

RECORDED DELIVERY
Scottish Palestine Solidarity Campaign
180 West Regent Street
GLASGOW
G2 4RW



Also by email: campaign@scottishpsc.org.uk

20 July 2017

Dear Sirs

MR MATTHEW BERLOW
SCOTTISH PALESTINE SOLIDARITY CAMPAIGN ARTICLE

We are instructed on behalf of Mr Matthew Berlow.

On 16 July 2017, an article entitled "*Scottish court yet again dismisses racism charges against Palestine solidarity activists*" (the "**Article**") was published on your website naming Mr Nick Napier as the author. The Article, insofar as it relates to our client, is grossly defamatory and actionable. On any reading, the Article is clearly a malicious attempt to damage our client's reputation.

The Article contains numerous false and defamatory statements regarding our client. In particular, it alleges that our client believes that peace will be achieved through mass killings of thousands of Palestinian men, women and children. The Article further alleges that our client supports "Israel's war crimes", crimes against humanity and Palestinian humanity and the burning alive of defenceless human beings in the Gaza concentration zone.

These statements are entirely untrue, without justification and extremely damaging to our client's personal and professional reputation as a prominent and respected Glasgow solicitor. The statements made in the Article in relation to our client represent a wholly inaccurate reflection of our client's beliefs. Our client will hold you entirely responsible for any damage which has been caused to his reputation as a result of the defamatory statements included in the Article.

Aberdeen Edinburgh Glasgow

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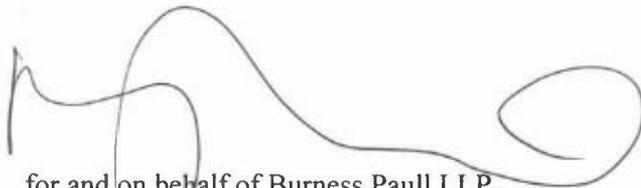
In the circumstances, our client requires from you an immediate, full and unequivocal retraction and apology to be published on your website in terms to be approved by us. This retraction will confirm that there is no truth in the defamatory allegations made in relation to our client in the Article. Our client has already suffered considerable reputational damage as a result of the defamatory statements made in the Article and as a result, requires compensation from you. We invite your proposals in this regard. Our client will also require payment by you of all legal costs incurred in this matter.

We look forward to hearing from you without delay. In the event that a satisfactory response is not received by **5pm on Tuesday 25 July 2017**, we will take our client's instructions on further action, including the raising of court proceedings. We hereby put you on notice that if the statements made in the Article in relation to our client are repeated, we will advise our client on the raising of defamation proceedings against you without further intimation to you.

We reserve all rights which are competent to our client resulting so far from the damage caused by you and any damage that may follow. This letter is written entirely without prejudice to our client's whole rights and pleas in law and cannot be founded upon in any court proceedings except at the sole instance of our client.

Given the seriousness of this matter, we recommend that you seek independent legal advice.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Kirsteen MacDonald', with a large, stylized flourish extending to the right.

for and on behalf of Burness Paull LLP

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