

From: Petra Billing

Sent: 29 March 2023 09:13

To: XXXXXXXXXXXX; NH-Injunctions <NH-Injunctions@dlapiper.com>

Subject: Extension of time to Revert on Undertaking - Our client : National Highways Limited - Hearing 24 April 2023

Dear XXXXXXXX

Many thanks for your email.

We note that you are taking legal advice, and that you intend to respond to relation to the proposed undertaking by close of business on 6 April 2023. On that basis, we agree not to provide any updates in relation to defendants to the claim to the Court before 6 April 2023, but would encourage a response from any and each named defendant by close of business on the date you have indicated of 6 April 2023. We note that that is just before the Easter Bank Holiday. If your position is made clear by 6 April 2023, that will allow sufficient time for our client to consider the position and to notify the Court of any developments and undertakings in advance of the hearing on 24 April 2023.

As we have agreed not take any steps in relation to the proposed undertakings until after the Easter Bank Holiday, that concession would apply to all named defendants. We will place this email with your name redacted on the NHL Injunction Website.

regards

Petra Billing

Partner

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DLA Piper UK LLP