



Government Legal Department

Jamie Potter
Bindmans LLP
236 Gray's Inn Road
London
WC1X 8HB

By Email

Litigation Group
One Kemble Street
London
WC2B 4TS

T 020 7210 3000

DX 123242 Kingsway 6

www.gov.uk/gld

Your ref: 265422.1/JDP/BG
Our ref: Z1724358/SRW/B5

3 October 2017

Dear Mr Potter

Proposed claim: Plan B. Earth v Secretary of State for Business, Energy and Industrial Strategy

Further to your pre-action protocol letter of 26 September 2017 ("PAP letter"), we write to explore whether you would be amenable to an extension of time for the Secretary of State's response.

The Department for Business, Energy and Industrial Strategy is carefully considering the issues set out in your detailed and lengthy PAP letter. However, so that the matters raised by your clients can be properly addressed in a reply, we would be grateful for a further two weeks i.e. until close of business on 24 October 2017, to respond.

As you are aware, the Court expects the parties to co-operate with one another at pre-action to refine the issues between them and to enable them to make informed decisions as to whether litigation is necessary.

We consider that in all the circumstances that this request is a reasonable one, and look forward to hearing from you with confirmation that you are content to agree this brief extension of time.

Yours sincerely

James Barry
For the Treasury Solicitor

D +44 (0)20 7210 2982
F +44 (0)20 7210 3001
E james.barry@governmentlegal.gov.uk

Lee John-Charles - Head of Division
Gary Howard - Deputy Director, Team Leader Litigation B5

