

Mark Anthony Taylor Kalamata Billington Lane Derrington Stafford ST18 9LR

5 February 2015

Dear Mr Taylor

## Re: Precious Metal Manipulation lawsuit A07YQ334

We refer to your email dated 25 January 2015.

As requested in our previous correspondence, please can you direct all future correspondence to the following address:

Litigation and Regulatory Enforcement

Level 22

8 Canada Square

London

E14 5HQ

We do not accept that we have been validly served with your claim and we are therefore not acknowledging or accepting it in any way until you do so. For the avoidance of doubt, we do not accept service of proceedings via email and pursuant to the Civil Procedure Rules you are required to obtain our consent to accept service via email. You have not sought to obtain that consent from us and we refuse to provide it. If you seek to issue proceedings against HSBC Bank plc, please do so at our registered address. We have provided a copy of this letter to the Court so they are aware of our position.

Notwithstanding the above, we note the contents of your correspondence. We do not consider that you have made out any claim against us that has any basis in law. Your letter fails to identify:

- a) Any legal basis for the allegations you make against us;
- b) Any legal basis on which you say we are liable to you for any loss you may have incurred;
- c) The basis on which you say that any act or omission by us (whether actionable or otherwise) has caused you loss; and

HSBC Bank plc HBEU Legal, Level 22, 8 Canada Square, London E14 5HQ



d) Any documentary or other evidence on which you intend to rely other than generic media reports or publicly available statements.

We also note that you seek damages by way of a payment in bullion. As we made clear in previous correspondence, the Court has no power or jurisdiction to order a payment of damages in anything other than currency, whatever reasons you may have for wishing to receive an award in another form. For the avoidance of doubt, we reiterate that we entirely reject any allegation of wrongdoing, or of liability to you on the part of the Bank.

Pending any such valid claim being served, we reserve the Bank's position in full.

Yours sincerely

**HSBC** Bank Plc

Litigation and Regulatory Enforcement 8 Canada Square Canary Wharf

London E14 5HQ