



Mr J

Our Ref: LC/2111/sb

9 January 2026

Dear Mr J

Claim No: L00BP152 Mayo v Miss E & Mr J

We write further to your letter of 5 January 2026.

The documents requested are irrelevant to the dispute and we therefore will not be providing them. If you make an Application for specific disclosure then we will defend the same and seek an Order that you pay the costs incurred in respect of that application on an indemnity basis.

We would also refer you to paragraph 46 of Reed v Woodward Property Developments Ltd & Another [2023] EWHC 36 (SCCO) which reads as follows:-

“The second principle is that where, as here, a Receiving Party's bill of costs bears the certificate of a solicitor to the effect that the indemnity principle has not been breached, the Court can (and should unless there is evidence to the contrary) assume that his signature to the bill of costs shows that the indemnity principle has not been offended: Bailey v IBC Vehicles Ltd [1998] 3 All ER 570. In practice this means that there must be some real reason to doubt the accuracy of the certificate in the bill. Speculative challenges should not be entertained”.

As a matter of courtesy, we would point out that you appear to be confused between incurred and estimated costs on the Claimant's Precedent T. We suggest you obtain independent legal advice if you need assistance in understanding this document.

As a general comment, the ongoing and spurious allegations of fraud, professional misconduct etc are only serving to increase costs and our client reserves the right to bring this (and other conduct) to the court's attention at trial.

Finally, we note that you have sent correspondence to nbaddick@seldons.co.uk. Nicola Baddick is not the appropriate contact in respect of this matter and we ask that you please do not send

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correspondence to her email address. For avoidance of doubt, Nicola Baddick has blocked your email address and will not receive any communications which you send to her.

Yours faithfully

Seldons LLP