**To**

**Anthony Glynn**

**#40 Peas Trace**

**Coura Road**

**El Dorado**

Dear Sir

**RE: Repayment of deposit and charges due to the breach of contract of a sale of Motor vehicle Nissan Serena White, 200cc, chasis no.#c25 - 213885**

**PRE-ACTION PROTOCOL ISSUED IN ACCORDANCE WITH PRACTICE DIRECTION DATED THE 15TH DAY OF NOVEMBER, 2005 MADE BY THE CHIEF JUSTICE OF TRINIDAD AND TOBAGO.**

We act on behalf of Kertis Blake and Kathleen Llewellyn Blake, of #50 Dookie Singh Trace, St.Augustine, Trinidad

This pre Action protocol is issued in accordance with the practice Direction dated the 15th of November, 2005 made by the Judiciary of Trinidad and Tobago.

**FACTUAL SCENARIO**

We were instructed by our clients that

1. On or about 11th of October, 2010, our clients had an agreement with you to obtain a Motor vehicle , 2007 Nissan Serena, white, 2000cc, Ac Automatic gasoline, chasis no. #c25 – 213885 for a price of $160,000.
2. During the Agreement my client have indicated to you the purpose for the vehicle is to run it as Taxi.
3. Our Clients paid a sum of $59,000 as part of the payment. A copy of the cheque is hereto attached.
4. Upon enquires made by our clients, you told them that the said vehicle will be shipped on the 25th of the October, 2010 and will take 6 weeks to arrive and the estimated date of arrival is 22nd of November, 2010. But however the Bill of lading the date of arrival is 14th of November, 2010.
5. My clients instructs us that you demanded the rest of the purchase price. My clients approached the bank for the rest of the money and were told that the vehicle should be in the purchase compound which would be your compound and not the port.
6. They further instructs us that you stopped answering your phone stopped contacting our clients
7. Upon investigations made by our clients they found out that you had not port licences and hence you breached the agreement in obtaining the said vehicle.

**In the Circumstances my client seeks the following relief**

1. **$59,600 which was paid on the 14th of September.**
2. **Loss of not having a taxi $24,000**
3. **Bank charges charged to obtain a loan, which is $2000**
4. **Bank interest at the rate of 10.50% per annum. The interest so far for one month is $521.**
5. Cost.

**Legal proceedings to be issued**

Please be advised that should you fail and or neglect to respond to this Pre-Action Protocol, Legal proceedings would be issued within 14 days, which could incur further costs for you and also embarrassment.

I am required by the Practice Direction issued by the Judiciary on the 15th day of November, 2005, in respect of Pre Action protocol pursuant to the Civil proceedings Rules, 1998 (as amended) to remind you of the relevant provisions so that you will understand your responsibilities and obligations in respect of my Client’s claim as herein above stated and the powers of a judge of the High Court to impose sanctions, i.e legal costs on any party who fails or omits or neglects to follow and comply with these Pre Action Protocols.

Please be guided accordingly

Yours in Service,

**Christopher Ross Gidla**

Attorney at law