

Dear Mr Leoussis,

As Freeholders and joint owners of Flat D, 50 Queens Avenue we agree with the need for an independent property management company without the need to pursue a court order. We understand that this is the preferred option of the freeholder of Flat C, We agree that given the breakdown in relations within the House this is probably the only way forward but would want to have input into the management company appointed.

We also wish to respond to grounds presented in Schedule 3;

- a) I refute any allegations by your client of myself and my wife of any harassment or threats against him, indeed in the past your client has harassed us. There are no obstructions in the communal areas. Therefore, there is no breach.
- b) As far as I am aware trees in Flat A's garden have either been trimmed or removed.
- c) It is agreed that there are a number of maintenance issues that are to be addressed . Matters have been hampered by the breakdown in communication within the property specifically your client's willingness to engage, All Freeholders are responsible for maintenance and clearly given the breakdown in communication between all flats the only way forward is a property management company.
- d) The buildings insurance is valid. 50 Queens Avenue have used the same insurance broker for a number of years and this has always been accepted by all parties without complaint or concerns from the insurance companies involved. We are, therefore unsure of your point.
- e) There were over the years a number of meetings on a quarterly basis. Many of these meetings were not attended by your client but minutes were always circulated. Freeholders paid into a House Account which was on the basis of a Nationwide 'passbook'. There was no 'statement' of this account but at each, minuted meeting, freeholders were informed of the monies in the account, what had been spent and what would be required. The sums involved were originally £30 per month per flat and increased to £50 per month. There was never any objection to this. There was one anomaly which was quickly rectified and the freeholders reimbursed. All monies agreed for insurance purposes and for communal cleaning was agreed until recently due to your client and the Freeholder of Flat C opposing the increase in cost. This method of organising accounts has since been discontinued. As Freeholders we are all responsible for the present situation. Any allegations you appear to be making are therefore denied.
- f) The recent installation of security cameras was carried out on a unilateral basis without any reference to the 'Landlord' or discussion with myself or my wife. There was no warning, no communication, simply a de facto action. Your client may feel that this action was necessary, perhaps it is, but there was no communication or attempt to request agreement with us.

We note in your email of 17/1/2024 that you seem to suggest we could be liable for your costs. We will not be paying your costs in any circumstances as, if your client had engaged properly, had observed the democratic process and not taken unilateral action, none of this would be necessary and your client must bear his own costs.

In conclusion,

There is clearly a need for an independent property management company and the need to treat our neighbours with courtesy and let us get on peacefully with our own lives.

Regards, David Jeffrey and Adrienne Jeffrey