

THOMAS COOPER & CO
(STIBBARD, GIBSON & CO)

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J. I. PICKERING.
C. H. DEANS.
W. BODLE.

TELEPHONES: ROYAL 8851-8855.

TELEGRAMS: RECOUR, FEN, LONDON.

RECEIVED

- 6 MAR 1952

Ans'd.....

27, LEADENHALL STREET,
LONDON, E. C. 3.

5th March, 1952.

OUR REF: JHF/IA
YOUR REF: ADMIN

Fulcher

Dear Sirs,

"SECURITY"

We thank you for your letter of the 28th ultimo, and confirm our interview with Mr. Bryden when we explained to him that our Counsel had advised that evidence was required from the surveyors enumerated in our letter to you of the 27th ultimo.

We shall therefore be obliged if you would kindly grant us permission to interview these gentlemen and for which purpose we would send a representative to the respective places at which the surveyors are now engaged. If this permission is granted, we shall be able to confer with the respective surveyors on the points arising out of their reports and we would be quite prepared to submit for your approval a draft of the statements of the witnesses before these are signed by any of the surveyors.

If this procedure is followed, we would be in a position to prepare affidavits which could be sent to the witnesses for completion before a Commissioner for oaths and the affidavits would exhibit photostat copies of the survey report or other documents to which the deponent refers. When the affidavits have been completed we should then be in a position to approach the Plaintiffs' solicitors with a view to their agreeing to the affidavits being read at the trial and raling such agreement, we could apply to the court for leave to read the affidavits at the trial.

We hope that you will be able to agree to this proposal as otherwise we shall be placed in the position of having to subpoena each of the witnesses to attend at the trial of the action and produce the survey reports etc. This would of course undoubtedly cause a great deal of inconvenience and further-more, substantial expenses would be incurred.

We confirm having despatched photostat copies of the survey reports and load line certificates and which we shall be glad if you will kindly let us have at your early convenience.

Yours faithfully,

The Secretary,
Lloyd's Register of Shipping,
71, Fenchurch Street, E.C.3.

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