

**Outline structure of report by McGrigors LLP**

**in relation to  
Project Separation**

- 1 Executive summary
- 2 Introduction and aims of report
- 3 "Automatic termination" arising out of:
  - (a) Heads of Terms agreed following mediation;
  - (b) Minute of Variation 4.
- 4 Factual position in relation to various heads of claim, for example:
  - (a) Clause 65;
  - (b) Clause 80;
  - (c) Schedule Part 4;
  - (d) Extension of time;
  - (e) Princes Street defects.
- 5 Legal position in relation to the heads of claim referred to above.
- 6 Discussion of impact of legal position on the commercial outcome of automatic termination.
- 7 Examination of work carried out tie and others (e.g. Cyril Sweett) in relation to valuation of work carried out by Infracore and entitlement.
- 8 Conclusions

**McGrigors LLP  
28 April 2011**