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1 February 2016

Dear Mr Howell,

Our Client : Mr H Lamb

I am instructed on behalf of Mr Howard Lamb and would imagine I will have more substantive instructions when I have the chance to meet him shortly.

In the interim and to facilitate those instructions, Mr Lamb indicated that he wrote to Jamie Button and you on the 20th January but he has yet to receive a reply. Please could you expedite a reply either directly to Mr Lamb or via these offices so that we may progress matters generally.

In addition, my client either requires his certificate of retention for next year in respect of CPD to show that he remains on the roll of chiropractors or alternatively (or in fact in addition) my client requires copies of any expert reports relied upon by the GCC to refute his CPD.

If you refuse to allow disclosure of the documentation, then it is highly likely that my client will instruct me to make application to the Court under Civil Procedure Rules 31.16 for disclosure before proceedings start. You will be aware that this rule applies where an application is made to the Court under any act for disclosure before proceedings have started. In the circumstances it is likely that the GCC as Respondent is likely to be a party to subsequent proceedings and that the Applicant, Mr Lamb, is also likely to be a party to the proceedings. The document sought would of course be documents which, by way of standard disclosure, would be sent in due course. We would argue that disclosure before proceedings have started is desirable in order to:-

Strictly Private & Confidential

Mr David Howell
General Chiropractic Council
44 Wicklow Street
London
WC1X 9HL

1. Dispose fairly of any anticipated proceedings.
2. Assist the dispute to be resolved without proceedings; or
3. To save costs.

I look forward to hearing from you in due course.

Yours sincerely,

Paul Gardener

Partner

(E-mail: paul.gardener@jgalaw.co.uk)