

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

6 Cadbury Close  
Whetstone  
London  
N20 9BD  
Our Ref: WC/3885

2 September 2020

*Also by email:*  
*Andrew Wills <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.

We have recently been provided with correspondence dated 21 August 2020 sent from you directly to our client. Please be informed that as our client is legally represented we expect all correspondence to be sent via this firm marked for our attention. As we continue to correspond on this matter, please ensure any correspondence you send, or will otherwise be sent by other interested parties, regarding this matter is directed to this firm.

As you can no doubt appreciate, and have accepted previously, our client is rightfully entitled to compensation for the care provided to your late mother during her last years. Our client has raised an invoice for the same and provided you with comparative costs for the care your mother could have incurred.

The money was withdrawn by our client with your verbal consent and at all times has acted in good faith and tried to keep an open discussion with you regarding the compensation she is entitled to. Our client has commented on the baseless allegations in earlier correspondence (15 June 2020) and for the avoidance of doubt her position remains unchanged. Moreover, the tone and contents of your correspondence received to date have not been reciprocal of our client's efforts to look towards actively resolving this matter.

Our client appreciates your fiduciary duties as executor of the estate but these include settling all debts of the estate too. Our client's invoice makes her a creditor of the estate, as well as a beneficiary and as such our client's claim to the compensation should be resolved forthwith and any funds retained should not form part of the pot to be distributed as per your late mother's will. For the avoidance of doubt please be informed that any claim made against our client on behalf of the estate will be met with a counterclaim for the outstanding sum under the invoice raised.

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We trust the above is not necessary and we can come to an arrangement which suits all parties and that this matter can be resolved amicably.

Our client maintains that the invoice submitted is fair and reasonable in all the circumstances and has evidenced the cost of equivalent private care, as such our client maintains that her claim for the outstanding balance of £35,000 is legitimate. Our client did not appreciate the facetious comments made in your last correspondence; these were neither helpful nor progressive. Our client worked tirelessly for a number of years to provide the best care for your mother with minimal assistance from her siblings throughout this difficult period of your mother's ill health, and this unequivocally entitles her to the rightful compensation.

Our client is reluctant to return the funds at this time as there have been absolutely no assurances from you as Executor that our client will be duly paid a fair sum for the care she provided. Our client has always maintained that she is willing to having a frank and open discussion with you and has invited you to a mediation to agree her compensation. If this is still something you are not willing to explore then we propose a roundtable meeting to try and resolve this matter.

Our client is not willing to continue to engage in endless correspondence if there is does not appear to be a sensible and forthcoming resolution in sight. As such we suggest you take independent legal advice on the contents of this letter and substantively respond to us. Our client welcomes your thoughts and input on the above and hopes to be able to resolve this matter soon, but we do require your cooperation and rational engagement from you.

We look forward to hearing from you.

Yours sincerely

A handwritten signature in cursive script that reads "Kleyman & Co".

**Kleyman & Co Solicitors**