6 Cadbury Close Whetstone London N20 9BD

Our Ref: WC/3885

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

25 October 2021

Also by email: Andrew Wills <andrew.j.wills@gmail.com>

Dear Mr Wills

Our Client: Mrs Bernadette Rogers Re: Estate of the late Ursula Wills

We write further to your email of 22 October 2021.

Whilst we appreciate the CPR gives guidance for 14 days for a defendant to respond to a letter of claim, this can be reduced in circumstances in which there is a degree of urgency in achieving a resolution and where parties are familiar with the facts of the case. Given the length of time we have been corresponding on this matter and our client's concerns that you have begun to pay out the estate to the residuary beneficiaries without first dealing with creditor claims the time given was appropriate in the circumstances.

Nonetheless our client is agreeable to allow you time to take legal advice and we await your substantive response by no later than 4pm on 29 October 2021, being 14 days from the date of our letter. After this time our client reserves the right to initiate proceedings without further notice.

This is by no means a complex matter and there is no need for additional investigation, as such our client is not willing to grant you three months to respond as this is a very straightforward matter and you are aware of the facts.

We also write further to your agreement for the estate to pay our client's out of pocket expenses which we have set out in detail. We await payment of the same by return. Please confirm once payment has been processed so we can confirm safe receipt.

We look forward to hearing from you in due course and by no later than 4pm on 29 October 2021.

Yours sincerely

Kleyman & Co Solicitors

Klyman & Co

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