

Alfred Boddy

Queen's University - Herston

Castle - Shankland  
correspondence

1993

|                             |      |
|-----------------------------|------|
| QUEEN'S UNIVERSITY ARCHIVES |      |
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ALFRED BADER FINE ARTS

DR. ALFRED BADER

October 20, 1993

ESTABLISHED 1961

Via Fax 011 44 71 248 4212

Mr. David Shankland  
Lovell White Durrant  
65 Holborn Viaduct  
London EC1A 2DY  
England

Dear Mr. Shankland:

Thank you so much for your fax of today. It is so good to know from your fax and a phone call from Mrs. Whistler that Queen's finally owns the castle. Congratulations, and many thanks for all your help.

Isabel and I look forward to arriving in Bexhill on November 12th, and I believe that we will be able to attend Guinness Mahon's party on November 16th. Whether or not we will be able to get to your party at 6:00 p.m. on the 17th depends on the timing of Sotheby's old master auction in Amsterdam. I do not plan to go to Amsterdam, but to bid by telephone, and I will not know until I see the catalog whether the sale is in the morning, afternoon or evening.

Best wishes.

Sincerely,

c: Mrs. Jane Whistler

*By Appointment Only*  
ASTOR HOTEL SUITE 622  
924 EAST JUNEAU AVENUE  
MILWAUKEE WISCONSIN USA 53202  
TEL 414 277-0730 FAX 414 277-0709

20-OCT-1993 17:21

FROM LOVELL WHITE DURRANT

TO 01014142770709

P.002

C Taylor  
G J B Hutchings  
W G Watkins  
M P Ansell  
A Tugh Thomas  
D F Gray  
H N Henshaw  
G K Roland  
K N H Gould  
M B Macmillan  
P R Phillips  
M D Shankland  
C J Hansen  
T F M Olsen  
D S Baker  
A J White  
J B Gordon  
M P L Wright  
W I R Ward  
P G Harricks  
R A Strachan  
A D Walker  
T A R Curran

I R H Kitching  
D C Mace  
N J Pagan  
R J Anderson  
P G H Cullins  
C F Moore  
D B D Murdy  
C P Renicul  
D Sparks  
C P Dozson  
C F Grewson  
M B Hutchings  
A S Lamplough  
J D Smith  
A P F Williamson  
A W Ryrie  
A Gamble

S & F Glennie  
D Macfarlane  
S W Polho  
M J Seymour  
M F Stacombe  
N P Trewe  
L O F Hill  
C G Pike  
J G Trotter  
C V S Mansfield  
G B B Yewatt  
R I Kidby  
D Simler  
A S Gordon  
N D Campbell  
J F Powell  
J Cooper  
S M P MacDonough  
N R Macfarlane  
R H Ninnesham  
A J A Penston  
J E Pheasant

# LOVELL WHITE DURRANT

65 Holborn Viaduct London EC1A 2DY  
Telephone 071 236 0066

Dx Box 57 London / Chancery Lane  
Fax 071 248 4212 / 236 0084 / 248 7273  
Telex 887122 LWD G

P P Sherrington  
I R Smyth  
D A Cox  
A C R Davis  
K Cairnes  
D A Harper  
D A Harris  
D C Kelly  
A G Murray-Jones  
J S Rigler  
M A Stanger  
R T Whitehouse  
H J H Pearson  
Q D R Archer  
S L Burns  
P A Oldman  
G A Pruedler  
R A Shean  
R J L Stones  
G Watson  
J T Young  
L M Ainsworth

C M Allinson  
A M Dimdale-Gill  
P J Fisher  
M Gallimore  
F P A Glason  
M S Golding  
D A Latham  
R H R McKean  
D I Moss  
R Rowe  
N M G Brumfield  
D A Gregory  
G N C Livingstone  
M S Matheou  
J McDermott  
J H Reeves  
L Wilner  
D D Gershuny  
D J Hunter  
D Lane  
M C McCaw  
C D Shi Penney  
E T Slattery

J M Bradshaw  
L A Crowley  
J Davidson  
L R Dunlop  
R M Haleath-James  
J M Samsworth  
C H D Smith  
K S Ashman  
J N Cole  
L M Garside  
R M Grant  
D P Harlock  
P L Quenby  
P L Taylor  
D S Cheung  
M Compagnoni  
M J Costa  
R P Folie  
G P K Huntley  
G J Sinfeld  
Consultant  
R S Reston

Our ref P2/MDS

Your ref

20th October 1993

By fax

Dr Alfred and Mrs Isobel Bader  
Alfred Bader Fine Arts  
Suite 622  
924 East Juneau Avenue  
Milwaukee  
Wisconsin 53202  
USA

Dear Dr and Mrs Bader

Herstmonceux

I thought you would like to know that we completed the purchase of Lots 1, 4, 6 and 7 of the Herstmonceux Castle Estate today. Dr Bader may wish to complete that chapter of his opus accordingly!

I understand that work should start on Monday on Bader Hall (formerly the West Buildings).

Jane Whistler tells me that you will both be in England in the middle of next month. It would give me great pleasure if we were able to meet up whilst you are over here, either in Sussex or in London.

Jane tells me that she, you, and I have been invited to Guinness Mahon's party on 16th November. I look forward to seeing you there.

Jane is coming to a party which my firm is giving for Queen's and Dr Barnard and other clients here at 6 pm on 17th November and it would also be delightful if you would both be able to come to that.

With very best wishes.

Yours sincerely

M D Shankland

the 1990s, the number of people in the world who are undernourished has increased from 600 million to 800 million.

There are a number of reasons for this. One is that the world population has increased from 5 billion to 6 billion.

Another reason is that the world population is becoming more urbanized. This means that more people are living in cities, where food is more expensive.

A third reason is that the world population is becoming more aged. This means that more people are living longer, which increases the demand for food.

There are also a number of other factors that contribute to the increase in undernourishment, such as the increase in the number of people who are living in poverty.

One of the main reasons for the increase in poverty is the increase in the number of people who are living in developing countries.

Another reason is the increase in the number of people who are living in rural areas, where food is more difficult to come by.

There are also a number of other factors that contribute to the increase in poverty, such as the increase in the number of people who are living in slums.

One of the main reasons for the increase in slums is the increase in the number of people who are living in cities.

Another reason is the increase in the number of people who are living in informal settlements, where there is no access to basic services.

There are also a number of other factors that contribute to the increase in slums, such as the increase in the number of people who are living in informal housing.

One of the main reasons for the increase in informal housing is the increase in the number of people who are living in cities.

Another reason is the increase in the number of people who are living in informal settlements, where there is no access to basic services.

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Tel: 071 236 0066  
 Fax: Please reply to number below

International:  
 Tel: +44 71 236 0066

# LOVELL WHITE DURRANT

65 Holborn Viaduct  
 London EC1A 2DY

A list of partners is available for  
 inspection at the above address

|                     |   |                                 |                   |
|---------------------|---|---------------------------------|-------------------|
| To                  | Dr Alfred and Mrs Isobel Bader  | Fax number(s)                   | 0101 414 277 0709 |
| Company/Firm        | Alfred Bader Fine Arts  |                                 |                   |
| Town/Country        | Wisconsin, USA  | No. of pages (inc. front sheet) | 2                 |
| Copies to           | Dr David Barnard - 0101 613 545 6453<br>Mrs Jane Whistler - 0323 832562 |                                 |                   |
| From                | David Shankland   | Date                            | 20th October 1993 |
| Reply to fax number | 071 248 7273 (International: +44 71 248 7273)                           |                                 | U                 |

Please see attached.

| For Receiving Fax Operator   | For Internal Use              |
|--|-------------------------------|
| Please deliver this document immediately to addressee.<br>If he/she is not available please telephone originator.<br>Please telephone our telecoms room (Ext. 5432) if any pages<br>are missing or illegible.<br><b>Confidentiality.</b> The information in this fax is<br>confidential. It is intended only for the use of the named<br>recipient. If you are not the intended recipient, please<br>notify us immediately so that we can arrange to collect this<br>fax from you. You should not disclose the contents to any<br>other person, nor take any copies. | Client /                      |
|  | Matter no:                    |
|  | Originator's location: BB 519 |
|  | Extension: 2152               |

LOVELL  
WHITE  
DURRANT

THE  
MURDER OF  
MRS. T. S. BARKER

CHAPTER I

It was a hot, sultry day in the month of June, and the sun shone down upon the city of New York with a fierce, unrelenting heat. The streets were filled with a throng of people, many of whom were dressed in the latest fashion of the day. The air was thick with the smell of hot asphalt and the distant sound of a fire siren could be heard in the distance.

At the corner of Broadway and 42nd Street, a group of people were gathered, their attention focused on a man who was being escorted by several police officers. The man was dressed in a dark suit and a white shirt, and he looked somewhat disheveled. He was being led towards a police station, and the crowd of people followed him with curiosity and interest.

The man's name was Lovell White Durrant, and he was a well-known figure in the city. He had been involved in several high-profile cases, and his name was often mentioned in the newspapers. The police officers who were escorting him were looking at him with a mixture of suspicion and concern.

As the group moved down the street, a woman in a long, flowing dress and a wide-brimmed hat caught the eye of the crowd. She was walking with a graceful, confident stride, and her presence seemed to draw the attention of everyone around her. She was Mrs. T. S. Barker, and she was the wife of a prominent businessman.

The woman's dress was a masterpiece of fashion, and she carried herself with an air of elegance and sophistication. She was looking towards the man being escorted by the police, and her expression was one of concern and worry. She seemed to know something about the man, and she was determined to find out what was going on.

The crowd of people followed the woman and the man, and the scene became a spectacle. The police officers were looking back over their shoulders, and the woman was walking with a determined purpose. The man was looking down at the ground, and he seemed to be in a state of distress.

The scene was a mix of chaos and order, and it was a clear indication that something significant was about to happen. The woman's presence in the crowd was a sign of her importance, and the man's arrest was a sign of the danger he was in.

CHAPTER II

The woman's name was Mrs. T. S. Barker, and she was the wife of a prominent businessman. She was a woman of great wealth and influence, and her name was well-known in the city. She was looking towards the man being escorted by the police, and her expression was one of concern and worry.

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FAX FROM

DR. ALFRED R. BADER  
Suite 622  
924 East Juneau Avenue  
Milwaukee, Wisconsin 53202  
Telephone 414-277-0730  
Fax No. 414-277-0709

August 27, 1993

To: Mr. David Shankland  
Lovell White Durrant  
Fax 011 44 71 248 7273

Dear Mr. Shankland:

Thank you for your fax of today.

David Smith told me that Queen's signed the documents on August 24th.

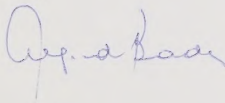
I just wrote to Dr. Jeffrey Cooper, offering to negotiate for the purchase of Lots 2, 3 and 5 which are under option, as an additional gift to the university. The bank will certainly not want to sell in this calendar year, but might be persuaded next year.

The chapter on the purchase of the castle is written and now requires only a few sentences to describe the happy ending.

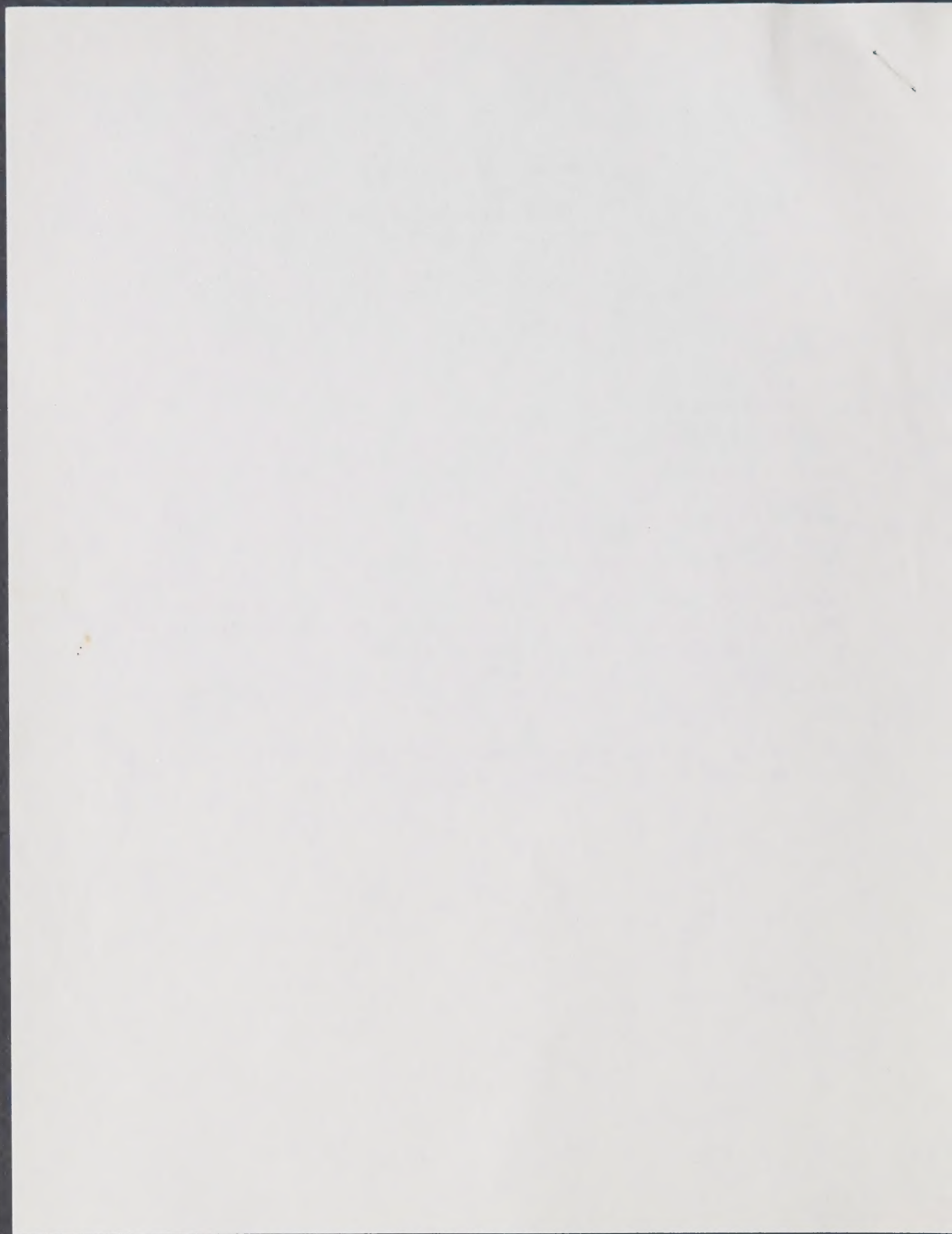
Isabel and I will be in Bexhill from early November until Christmas, and I will be in London many times during our stay. It would be a great pleasure if we could get together.

Best wishes.

Sincerely,

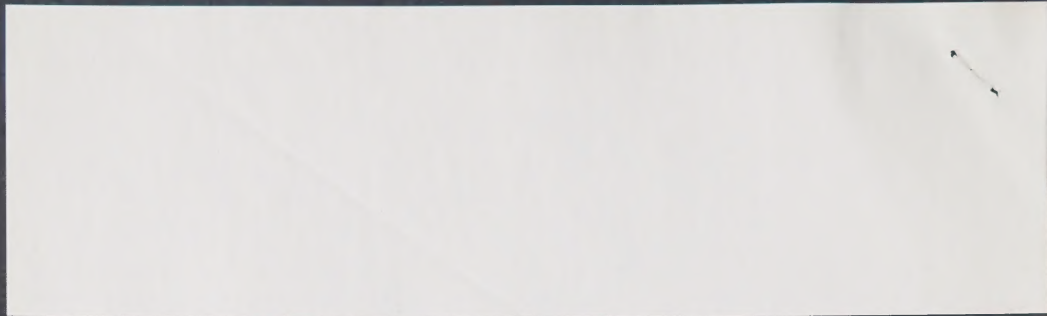
A handwritten signature in blue ink, appearing to read "Alfred R. Bader".

