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Dec 23 2024

S.C. SUPREME COURT

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10 December 2024

**By email**

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Dear Sirs/Madams,

**BL-2024-001337: Cape Intermediate Holdings Limited and Cape Plc v Peter D. Protopapas (the "Proceedings")**

We write further to our letter dated 27 November 2024 on behalf of the Claimants in the above Proceedings issued in the Business and Property Courts of the High Court of Justice in England & Wales.

We have not received a response from you despite requesting confirmation that you will, within 7 days, advise your client to take all necessary steps to ensure compliance with the Order of Mr Justice Mann of the High Court. It is not clear why you have refrained from providing such confirmation.

Accordingly, we now enclose an updated copy of the Order with a Penal Notice at the front. Please read the Penal Notice carefully and confirm that you will comply with the terms of the Order and that you will not going forwards assist or act for Mr Protopapas in any way that would breach the terms of the Order or that would facilitate a breach. For the avoidance of doubt, you should note that such assistance is not limited to taking steps in proceedings on behalf of Mr Protopapas in legal proceedings - it includes providing any help or assistance to his breaches of the Order. We require your confirmation within 7 days of this letter.

This letter is also a formal request, on behalf of our clients, that as the attorneys representing Mr Protopapas you will preserve, and take all necessary steps to preserve and safeguard, any and all documents or data relating to the claims involving CIHL and Cape Plc in South Carolina or elsewhere, that are in your custody and control. Please confirm that you will do so, also within 7 days of this letter.

In the meantime, all our clients' rights are reserved. This correspondence shall not be construed as submission to the jurisdiction, personal or otherwise, of any United States Court, including those within South Carolina.

Yours faithfully

**Signature Litigation LLP**

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