

6 Oaklands Way  
Fareham  
Hants  
PO14 4LE  
29<sup>th</sup> October 2021

Reference: Estate of Mrs U.L. Wills

Mr Couchman

As per the MoJ protocol, I have responded within 14 days of your letter, and I will provide a substantive response to your letter once I have returned from my break and have spoken again with my solicitor. Your assertion that there is an “*urgency in achieving a resolution and...*” is not consistent with you taking 2 full months to respond with this revised list of expenses.

As I have previously stated on a number of occasions, your client should not be out of pocket as a result of Mum’s stay with her, and the estate is receptive to paying her reasonable out of pocket expenses. However, these expenses must be reasonable, truthful and properly documented. Your client’s expenses must be backed up by evidence such as bank statements, invoices and receipts.

Your pre action letter of claim does NOT provide a complete summary of the facts as it omits crucial details including the theft of £100,000 from the estate following Mother’s death.

As per the protocol, your client is to provide details of how the amount demanded is calculated. It is unacceptable to demand the estate pays  $\frac{1}{3}$  of your client’s credit card, bank usage and other outgoings without providing justification and receipts/invoices. To date you have not provided one iota of evidence in support of your demands.

I have rejected such claims in my previous letters and I fully reject your client’s demand for the reasons given above.

Furthermore, your “pre action claim letter” contains errors:

- In point 3 you speak of a ‘*Mrs Ursula’s will*’. My Mother was Mrs Wills, not Mrs Ursula. This error alone renders your letter factually incorrect and so lacks all credibility.
- In section 21, you refer to a food supplier “Riverfood”, I can find no reference to a Riverfood food supplier.
- Mum was 92 and qualified for a free TV licence yet you have “TV Licence” listed in expenses.

I await your client’s revised reasonable out of pocket expenses complete with their evidence and your justification for attributing these outgoings to Mrs Wills.

Please have your client contact me to discuss her paying compensation to the estate for loss of interest, costs, time and effort expended by the estate in retrieving the £100,000 that she stole from Mum's bank accounts.

Yours sincerely

A.J. Wills

For the estate of Mrs U L Wills