c: Principal David Smith

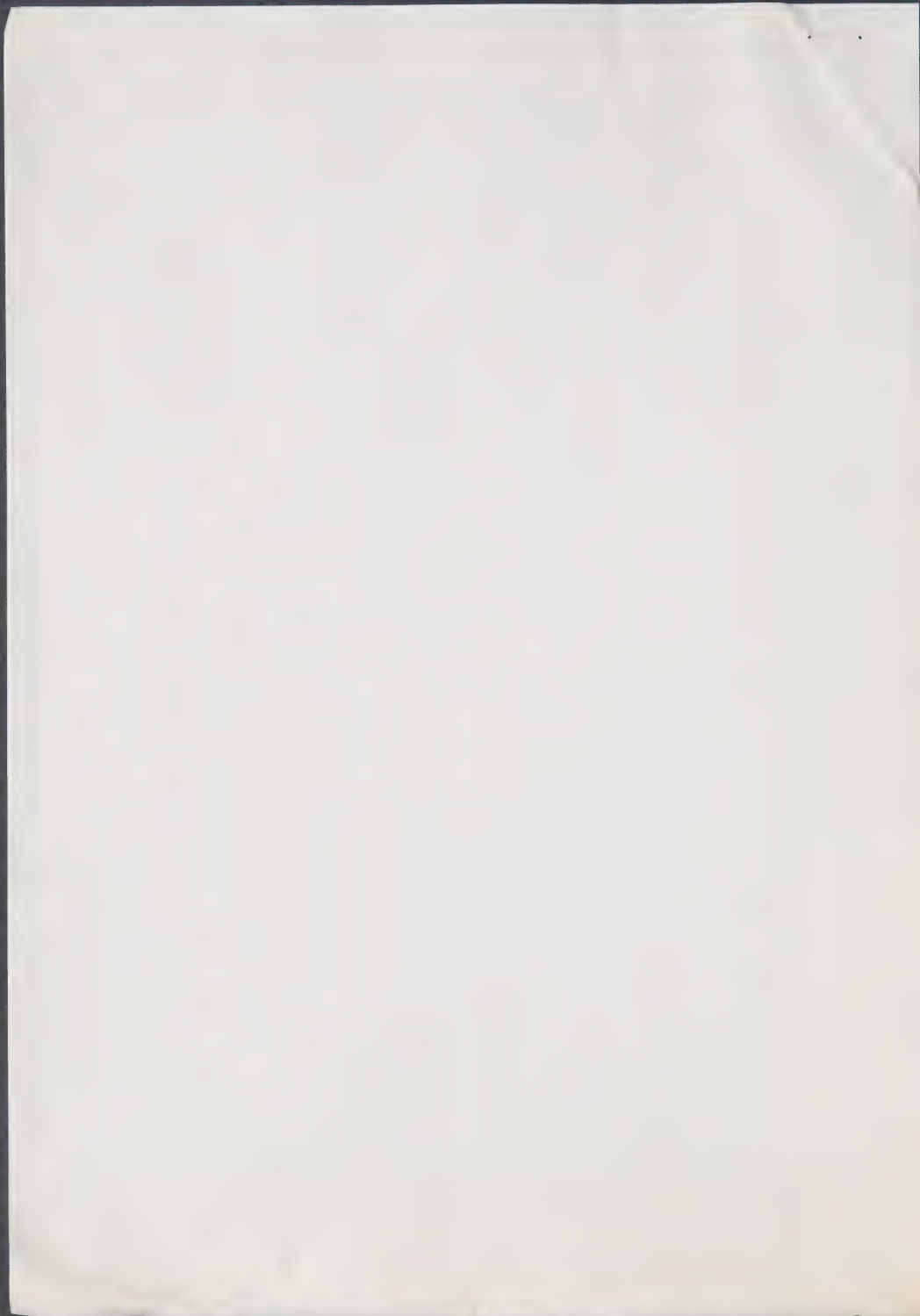












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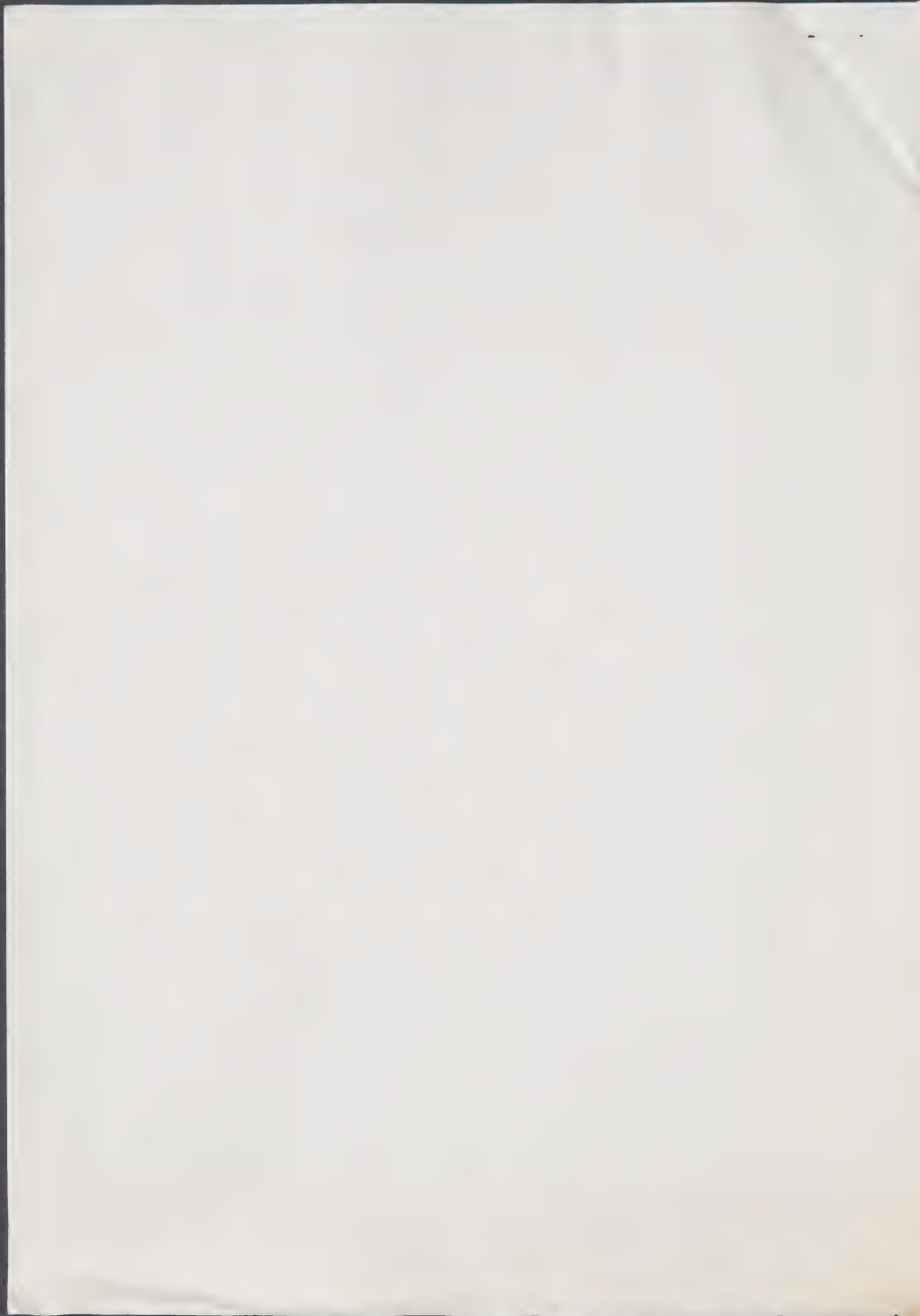
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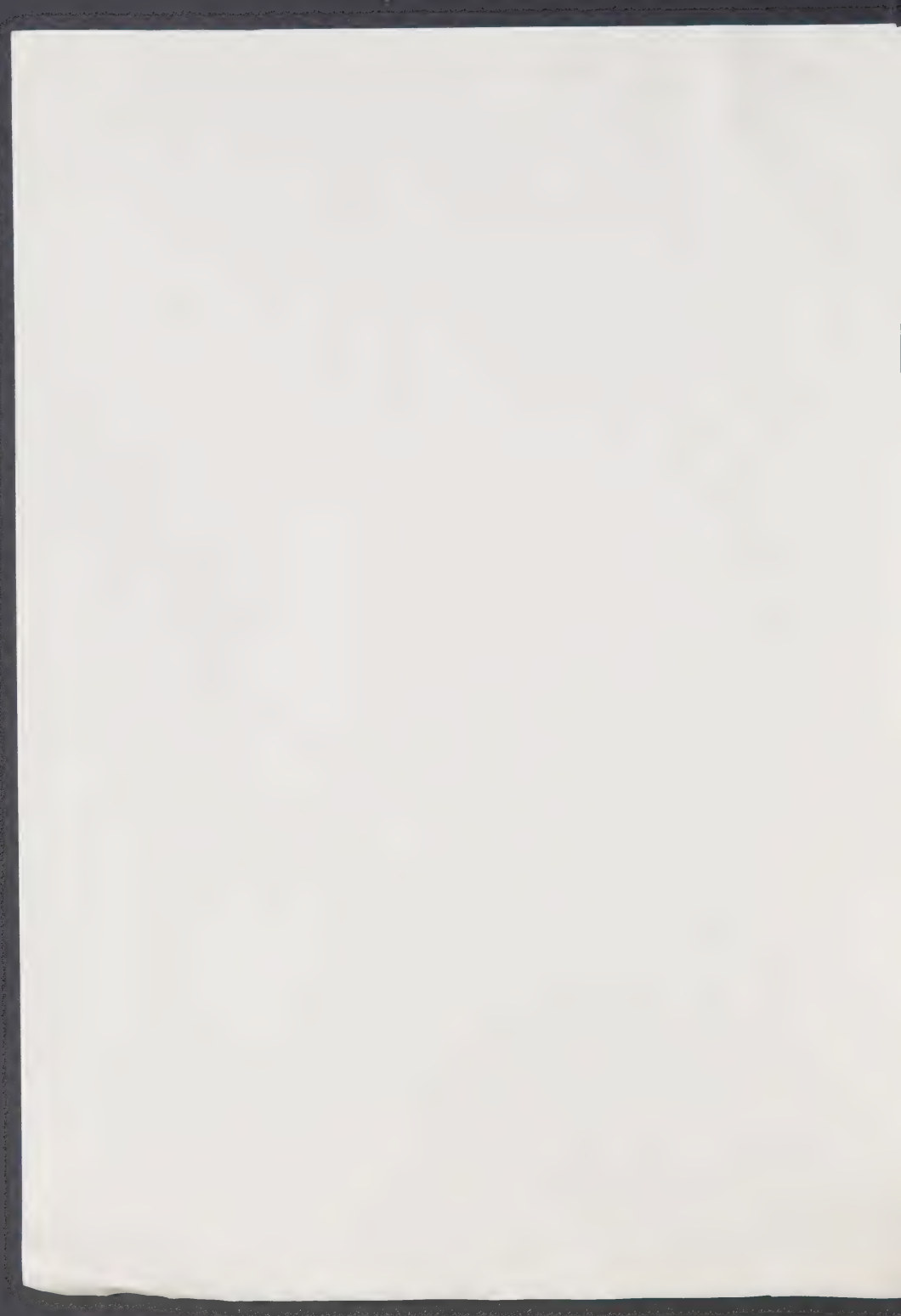
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1875

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TELEPHONE CONVERSATION RECORD

A. BADER

DATE Jan 18, 1993

PERSON CALLING David Strickland

TELEPHONE NO.

Quinn Mabon demands

Answer

(1) Ask 1 guarantee Quinn's performance !!

No

(2) Changing option - 2 & 5 years - to first refusal.

No

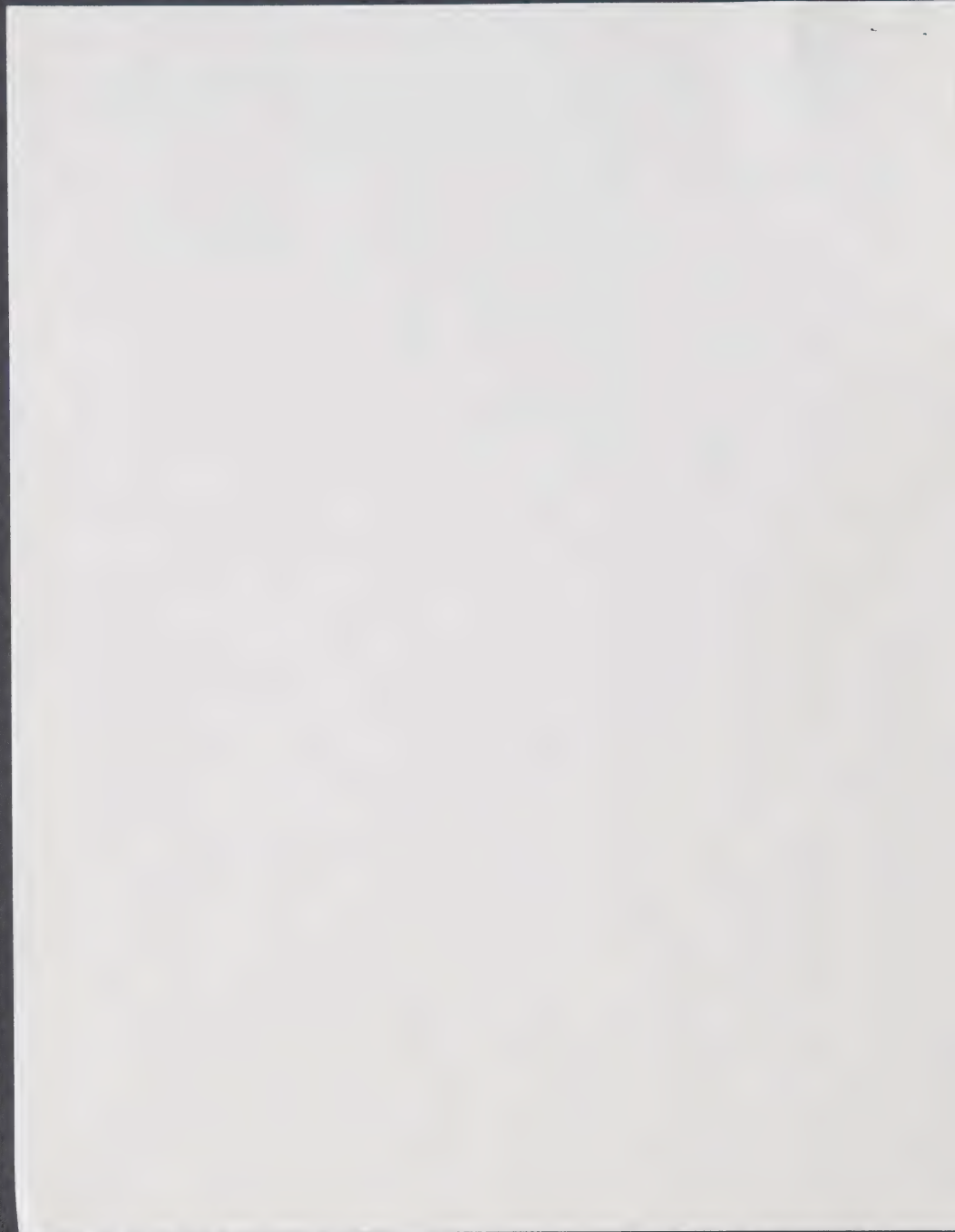
HM outright still possible

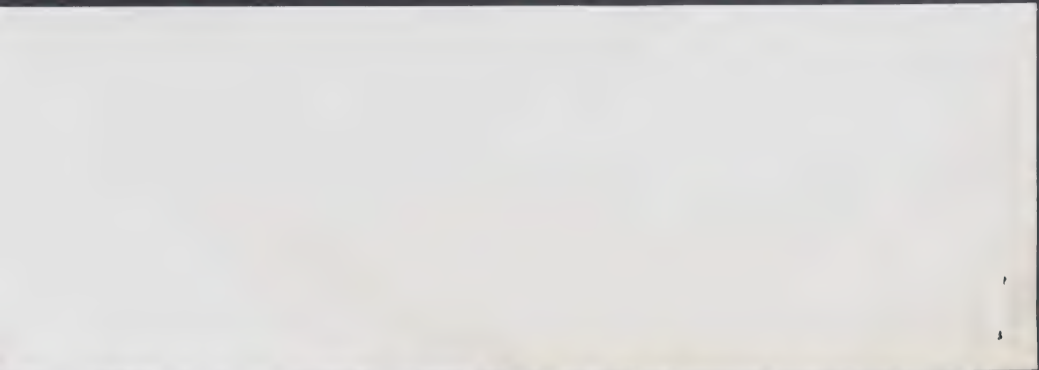
(3) £ 2000/day between planning permission and final approval

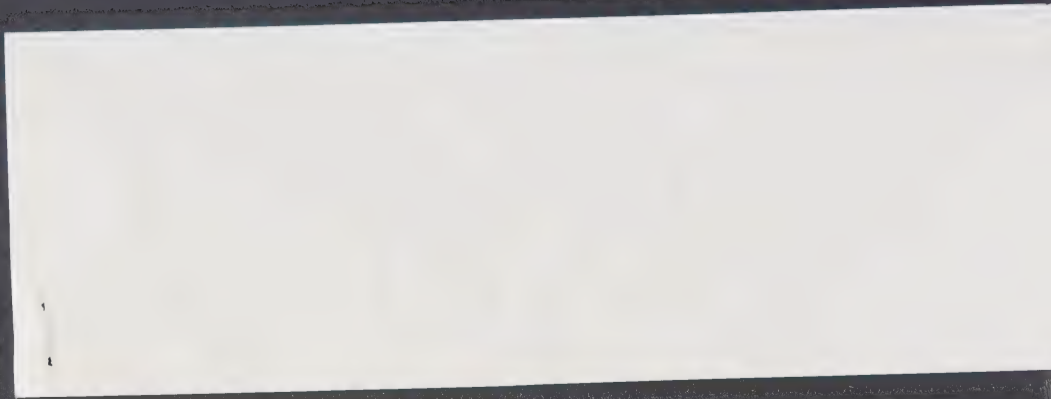
No

instead £ 3.8 M into escrow account, with interest to G. Mabon.

cc Principal David Smith







FAX FROM

1/2

DR. ALFRED R. BADER  
Suite 622  
924 East Juneau Avenue  
Milwaukee, Wisconsin 53202  
Telephone 414-277-0730  
Fax No. 414-277-0709

January 13, 1993

To: Mr. David Shankland  
Lovell White Durrant

Fax No. 011 44 71 248 4212

Dear Mr. Shankland:

In response to your fax of January 12th, I am a U.S. citizen domiciled in the United States. My wife is a Canadian citizen holding a U.S. Green Card and domiciled in the United States.

Isabel does have some British income; specifically, her pension as a school teacher, and pays U.K. tax on it.

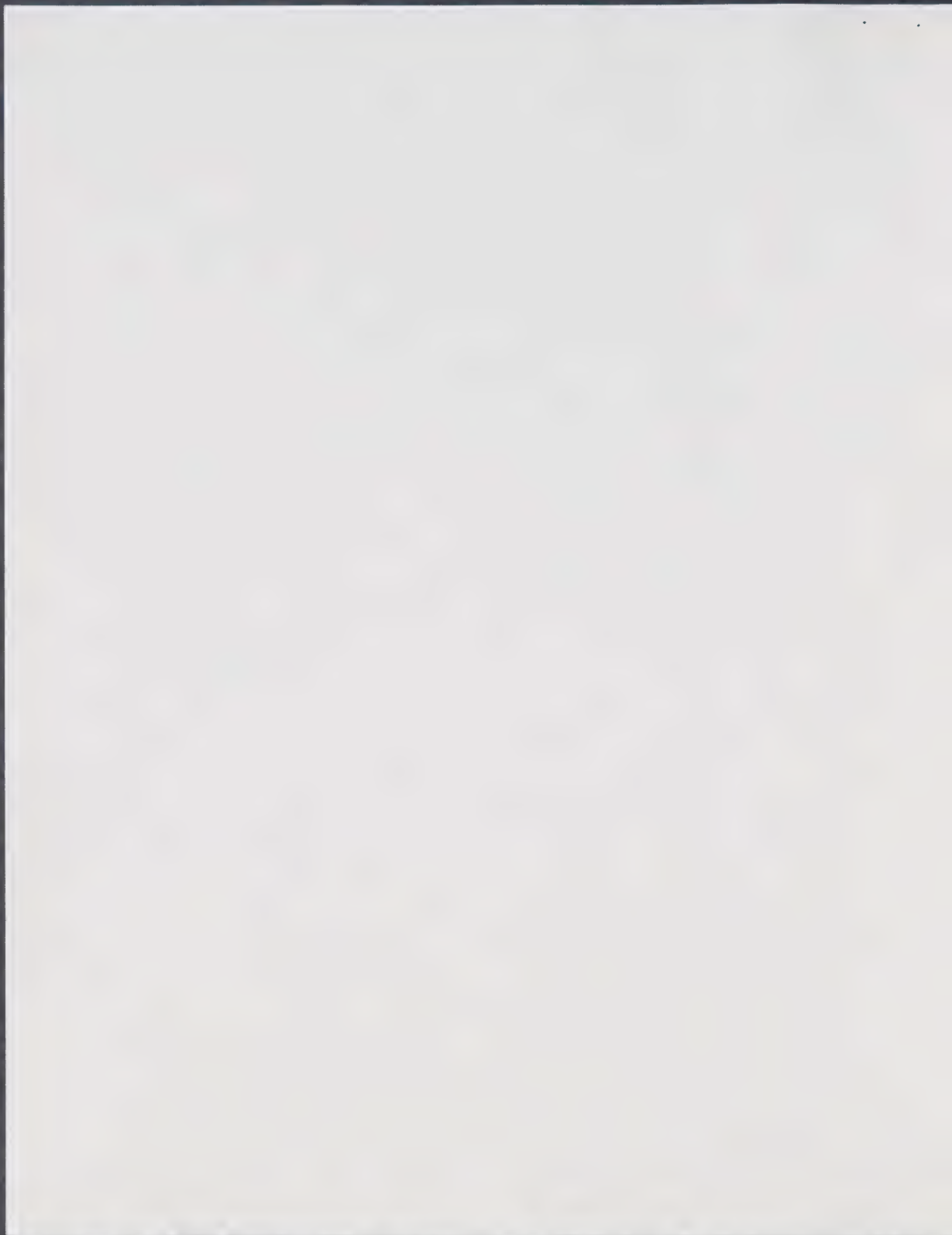
Best wishes.

Sincerely,



c: Principal D. Smith, Queen's University (fax)  
Jere McGaffey, Esq., Foley & Lardner (fax)

(Dictated by Dr. Bader and  
signed in his absence)



FAX FROM

DR. ALFRED R. BADER  
Suite 622  
924 East Juneau Avenue  
Milwaukee, Wisconsin 53202  
Telephone 414-277-0730  
Fax No. 414-277-0709

January 12, 1993

To: Dr. Alfred Bader - c/o Mr. Bert van Deun  
FAX 908 828 3912

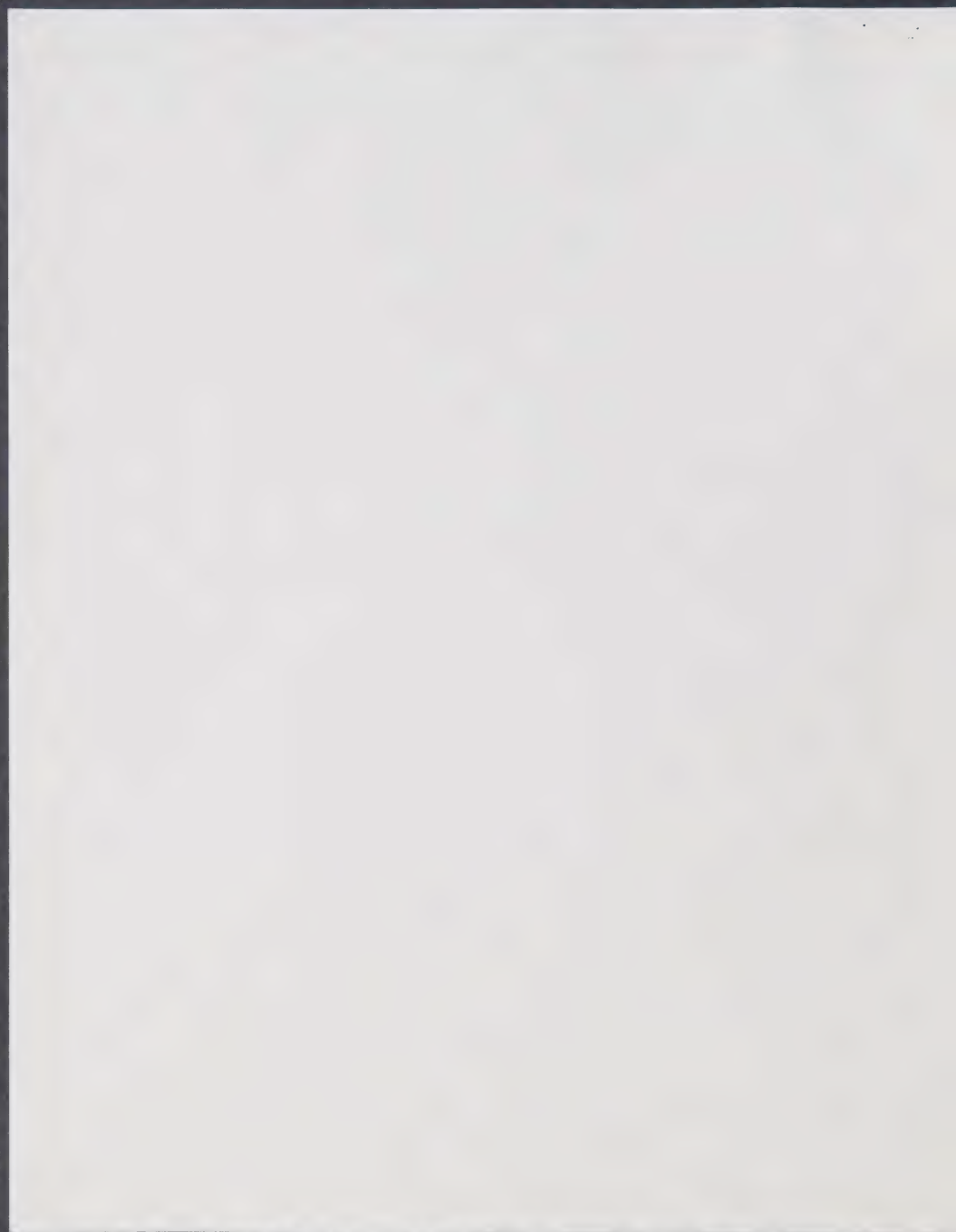
Dear Sheila

Would it be possible to get the following letter to Dr. Bader, please. If the van Deuns have a fax at home and Bert will not return to this office, perhaps you could fax to the house.

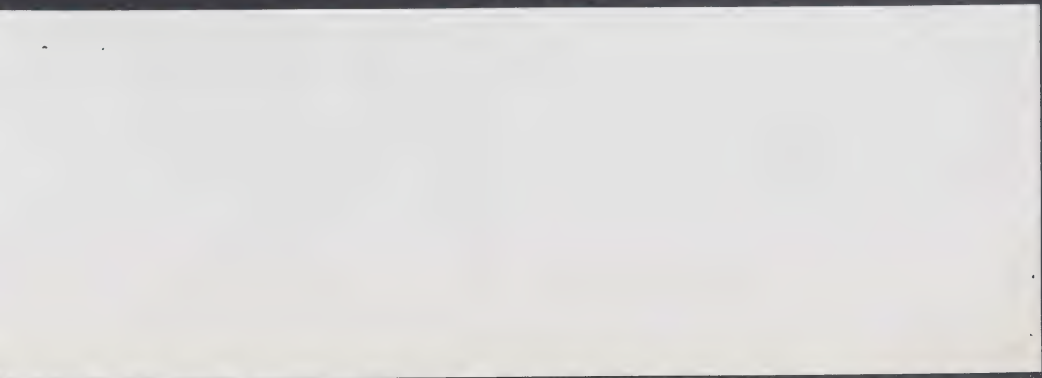
If the van Deuns have a home fax, would it be possible to furnish that number to me?

