

Herbert Smith Freehills
DX 28
London Chancery Lane

21 June 2017

Our Ref: DMG/GOO.63.1
Your Ref: 2346/7455/31002837

By DX & By Email
michael.hunt@hsf.com

Dear Sirs

Jolyon Maugham QC -v- Uber London Ltd
Claim No HC-2017-001496

Further to yours of 20 June in which you confirmed your instructions to accept service we enclose by way of service the following:

1. Issued Claim Form;
2. Particulars of Claim; and
3. Application for cost capping with witness statement and exhibit.

You will note the application for some form of cost control. This application has been issued with a date to be fixed. The hearing of the fixture is set for 29 June 2017. We appreciate that that is too soon for you to consider the proceedings and the application. We propose adjourning that application to fix.

The reason that we have issued that application is because, as you will see from the statement made by our client in support of the application, the result of it will affect the conduct of the claim including whether it is pursued by the present claimant or another claimant. We propose that whilst we await the outcome of the application for a cost control order no steps should be taken in the proceedings, so that subject to the Court's agreement we would not propose that any defence or application on your client's part should be made. We appreciate that you and your client will need time to consider that proposal but if you agree we would propose that a consent order to that effect be agreed.

In the meantime we see no reason why costs should be incurred other than those involved in considering this issue and the application itself.

Yours faithfully


Edwin Coe LLP

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