trial judge. The CCRC failed to give appropriate weight to these points in that: a) it only conceded that the letters 'may' have been ruled inadmissible by modern standards whereas it is not realistically conceivable that they would be admitted; and b) it only accepted that 'it could be argued' that the summing up 'lacked fairness and impartiality', whereas it is incontrovertible that the summing up flagrantly breached modern standards of fairness.
- 10.8 The CCRC dismissed these submissions on the basis that they were not new points, as they had been raised at trial and on appeal. This is perverse. The very basis of the Application is that the trial (and appeal) breached modern standards of fairness. It is no answer to say that these points were considered by the very process which was unfair.
- 10.9 The new evidence is indeed the submission that the trial was unfair to Edith, grossly so, leading to a miscarriage of justice that demands to be recognised by the state and rectified.
- 10.10 Furthermore, the CCRC failed to have regard to a further example of unfairness, which was referred to in the Application and which was apparent in the papers reviewed by the CCRC. The Solicitor General stated in his opening address to the jury that '*there is the undoubted evidence in the letters upon which you can find that there was a preconcerted meeting between Mrs Thompson and Bywaters at the place*'. The assertion that there was evidence in the letters of a preconcerted meeting was false. There was no evidence anywhere in her letters to a 'preconcerted meeting', whether that night or at the place of the murder. The opposite is the case: Edith explicitly regrets in her letters that she will not be able to see Bywaters that night, his last night of shore leave, because of a pre-arranged family outing to the theatre that night.

- 10.11 This false assertion put forward by the Solicitor General was an attempt to frame Edith for the murder of her husband in the minds of the jury. It was a critical falsehood that the judge failed to correct. It was highly prejudicial to Edith as it was addressed to the jury at the very beginning of the trial and it directly implicated her in the time and place of the murder against all the evidence. There can be few things more damaging to a fair trial than an unchallenged direct falsehood by a law officer of the Crown in a capital case. The CCRC's decision appears to have completely overlooked this point.
- 10.12 **Third Limb.** The CCRC erred in holding that the admissibility and fairness arguments were not indicators of Edith's innocence. In the absence of the letters, there was no evidence at all against Edith. In the absence of any evidence that Edith had committed the crime, it is irrational to require the production of evidence to prove that she was innocent: that is to prove a negative.
- 10.13 In any event, the CCRC failed to give weight to the evidence of her innocence that was advanced, contra to the prejudicial evidence of the letters. This included the evidence of Bywaters that Edith knew nothing of his plans and, critically, the evidence of an independent witness. John Webber, who lived close to the scene of Percy's murder, gave evidence that, at the time of the murder, he heard *"a woman's voice, crying, "oh don't, oh don't!" in the most piteous manner"*, as he was *"about to retire to bed"*. On hearing that, *"[he] went out into the street"*. Webber's evidence is indicative that Edith was taken by surprise by Bywaters' actions, was upset by them and was technically and morally innocent of the crime of aiding and abetting Percy's murder.
- 10.14 After considering the "three-limb test", the CCRC acknowledged that the RPM was flexible and that the RPM could be exercised in *"exceptional"* cases notwithstanding that all three limbs were not satisfied. The CCRC gave two examples of exceptional cases, which it then distinguished from Edith's case.
- 10.15 The first was the example of Dr Turing, who was granted a posthumous Free Pardon in 2013 without new evidence of innocence but as an acknowledgment that his conviction and sentence *"would now be considered unjust and discriminatory, and the offence and sentence he was subject to have since been repealed"* and *"as a reflection of the exceptional nature of his achievements during World War 2"*. The CCRC distinguished Edith's case from Dr Turing's on the basis that there has been *"no moral transformation in society's views on [murder], and there are no other apparent compelling circumstances in her case"*.
- 10.16 The CCRC erred because the basis of Edith's case is not concerned with whether there has been any moral transformation in society's views on murder. The moral transformation in Dr Turing's case was society's attitude towards homosexual behaviour. In the same way, there

has been a moral transformation in society's views towards adultery and, in particular, adultery by married women. The prejudicial summing up by the Judge in Edith's trial revealed his moral disdain for extra-marital affairs and he invited the jury to consider that they "*like any other right-minded persons, will be filled with disgust at such a notion*". Such attitudes would be regarded in modern society as misogynistic.

