From: Chris Emmins <Chris.Emmins@KwikChex.com>
Sent: Thursday, April 3, 2025 12:23:52 PM
To: Sarah.Kemp@clarkewillmott.com <Sarah.Kemp@clarkewillmott.com>
Cc: KwikChex Team <info@KwikChex.com>
Subject: Our Client: Seasons Holidays PLC [CW-LEGAL.FID5761817]

We are in receipt of your email dated 03 April alleging that KwikChex has published defamatory content regarding your client, Seasons Holidays PLC.

You particularly cite the following as defamatory

"Our client takes an unfair advantage over "vulnerable investors" who are pressurized into attending face to face-to-face meetings by our client's" coercive tactics"

In this regard, I can confirm that KwikChex has testimony from several Seasons customers, supported by documentation that

- They have been pressured, and frankly, pestered into attending face-to-face meetings with Seasons representatives.
- They have advised Seasons that they do not wish to attend these meetings, and are not obliged to do so.
- Seasons has ignored the objections from its customers to the meetings, and Seasons has inferred that those being pressured may suffer some type of detriment if they do not attend.
- Seasons has been advised on multiple occasions that, due to age, health issues, and location, it is difficult for them to attend the requested meetings, yet this still persists.
- Several of those being pestered by Seasons in this manner are suffering serious ill health, including terminal illnesses, and are of advanced age, and so can be justifiably described as vulnerable.
- When attending meetings at Seasons' insistence, representatives of Season's attempt to persuade the attendees to purchase new products on the basis that the products they purchased previously, known as 'Keys' were unlikely to produce the financial return that was indicated at the time of sale at the end o the contract term - and that in fact money may be owed to Seasons for previously undisclosed fees which would likely be applied after the contracts end, and that these would be applied for an undefined, and possibly lengthy period. In addition, they are told that the promised 'roll over feature that was said at the time of sale would provide an

additional 16 years of fee-free holidays (as an alternative to 'cashing in' their purported investment, was, in essence, no longer viable, as there would be very limited availability under this scheme, that only very basic and minimal size accommodation was now included, and that additional supplements would be charged at several of the properties. Seasons representatives suggest that it would be wiser to exchange the Keys products for a new product costing an average of around £10,000 more.

- The pressure put on the Keys purchasers to attend meetings is, in many cases, entirely inappropriate and misleading. The terms agreed at the point-of-sale state that the purchasers must make decisions on whether to take a share of the proceeds of the properties said to be included in the scheme, or take the 'roll over' option in the penultimate year of their contract, but Seasons are insisting that Keys purchaser attend the aforementioned meetings long before that time.
- Those being approached by Seasons in the manner described above are willing to testify as to the distress they have suffered caused by the conduct of Seasons.

In addition to the above points, there are several other serious concerns, including the fact that there is extremely robust evidence that Seasons gave the impression that the Keys products were a viable and attractive financial investment. Your clients will be well aware that under the Timeshare Regulations that came into force in 2010, it is prohibited to market and sell timeshares as an investment. There is strong evidence of multiple further misrepresentations,

b. "hundreds of millions of financial detriment and extreme stress have been caused by misrepresentations, unethical sales practices, and in several cases, outright fraud"

You appear to have misinterpreted this element, which clearly refers to other businesses, rather than your client. I quote

"Vacation Investment schemes require urgent actions

This is not the only case of Long-Term Vacation Investment products causing distress to those who have bought into these 'dreams' – KwikChex is also working on the mis-selling and collapse of a scheme called Global Great Hotels, and the practices of Holiday Park Resorts in the selling and management of static caravans – often referred to as 'holiday lodges'. All the evidence indicates that hundreds of millions of

financial detriment and extreme stress have been caused by misrepresentations, unethical sales practices, and in several cases, outright fraud. "

I am aware that your firm has issued threats of defamation on behalf of Seasons Holidays to others who have already contested the allegations. I am also aware that legal representatives of several purchasers of the Keys products have commenced legal proceedings against your client, citing multiple breaches of law. I would welcome the opportunity to present evidence to a court, as I believe that KwikChex can incontrovertibly demonstrate the truthfulness of what we have published and that it is in the public interest. However, I would also direct your firm to the advice published by the SRA concerning 'SLAPPs' - see link https://www.sra.org.uk/consumers/problems/fraud-dishonesty/legal-threats-solicitor/ In this instance, while you may seek to defend your client and follow its instructions, you have already been provided with significant evidence that your client has acted in the manner described, and so you should bear this in mind. KwikChex will not hesitate to make a formal complaint to the SRA in this matter, should you persist in your allegations and threats of legal action

For the avoidance of doubt, and based on the details above and supporting evidence, KwikChex will robustly contest your client's allegations of defamation on the basis of truthfulness and public interest.

Chris Emmins,

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