

- (c) The Estate of Lily Margaret Fell;
 - (d) The Lily Margaret Fell Will Trust; and
 - (e) The Estate of Dennis William Spiers Fell.
6. The Claimant will lodge a Consent Order staying claim PT-2021-BHM-000006 until 1st May 2022 so as to allow the parties to lodge a Tomlin Order.
 7. Chris and Tim agree that the net proceeds of sale of any asset presently owned by CPL or DFL shall remain within the relevant company until completion of the Transactional Document or other agreement between the Parties.
 8. By 4pm 18th February 2022, Martin's Solicitors ("Meridian") shall send Chris's and Tim's Solicitors (Sydney Mitchell – "SM") and copy in Jonathan's Solicitors (Michael Hill Partnership "MHP") draft documentation to give effect to paragraphs 1, 2, 4, 5 and 6 above including a draft Tomlin Order ("the Transactional Documents").
 9. SM will revert to Meridian (copying in MHP) with any comments (using tracked changes) by 4pm 4th March 2022.
 10. Thereafter the Parties will use their best endeavours to agree the Transactional documents as soon as possible and in any event by 4pm 1st April 2022.
 11. By 4pm 18th February 2022, Martin and Jonathan will be provided with all necessary documents belonging to the DFL and CPL to allow for each company to be valued, including (but not limited to):-
 - (a) Full accounts for the last 3 years;
 - (b) The last three years Corporation Tax returns (CT600);
 - (c) Current Stock list (with individual book values) and the terms of the lease;
 - (d) Current List of Debtors;