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Daniel Drukarz Esq
Fladgate Fielder
Heron Place
3 George Street
London W1H 6AD

Your reference

Our reference

Date

GAM/1871/S1000/PCF

9th November 1994

Dear Daniel,

ERUV - NOTICES OF MOTION ETC

Further to our telephone conversation yesterday afternoon I enclose copies of the various documentation received from Sayer Moore & Co. on behalf of Jeffrey Segall in respect of the above matter.

1. A letter dated 31st October from Sayer Moore & Co. enclosing a Notice of Motion and a copy of an unsworn Affidavit by Jeffrey Segall. These were delivered by hand to our office by Jeffrey Segall himself during the course of the afternoon of Monday 31st October and the attached receipt confirms this. I regret that I cannot give you an exact time during the afternoon that the document was delivered to the office.

I circulated this to Graham Morris and Laurence Begner and the following day was informed by both them and Edward Black that the Notice of Motion was incomplete because as you will see there appears to be something missing at the bottom of the first page.

2. I immediately telephoned Sayer Moore & Co. and informed them that part of the document was missing. This conversation was confirmed in a letter faxed to them. Although my letter is marked as being copied to Graham Morris, Edward Black and Laurence Begner, this was not done because immediately after this fax was sent to Sayer Moore & Co., they responded by fax with the corrected document.

3. By a letter dated 1st November Sayer Moore & Co. sent a corrected Notice of Motion. This was originally sent by fax. The time identified on the fax, 18:01 to 18:03 is incorrect it should have been 17:01 to 17:03 - I remember noting that at the time and believe they had forgotten to put their fax's clock back. This letter was also sent in the post, received the following day November 2nd.

- 1 -

continued...

Ref: 1871

To: D. Drukarz Esq

9th November 1994

4. A second copy of the Notice of Motion was delivered to the office late on the afternoon of Tuesday 1st November 1994, at approximately 6.00pm. This also referred to the jurat of the Affidavit of Jeffrey Segall.

5. Although I have not included documents attached to the Affidavit I would confirm that they are as follows; document JS1 is the Secretary of State's Decision letter; document JS2 is the Inspector's report; and document JS3 is Planning Policy Guidance Note No. 1. I understand you do not require copies.

During our telephone conversation you also asked me to look at the position regarding spare copies of the various proofs of evidence. Unfortunately we do not have any spare copies of them. If need be I can arrange to provide copies but I understand you will look to colleagues on the Committee to provide them in the first instance.

Please do not hesitate to contact me if you require any further information.

With kind regards.

Yours sincerely,



Graham Murdoch

c.c. ~~Graham Morris Esq~~
Laurence Begner Esq
Edward Black Esq

Enc.