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29<sup>th</sup> June 2018  
Our ref: JR/0068825  
Contact: jonathan.rogers@gunnercooke.com

Dear Sirs,

**Our clients: Naked Technologies Limited and Mark Lawrence Robinson  
Re: LETTER OF CLAIM**

## **BACKGROUND**

We confirm we have been instructed by Naked Technologies Limited and Mark Lawrence Robinson regarding numerous comments which have been made by you regarding our clients to our clients' investors which equates to Defamation of our clients' character and has resulted in considerable financial losses to Naked Technologies and has caused considerable damage to the reputation of both of our clients.

Our clients assert all of the statements made by you are untrue and are defamatory by their very nature against them (**Offending Statements**). We shall let you have copies of these statements in due course.

You have also uploaded defamatory and derogatory videos about our clients on You Tube (**Offending Videos**).

The Offending Statements and Offending Videos are untrue and are likely to continue to damage the reputation of our clients and cause other financial losses to our clients going forward.

The Offending Statements and Offending Videos include defamatory statements which suggest our clients are not honest, that their business interests are not genuine and that he should not be trusted. This is untrue and inaccurate as well as very damaging to our clients.

By reason of the foregoing we trust you now appreciate why the comments you have made personally against our clients are untrue and defamatory.

We therefore request that you provide to this firm URGENT confirmation within 48 hours of the date of this letter that you have remedied the Offending Statements by writing to this firm confirming that all of the Offending Statements you have made are untrue and are retracted by you in full. We also request that you provide to this firm

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URGENT confirmation within 48 hours of the date of this letter that you have removed the Offending Videos from YouTube and that you also agree to make an immediate public statement via You Tube formally apologising to our clients for, and retracting, all of the Offending Videos.

If this confirmation is not received by this firm as requested, our client reserves the right to issue proceedings against you seeking relief and damages for defamation, as well an immediate Interim Injunction against you. If proceedings become necessary (which may be issued and served without further notice to you), the remedies that may be available to our client include an injunction restraining further publication of the Offending Statements, damages, legal costs and interest.

Our clients are also currently assessing the total extent of their losses which have resulted from the Offending Statements and shall revert to you in this regard once fully quantified. However, in the meantime we would ask that you make a proposal for compensating our clients' for the losses you have caused to them by reason of the Offending Statements.

In respect of our clients' losses, you were commissioned by our client Naked Technologies Limited to act as its agent at our client's investor events by organising such events for our client and liaising with investors in respect of the investment opportunities with our clients. In breach of this agreement, you have made the Offending Statements and sought to encourage to sell your own products to our clients' investors rather than promoting our clients to their investors through the events you were commissioned to organise.

Furthermore, we are instructed that you have diverted funds from our clients' investors into your own personal bank accounts which equates to breach of contract and fraudulent. We are instructed that the total amount which you have diverted from our clients' investors is the sum of £11,250.

We are instructed by our clients that two police reports have been lodged in Malaysia for fraud & defamation with the evidence (proof of transfers) that you have directly taken monies from Cedric Wong and Pal Ji Singh. We are also instructed by our clients that more of their investors have been approached by you to do the same. Copies of the police reports are attached.

## **NEXT STEPS AND REQUIREMENTS**

By reason of the foregoing our client therefore requires the following remedies from you:

1. You provide to this firm URGENT confirmation within 48 hours of the date of this letter that you have remedied the Offending Statements by writing to this firm confirming that all of the Offending Statements you have made are untrue and are retracted by you in full.
2. You provide to this firm URGENT confirmation within 48 hours of the date of this letter that you will not make any further Offending Statements about our clients to either their investors or any other third party by any means of communication whatsoever.
3. You provide to this firm your proposed public retraction of all Offending Videos you have made on You Tube and your proposed public apology within 48 hours of the date hereof for our clients urgent approval. Please provide such proposals to this firm within 48 hours of the date hereof.
4. Please also confirm that you agree to not attempt to solicit any of our clients' investors going forward by attempting to entice them away from our client to a competitor business you have set up known as AX Blockchain, or any other business.

5. Your proposals for compensating our client for their losses, which include damages for defamation. Please note that notwithstanding this request, our clients are monitoring the effect of, and losses resultant from, your defamatory comments and accordingly our clients reserve their rights fully to recover all losses from you including financial losses. Please provide such proposals to this firm within 48 hours of the date hereof.
6. Your confirmation to this firm that you agree to meet all of our client's legal costs incurred in respect of this matter.

Should you not carry out the above to the full satisfaction of our client, and strictly within the timescales requested, we are instructed to make an immediate application to Court for an Interim Injunction against you to prevent any further Offending Statements being made in the future together with the removal of the Offending Videos and to recover all of our clients' financial losses from you.

We are also instructed by our clients that without you taking the requested above steps/action, and in order for our clients to mitigate their losses, all of your ownership of "BIGLUV" tokens and "NAKEDDOLLARS" will be suspended and withdrawn from you by Naked Technologies Limited without any reimbursement of monies paid by you.

This is a complex area of law and we strongly recommend that you seek independent legal advice immediately.

Our client reserves all of his rights and remedies against you.

We look forward to hearing from you as a matter of urgency.

Yours faithfully,

A handwritten signature in cursive script that reads "gunnercooke llp".

**gunnercooke llp**