

● Our Ref: 4253/CH/38281-1

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9 March 2012

**NOT FOR PUBLICATION - PRIVATE AND CONFIDENTIAL**

Dear Ms Walker

**Michael Shillaker**

We act for Mr Michael Shillaker, who is, as you know, a former colleague of yours at Credit Suisse.

On 28 February 2012, Mr Shillaker was contacted by the Sunday Times who notified him that there was an intention to publish an article based on information that they had obtained directly from you. For your reference, we attach a copy of the letter from journalists Heidi Blake and Jonathan Calvert. You will of course know that the Sunday Times did not publish your story. This letter is to put you on notice that should you repeat the defamatory allegations, action will be taken against you. You should take independent specialist legal advice.

As you know, your allegations concerning the events that took place in April 2010 have been investigated by the police on three occasions. On 30 July 2010, Mr Shillaker was informed that no further action would be taken, and Mr Shillaker had been fully vindicated. You then made a complaint to the IPCC and a new investigation was launched. On 15 August 2011, Mr Shillaker was again informed that no further action would be taken.

Whilst it is possible that you are acting out of a genuine belief the Mr Shillaker has in some way caused you harm, the fact is, he has not. You have effectively launched a campaign against him by making allegations that are untrue and unfounded. You have repeated your defamatory allegations to colleagues of Mr Shillaker and work associates, a number of whom have confirmed that they will provide witness statements to this effect. You have now provided private and defamatory information about Mr Shillaker to a national newspaper hoping to publish your story to a substantial and influential readership. This is damaging and has simply got to stop.

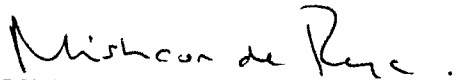
We have advised Mr Shillaker that he has a strong claim against you for defamation. The clear meaning of your allegations is that Mr Shillaker has committed a sexual assault and lied about it in order to avoid criminal penalty. We and our client simply cannot allow your allegations to continue relentlessly and uncorrected. Your conduct constitutes harassment and must cease.

If you wish to avoid the initiation of proceedings against you, please confirm within 7 days from the date of this letter that you will enter into undertakings (to be agreed) that you will cease this conduct. This will then be the end of the matter. If you refuse to sign the undertakings, we will consider that you remain a threat and Mr Shillaker will commence that process of initiating action against you for defamation, including damages and costs.

We look forward to hearing from you as a matter of urgency.

Please acknowledge service by return.

Yours faithfully



**Mishcon de Reya**

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