



## **Legally Privileged and Confidential**

Paul Baker  
Quinn Emanuel Urquhart & Sullivan UK LLP  
90 High Holborn  
London WC1V 6LJ

- *By email* -

11 July 2022

### **Proposal Letter – Project Bluefin**

Dear Paul,

Quinn Emanuel Urquhart and Sullivan LLP (“you” or “QE”) are engaged by Steward Health Care Malta Ltd (“Steward” or “the Client”). The Client has asked you to seek a work plan and cost estimate from us. You will provide instruction on the work and be the point of contact throughout the matter. We also understand that the Client, and not you, will be responsible for the payment of fees and any expenses invoiced. This engagement will be covered by legal privilege.

I am pleased to send you this letter on behalf of C|T Solutions and Private Advisory Ltd (“we” or “us”), part of the C|T Group, summarising our understanding of your requirements and our proposed engagement with you on this matter, which we will refer to as Project Bluefin.

#### **PROJECT OBJECTIVES**

The objective of Project Bluefin is to identify, evidentialise and deploy into the public domain information about the main opponent of the Client’s concession in Malta.

The outcome of this activity will improve their negotiating stance as they look to agree the future of their position in country. It can also be used to support any potential future litigation in Malta.

#### **APPROACH**

We have discussed and agreed an approach forward. This encapsulates the following steps:



### 1. **Initial Intelligence Gathering**

We will undertake the initial information gathering exercise using discreet and trusted human sources in Malta and elsewhere, with the understanding of the importance of caution given that another team has been working in this area for several years. The aim will be to identify instances or areas in which the opponent has behaved improperly, either directly or via his associates.

### 2. **Evidentialising Exercise**

We will analyse our initial findings to isolate areas that are most appropriate to deploy in the Client's favour, which we will agree with you and the Client. We will then target the vulnerabilities identified in the way any of these improper practices were carried out and seek to evidentialise these specific events to a level that will pass scrutiny in the media. This will focus on a maximum of two scenarios.

### 3. **Deployment Phase**

Once all parties are content with the level of information secured, we will agree with you and the Client and advise on the best way to deploy the information to secure coverage of the issue in the Maltese media. This will be done anonymously and in strict confidence to ensure that discretion is maintained. We will also advise on how the Client should follow up the publication of this material.

For each phase of the project, we will work as quickly as we can with the acknowledgement that human source enquiries can take time.

## **PROFESSIONAL FEES**

Our professional fees for Project Bluefin will be £290,000.

Our fees exclude sales tax or VAT if applicable. We require 50% of the fee to be paid in advance, with the remainder paid on completion of the project. The fees include all anticipated expenses, including international travel and hotel subsistence.

## **NEXT STEPS**

I trust that this proposal gives you an understanding of the methodology of our work and our proposed approach in cases such as this. Our standard terms of business are