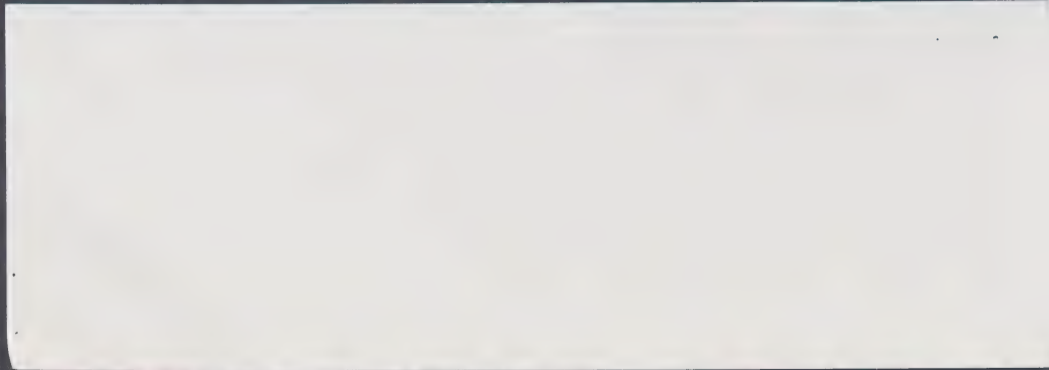
Thank you,

*Marilyn*









C. Taylor  
G. J. B. Hutchings  
W. G. Watkins  
M. P. Anscombe  
A. Pugh-Thomas  
D. F. Gray  
H. N. Henshaw  
G. K. Toland  
R. N. H. Gould  
M. B. Maunsell  
P. R. Phillips  
M. D. Shankland  
C. J. Hanson  
T. F. M. Olsen  
D. S. Baker  
A. J. White  
J. B. Gordon  
M. P. L. Wright  
W. I. R. Ward  
P. C. Harrocks  
B. A. Strachan  
A. D. Walker

T. A. R. Curran  
J. R. H. Kitching  
D. C. Mace  
N. J. Bagan  
R. J. Anderson  
P. G. H. Collins  
C. I. Major  
D. B. D. Moody  
C. P. Remoul  
D. Spaulis  
C. H. Davies  
D. Harrington  
R. H. P. Sligh  
A. D. Lickorish  
P. L. Warrack  
L. A. MacDonagh  
K. Dodson  
C. K. Orlinson  
M. B. Hutchings  
A. S. Lamplough  
I. D. Smith  
A. P. F. Williamson

A. W. Royle  
A. Gambia  
N. S. F. Givensie  
D. Madalane  
S. W. Rolito  
M. J. Seymour  
M. P. Stancombe  
N. P. Prome  
M. O. F. Hill  
C. L. Pike  
J. G. Trotter  
C. V. S. Manduca  
G. B. B. Yeoman  
R. J. Kildy  
D. Simler  
A. S. Gordon  
N. D. Campbell  
J. Cooper  
S. M. P. MacDonagh  
N. R. Macfarlane  
G. J. McQuater  
R. H. Nineham

# LOVELL WHITE DURRANT

65 Holborn Viaduct London EC1A 2DY  
Telephone 071 236 0066

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Fax 071 248 4212 / 236 0084 / 248 7273  
Telex 887122 LWD G

*Fax 71-248-4212*

A. J. A. Perston  
J. E. Theasant  
P. P. Sherrington  
J. R. Smyth  
D. A. Cox  
A. C. R. Davis  
K. Cairns  
D. A. Harper  
D. A. Harris  
D. C. Kelly  
A. G. Murray-Jones  
J. S. Rigby  
M. A. Stanger  
E. C. J. Wells  
R. T. Whitehouse  
H. J. H. Pearson  
Q. D. R. Archer  
S. L. Burns  
P. A. Oldman  
G. A. Frouder  
R. A. Sheen  
R. J. L. Stones

G. Watson  
J. T. Young  
L. M. Ainsworth  
C. M. Allinson  
A. M. Dinsdale-Gill  
P. J. Fisher  
M. Gallimore  
F. P. A. Gacion  
M. S. Golding  
D. A. Latham  
R. H. R. McKean  
D. J. Moss  
H. Rowe  
N. M. G. Bromfield  
D. A. Gregory  
G. N. C. Livingston  
M. S. Mathew  
J. McDermott  
J. H. Reeves  
L. Winer  
P. D. Gerahony  
D. J. Hunter

D. Lane  
M. C. McCaw  
C. D. Sil Penney  
R. S. Reason  
E. T. Slattery  
J. M. Bradshaw  
L. A. Crowley  
J. Davidson  
L. R. Dundlop  
R. M. Huleatt-James  
J. M. Samsworth  
C. W. D. Smith  
K. S. Ashman  
J. N. Cole  
L. M. Garnde  
R. M. Grant  
D. F. Harlock  
N. F. Quenby  
R. Rille  
Consultant  
W. F. Richards

Our ref F4/VAR/HNH/SAF/9504p

Your ref

*2/2*

12th January, 1993

Dr. Alfred Bader  
Alfred Bader Fine Arts  
Astor Hotel Suite 622  
924 East Juneau Avenue  
Milwaukee  
Wisconsin  
USA 53202

BY FAX

Dear Dr. Bader,

Thank you for your fax of 7th January about your UK tax position.

From what you say I would take it that you are deemed a resident of the United States for the purposes of the Convention between the USA and the UK which relates to income tax and capital gains tax and I would be most grateful if you could confirm this.

Our concern has been to establish whether there could be any liability to UK inheritance tax, because the UK exemptions available for gifts to charity are not normally available in respect of gifts to non-UK charities and a gift can in some circumstances constitute a "chargeable transfer" giving rise to a substantial charge to tax with a further charge if the donor dies within a certain period.

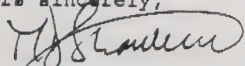
The Agreement of 11th November between you and your wife and the University and/or the transfer of stock by you to the University some of which I understand has now been transferred would be capable of being chargeable transfers giving rise to a charge to tax payable primarily by you but also recoverable from the University.

Liability to inheritance tax depends on domicile and deemed domicile and is governed by the separate Convention between the USA and the UK relating to taxes on estates of deceased persons and on gifts. I

-2-

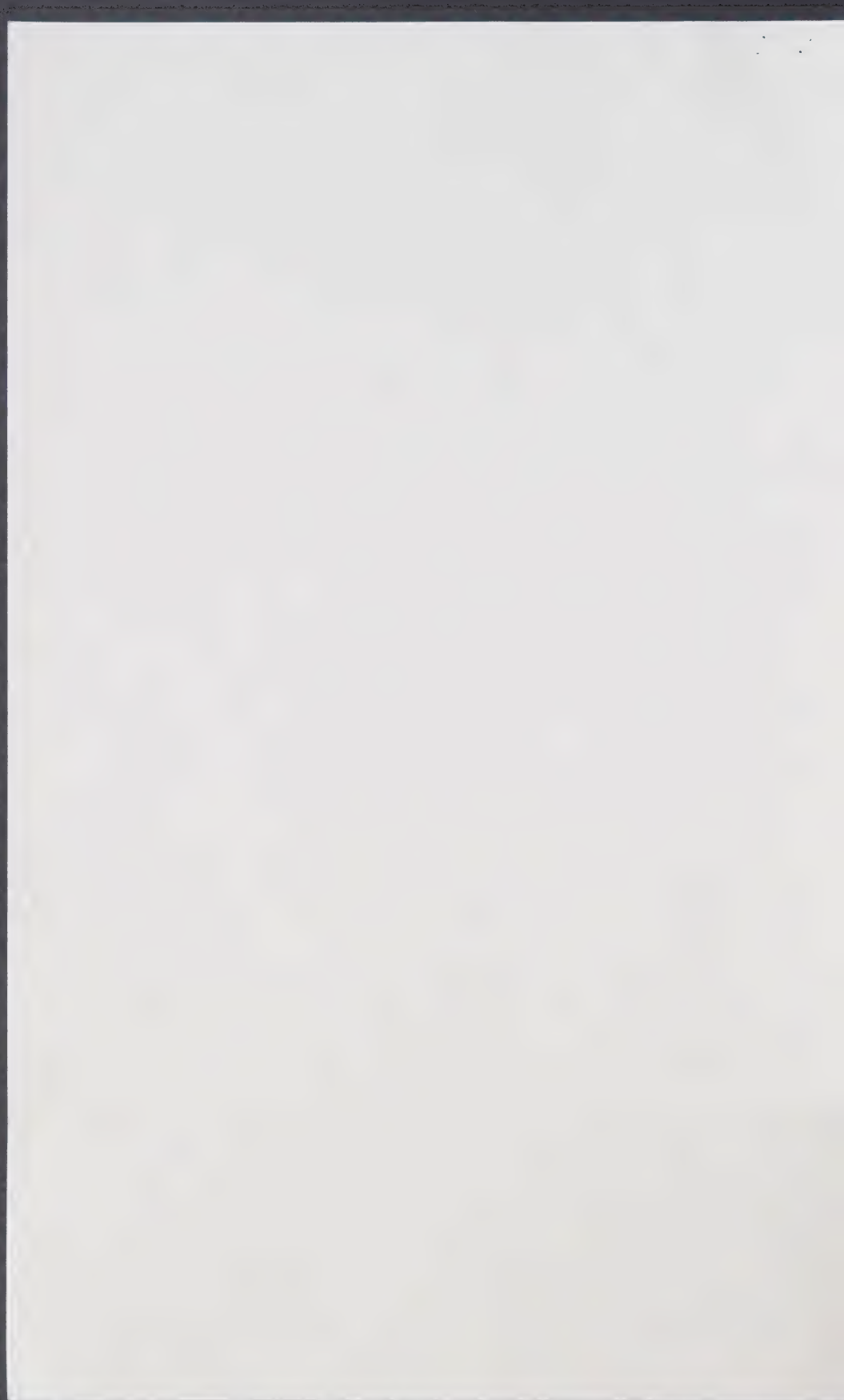
would be most grateful if you would confirm for the purposes of that Convention that you are domiciled and deemed to be domiciled in the USA; I note from Foley & Larnder's fax that you are a US national. As your wife is also a party to the 11th November Agreement I would be most grateful if you could confirm her nationality and domicile/deemed domicile position also.

Yours sincerely,

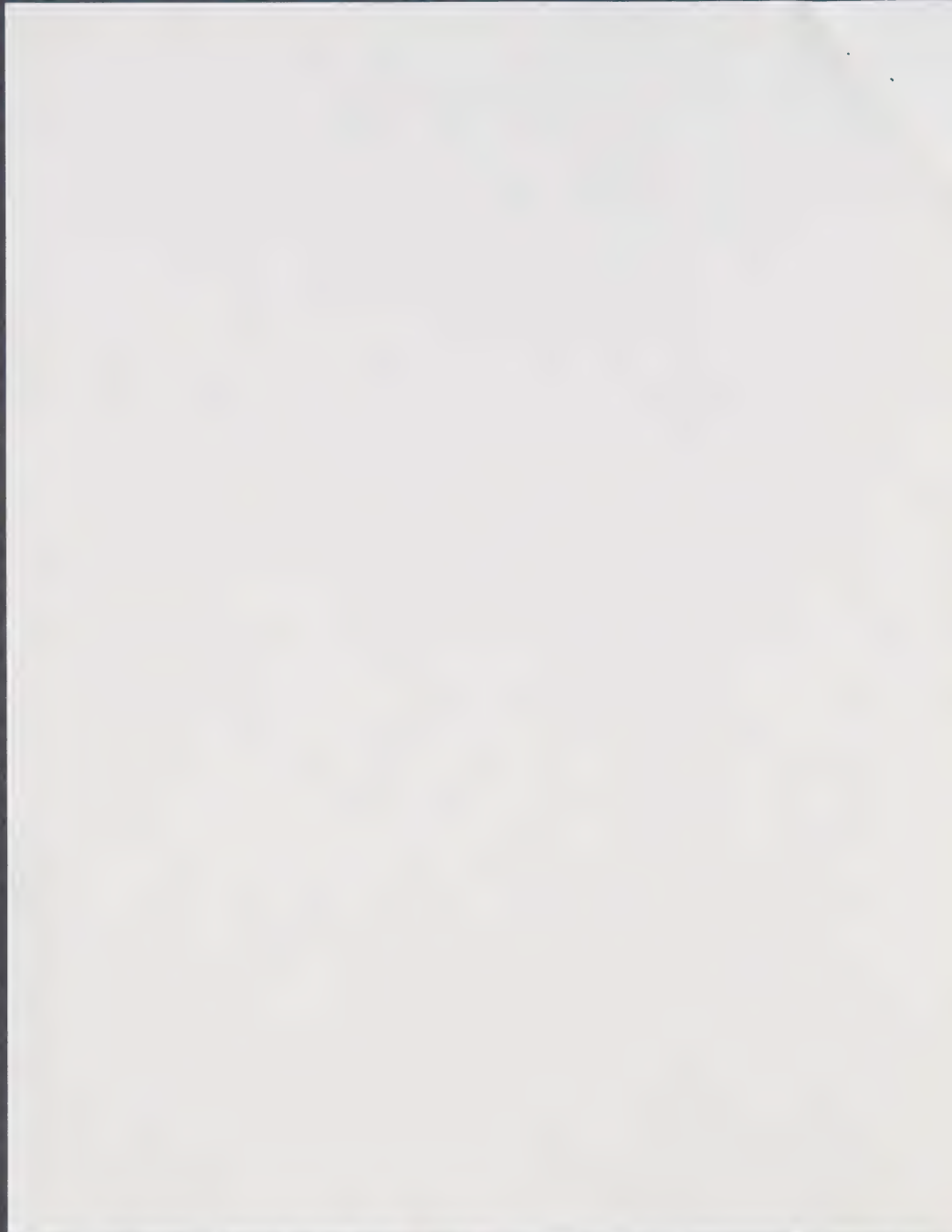


M.D. SHANKLAND

cc: John J. Heney, Queen's University







## FAX FROM

DR. ALFRED R. BADER  
Suite 622  
924 East Juneau Avenue  
Milwaukee, Wisconsin 53202  
Telephone 414-277-0730  
Fax No. 414-277-0709

January 12, 1993

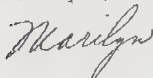
To: Dr. Alfred Bader - c/o Mr. Bert van Deun  
FAX 908 828 3912

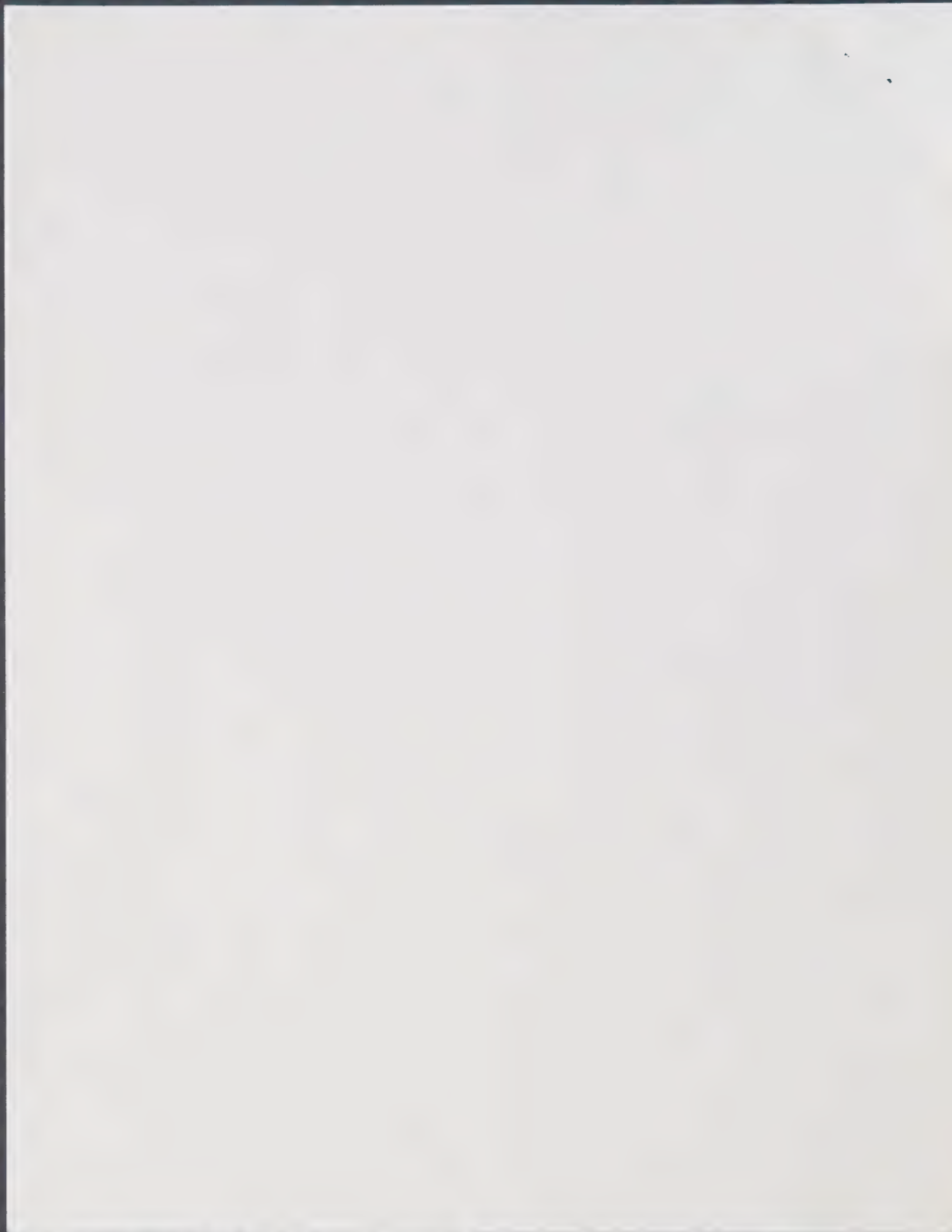
Dear Sheila

Would it be possible to get the following letter to Dr. Bader, please. If the van Deuns have a fax at home and Bert will not return to this office, perhaps you could fax to the house.

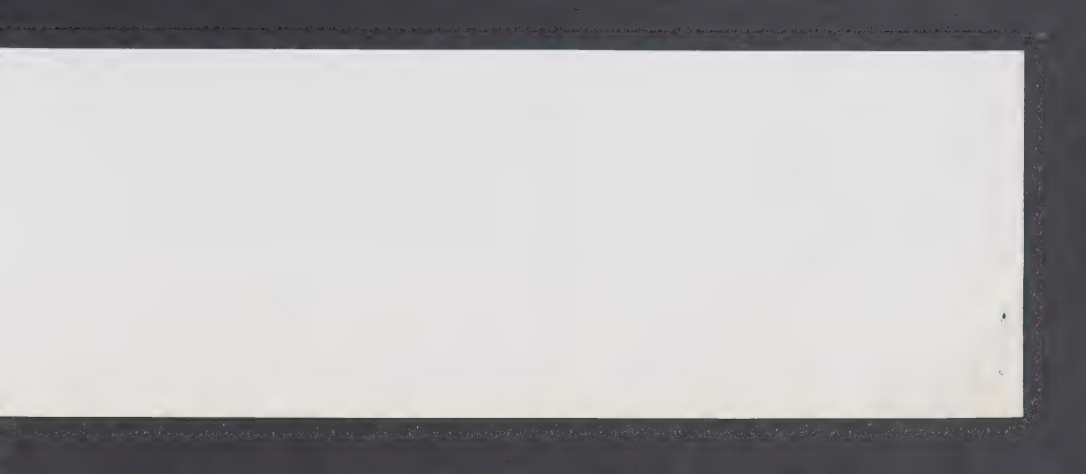
*- Mr. Bert*  
If the van Deuns have a home fax, would it be possible to furnish that number to me?

