

point out that the Plaintiffs seem to be claiming both costs and interest but nowhere is the Defendant's liability for such costs or interest established nor is any breakdown of the costs and interest given.

Re Accordingly, I respectfully ask that the Defendant be given unconditional leave to defend this action. On the 6th October 1980 I personally prepared a Defence which was subsequently filed and served. I am now informed by Counsel that he would wish to put in a substantially amended Defence which would deal with all the matters to which I refer above. However, Counsel says that he cannot do so until the Plaintiffs' claim is properly pleaded. It is for this reason that no draft Amended Defence is annexed to this Affidavit

SWORN at Liverpool in the County of
Merseyside the 17th day of July 1981
before me I having first truly and
distinctly and audibly read over the
contents of this affidavit to the
Deponent he being blind who appeared
perfectly to understand the same and
who made his signature in my presence

J. L. Tullow

A Commissioner for Oaths

Peter Wainwright