

southgate solicitors

Ms Sarah Walker
Hughes Fowler Carruthers
Academy Court
94 Chancery Lane
London
WC2A 1DT

Our Ref: LC/102369

Your Ref: BJ.SW.bs.WAL023

27 January 2025

Dear Sarah

Spalletti & Walker - 92 Ollerton Road

I write further to your letter dated 23 January 2025 to which I have only just had sight of given that it was emailed to me outside office hours on Thursday evening and, as you are aware, I was out of office Friday.

My client is extremely disappointed to read that your client now wishes to proceed via court and especially given that we have written to you on two separate occasions advising that efforts are ongoing to ensure that a full response is provided as soon as practicably possible.

I understand and can appreciate that the matter has been ongoing formally via solicitors since November 2024 however, for the most part of November, parties were preoccupied with Family Law Act proceedings. Thereafter, and following receipt of your Letter Before Action dated 13 December 2024, my client actively sought representation but due to the Christmas period fast approaching this proved difficult.

As you are aware, I was instructed by Ms Spalletti just over two weeks ago and there is a considerably large volume of papers to consider before a comprehensive response can be given. You will appreciate that I require reasonable time to respond on behalf of my client and do not consider your proposed deadline of 24 January a reasonable nor helpful timeframe. Not to mention, the continual chasing and threats are not assisting matters and are in fact impeding a more prompt response from us. Further, my client does not appreciate the persistent communications since this is contributing materially to her increasing legal costs which will be brought to the court's attention if an application is made.

Third Floor, Crown House, 47 Chase Side, London, N14 5BP
t: 0208 004 0065 e: hello@southgate.co.uk w: www.southgate.co.uk

As previously stated, my client is keen to resolve matters outside of court. My client simply does not wish to provide a meaningless and unhelpful response to your client's proposals and therefore requires reasonable time to ensure her response is thorough and addresses all issues raised.

We will aim to provide you with a response as soon as possible and by end of next week. We urge your client not to escalate matters in the meantime and again, put him on notice that should he proceed to make an application to court, my client will be seeking costs against him.

Yours sincerely

Lucy Cornish
southgate solicitors