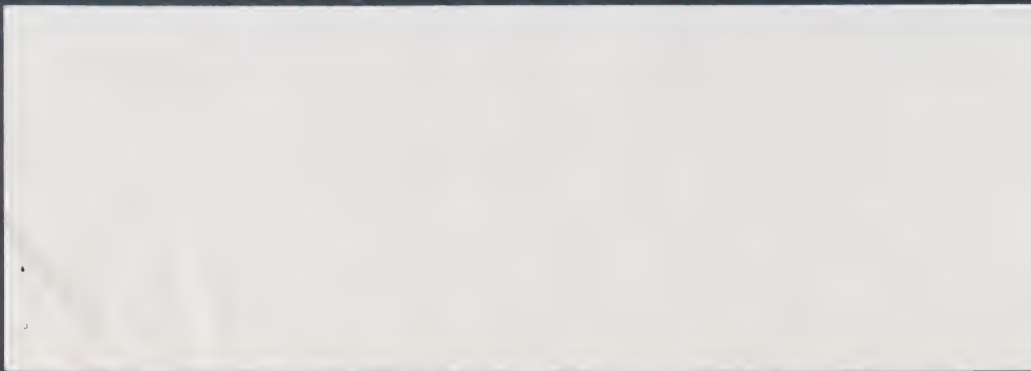
Thank you,

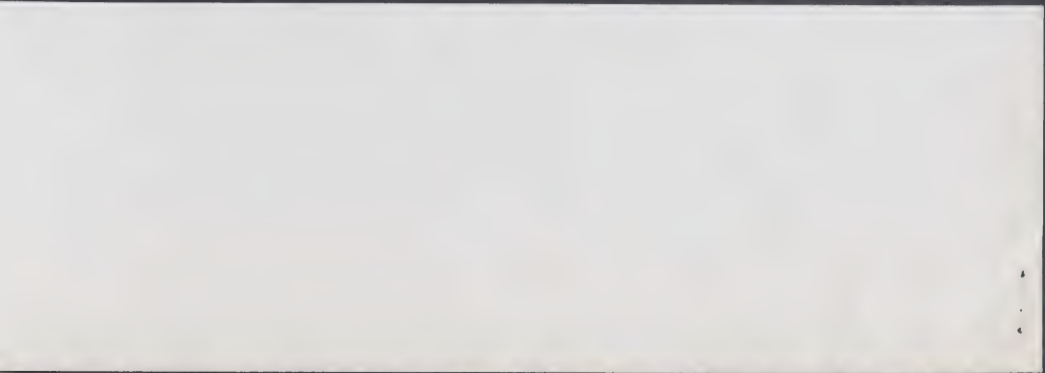






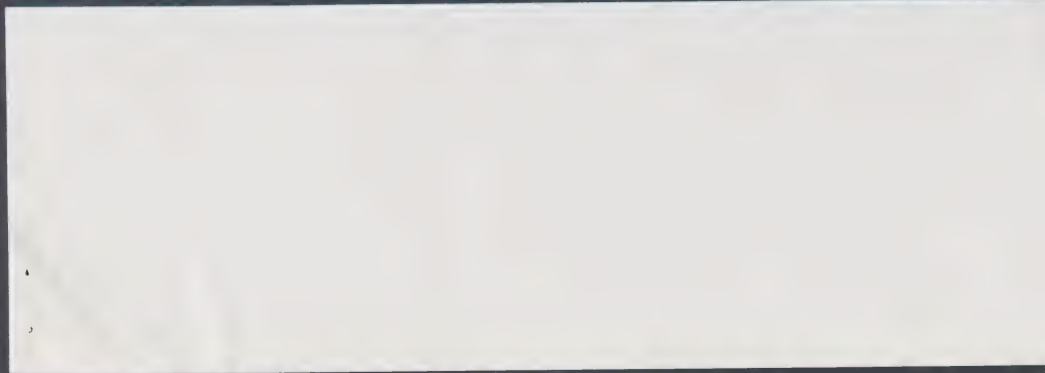










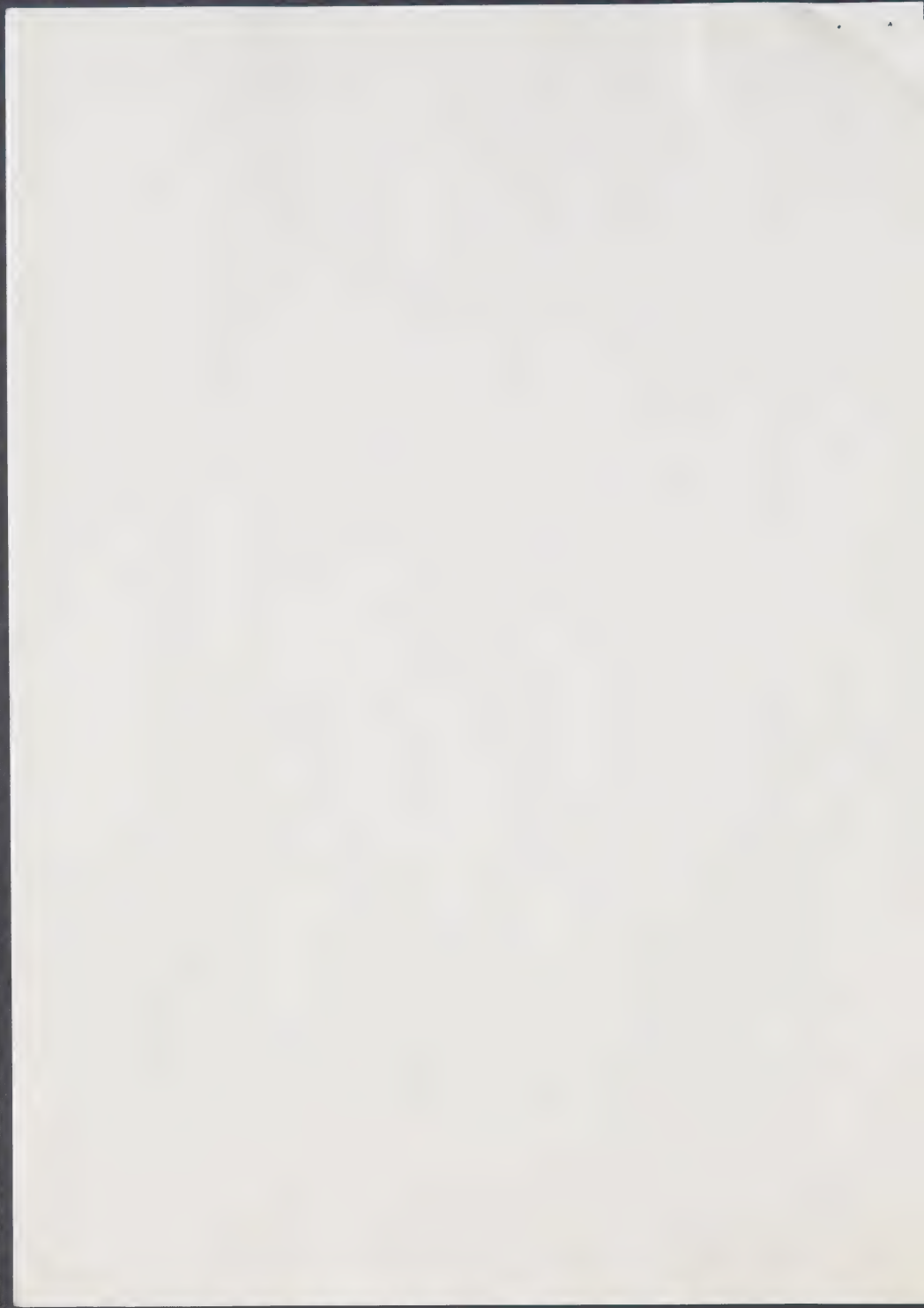


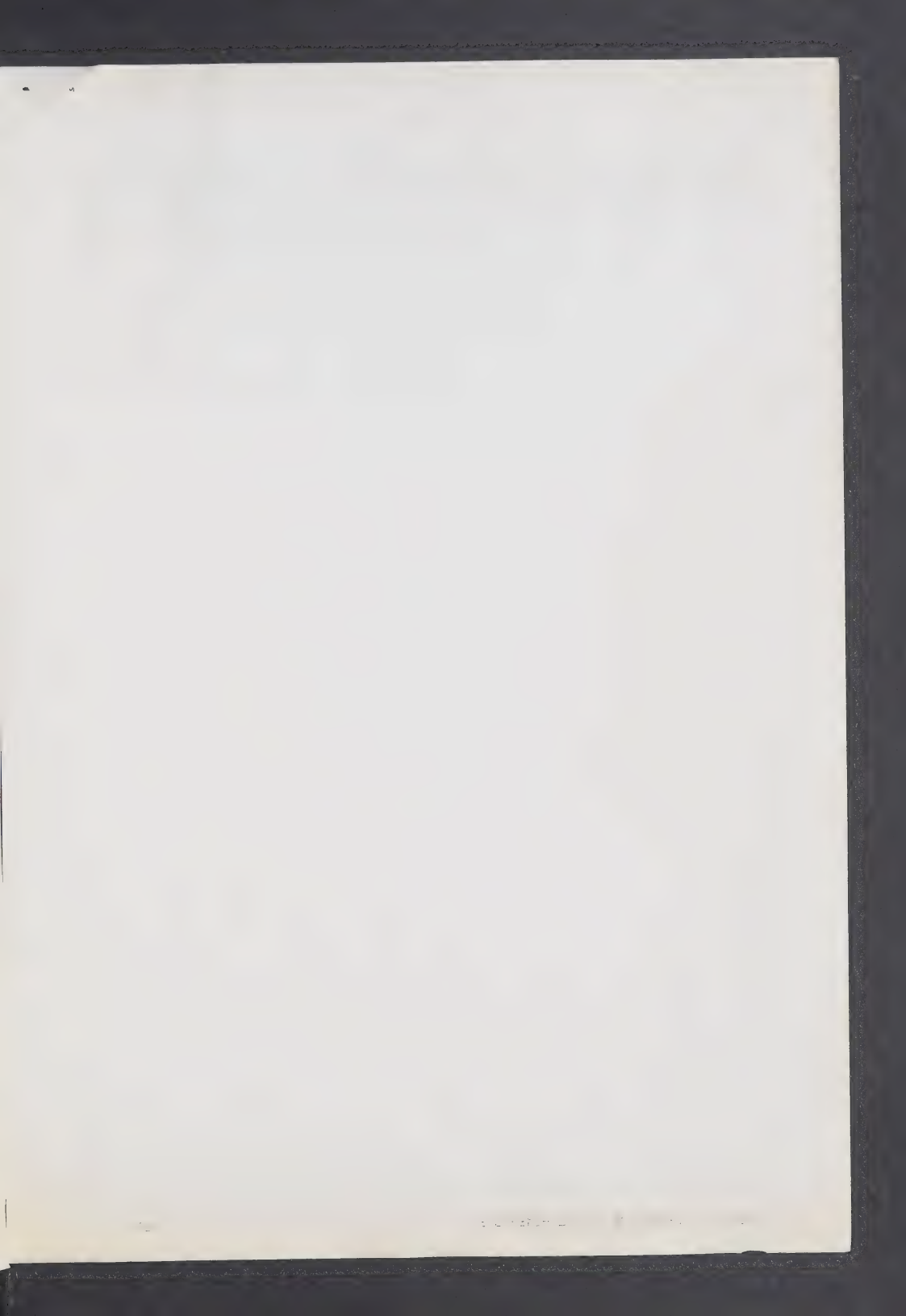


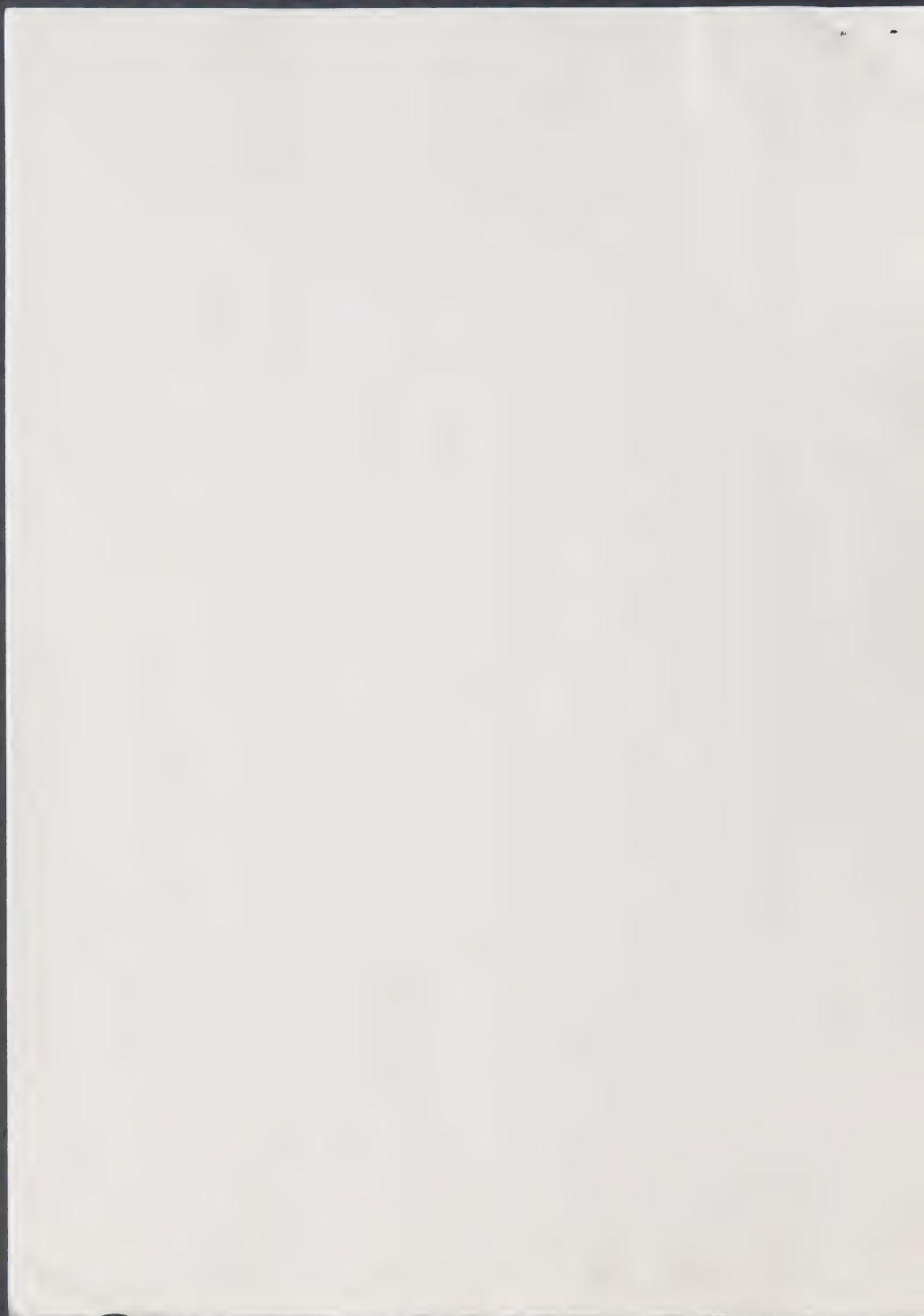


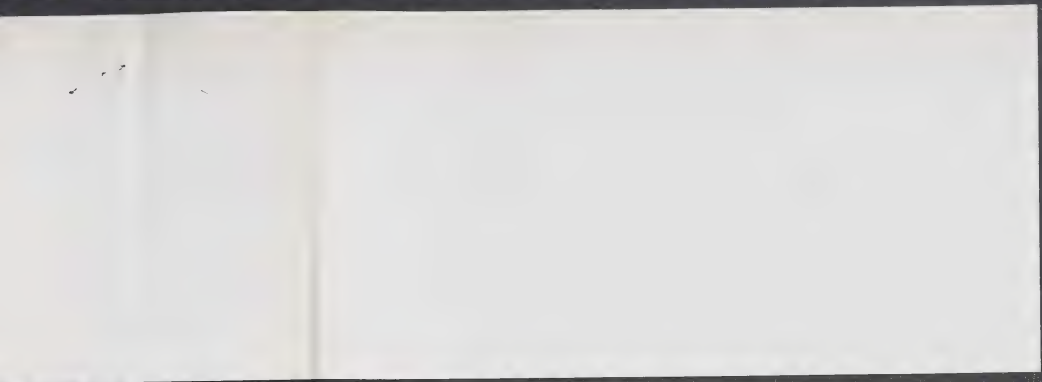


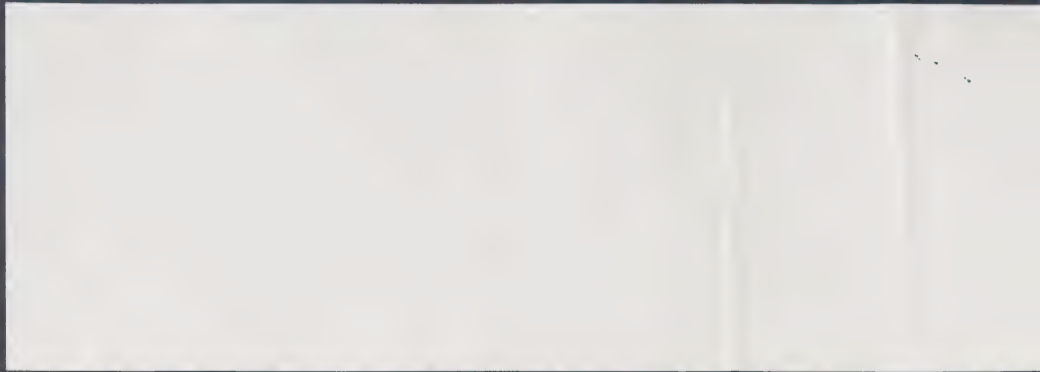
Jay 71-248-4212













ALFRED BADER FINE ARTS

DR. ALFRED BADER

ESTABLISHED 1961

January 7, 1993

Via Fax 011 44 71 248 4212

Mr. David Shankland  
Lovell White Durrant

Dear Mr. Shankland:

Referring to the fax exchange between Miss Vanessa Reburn and Mr. Charles Pike with Mr. Jere McGaffey, I would like to ask you and your associates that when next you have some questions about Isabel and me that you come right to the horses mouth and ask us, directly.

I have bank deposits in sterling at two banks in London and have used them many times to purchase paintings. I declare the interest income on my U.S. tax return. I mentioned that if Queen's should have any difficulties--for whatever reason--selling our gift of Sigma-Aldrich stock that I would be prepared to make a bridging loan in sterling to cover the initial payment. This question is academic because Queen's has just sold the first 50,000 shares of Sigma-Aldrich stock and so will have the funds required.

Isabel and I have been careful not to be in Britain for no longer than 89 days per year so that I am not subject to British taxes. Isabel does pay British tax on her British income.

Best wishes.

Sincerely,

c: Principal David Smith & Mrs. Jane Whistler  
Jere McGaffey, Esq.

*By Appointment Only*  
ASTOR HOTEL SUITE 622  
924 EAST JUNEAU AVENUE  
MILWAUKEE WISCONSIN USA 53202  
TEL 414 277-0730 FAX 414 277-0709







ALFRED BADER FINE ARTS

DR. ALFRED BADER

January 7, 1993

ESTABLISHED 1961

Via Fax 011 44 71 248 4212

Mr. David Shankland  
Lovell White Durrant

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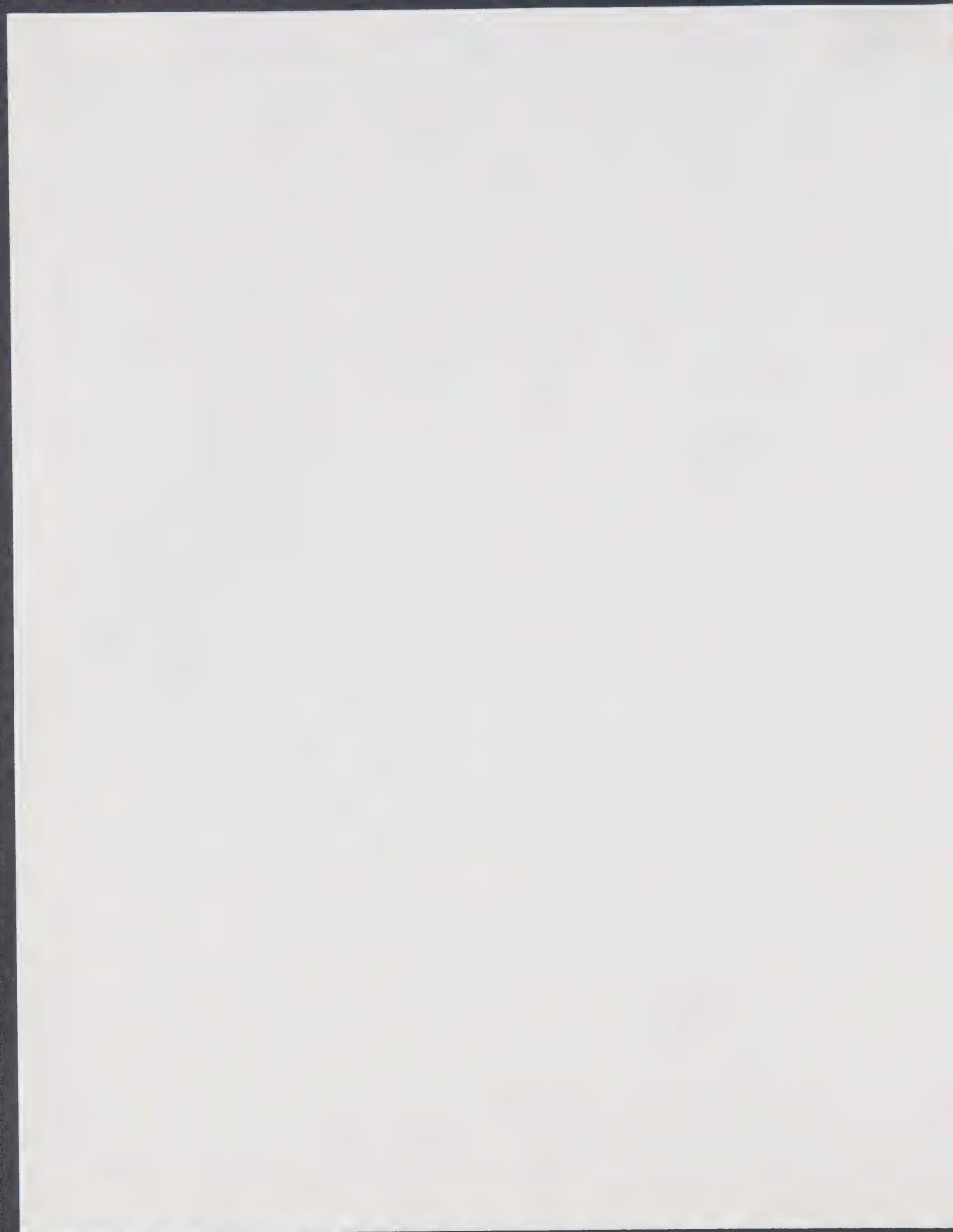
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Sincerely,

c: Principal David Smith & Mrs. Jane Whistler  
Jere McGaffey, Esq.

*By Appointment Only*  
ASTOR HOTEL SUITE 622  
924 EAST JUNEAU AVENUE  
MILWAUKEE WISCONSIN USA 53202  
TEL 414 277-0730 FAX 414 277-0709



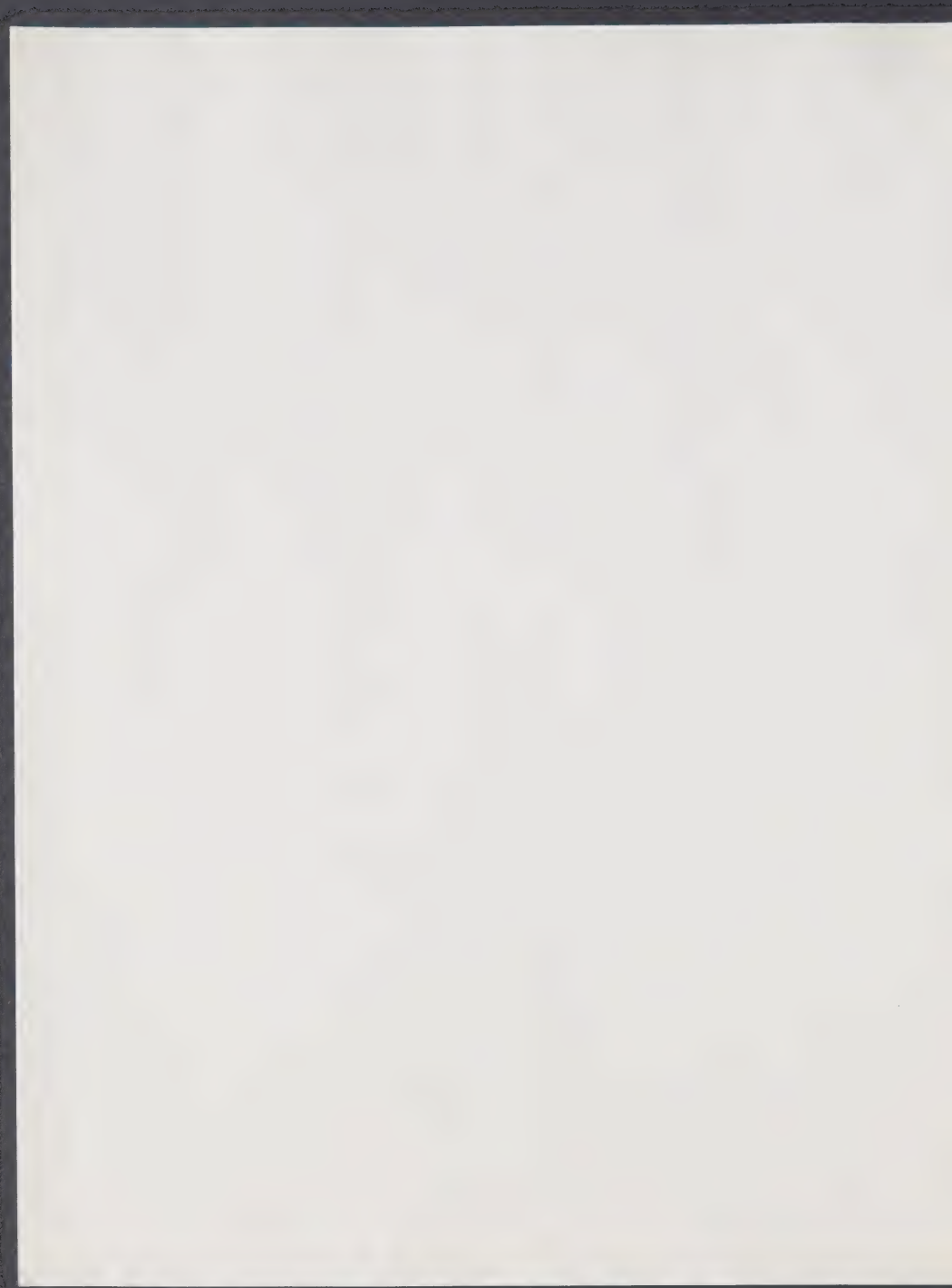
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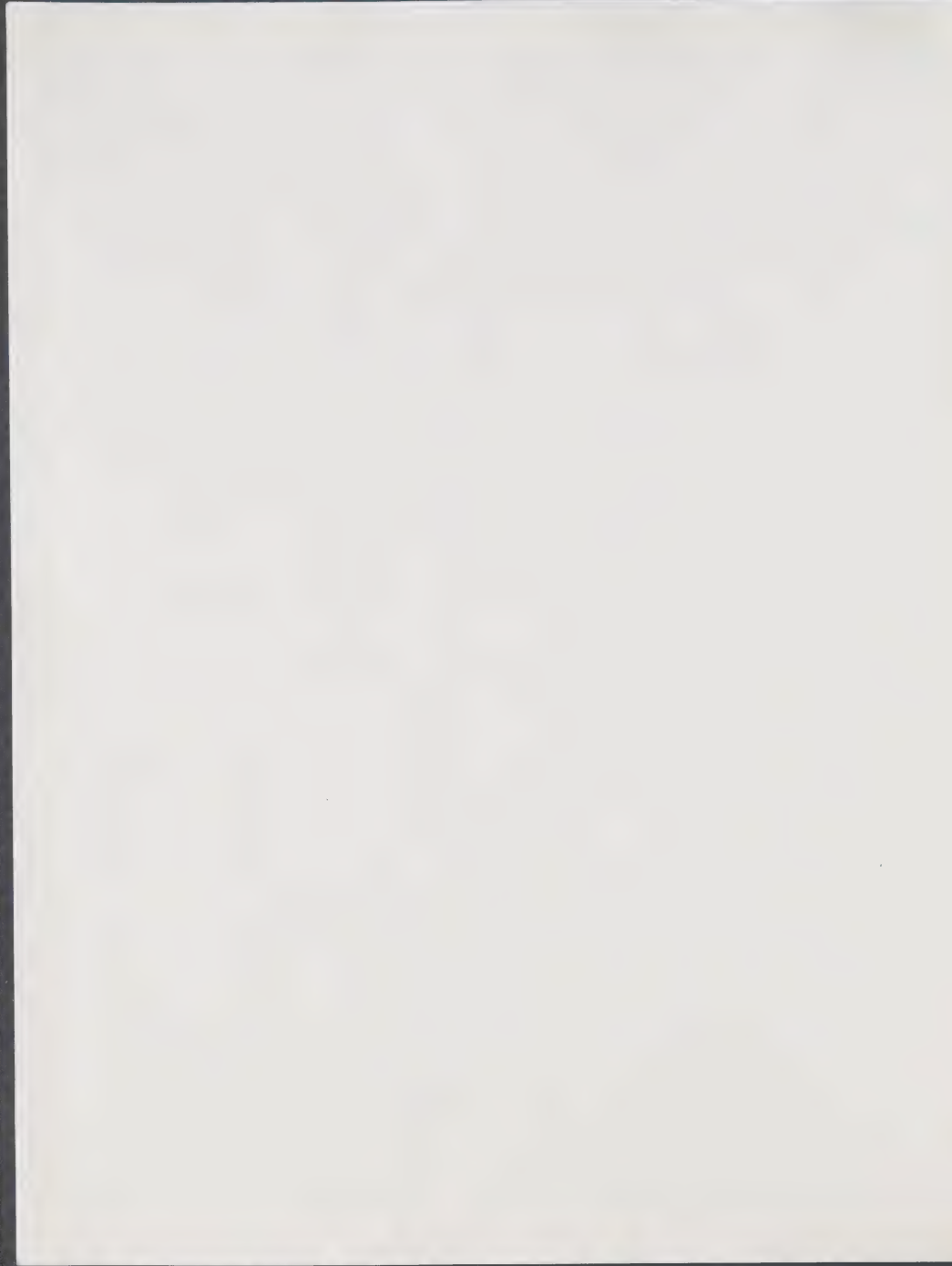
Faint, illegible text in the upper right section of the page.

