29th May, 2012

**To**

**NIGEL RAMSARAN**

**Suite 105, Precision Place**

**43 & 45 Woodford Street,**

**Port of Spain**

**Trinidad**

**Dear Mr. Ramsaran**

**Re: Purchase of Plot # 2 Park land Gardens.**

**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 Ms. Partricia Joanne Simon of #86 Duke Street, Port of Spain.**

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.

We are instructed by our client to claim against you Seventy thousand dollars together with interest at the rate of 10% per annum and two thousand dollars cost of this letter.

We are instructed that you executed an agreement for the sale of above property on 21st of March, Two thousand and eleven. Our client has paid $70,000 as per the agreement.

As per the agreement (clause 2) you supposed to develop the property by paving the roads, construction of drainage, and installation of utilities including water and electricity. Our client instructs us that there is no paving of roads done, and just a box drains were constructed without the full extent of the drainage, and the water and electricity were not installed.

As per the clause 6 you are supposed to provide all the necessary approvals from town and country, water and sewerage authority, drainage division of the ministry of works and transport. These were not obtained and hence constituted a further breach of the agreement.

As per the clause 8 of the agreement the completion date is 31st of January, 2012 and even though the said date is passed and our client is ready and willing to complete the agreement you did not do your part of the agreement and hence we ask you to return the amount of $70,000 plus the interest at the rate of 10% per annum including $2,000 for this letter within 14 days the receipt of this letter.

**Failure to do so will result in legal proceedings being commenced against you without further notice.**

Please be guided accordingly

Yours in Service,

**Christopher Ross Gidla**

Attorney at law