

**Dean Wilson**

---

**From:** "Barton, Sean" <Sean.Barton@dlapiper.com>  
**To:** <dean.wilson@curriculumvitaesite.com>  
**Sent:** 29 June 2006 18:23  
**Attach:** Scan001.PDF  
**Subject:** Yourself v Barclays

Dear Sir

We have today received from the court copies of your recent correspondence including your complaint to the Law Society, which we will deal with separately.

In the meantime, as promised, we enclose the signed signature page of Mr White's statement. We note your concern that the failure to sign was not a genuine mistake. We trust that receipt of the signature page allays your concerns.

We assume that you do not intend to serve any evidence in response to our client's application for summary judgment which was due today. However, if you do wish to serve evidence in response, please let us have it by return so that we may respond appropriately.

As to your application for committal proceedings against Barclays, please let us also have your evidence in that respect by return.

Yours faithfully.

**DLA Piper Rudnick Gray Cary UK LLP**

Sean Barton  
Associate  
DLA Piper Rudnick Gray Cary UK LLP  
T: +44 (0) 113 369 2367  
F: +44 (0) 113 369 2299

<<Scan001.PDF>>

---

This email is from DLA Piper Rudnick Gray Cary UK LLP.

The contents of this email and any attachments are confidential to the intended recipient. They may not be disclosed to or used by or copied in any way by anyone other than the intended recipient. If this email is received in error, please contact DLA Piper Rudnick Gray Cary UK LLP on +44 (0) 8700 11111 quoting the name of the sender and the email address to which it has been sent and then delete it.

Please note that neither DLA Piper Rudnick Gray Cary UK LLP nor the sender accepts any responsibility for viruses and it is your responsibility to scan or otherwise check this email and any attachments.

DLA Piper Rudnick Gray Cary UK LLP is a limited liability partnership registered in England and Wales (registered number OC307847) which provides services from offices in England, Belgium, Germany and the People's Republic of China. A list of members is open for inspection at its registered office and principal place of business 3 Noble Street, London EC2V 7EE. Partner denotes member of a limited liability partnership.

DLA Piper Rudnick Gray Cary UK LLP is regulated by the Law Society and is a member of DLA

29/06/2006

Piper Rudnick Gray Cary, a global legal services organisation, the members of which are separate and distinct legal entities. For further information, please refer to [www.dlapiper.com](http://www.dlapiper.com).

---

During the application process, with all of the mistakes/problems described by Mr Wilson, I am confused as to why Mr Wilson never thought to contact me.

**Conclusion**

42. I conclude that Mr Wilson's ePDQ facility was set up within an acceptable timeframe. I further conclude that I did not provide any assurances to Mr Wilson that the ePDQ facility would be set up by 1 December 2003. I believe that Mr Wilson's claim that there was delay in setting up the ePDQ facility has no prospect of success.
43. Accordingly, I ask the court to grant summary judgment to Barclays, as Mr Wilson's claim fails to disclose any reasonable prospects of success and there is no other compelling reason why the case should be disposed of at trial. Alternatively, I ask that the court strikes out Mr Wilson's claim using its case management powers under Part 3 of the Civil Procedure Rules.
44. I believe that the facts stated in this witness statement are true.

Dated



**MARTIN WHITE**

GJT/GJT/54000/120423/10010088.2  
12 June 2006 DIV1