Main body of faint, illegible text, possibly a list or a series of entries.









Client/Matter Code:

81101/000

**FOLEY & LARDNER**

FIRST WISCONSIN CENTER  
777 EAST WISCONSIN AVENUE  
MILWAUKEE, WISCONSIN 53202-5367  
TELEPHONE (414) 271-2400  
TELEX 26-819  
(FOLEY LARD MIL)  
FACSIMILE (414) 289-3791

Sender's Direct Line:

(414) 289-3642

FAX TRANSMISSION COVER SHEET

TO: Dr. Alfred Bader

COMPANY NAME: \_\_\_\_\_

COMPANY'S DIRECT PHONE NUMBER: 277-0730

FAX NUMBER: 277-0709

FROM: JoEllen/Jere D. McGaffey

DATE: January 6, 1993

TOTAL NUMBER OF PAGES INCLUDING COVER PAGE: 4

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\*\*\*\*\*  
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\*\*\*\*\*

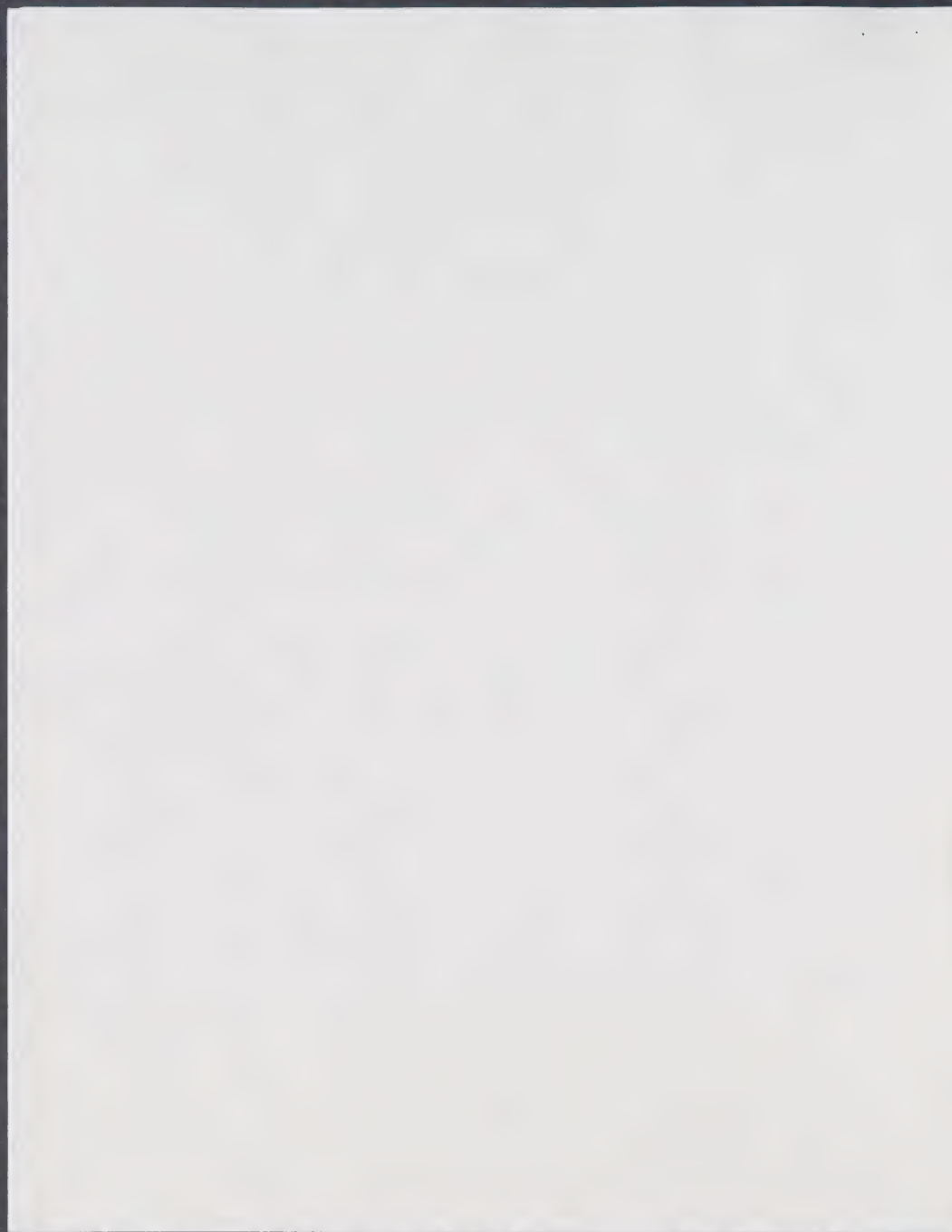
Xerox 7021's/7033's Automatic-Group III ..... 414/289-3791

SPECIAL INSTRUCTIONS:

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\_\_\_\_\_

Fax Operator: Sama

Date/Time Sent: \_\_\_\_\_





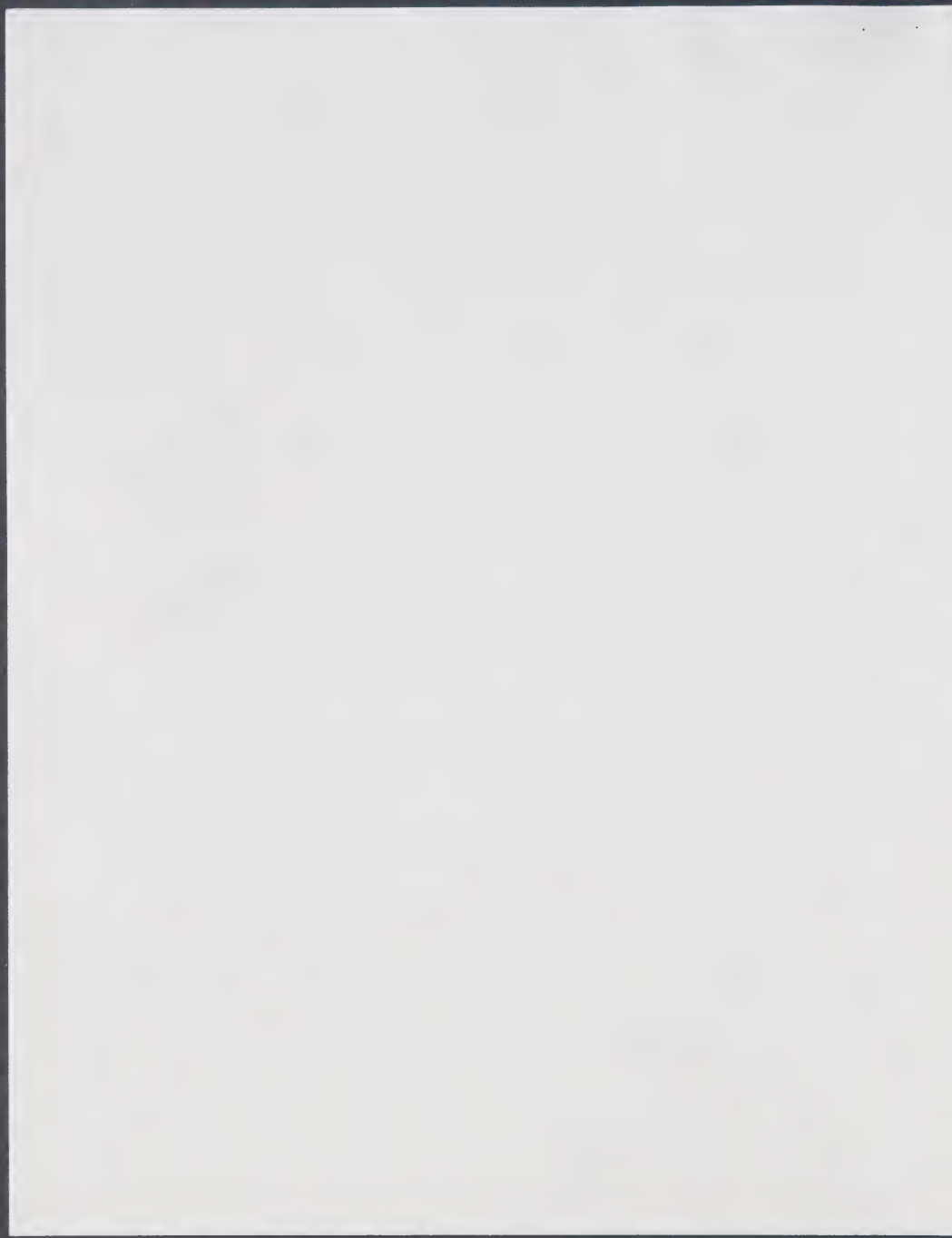
VIA FACSIMILE

MEMORANDUM

TO: Dr. Alfred Bader  
FROM: Jere D. McGaffey  
DATE: January 6, 1993  
RE: Inquiry of Lovell White Durrant

I received the attached Fax and plan to respond with the attached, if it is satisfactory to you.

What is the reference to sterling held in UK? Is this a good faith deposit with the seller? Are the funds yours or Queen's?



C. Taylor  
G. J. & Associates  
M. G. Walters  
M. J. Aronson  
A. Faght-Thoburn  
D. R. Gray  
P. N. Hershower  
C. K. Johnson  
R. N. H. Quaid  
H. B. Macneil  
P. R. Phillips  
M. D. Sharrland  
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T. R. M. O'Brien  
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M. P. L. Wright  
W. E. Wood  
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C. P. Dunham  
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M. P. L. Wright  
A. S. Longbridge  
I. D. Smith  
A. P. E. Wilkinson

**LOVELL  
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DURRANT**  
66 Holborn Viaduct London EC1A 1DY  
Telephone 071 236 0066

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J. P. Penson  
P. P. Burroughs  
J. E. Smith  
D. A. Cox  
A. C. Davis  
K. Galton  
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R. T. Whitman  
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Q. J. E. Anthon  
S. J. Burns  
R. A. Oldman  
G. A. Foxall  
E. A. Stann  
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K. I. Stann  
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R. P. O'Connell  
W. S. Stann

Dr Box 57 London / Chancery Lane  
Fax 071 248 4212 / 236 0084 / 248 7273  
Telex 887122 LWD G

Our ref **F4/VAR/HNH/SAP/8790p**

Your ref

Messrs. Foley & Lardner,  
1st Wisconsin Bank Building,  
Milwaukee,  
Wisconsin 53202,  
USA

5th January, 1993

**BY FAX** 011-44-71-  
248 4212

For the attention of Gere McGaffey

Dear Sirs,

Dr. Alfred Bader and Isabel Bader: Queen's University at Kingston

We are acting in the UK for Queen's University ("the University") in connection with the acquisition of Herstoncoeur Castle Estate. We have a copy of the Agreement dated 11th November 1992 between Dr. and Mrs. Bader and the University which refers to the provision of funds either by the Baders or by the Isabel and Alfred Bader Charitable Foundation ("the Bader Foundation"). In order that we can advise the University on the UK tax implications we would be most grateful if you would let us know if it is known whether the funds will be provided by Dr. and Mrs. Bader personally or by the Bader Foundation. If the funds are to be provided by the Bader Foundation it would be most helpful if you could let us have brief details of the Foundation and, if possible, a copy of the governing instrument. Could you also very kindly let us have confirmation of its US tax status.

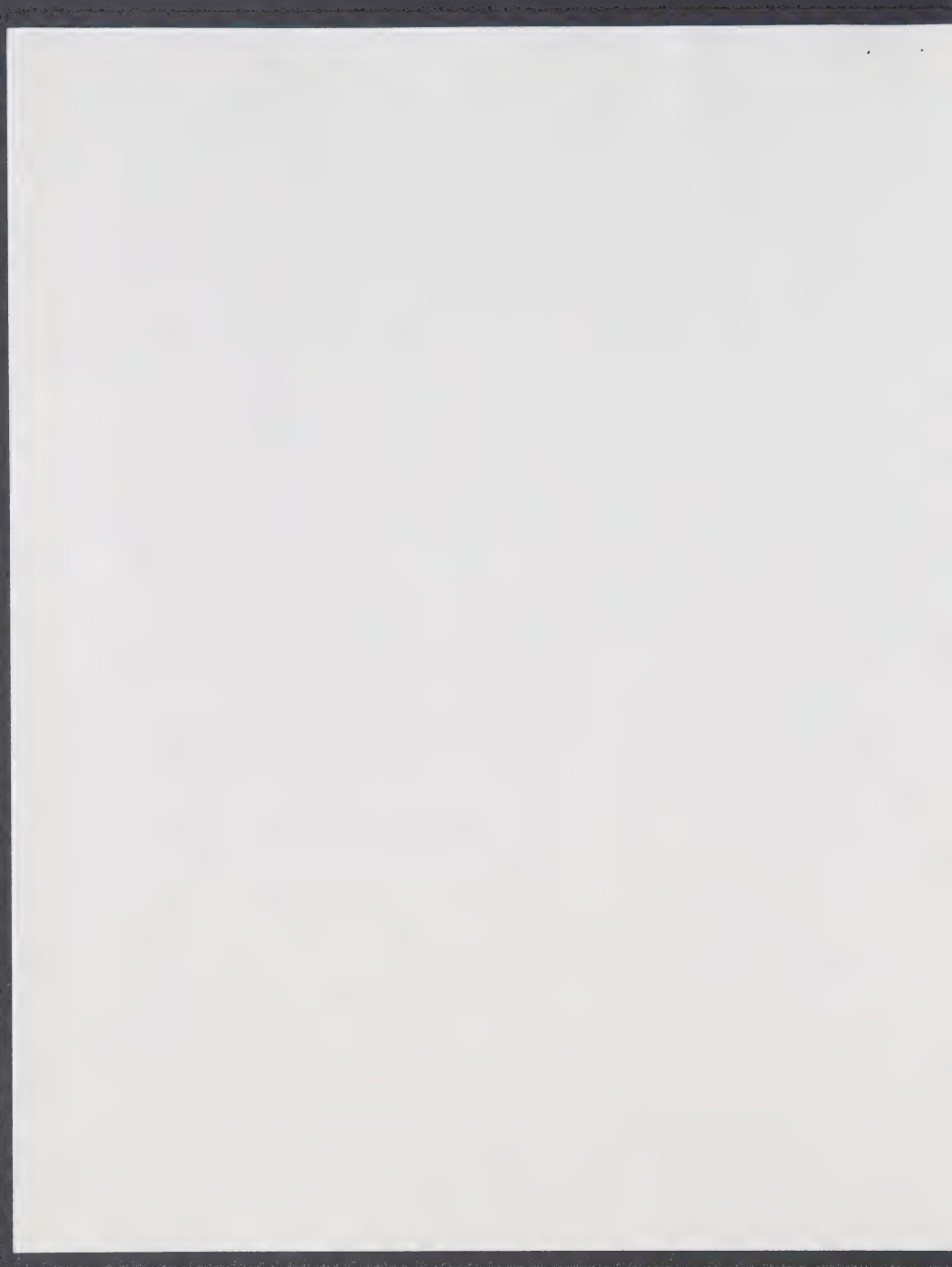
If the funds are to be provided by Dr. and Mrs. Bader personally could you very kindly let us know whether the UK tax position of either of them has ever been considered or determined.

We understand that funds are already held in sterling in this country against the purchase and would be most grateful if you could let us know for whose account these funds are currently held.

It would be very helpful if you could contact Charles Pike or Vanessa Reburn of this firm about these points as soon as possible.

Yours faithfully,  
*Lovell White Durrant*  
cc: Dr. D. Smith  
Mrs. J. Whistler

507 Madison Avenue New York NY 10022 Tel (212) 756 8773 Fax (212) 486 0260  
37 Avenue Pierre Larousse Paris 75008 France Tel (1) 49 23 08 38 Fax (1) 49 23 08 12  
Avenue Louise 1070 Brussels Belgium Tel (2) 847 0660 Fax (2) 467 1234  
1100 Broadway New York NY 10036 Tel (212) 512 2395 Fax (212) 512 1980  
11th Floor, Pingpong Street Upper Circular Quay Sydney New South Wales 2000 Tel (61) 2 352 4500 Fax (61) 2 352 4501  
60th Fl., CITIC Building 99 Jingsongmen Road Beijing P.R. China Tel (86) 10 550 1371 Fax (86) 10 550 1371  
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ORLANDO, FLORIDA  
TALLAHASSEE, FLORIDA  
TAMPA, FLORIDA  
WEST PALM BEACH, FLORIDA

January 6, 1993

## VIA FACSIMILE

Lovell White Durrant  
65 Holborn Viaduct  
London EC1A 2 DY  
England

For the attention of: Charles Pike or Vanessa Reburn

Dear Sir or Madam:

Re: Dr. Alfred Bader and Isabel Bader: Queen's University at Kingston

I have received your Fax of January 5th. It is my understanding that Dr. Bader will personally be giving appreciated securities to Queen's University.

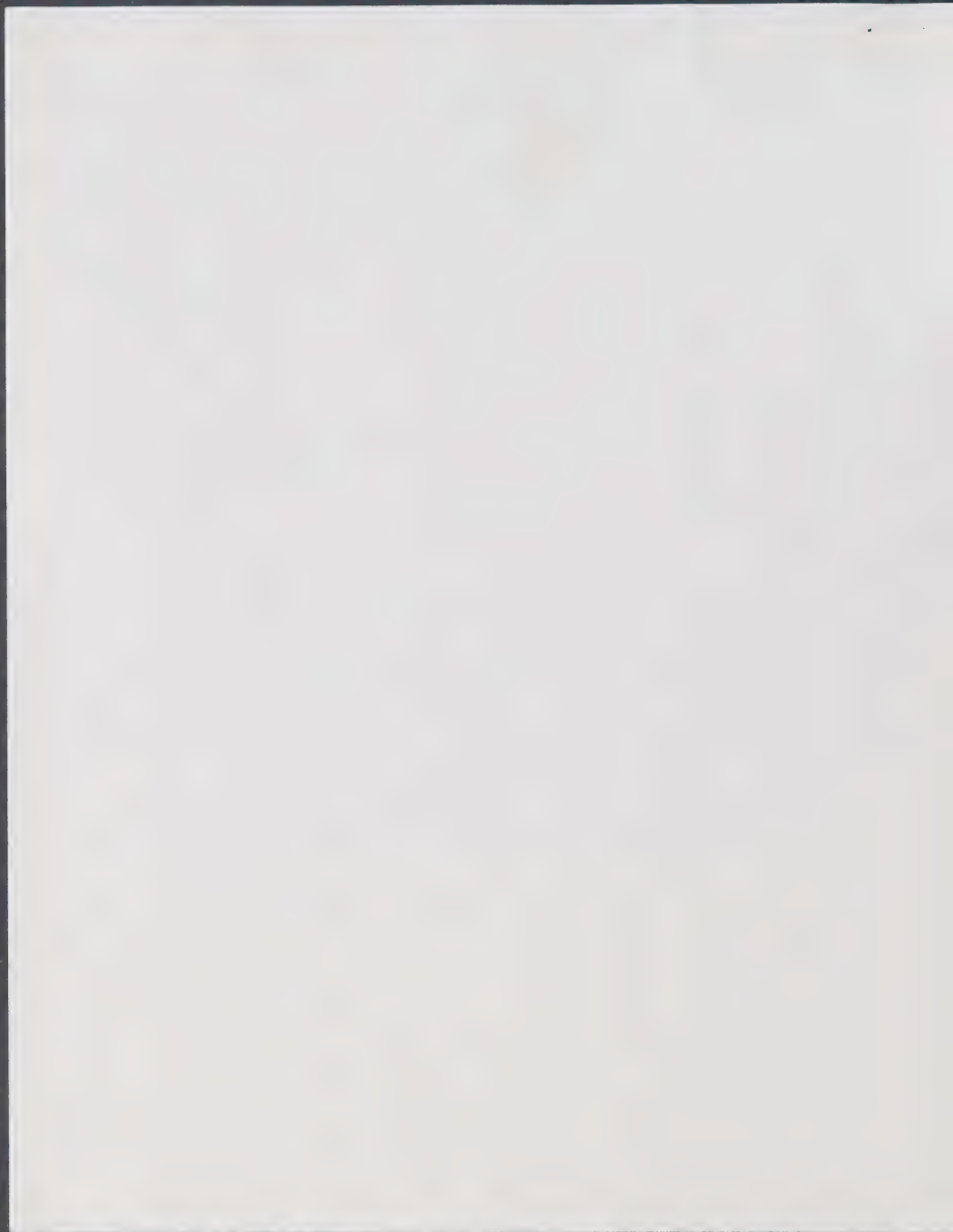
I have given no consideration to the UK tax position as Dr. Bader is a U.S. citizen and resident, and is giving to a Canadian University. I am curious as to the reason for your inquiry as to the UK tax position.

