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PRIVATE & CONFIDENTIAL BY COURIER

18 March 2019

Sr Don Jaime Alfonsín Alfonso
Head of the Royal Household of His Majesty the
King of Spain
Palace of La Zarzucla
Carretera del Pardo s/n
28071 Madrid

Dear Sir,

We write on behalf of our Client, Ms. Corinna zu Sayn-Wittgenstein, and following our letter of 5 March 2019 in which we requested that a legal representative of HM King Felipe VI make contact with us to discuss the matters we raised in that letter. Our purpose in writing is to repeat that request, and to record a visit made by the King Emeritus to our Client on 16 March 2019.

The visit, instigated by the King Emeritus at his own initiative, took place at our Client's residence in London. Also present was HSH Prince Alexander zu Sayn-Wittgenstein, who took a full part in the discussion, having studied in detail the relevant legal and factual files. Our Client also arranged for the King Emeritus to speak on the telephone to the head of her media team, who made clear that the defamatory articles which continue to be placed in the media have generated significant interest among investigative journalists.

Our Client made clear that the matters outlined in our letter of 5 March 2019 are now being dealt with through formal processes requiring the full participation of King Felipe. Accordingly, she communicated plainly the fact that her sole request at this stage is for a legal representative of HM King Felipe to make contact with us without further delay. She also recommended that His Majesty's media advisers deal directly with her media advisers, since the King Emeritus expressed considerable concern over the media aspect of the present situation. The offer made by the King Emeritus to send his own legal and media representatives is unacceptable.

For the same reason, our Client has instructed us to notify you that any involvement whatsoever by the Centro Nacional de Inteligencia in this process is wholly unacceptable. She wishes to place on record that, in the view of her own head of security, the person who accompanied the Don Jaime Alfonsin Alfonso 18 March 2019 Page 2

King Emeritus to her home was not his Private Secretary, as had been stated, but an agent of the CNI. If true, the covert participation in this meeting of a CNI agent plainly amounted to breach of the good faith in which our Client accepted this meeting. Our Client trusts that no further such breaches will be sanctioned.

During the meeting, Prince Alexander also took the opportunity to describe to the King Emeritus the devastating harm the hostile campaign has caused his family and the disruption to his school life. As a result of the campaign of lies and defamation undertaken against our Client by the Director of the CNI, with the full knowledge and encouragement of the King Emeritus, Prince Alexander was bullied so badly in 2012 that he had to be taken out of school. This episode is fully documented.

In order that we can proceed to resolve these matters formally, we request that you confirm receipt of this letter by close of business on Thursday 21 March, indicating whether you or another representative of the Royal Household is authorised to enter into discussions on this matter with our Client and her representatives. Please direct all correspondence to Robin Rathmell at

Please be aware that we shall perform identity checks on any individual put forward to speak on behalf of the Royal Household, in order to establish that they truly represent HM King Felipe and not an agency of the Spanish government or any other person.

We are sending copies of this letter to Jose Manuel Zuleta y Alejandro, Secretary to HM Queen Letizia, and Sr. Gomez-Barreda, senior partner of J&A Garrigues, legal representatives of the Spanish Royal Household.

We await your response by that date. If no response is received our Client will exercise in full her right to defend herself.

Yours faithfully,

hobre & king

Kobre & Kim (UK) LLP

cc: The Private Secretary to Her Majesty Queen Letizia

Sr Ricardo Gomez-Barreda, Senior Partner, J&A Garrigues, S.L.P