

28 May 2014

EME/DLM/SC416 X006

Mr Thomas Minogue  
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Please reply to our Edinburgh office:  
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Dear Sir

## Chief Constable v Murat Aksakalli, Republic of Turkey & Thomas Minogue

We act for the Chief Constable. We refer to the documents titled "Defences" and "Condescendence and claim" lodged by you with the court on 15 May 2014. We write to invite you to withdraw your "defences" forthwith.

The documents lodged by you suggest that you believe that the golden wreath was removed by Earl Elgin from Greece in the 19th Century. Regardless of whether that is correct, you have no title or interest to either defend or make a claim in this action. If the wreath did come from Greece, it would be for the Republic of Greece to pursue that claim. The suggestion that you will return it to Greece is insufficient to give you title or interest to be involved in this action.

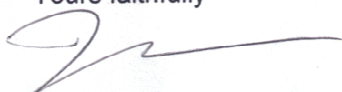
Separately, there is expert evidence that makes it very clear that the wreath does not come from Greece but comes from what is now within the Republic of Turkey. We enclose a copy of an expert report lodged by the Republic of Turkey (you can see the principal at 7/1 of process) that makes it clear that the wreath's origins are in Turkey and puts forward the Turkish Government's case that the wreath was removed from the Hecatomios Tomb in Milas in Turkey during an illegal excavation. You will see from the report that there is no suggestion whatsoever that the wreath has any connection with either Greece or the Earl of Elgin in the 19th Century. The first defender's, Mr Aksakalli, case is that the wreath is a family heirloom that he has inherited from his father. Mr Aksakalli is a Turkish national who now resides in Scotland. His case is that he brought the wreath with him from Turkey to Scotland. The golden wreath was in Mr Asksakalli's possession when it came to the police's attention in 2010. For the avoidance of doubt, the Chief Constable has no interest in the wreath and the purpose of the action is to enable the court to decide who the wreath belongs to and for it be returned to the appropriate owner.

We invite you to withdraw your "defences" now with no award of expenses against you. Should you not drop your "defences" within 7 days of the date of this letter, our client will request that the court fix a hearing to determine further procedure. That will incur expenses for our client and for the other parties to the action. We have instructions to seek an award of expenses against you personally and our client will seek to enforce that against you, should you not drop your "defences".

We recommend that you take independent legal advice on the content of this letter.

This letter is written without prejudice to our client's whole rights and pleas and may not be founded upon.

Yours faithfully

A handwritten signature in black ink, consisting of a large, stylized initial 'J' followed by a horizontal line that tapers to the right.

For Morton Fraser LLP