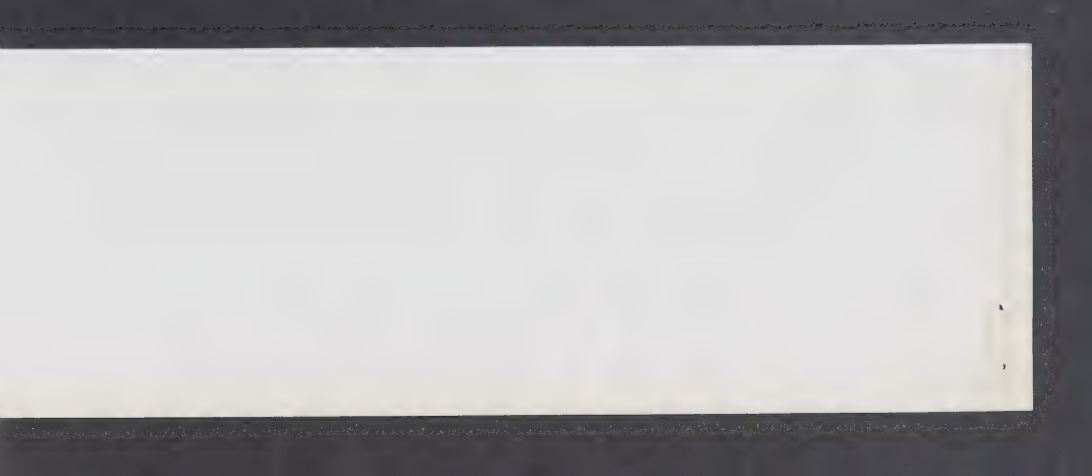
I am not aware of sterling being held in the UK against this purchase.

