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By Fax and DX

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Your Ref RMW/LD

OWT Ref CSJ/JXM/105457/JEC

15 April 1998

Dear Sirs

Donovan v. Shell UK Limited

We refer to the letter dated 15 April 1998 sent to Mr Mark Moody-Stuart of Shell by your client John Donovan. Mr Moody-Stuart is presently in the Far East on business and is therefore unable to respond to your client's letter.

We refer to your letter dated 8 April 1998. On the second page of this letter you have stated that "so far as the Mediation Agreement is concerned there was no intention to circulate the Don Marketing saga other than to Shell employees". The letter of today's date from your client to Mr Moody-Stuart states that your client is intending to supply to a national newspaper "copies of my recent letters to [Mr Moody-Stuart] together with a copy of the letter from Mr Wiseman dated 14 May 1997". Apart from the letter dated 14 May 1997 we were unclear as to exactly what letters your client is proposing to forward to a national newspaper. However, if as appears to be the case, your client intends to forward all the enclosures that he has sent with recent correspondence this would appear to be in contradiction to what you say in your letter.

Please note that Shell have not agreed that any of the letters referred to in your client's letter dated 15 April 1998 should be copied to any persons not involved in this litigation and reserve their position against your client if such documents are circulated to persons other than Shell employees.

We are copying this directly to your client for his information. However, in future we would be grateful if all correspondence could be forwarded through ourselves.

Yours faithfully

LB131023.1

Tony Leifer Stephen Kochoo Toby Greenhury Edward Toomas Ionathan Lowis Macus Rotherford Paul Clark Hichard Spiller Vivien Tyzell Alan Magnus Susan Hall Anthony Edwards David Counc Throuby Daniel Christopher Comyn David Kendali James Innes Alan Perry Barbara Nafrahn David Johnson Peter Taylor Andrew Sanders Maira Freser Christine Detrett Sally Hine Susar Aslan Derothy Cory-Wright Clive Davies Sumon Corler Devid 'Splady Jane Moorman Richart Hopley Henry Clinton-Davis Laurence Marrie Alexander Carter-Silk Lesley-Anne Avis Moniso Blake Caroline Jarzen Ashwani Kochhar Richard Max Sugan Charles

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