RICHARD SLADE

& PARTNERS LLP

Mr Alex Wilson
RPC
Tower Bridge House
St Katherine's Way
LONDON E1W 1AA

16 June 2026

Our Ref: RJS
Your Ref:
Email: richard.slade@richardslade.com

Dear Alex

MR SIMON GROSS
MS ALEXA BULL

I am replying to your letter of 30 April 2026. I wanted to reply personally. I am sorry that that has taken a little time.

I can resolve one issue very easily. My colleagues' previous correspondence was not sent under the Pre-Action Protocol. Rest assured that if we get to that stage, any correspondence will be clearly labelled. Prior to that, my preference is to resolve matters consensually, if possible.

I have, over the last few days, watched various videos featuring your client online. I formed the impression that she wants and intends (and deserves) to be taken seriously. I hope, therefore, that she will take the observations which I make in this letter seriously and that we may find a way of resolving the matter.

Standing back, my principal objections to the Article are, first, that it fails to recognise that there are, normally, two sides to a story and puts forward allegations as if they are facts and, second, that it seeks to present a current picture but does so on the basis of very old information. Neither of those two approaches is intellectually honest and I think that your client ought to recognise that.

In relation to my first complaint, it does not really matter whether an allegation is made privately or reported publicly. It is, still, an allegation. Describing it as a "testimony" does not change that. Unless a person in the position of your client puts the allegation to the person who is the subject of it, inviting commentary, it will seldom be possible to get to the bottom of the question whether the allegation is true or not. If an allegation underlies a dispute about money and the dispute is then settled, it is even more difficult to establish whether the allegation is true or not.

In relation to the second complaint, your client refers to "a recurring pattern of concerning behaviour" and "the persistence of these practices". Those words indicate a state of affairs which is said to exist now. The point is put beyond doubt by the conclusion: "This is particularly concerning given that [my client] has posted casting calls for new shows … as recently as September 2025." But the information on which your client relies to justify her assessment is, in the main, more than ten years old, relating to the company which was put into liquidation in 2015. She also suggests, in her heading, that my client is the subject of "industry concerns". She refers in the body of the Article to steps allegedly (but not in fact) taken by the trades union, Equity. She is, clearly, unaware that my client is in frequent contact with Equity and has a good relationship with Equity as a body and with a number of its officers and staff.

I note with some surprise that you state in your letter that the Article is not defamatory. I find that, with respect, to be completely unreal. The Article begins with a disclaimer that it is not intended to harass or defame. I suggest that it is perfectly obvious that such a disclaimer would not have been included had it not been appreciated that there was a very real risk that the Article would constitute harassment and defamation. Most articles which claim to be, in some sense, "reporting" do not contain such disclaimers.

In reality, the content of the Article is, obviously, defamatory. Its meaning is that my client is dishonest, domineering and abusive to young or inexperienced actors who are scarcely able to defend themselves, both in terms of his conduct towards them and his attitude to payment (which are, completely illogically, presented by your client as connected characteristics), and that, in particular, he threatens to make claims in defamation without foundation and without any honest belief in their truth. That is a defamatory meaning. It has caused my client serious harm. Indeed, it is difficult to see how it could be said that it would not have done so or that that was not the intention of the author. As to defences, the defence which your client would have to raise is that the statements are true. There she has a problem in that she is relying on information which is more than a decade out of date (and, incidentally, largely wrong) and allegations which she has never put to

my client but simply accepted as true without investigation. She is also compromised by maintaining in the Article a Facebook posting which was deleted by its author following a settlement with my client. Her doing so has nothing whatsoever to do with "accuracy and transparency". Had it, she would have sought to attain accuracy and transparency by putting the allegations to my client and "reporting" both the allegations and my client's response to them. She has not done that. My impression is that she seeks to harass and defame my client but, rather dishonourably, to do so by distancing herself from the material by re-publishing words whose author was not prepared, ultimately, to stand by them.

For the reasons set out in this letter, I think that your client should look at the Article afresh and do so seriously and honestly on the basis that that is the way in which she expects people to react to her own work. I invite her to do so. I believe that if she does, she will conclude, as I do, that, however strongly she may hold the views she does, its contents cannot be supported objectively and that it should be removed. If she reaches that view, that will be the end of the matter. Everyone makes mistakes and I hope that she is honest enough to accept that the Article was an error of judgment on her part. If she does not, then I am perfectly prepared to re-cast this letter as a letter under the Pre-Action Protocol and to back it up with court proceedings. I would, however, regard that, personally, as a shame. My assessment is that your client is, generally, an honest and serious individual and that there ought to be a mutually acceptable accommodation here, which does not offend either party. I am perfectly happy to speak to you to attempt to identify it – in the interests of both our clients.

May I hear from you, please, within the next fortnight.

Yours faithfully



RICHARD SLADE & PARTNERS