

Strictly Private & Confidential

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Our Ref: PAD/spl/612152.1
Your Ref:

4 November 2009

Dear Sirs,

RE: EDWARD MCMILLAN-SCOTT (MEP)

We have been instructed by the above named following the removal of the whip on 15 July 2009 and his expulsion from the Conservative Party ('the Party') on 15 September 2009.

We have advised our client that this removal was plainly unlawful. We reserve all our client's rights, including a right to seek damages and/or an appropriate declaration.

However, our client's preference has always been an amicable solution.

In relation to the appeal process, we note that despite numerous requests by our client requesting full reasons for the determination from the Party these have still not been provided.

We therefore request once again that you provide, by return, the following:

1. Full and detailed reasons for our client's expulsion, including details of all acts and/or omissions relied upon by the party;
2. The legal basis of the expulsion under your Constitution;
3. Precisely who made this decision and when?
4. All documents/matters relied upon in support of your decision, including any grounds to support the contention that you complied with the Constitution's procedures and natural justice in removing our client, and/or acted reasonably and proportionately in making your decision.

We intend to require, in due course, in detailed disclosure of relevant documentation, in relation to the reasons for our client's removal, including in respect of the Kaminski matter. Please kindly ensure that no documents, emails or other records are in any way destroyed or deleted prior to court proceedings, as required by law.

In the meantime we would be grateful if you could confirm what your proposals are for an appeal hearing and when this is proposed to be so that we can arrange appropriate legal representation for our client at such a hearing.

We look forward to hearing from you by return.

Yours faithfully,

Russell Jones & Walker