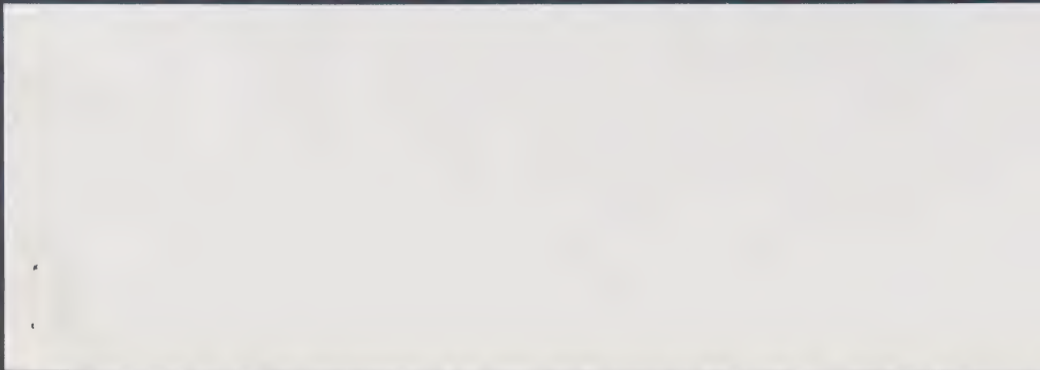
Very truly yours,

Jere D. McGaffey

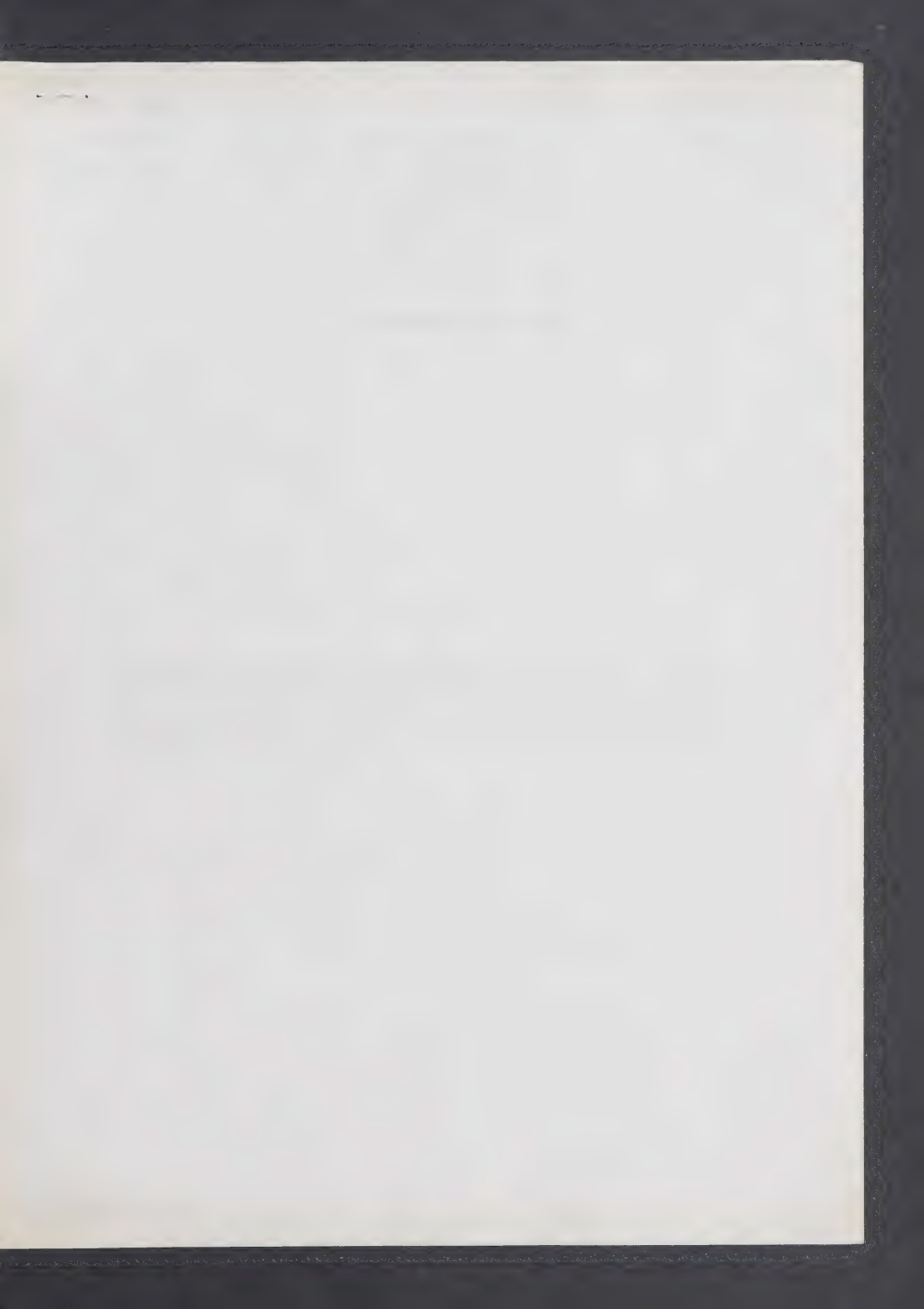




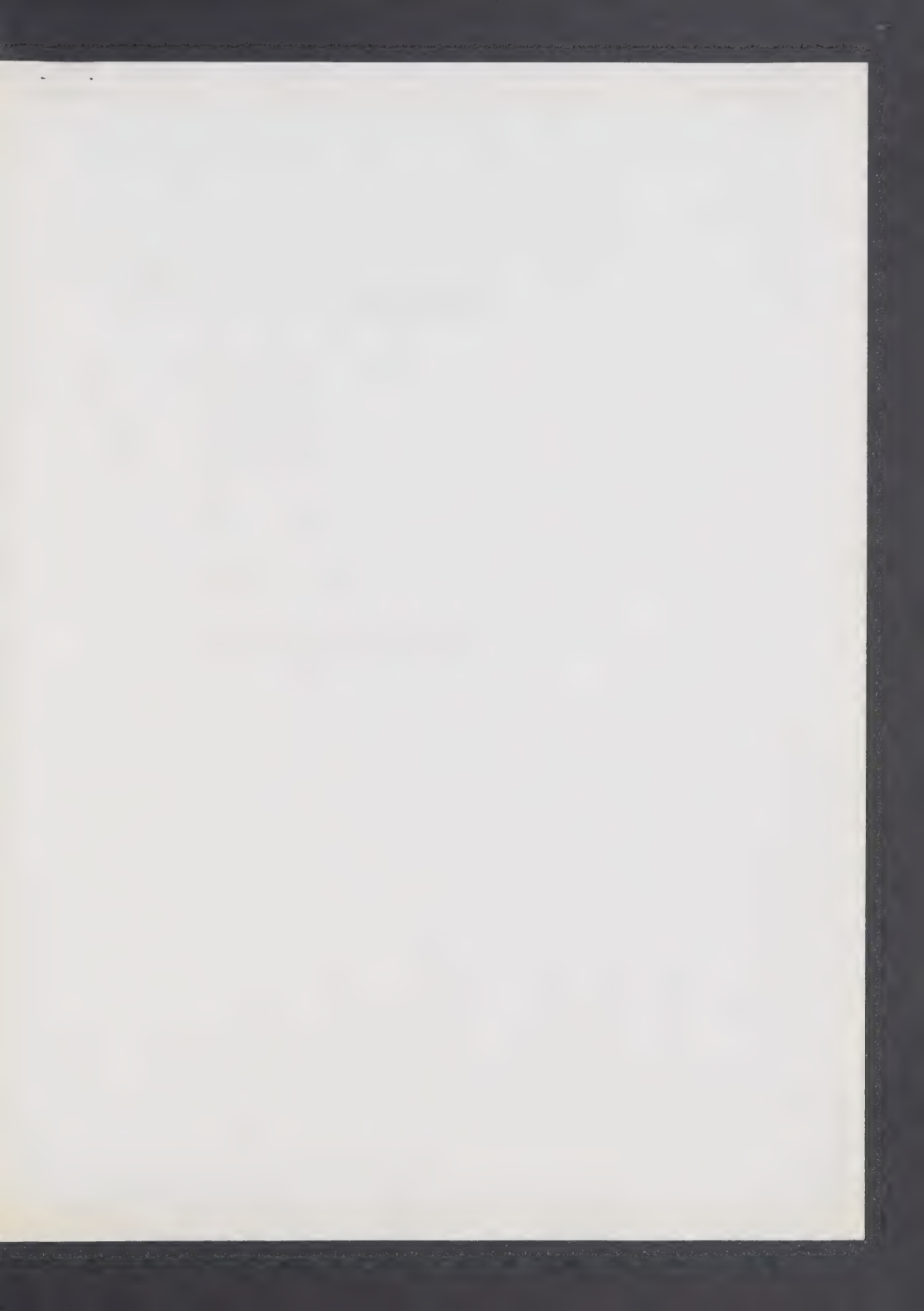


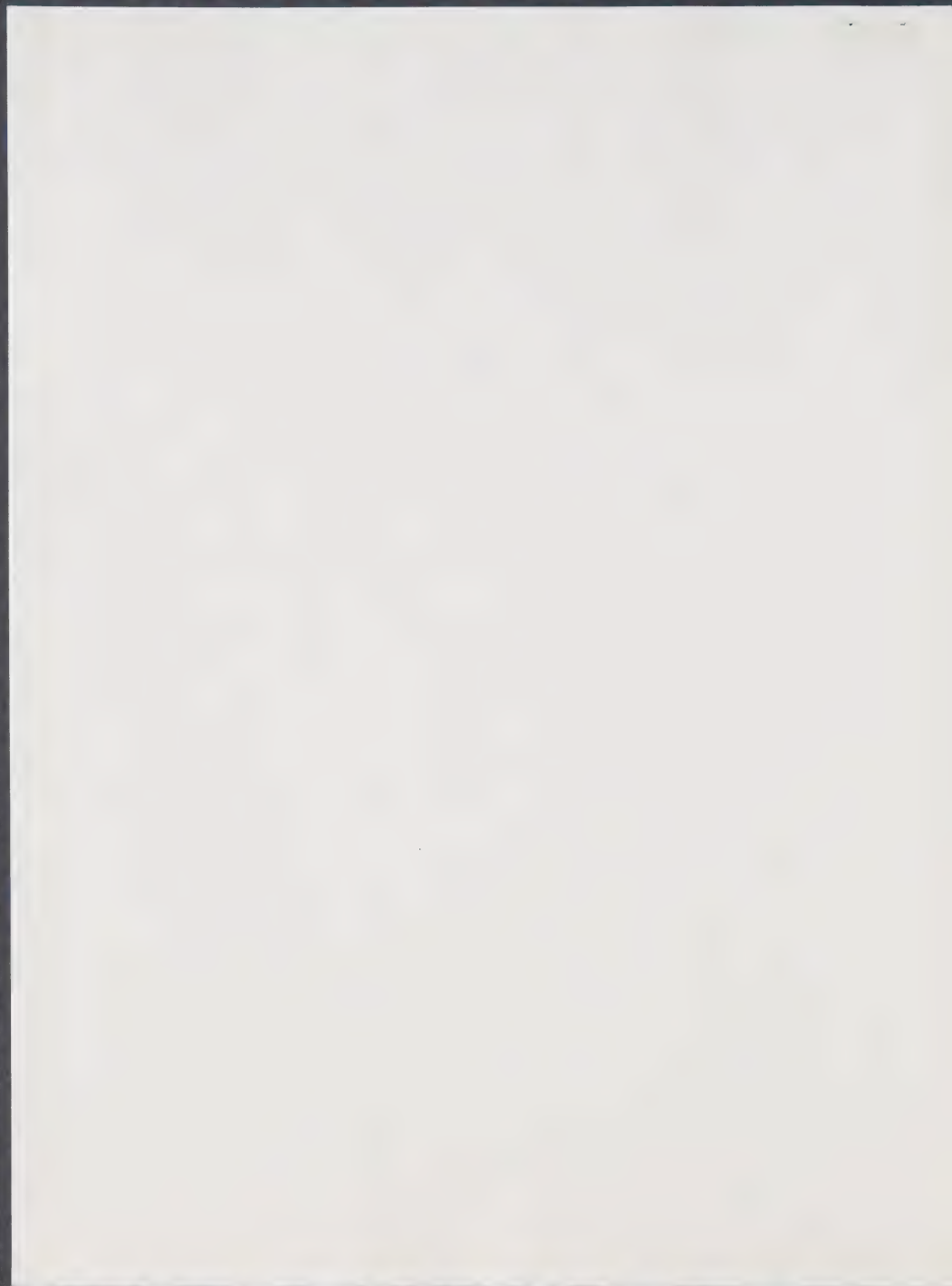


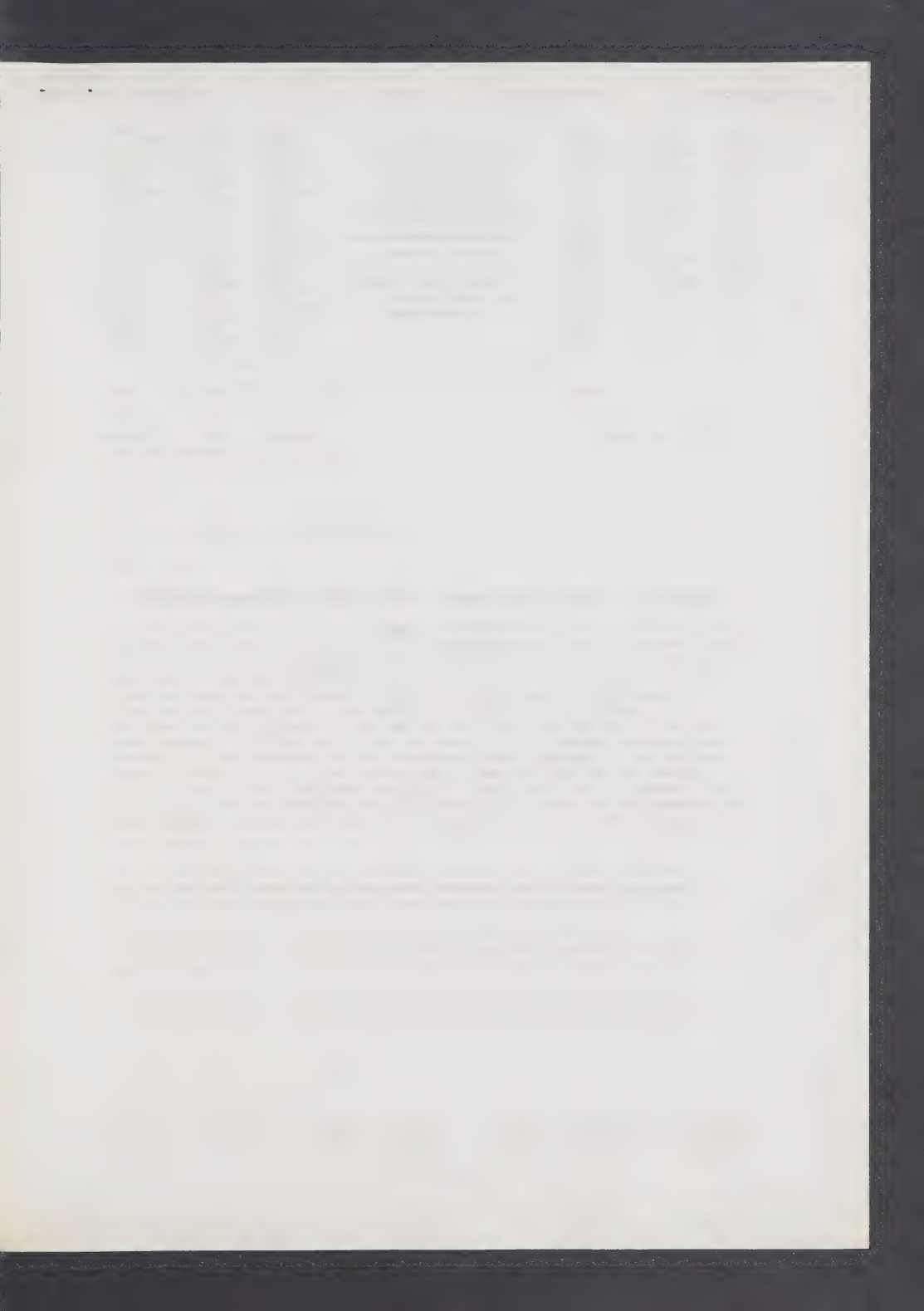


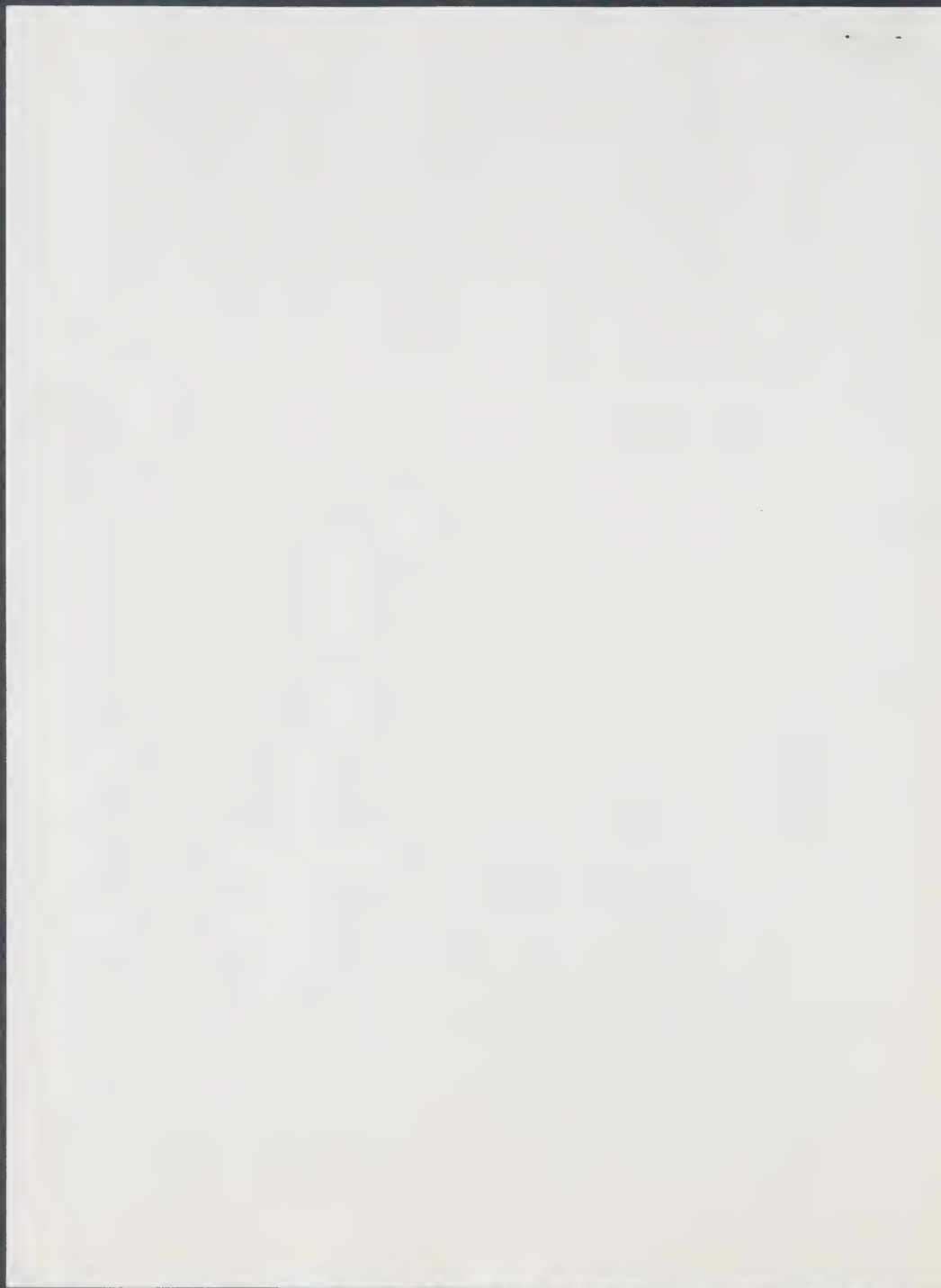


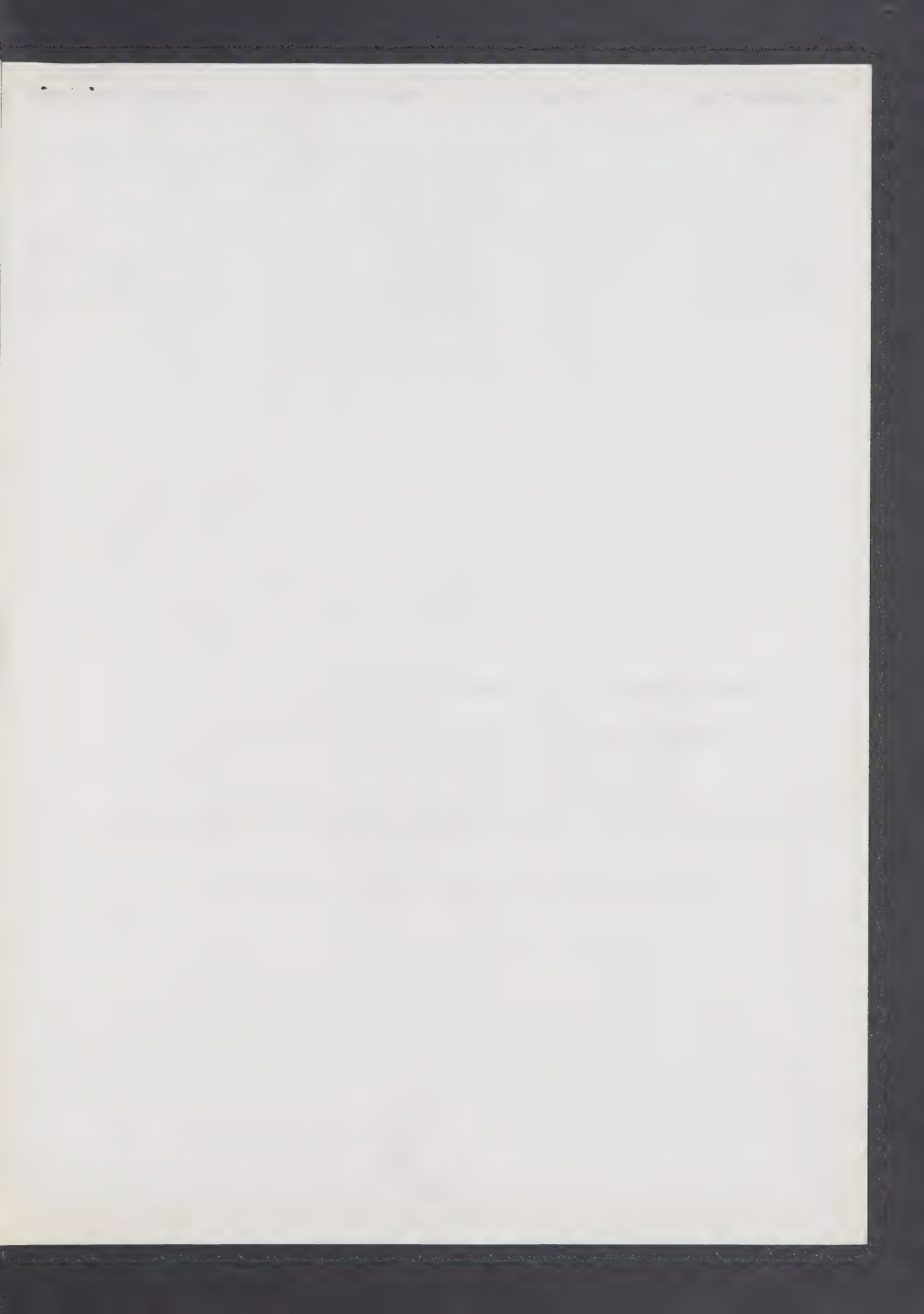


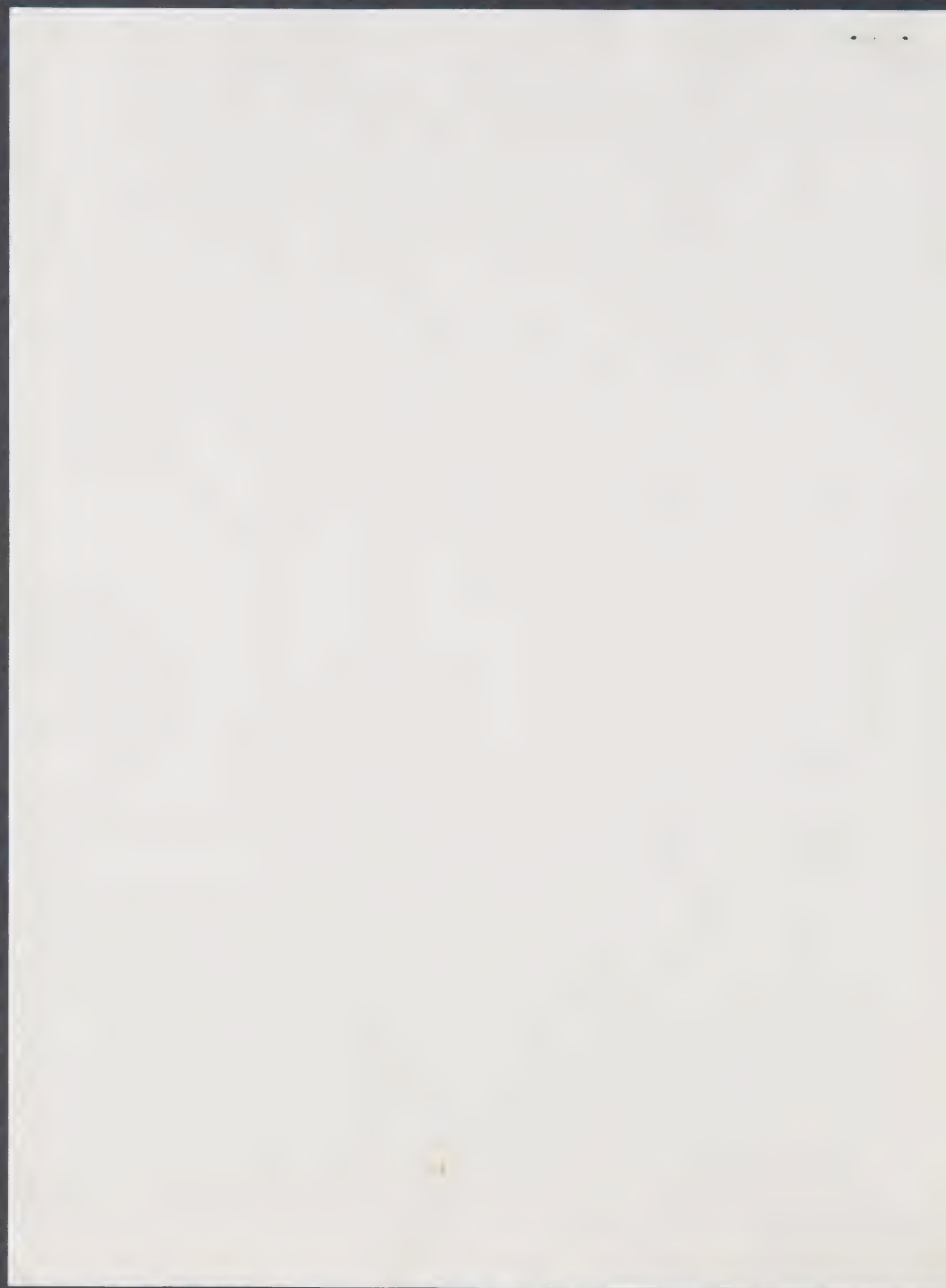








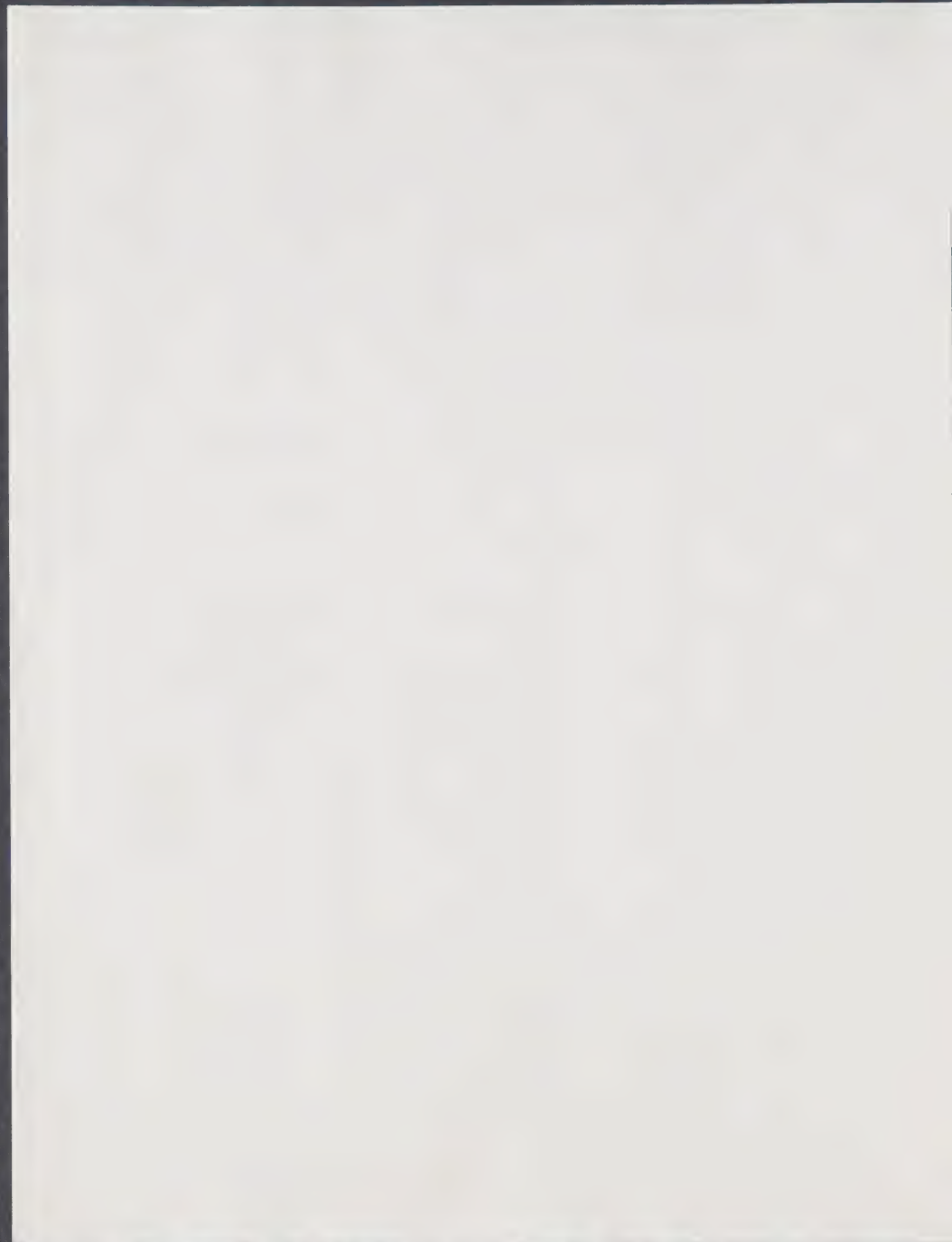






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WHITE  
SUPPORT

*Handwritten signature or initials*



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# LOVELL WHITE DURRANT

65 Holborn Viaduct London EC1A 2DY  
Telephone 071-236 0066

Dx Box 57 London / Chancery Lane  
Fax 071-248 4212 / 236 0084 / 248 7273  
Telex 887122 LWD G

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P. P. Sherrington  
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G. A. Proudler  
R. A. Shean  
R. J. L. Stones

G. Watson  
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C. M. Allinson  
A. M. Dimsdale Gill  
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J. McDermott  
J. H. Reeves  
L. Winer  
P. D. Gershuny  
D. J. Hunter

D. Lane  
M. C. McGaw  
C. D. St. J. Penney  
R. S. Reston  
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J. M. Bradshaw  
L. A. Crowley  
J. Davidson  
L. R. Dunlop  
R. M. Huleatt-James  
J. M. Samsworth  
C. H. D. Smith  
K. S. Ashman  
J. N. Cole  
L. M. Garside  
R. M. Grant  
D. F. Harlock  
N. P. Quenby  
R. Follie  
Consultant  
W. F. Richards

Our reference P2/MDS/AD

Your reference

24th November, 1992

Dr. Alfred Bader,  
52 Wickham Avenue,  
Bexhill-on-Sea,  
EAST SUSSEX  
TN39 3ER

Dear Dr. Bader,

## Herstmonceux Castle

It was very good to meet you here yesterday, with Jane Whistler and my partner Charles Pike.

As arranged then, I enclose a copy of the letter which I have sent to Dr. Smith today by fax.

Yours sincerely,



M. D. SHANKLAND

Enc.

(8883w)

527 Madison Avenue  
10th Floor  
New York NY 10022  
Tel (212) 758 3773  
Fax (212) 486 0367

37 Avenue Pierre 1er de Serbie  
75008 Paris  
Tel (1) 49 52 04 26  
Fax (1) 47 23 96 12

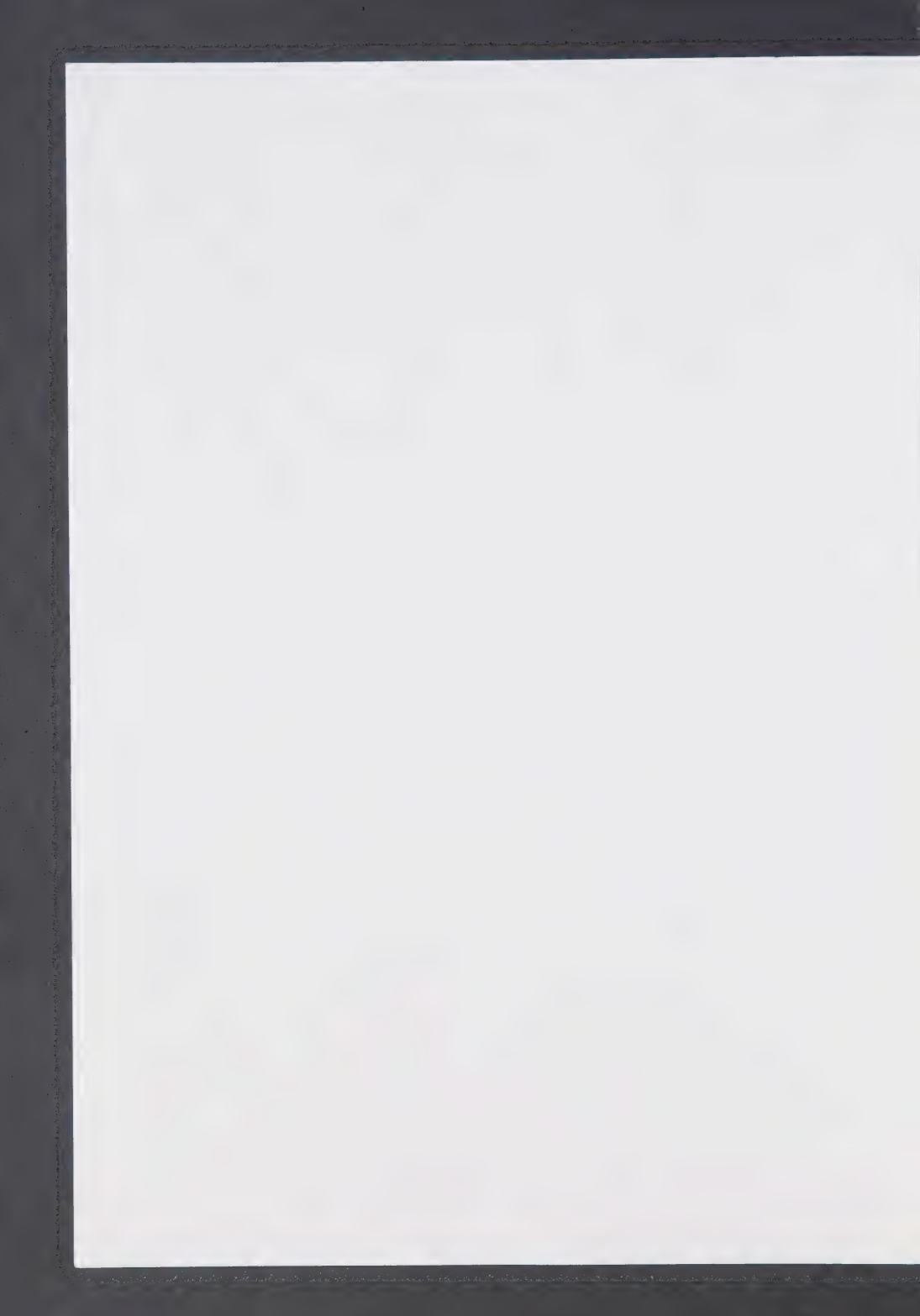
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1050 Brussels  
Tel (2) 647 0660  
Fax (2) 647 1124

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Tel (2) 232 2373  
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3-3-2 Kasumigaseki  
Chiyoda-ku Tokyo 100  
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Fax (3) 3503 0699



COPY

P2/MDS/AD

24th November, 1992

Dr. David Smith,  
Principal,  
Queens University,  
Kingston,  
Ontario K2L1 3N  
CANADA

SENT BY FAX

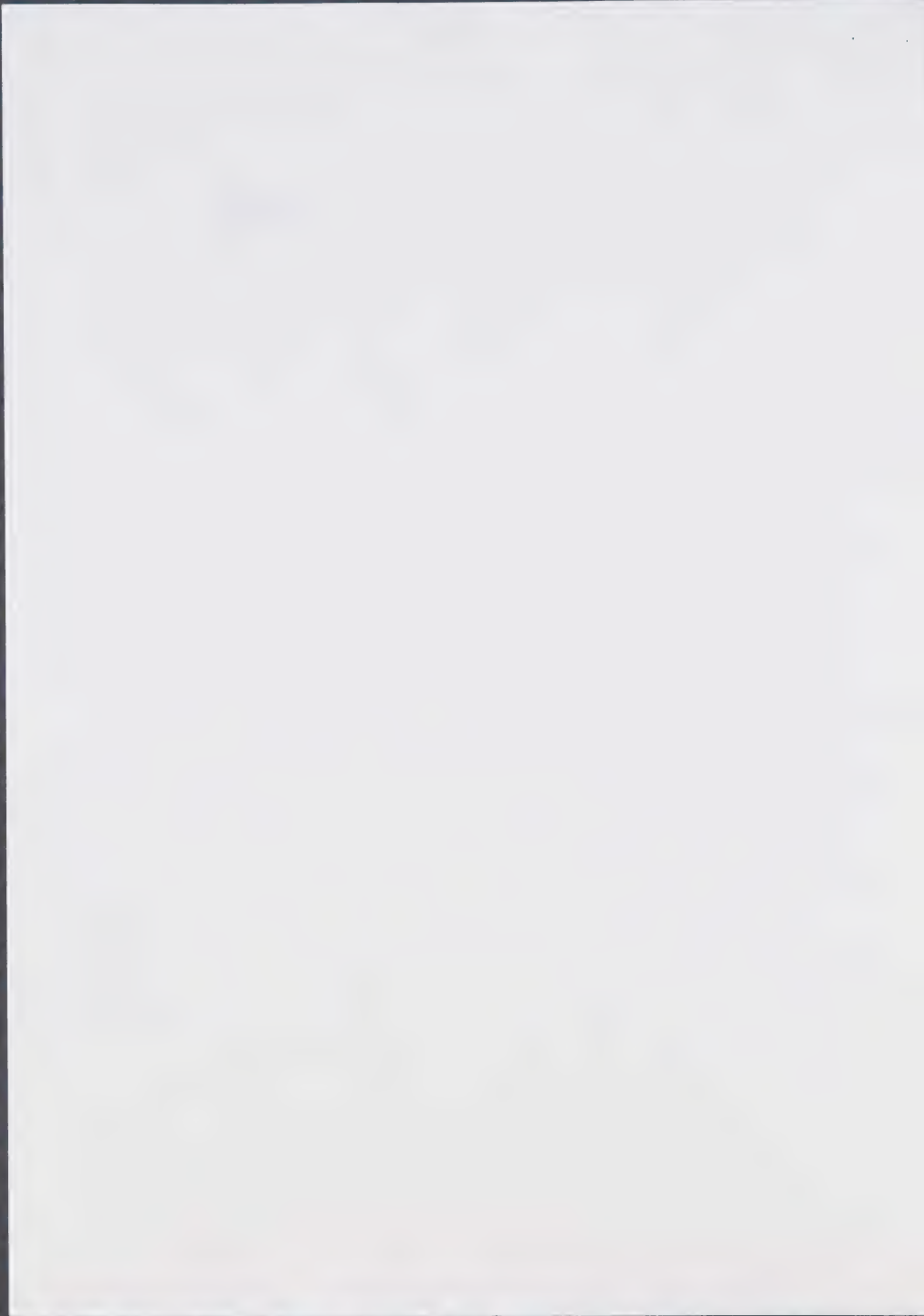
Dear Dr. Smith,

Herstmonceux Castle, East Sussex, England  
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I met Mrs Jane Whistler and Dr. Alfred Bader yesterday with my partner, Charles Pike. Dr. Bader and Mrs Whistler outlined the legal advice required on this project and asked me to write to you, so that you could consider appointing Lovell White Durrant as the University's Solicitors on it.

The Project

- 1.1 Charitable Status: The University does not at present have the acknowledged charitable status in England necessary to accord it the direct UK tax exemption and indirect UK tax benefits available to charities. That status will be required, either for the University itself or by the University setting up a new Charitable Foundation in England for this project.
- 1.2 Purchase: The freehold of the Castle and its buildings and grounds and Hoads Hill Farm (about 532 acres in all) is being offered for sale by the Administrative Receivers of the present owner, with vacant possession except for:-
  - (1) a 15 year lease to the Science and Engineering Research Council of the Satellite Laser Tracking Site at a peppercorn rent, and



- (2) the occupation of Hoads Hill Farmhouse by a retired farmworker and his wife, who are both about 70 years old.

West Lodge is occupied by Keith Newman, the present Castle Manager. Whether the University would employ him remains to be decided.

The freehold title to the property is registered at H.M. Land Registry.

The University has offered to purchase the property at a price of £3.6m sterling, and should hear whether that offer has been accepted by the end of this week. If it is decided to set up a Charitable Foundation, the Foundation will be the purchaser of the property.

- 1.3 Repairs, Alterations and Use: A full survey has been carried out for the University, which identifies the repairs required. It is also proposed to make alterations to some buildings and to change the use of the West Building to residential accommodation for students, in order to enable the property to be used as a residential educational institution. These matters have been discussed with the Local Planning Authority and with English Heritage, who have indicated their support. Nevertheless the purchase contract will be conditional upon the necessary statutory consents being obtained before completion of the purchase.

