
BHATIA BEST SOLICITORS

YOUR REF:

OUR REF: RJW/JMC/100997

DATE: 31 August 2018

12 CARRINGTON STREET
NOTTINGHAM
NG1 7FF
DX 702153 NOTTINGHAM 6
TEL: 0115 9503231 (24 HR)
FAX: 0115 9413169
WEB PAGE: www.bhatiabest.co.uk

Email: jon.wakefield@bhatiabest.co.uk

Will Green
Head of Corporate Communications
Cleveland Police & the Office of the
Police & Crime Commissioner
Community Safety Hub
1 Cliffland Way
Middlesbrough
TS8 9GL

Dear Mr Green

Re: Our client – Tim Hicks

Press Article on the murders of Vicky Glass, Rachel Wilson and Donna Keogh

We act for Mr Hicks who has passed to us his email exchange with you regarding his draft article in connection with the above and we have considered the matter, and in particular your emails of 1st August 2018.

We have observed the following:

- A. Your response of 1st August 2018 at 13:27 does not of itself object to publication of the article by our client.
- B. The observation which you convey from your Legal Department relates solely to matters pertaining to Rachel Wilson, and not Vicky Glass or Donna Keogh.
- C. The view expressed by your Legal Department is limited to a statement that the article is “potentially prejudicial”. No explanation is advanced that explains any particular prejudice, or to whom the prejudice may apply. That would not appear to be a lawful basis upon which publication ought to be prevented.
- D. All the material upon which the article is based and to which it refers is already in the public domain.

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The Westfield, Westfield Lane, Mansfield, Nottinghamshire, NG18 1TW. DX: 10371 MANSFIELD 1 Telephone: 01623 427944 Fax: 01623 427955
11-17 Sitwell Street, Derby, DE1 2JT DX: 700307 DERBY 3 Telephone: 01332 203000 Fax: 01332 203555

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- E. Our client has a right to freedom of expression, and there appears to be a public interest in publication of the article. Such renewed coverage can lead to additional witnesses coming forward or other evidence being identified.

The above is not intended to be exhaustive of the issues engaged, but identifies certain salient features. We may expand upon them subject to hearing from you. We would invite you to reconsider your position and offer further explanation or response to the matters identified.

We will advise our client further as to publication on hearing from you, and in any event your comments upon its content are invited.

Yours faithfully,


Bhatia Best