

Our ref: GXE.NJL.180711.B&R
Ask for: George Edmond
Your ref:



BY EMAIL ONLY: NGrover@trowers.com

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30 May 2024

Dear Sirs,

**Bishop & Rook UK Limited - In Liquidation ("Company")-
Your client: Bishop & Rook LLC ("LLC")**

We refer to your email and our telephone call of yesterday and also, to Katie Farmer's email of 24 May 2024.

The information your client has given you is incorrect. As stated in our email of 28 May 2024, no assets have been sold to Andrew Fox. For the avoidance of doubt, no assets of the Company have been unlawfully sold by our client, nor have any of the vehicles or chassis that purport to be the property of US customers have been sold. Our client is in direct contact with a number of US customers to agree terms on which they can collect the vehicles or chassis.

In the meantime, we have not received a substantive response to our letter of 17 May 2024 and it is not clear to us or our client on what basis your client asserts any rights over or interest in the assets on site. Your letter of 2 May 2024 did not claim any title to any of the assets. However, this position appears to have changed in your subsequent correspondence, yet no evidence has been produced to support any title claim or other interest in the assets. Further, your client's sole director, Micheal Kraabel, has told our client that the vehicles/chassis belong to the US customers, not the LLC.

Our client has already set out her entitlement to a lien over the goods as per our letter of 17 May 2024. For the avoidance of doubt, this is claimed on the basis of unpaid labour costs to which the Company is entitled, agents costs to arrange removal of the goods and a payment to the landlord to account for the vehicles remaining on site. Our client is currently releasing her lien over specific vehicles in exchange for settlement amounts with US customer's directly.

Further, to the extent that it is relevant, your client claims to be a creditor of the Company. Despite inviting your client to do so, no evidence has been produced to support this; nor any response or rebuttal to the position set out in our letter of 17 May 2024.

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Therefore, pending any substantive response and evidence to support your client's claim or interest in any of the assets, any further correspondence would appear to be otiose. Further, any action or claim against our client will be vigorously defended and an order for costs will be sought against your client and its director personally, given his clear conflict of interest in failing to properly co-operate with our client as a director of the Company.

Finally, contrary to your email of yesterday, we confirmed to you in our letter of 21 May 2024 that our client's proposal to resolving the situation was confirmed in her email of 19 April 2024 to your client's director and we told you this in our letter of 21 May 2024. Our client is keen to resolve matters quickly to prevent a further escalation of costs. Please therefore provide your client's substantive response to our letters of 17 and 21 May 2024 including, any offer they may wish to make to resolve the current impasse within the next 48 hours should they wish to resolve the current situation to allow the lien to be lifted and all vehicles released to the US customers who, we understand, are threatening to take action against your client directly.

We look forward to hearing from you by 1 pm on 31 May 2024.

Yours faithfully,

Lupton Fawcett LLP.

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