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Our Ref:

CFG/AF/HSS/15237.1

24 July 2013

By Courier and Email:

PRIVATE AND CONFIDENTIAL

Laurence Moffitt

Carter-Ruck

URGENT

NOT FOR PUBLICATION

Dear Sir

Ox Products Group UK Ltd, Lee Hazell, James Hazell, and Donovan Payne

We have been consulted by Ox Products Group UK Ltd and its three directors Lee Hazell, James Hazell and Donovan Payne in relation to two highly defamatory tweets published by you on your Twitter account, @laurencemoffitt, on 7 July 2013, which state as follows:

"Ox products would be best boycotted globally # the Hales family are evil cultists and defraud Governments globally of millions # PBCC"

"Hope @Screwfix don't EVER buy ox products kit # ox products is a # Hales owned company and proceeds feed the cults coffers"

We have attached the tweets in their full context for reference. They are highly defamatory both of the company and indeed of its three directors who will be understood to be responsible for the activities, direction and propriety of the company. At the time of writing these tweets remain available online and continue to cause serious damage to our clients.

Your tweets will have been understood to mean that Ox Products Group UK Ltd and its directors are part of an evil cult that defrauds "Governments globally of millions" of pounds, and that any money made by our clients is used to "feed the cults [sic] coffers" and thus that Ox Products Group UK Ltd's products should be boycotted globally.

It goes without saying that such extremely serious allegations are wholly untrue and have caused the directors of Ox Products Group UK Ltd considerable embarrassment and distress as well as serious harm to their personal and professional reputations, and of course, to that of the company itself. In addition, and for the avoidance of doubt, our clients' reserve their rights in relation to any claim for special damage arising out of any financial losses caused as a result of your extremely serious allegations.

Carter-Ruck Solicitors

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