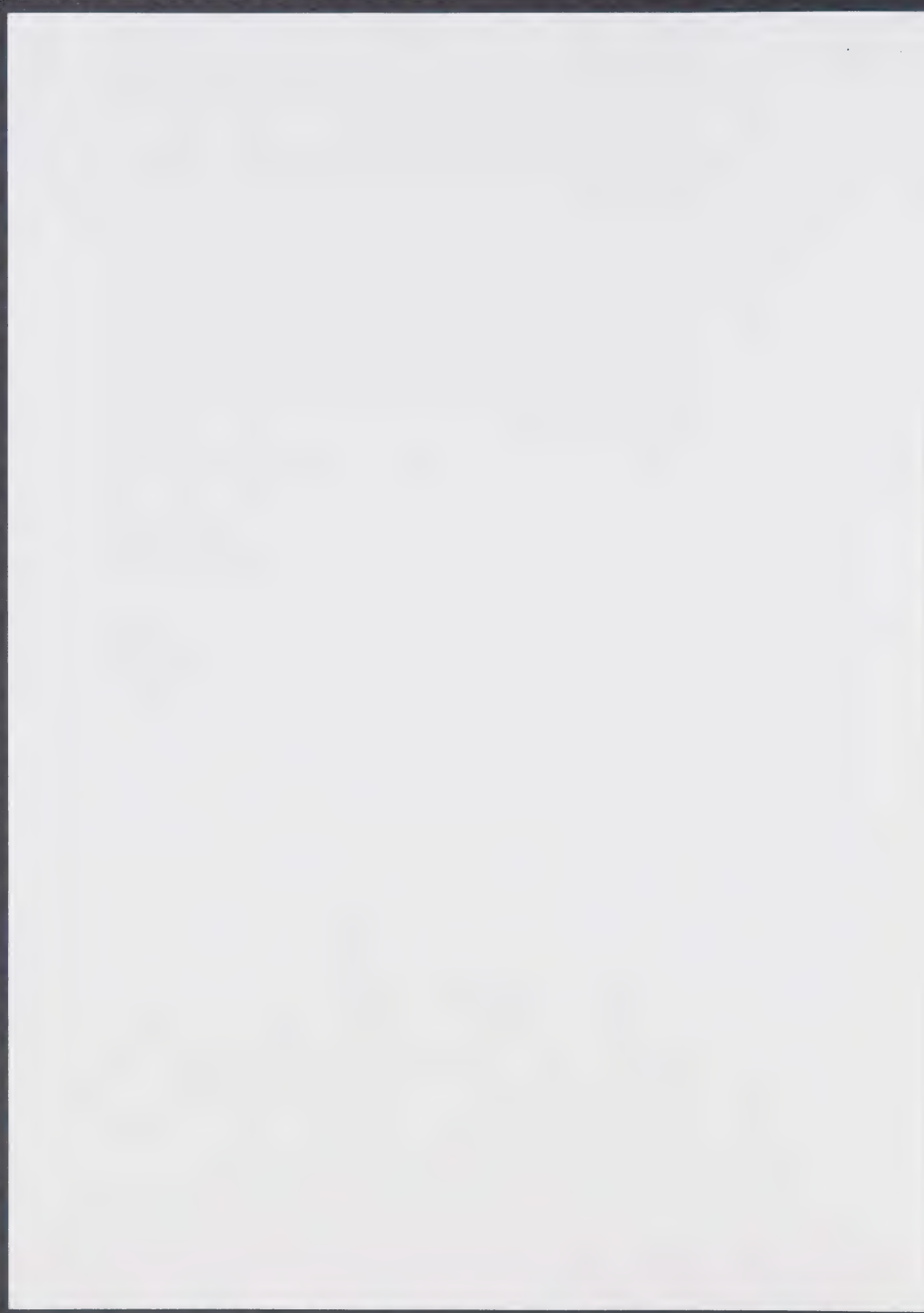
The cost of the repairs and alterations is estimated at £2.4m sterling, without any allowance for contingencies.

- 1.4 Finance: Dr. Bader will provide £6m sterling in cash for the above. Any additional funds for that and for equipping, staffing, maintaining and running the institution will be provided by the University, out of students' fees, and/or hiring out premises for occasional use by others.

#### The Legal Advice

- 2.1 If appointed, my firm will be required to:-

- (1) Advise the University on how best to achieve that required charitable status and those UK tax advantages: on the structures for the Charitable Foundation and in respect of non-charitable or other activities in order to minimise the impact of UK tax, and obtaining the necessary approvals of the Charity Commissioners and the Inland Revenue (and perhaps also the Department of Education and Science) in the UK. For those approvals you will have to supply detailed information on those structures, the intended trustees of the Foundation (a minimum of 3, a majority of whom should be resident in England), aims and objectives for both the short and the longer term, feasibility studies, and detailed financial projections of income, expenses and





sources of funds. One or more meetings with the Commissioners will be required. We act for a number of charities run as educational institutions in England, so we are well aware of the requirements in such matters.

- (2) Assist the appointed Architects to obtain the statutory consents referred to in 1.3 above prior to completion;
- (3) Examine and report on the legal title to the property and the usual local and other searches and enquiries in respect of it; and
- (4) Agree the form of the conditional purchase contract, and its exchange and completion.

2.2 I would be the partner with overall responsibility, with Charles Pike's assistance. I enclose biographical details on both of us.

We would draw on other expertise within Lovell White Durrant, as and if necessary. I have provided Dr. Bader and Mrs Whistler with my firm's brochure and also some other publications of ours on subjects relevant to this project.

#### Legal Costs

3.1 My firm's fees are calculated by taking into account a series of factors established under English law, including the amount of time spent on the matter, its complexity, the level of skill and specialised knowledge involved, the value of the transaction and the importance of the matter to the client.

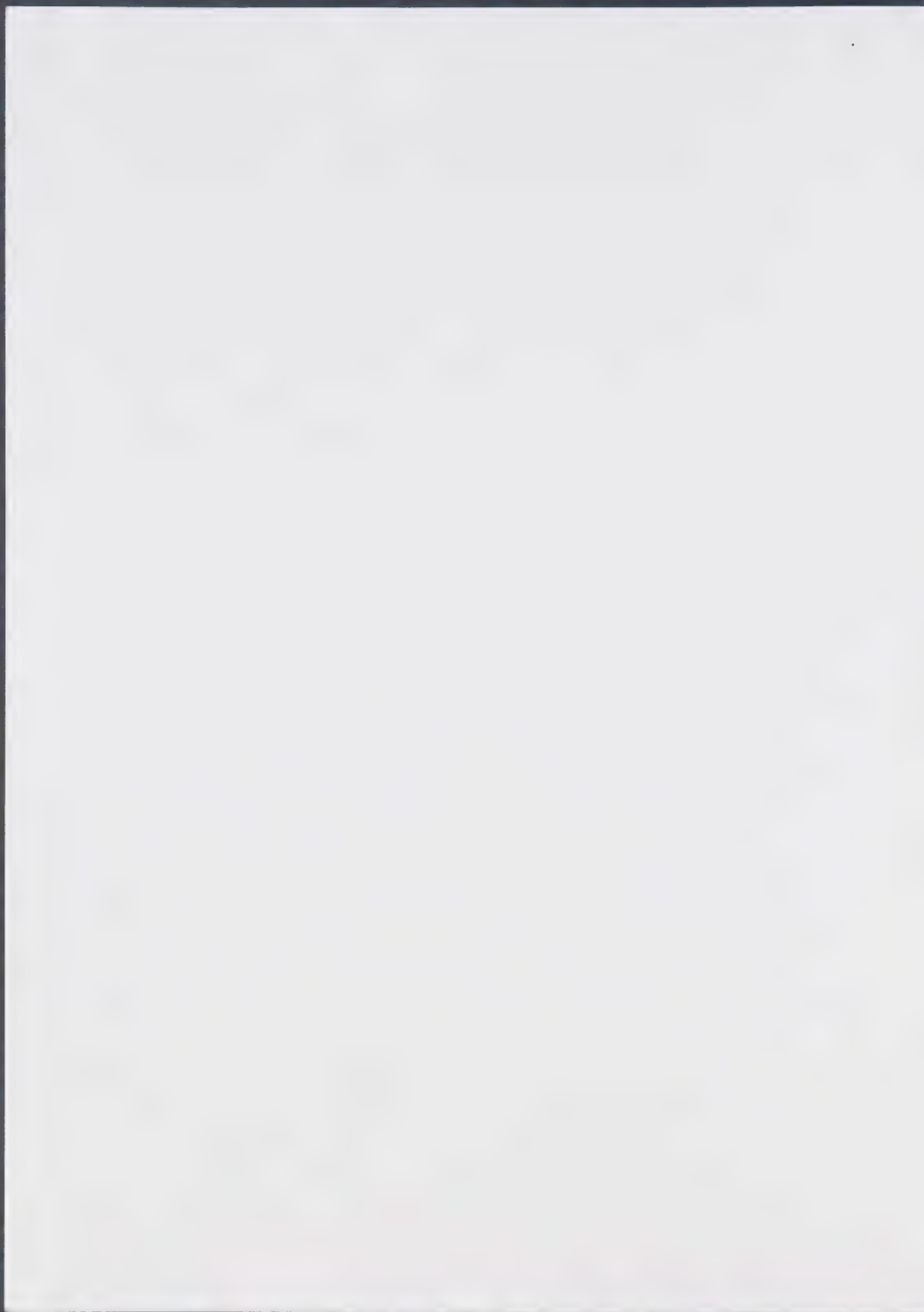
In this case those fees will be charged on the basis of time spent at my firm's hourly rates for the partners and staff concerned, subject to the following maximum fees:-

- (1) In respect of the work outlined in 2.1(1) above £10,000
- (2) In respect of that outlined in 2.1(2), (3) and (4) above £12,500.

However, if the project should prove abortive, then the total fees will be 80% of the time spent, with maxima of 80% of the figures in (1) and (2) above.

If the scope of the instructions as outlined in 2.1 above is changed, or my firm works on the project for more than 6 months, we will review that basis together.

3.2 In addition to the fees, my firm's disbursements will be charged (itemised by category) on photocopying, out of pocket expenses such as long distance telephone and fax charges, travel and computerised legal research (at cost). I enclose a note on my firm's travel policy.



If it becomes necessary at some stage in the project for us, with your consent, to instruct outside professionals such as Counsel, their fees will be added (at cost) in our bills to you.

Any money transfer through the CHAPS system will be charged at Barclays Bank's standard CHAPS charges.

There will be stamp duty on the Transfer of the property at 1% (0.5%, if the purchaser is a recognised charity) of the price and any VAT on the price (which is unlikely), and H.M. Land Registry fees on it of (currently) £1,400 to £1,600 sterling dependent upon the price. Fees on local and other searches and enquiries will be about £90 sterling.

- 3.3 Value Added Tax (currently 17.5%) should not be payable on our fees or disbursements, as UK law now stands. Either VAT on them should be at the zero rate, or they should be outside the scope of VAT.

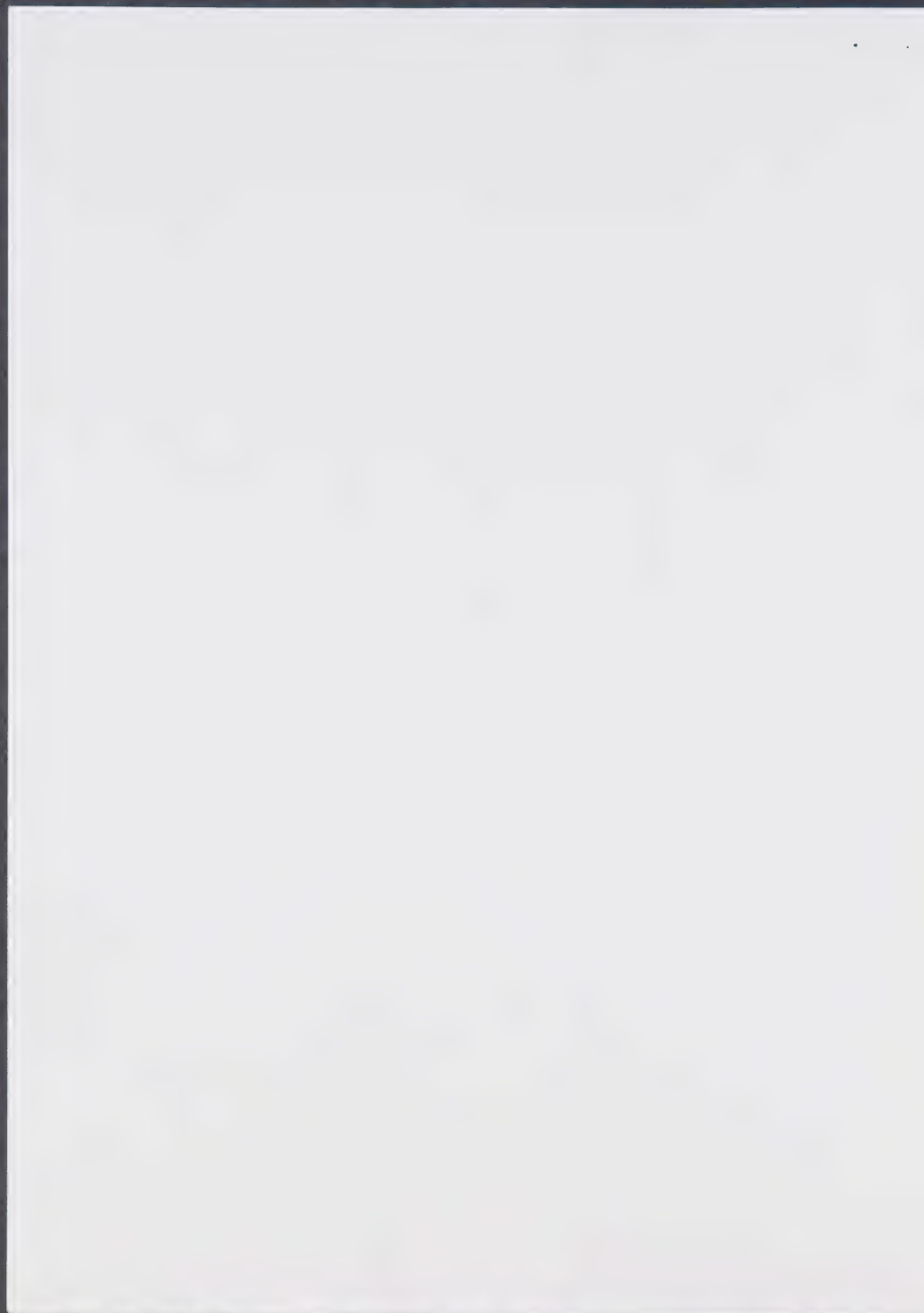
As arranged with them, I am copying this letter to Mrs Whistler and Dr. Bader.

I stand ready with Charles Pike to assist the University to the best of our ability on this most exciting and interesting project, if the University decide to instruct Lovell White Durrant, as we very much hope it will. If you require any further information, please do not hesitate to get in touch with me.

Yours sincerely,

M.D. SHANKLAND

(8826w)



LOVELL WHITE DURRANT PARTNERS

DAVID SHANKLAND

Age: 53  
Qualified: 1967  
Partner: 1971

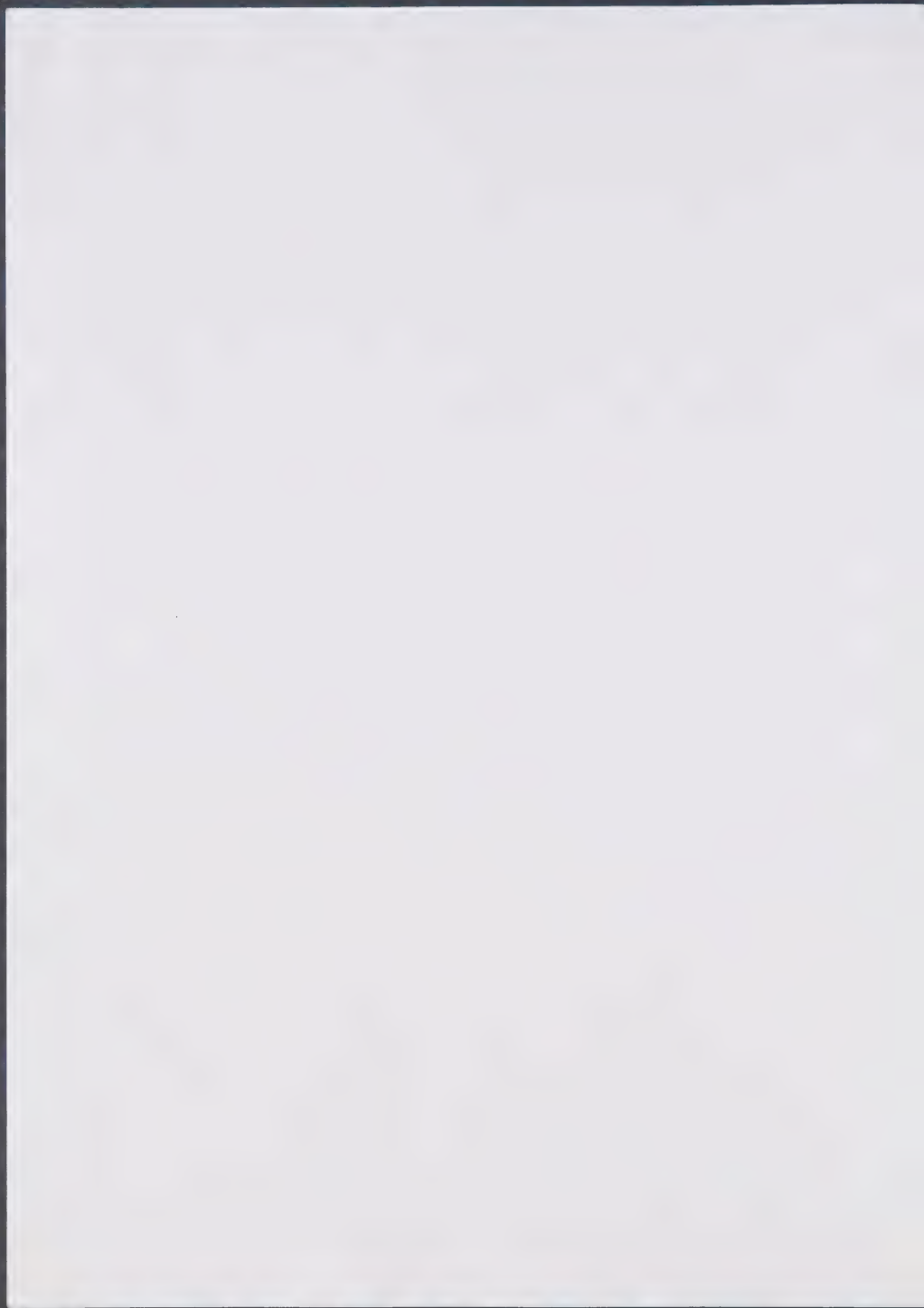
Experience in all aspects of property acquisition, development, financing and letting. One of 19 partners in the firm's property area. BA (Economics), Trinity College, Cambridge (1963). Member of the Law Society of England & Wales, Land Law Sub-Committee of the City of London Law Society, International Bar Association and Commonwealth Bar Association.

CHARLES PIKE

Age: 43  
Qualified: 1974  
Partner: 1983

Experience in all facets of charitable and individual trusts and tax planning for both UK and overseas clients, and the acquisition and management of agricultural and residential estates and buildings owned by them. One of 2 partners in the firm's private client area. MA (Law), Magdelene College, Cambridge (1970) and a member of the Law Society of England & Wales.

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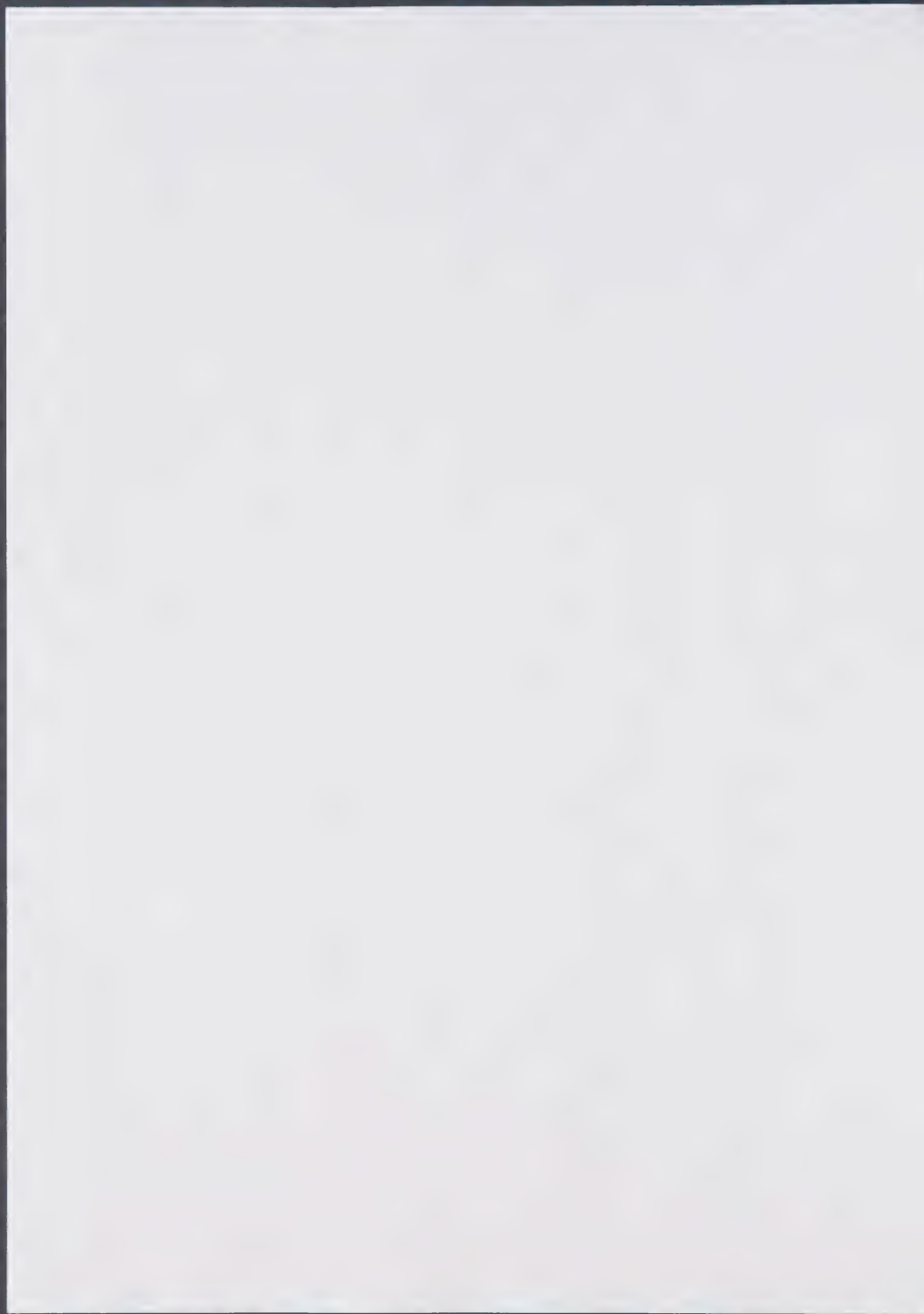


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Fax: (071) 495 3773

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Our ref HLR/sjk/4249i

Dr Alfred R Bader  
52 Wickham Avenue  
Bexhill-on-Sea  
East Sussex  
TN39 3ER

22nd December 1992

Dear Dr Bader

## HERSTMONCEUX CASTLE

Thank you for your letter of 19th December and for your kind comments contained in it.

I am particularly delighted that after such a long period of uncertainty, the property is finding such a good and suitable home. I confirm that once the sale is completed, we will make the agreed payment to Wyatt & Company as a gesture of goodwill and I trust that this resolves the difficult position you found yourself in.

In the meantime, we will be assisting in whatever capacity is necessary to try and ensure that the planning and legal formalities are satisfactorily concluded and if I can help you in any way, please let me know.

My best wishes for Christmas and the New Year.

Yours sincerely



HENRY RICHARDS

REVISED

1/1/19

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Henry L. Richards ARICS

Director

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