

Our Ref: AJS:JXM:364987
Contact: Jodie McCullan
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ABN 59 874 202 316

Your Ref: Bruce Woolf

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16 September 2013

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Dear Sir,

Re: Manly Council ats Save Little Manly Beach Foreshore Incorporated - Land and Environment Court Proceedings No. 40549 of 2013

We refer to the above proceedings.

We are instructed that our client requests your client to provide security for its estimated legal costs in the proceedings.

The Respondent's estimated legal costs in the proceedings are **\$127,000.00** (exclusive of GST) which comprises of the following:

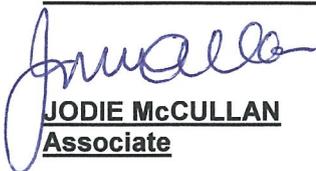
1. Marsdens Law Group, Solicitors – \$50,000.00 exclusive of GST
2. Craig Leggat, SC - \$56,000.00 exclusive of GST
3. Mark Seymour, Barrister - \$21,000.00 exclusive of GST

Please advise us by **12:00pm on Tuesday, 17 September 2013** as to whether your client agrees to provide security for costs in the sum of \$127,000.00.

Should your client not agree to provide security for costs in the above sum by 12:00pm Tuesday, 17 September 2013, we are instructed to make an application pursuant to rule 42.21 of the *Uniform Civil Procedure Rules 2005* seeking an order that your client provides security for costs in the sum of \$127,000.00.

Given the proceedings are listed for hearing on Tuesday, 24 and Wednesday, 25 September 2013, we are instructed to seek to have such an application listed before the Court on Friday, 20 September 2013. In that regard, would you please advise whether your client would agree to accept short service of any Notice of Motion filed by our client, with such service being effected by 5:00pm on Tuesday, 17 September 2013.

Yours faithfully
MARSDENS LAW GROUP



JODIE McCULLAN
Associate

A.J. SETON
Partner
Accredited Specialist Local Govt. & Planning

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Partners

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K J Searle
A I Percival
A J Seton
D R Baird
P J Crittenden
T C Reeve
G P Butterfield
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Professional
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