



29 September 2021

BY HAND & BY EMAIL: gmajor@ilstudios.com

Verizon Media Group Limited
ILTV Studios
162 University Drive,
Nassau, New Providence
The Bahamas

Attention: Mr. Gershan Major

Dear Sirs,

Re: 103.5 'The Beat' and Freedom March Radio Talk Show

We act for UBS (Bahamas) Ltd (in voluntary liquidation) ("UBS"); Mr John K F Delaney QC ("Mr Delaney"), Senior Partner at Delaney Partners and one of UBS's joint voluntary liquidators; and Mrs Lena Bonaby ("Mrs Bonaby"), a Partner at Delaney Partners and a member of the UBS liquidation team.

We are aware that Verizon Media Group Limited owns the radio station 103.5 'The Beat' and is the broadcaster of the radio talk show "Freedom March".

On 27 September 2021 and 28 September 2021, the host of Freedom March commented on certain ongoing litigation in the Supreme Court of The Bahamas between UBS and Mr Yuri Starostenko and Mrs Irina Starostenko.

The host made statements, directly or by innuendo, about each of Mr Delaney and Mrs Bonaby that were untrue, offensive, damaging as to their reputation, and directed against them in their professional capacities. Each Mr Delaney and Mrs Bonaby believe, as appears obvious, that the host's statements were deliberately made during the show and calculated to lower their professional standing in the community. While the host is entitled to his opinion, the host is not entitled to defame our clients.

We hereby request that, within the next two days, you provide us with a copy of the transcript of the 27 and 28 September 2021 Freedom March broadcast, so that we may fully consider and advise our clients regarding this matter. Should you fail to produce the requested transcript, we will take this matter up with the Utilities Regulation and Competition Authority (URCA).

Meanwhile, we reasonably expect your radio station to strongly caution its radio hosts to refrain from making any libellous comments regarding our clients, whether concerning the Starostenkos litigation or otherwise. Should your company fail to control its radio hosts, our clients will take all appropriate legal measures to protect their reputations.

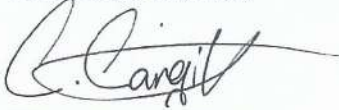
Bahamas: +1 (242) 502 5000
BVI: +1 (284) 494 6864
Email: kp@lennoxpaton.com
Web: lennoxpaton.com

3 Bayside Executive Park,
West Bay Street & Blake Road,
P.O. Box N-4875,
Nassau, The Bahamas

Flemming House, 4th Floor,
Wickhams Cay, PO Box 4012,
Road Town, Tortola,
British Virgin Islands, VG 1110

Our clients reserve all their rights against your company concerning this matter.

Yours sincerely,
LENNOX PATON



Chizelle Cargill (Ms)