- 10.17 Furthermore, there has also been a "*moral transformation in society's views*" towards the death penalty since Edith's conviction and execution. The CCRC even acknowledges that "*the sentence of capital punishment offends all modern standards and would be considered unconscionable by those standards.*" Although it does not follow that all persons executed by the state are now deserving of the RPM, Edith's case is exceptional in that her execution was instrumental in bringing about the abolition of the death penalty in the UK. Her name came up repeatedly during the 1948 and 1956 debates on the death penalty in the House of Commons, as a suspected miscarriage of justice and therefore a powerful argument against the death penalty. In the words of the former *Express* editor and MP Sir Beverley Baxter, who was present at the debates, "*Let there be no misunderstanding about the matter. The hanging of Edith Thompson is the classic example of the death penalty being used by society as an instrument of revenge. Undoubtedly it was also the origin of the all-party coalitions which twice abolished the death penalty in the British parliament.*"²
- 10.18 The second example given was Mr Timothy Evans, who confessed to the murder of his wife and daughter, was convicted of their murders and executed, but who, a few years later, was granted a posthumous royal pardon after new evidence emerged to support the guilt of John Christie. The CCRC decided that this could be distinguished from Edith's case because "*this sort of circumstance* [i.e. compelling new evidence that another person was guilty of the offence] *is not present in Mrs Thompson's case*". We agree that the Evans case can be distinguished. Edith's is not that sort of case. It is not suggested that another person was guilty of aiding and abetting Bywaters in the murder – the point is simply that Edith was innocent of that charge because no-one aided and abetted Bywaters: he acted alone.
- 10.19 It appears as though the CCRC has cited the Evans case as a 'straw man' in order to imply that it has given proper consideration to whether an exception to the three-limb test should be made. It is striking that the CCRC wholly failed to consider and address another exceptional case which was much more appropriate to compare, namely the case of Derek Bentley referred to above. It could be said that Bentley did not come to court with clean hands as he had accompanied Craig on a robbery expedition. In contrast, Edith was simply walking home from the theatre with

² See [Maclean's](#), 8 March 1959. Also see enclosed Evening Standard article dated 14 April 1948: 'The Ghost of Mrs. Thompson'.

her husband. If any distinction can be made between the cases of Bentley and Edith, it is that Edith is *more* deserving of mercy.

11 Actions that the Proposed Defendant is expected to take

11.1 The Secretary of State should either agree to consider the matter afresh himself, on a proper basis and with the correct legal principles in mind, or should submit a fresh reference to the CCRC, inviting it to advise afresh, on a proper basis and with the correct legal principles in mind.

11.2 In accordance with the Pre-Action Protocol, we require a substantive response to this letter within 14 days, namely by **17 April 2024**.

12 Alternative Dispute Resolution proposals

12.1 The Proposed Claimant is willing to consider any proposals in relation to Alternative Dispute Resolution (**ADR**).

12.2 However, should the Proposed Defendants fail to provide a satisfactory response and/or ADR prove unsuccessful, our client intends to issue judicial reviewing proceedings and seek to recover his costs from you.

13 Details of any information sought

13.1 In view of the parallels between Edith's case and that of Bentley, the Secretary of State is requested to provide details of the reasoning of the Home Secretary when granting Bentley a conditional pardon.

14 Details of any documents that are considered relevant and necessary

14.1 Please provide us with a copy of the MOJ's Summary Document.

15 The address for reply and service of court documents

15.1 The address for replying to this letter and serving documents is BDB Pitmans LLP, One Bartholomew Close, London EC1A 7BL. Please ensure that your response is sent by email to Nicholas Brown at nicholasbrown@bdbpitmans.com and Cheryl Fletcher at cherylfletcher@bdbpitmans.com.



We look forward to your response.

Yours faithfully

A handwritten signature in black ink that reads 'BDB Pitmans LLP'.

BDB Pitmans LLP

T +44 20 7783 3410

M +44 7973 316253

E NicholasBrown@bdbpitmans.com