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Whetstone  
London  
N20 9BD

Mr A Wills  
6 Oaklands Way  
Titchfield Common  
Fareham  
Hants  
PO14 4LE

Our Ref: WC/3885

29 January 2021

Also by email: *Andrew Wills* <[andrew.j.wills@gmail.com](mailto:andrew.j.wills@gmail.com)>

Dear Mr Wills

**Our Client: Mrs Bernadette Rogers ("our client")**  
**Re: Estate of the late Ursula Wills ("Mrs Wills")**

We write further in the above matter.

As you are aware our client has continued to cooperate with you (and the police) in order to bring around a resolution to this protracted and distressing matter. However, we note that you frustratingly insist on continuing to attempt to report our client to a number of authorities and institutions to pursue this baseless criminal agenda you have conceived.

We remind you that, despite your misguided assertions, this remains a civil matter and as such we encourage you to engage with us to find a solution to this matter. We also take this opportunity to remind you of your fiduciary duties to the estate of the late Ursula Wills in your capacity as Executor. Our client remains concerned that you are failing to have proper conduct and administration of the estate and we have advised our client of her rights as a beneficiary of the estate.

Whilst it is not our place to provide you with legal advice, we do encourage you to seek professional advice on your duties and obligations as Executor. Our client is concerned that significant time has passed without any progression with administering the estate and as such we request an update from you as to the current position of the estate and what steps you have taken. Again, without overstepping our position, any experienced legal professional would direct you, in the event you are unsure what to do next, to apply to court to seek directions. We invite you to seek further advice on this point and have solicitors revert to us on this.

Notwithstanding the above, and in her capacity as a Beneficiary, our client also requests an explanation from you as to why you have clearly failed to seek professional advice to date in respect of the estate.

As you are aware the £100,000 in question regarding restitution for our client's care provided to your late mother remains untouched in a designated account. We write now also to put you on notice that, given the verbal admission from you to our client on 3 June 2020 (which has not been denied by you) you believed our client would take £30,000 towards the costs. Given this is part of the sum which is

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undisputed our client will, in seven (7) days of this letter, transfer the undisputed sum to her personal account.

The remainder of the balance will remain in a designated account and will form the basis of any quantum meruit claim. This is to say that there is no dispute that our client is owed something, as accepted by you previously, but the issue is over the sum that is owed. We trust you can see how this falls within the remit of a civil claim and is not a criminal matter.

In the event you wish to contest our client transferring the undisputed sum then we invite you to take legal advice on your options for (and prospects of successfully) applying to prevent the same. In the event we do not hear from you, or preferably your solicitors, within 7 days then our client will proceed with the transfer of the undisputed sum and will explore her option to issue Part 8 proceedings for a determination from the court that the outstanding balance is rightfully owed.

We also wish to address a matter first raised in our correspondence dated 15 July 2020 regarding the whereabouts of certain valuable coins from your mother's collection. Your response dated 29 July 2020 is insufficient and skirts around the issue which raises serious concerns for our client as beneficiary of the estate. We again highlight the significant amount of time which has passed since this issue was raised and that these coins as referred to in earlier correspondence have still not yet been properly accounted for. Please confirm who possesses them and their whereabouts by return. In the event you fail to properly address our client's concerns on this matter our client reserves her right to report this issue to the police for investigation.

We also wish to inform you that we have advised our client of her right as beneficiary to make any applications as to the administering of the estate which she feels appropriate and put you on notice that our client reserves her right to make the same. We bring to your attention the possibility of an adverse costs order being made against you.

Our client is deeply saddened that this issue has escalated to the point it has and is of the reasonable opinion that if you had taken legal advice on this matter from the outset then this could have been resolved much sooner. There is, by your own admissions, no dispute that our client is owed compensation for the care provided to your mother and the allegations of criminal activity has hindered the amicable resolution of this matter to date. We again invite you to take professional advice on this matter and have your solicitors respond to this letter by no later than 5 February 2021.

We look forward to hearing from you.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Kleyman & Co', written in a cursive style.

**Kleyman & Co Solicitors**