

EXHIBIT 1

Kevin McCulloch

From: Michael Lindsey <Michael.Lindsey@geldards.com>
Sent: Wednesday, January 14, 2015 12:29 PM
To: Kevin McCulloch (kmcculloch@nelsonmcculloch.com)
Cc: Joanne Osborne; David Moore; Nia Griffiths
Subject: RE: Your Claims [GELDARDS LLP-Cardiff.FID1640307]

Dear Sir

It is highly regrettable that your client has refused to settle the matter in the manner proposed in our emails of 19 December 2014 and 8 January 2015.

We note your instructions to file suit. We are confident that your client will fail on liability, and even if it succeeds in this regard, will not recover financially beyond an award of actual damage suffered, which will be calculated on the basis of a market rate licence fee covering the uses in question.

We are not authorised to accept service. Proceedings should be served upon the Welsh Ministers, addressed to the Director of Legal Services, Mr Jeffrey Godfrey. This is in line with the provisions of the Crown Proceedings Act 1947.

We anticipate that we will be instructing Richard Oparil of Porzio Bromberg and Newman, once our client has been served with the claim.

Yours faithfully

Geldards LLP

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From: Kevin McCulloch [mailto:kmcculloch@nelsonmcculloch.com]
Sent: 08 January 2015 19:19
To: Michael Lindsey
Cc: Joanne Osborne; David Moore
Subject: Re: Your Claims [GELDARDS LLP-Cardiff.FID1640307]

Michael

Our prior responses were clear that we don't agree it is a workable, feasible, or cost effective means of proceeding. You now note that your proposal was meant only as a back-up suggestion if our direct settlement talks fail. In that case, you have wasted a lot of time devoting your response to that option when you should have been focused on settlement exchanges.

Since your client has failed to provide a substantive response to our last settlement offer, I have been directed to withdraw that offer; terminate all settlement communications; and advise you that we are going to proceed with

filing suit.

Please advise as to who is your New York counsel so I can send relevant communications to them. Also, please advise if you are authorized to accept service on behalf of your client and if you'd be willing to do so electronically. If not, please identify your client's agent for service of process in New York.

Regards

Kevin P. McCulloch
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From: Michael Lindsey <Michael.Lindsey@geldards.com>
Date: Thu, 8 Jan 2015 18:30:23 +0000
To: Kevin McCulloch (kmcculloch@nelsonmcculloch.com)<kmcculloch@nelsonmcculloch.com>
Cc: Joanne Osborne<Joanne.Osborne@geldards.com>; David Moore<David.Moore@geldards.com>
Subject: FW: Your Claims [GELDARDS LLP-Cardiff.FID1640307]

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