

42B Queens Road
Wimbledon
London SW19 8LR

24 July 2008

Mr Richard Walford
Gilbert Stephens Solicitors
15-17 Southernhay East
Exeter EX1 1QE

Dear Mr Walford,

Re: The Estate of Graham Sheppard (Claim HC07C01317)
Your client: Margaret Sheppard

I am very concerned that you have been preparing the ground for not properly disclosing your client's diary, which as I have stated before is inaccurate in its recording of the events of 11-12 October 2004.

Going through correspondence, you have stated on numerous occasions that I have had opportunities to inspect the 2004 diary, and that there has been "substantial disclosure" of the diary. These assertions are all incorrect. It was a year before I got to look at the diary at all and then, in September 2007, it was in parallel with negotiations where I only flicked through the diary, in a couple of minutes. Nicola Sheppard, Emily Campbell and Stan Baring can all attest to this.

Given that the diary is central to your client's case and that despite strenuous efforts I have still not been afforded proper inspection, I will be expecting that the most relevant parts are disclosed next week as part of standard disclosure. For example a scan of the week of 18 October 2004 must be included.

In addition, in the interests of justice I should be afforded a proper opportunity to inspect the diary following exchange of lists. This is not disproportionate in any way, so please do not claim that it is.

I do not know if the entire diary is fabricated, or whether small amendments have been made, but either way it does not reflect what I know to be the truth. But there are likely to be aspects which could help me, with the unfortunate downside that your client may have made other amendments.

With this caveat, I would like to check what the diary records of my father's whereabouts between his return from Rome and mid-November, when he and your client went on a trip to Dublin. I have obtained my father's account from A4 Hire in Hungerford (enclosed) which shows that an item of equipment was hired on '10/11'. A4 Hire were able to tell me that the item code referred to a sit-on tractor mower.

I have a recollection of my father saying he was feeling sore because he had cut the field at Inkpen with a tractor-mower, and I remember us agreeing that it had not been sensible given the operations to his behind that he was recovering from.

I also recall him saying that he was cutting the grass because Aston Piper, who usually cut it, was away in Africa. Aston has ^{since} confirmed that he was in Africa on 11 October 2004.

Originally A4 Hire told me that the accounting date could not be altered and if it had been, their accounting package would have tracked it. However they changed from Hiremate to Sage in early 2007 and the writers of the Hiremate software confirmed that entries (such as dates) can be changed with no trace. So there is a possibility that 10/11 was supposed to be 11/10 but was entered wrongly or changed.

It seems very unlikely to me that my father would be cutting the grass in mid-November, and I also recall that I was in New York running the Marathon just before his Dublin trip and that we did not see him for several weeks after that. Nicola and I remember commenting how strange it was that he had not been in touch for quite a while following our return from New York (we thought he'd be more interested to know how the Marathon had gone).

So if I did not see him in November, why would I have a recollection of him telling me about cutting the grass, hiring the tractor-mower, and still being sore? I believe that the recollection is more likely to relate to one of the two occasions I saw my father in mid-October 2004, and that he had cut the grass on his way up from Teignmouth to Walton-on-Thames on 11 October 2004.

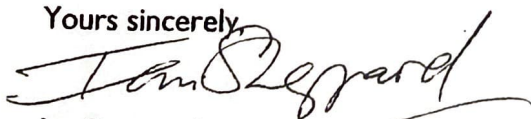
I have requested that A4 Hire send me a copy of the invoice relating to the tractor-mower, which was paid for in December 2004, but although they originally said it would be in storage they later said that records were only kept on computer screen (so I have not been able to obtain the invoice raised). They showed me Hiremate – the very computer programme which I had been told could be amended without trace!

A4 Hire had also originally said that such an entry would relate to the date on which it was hired. It was only after I pointed out that my father was in Dublin on 10/11/04 that they eventually said that the tractor-mower had been hired the weekend before. They also showed me an entry in a 'hiring out' book from November 2004 but this book was not mentioned on two previous occasions when I had visited A4 Hire, or in any of the previous correspondence with the accounts person (Denise Gaines) or owner (Paul Folland). Thus I am wanting to clear this up and find the truth of the matter.

Please remind your client of her duty to disclose anything relating to these events, and that if she has interfered with evidence of my father's actual whereabouts this is a very serious matter.

Many thanks,

Yours sincerely,



Ian Sheppard