

PRIVILEGED AND HIGHLY CONFIDENTIAL

**THE GRENFELL TOWER INQUIRY**

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**ADDENDUM TO RYDON  
MAINTENANCE LIMITED'S  
OPENING STATEMENT**

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Our Ref: [REDACTED]  
Your Ref:

31 May 2018

**PRIVATE & CONFIDENTIAL**

The Grenfell Tower Inquiry  
For the Attention of Cathy Kennedy

138-142 Holborn  
London  
EC1N 2NQ

**By email only (cathy.kennedy@grenfelltowerinquiry.org.uk)**

Dear Sirs,

**Rydon Maintenance Limited**

Further to the Inquiry's letter dated 26 April 2018 from Caroline Featherstone, we write to notify the Inquiry that, subject to the below, our client will rely upon its written Opening and does not presently wish to make an oral Opening at the hearings to be held in the week of 4 June 2018.

Our client fully reserves the right to challenge factual inaccuracies in the written Openings filed by other Core Participants, at the appropriate point.

An example of key factual issues being raised in Phase 1 Openings is the contention in paragraph 5 of the Outline Opening Statement filed on behalf of the G4 BSRs (represented by Bhatt Murphy & others) that "...Rydon suggested that the specified zinc cladding could be replaced by an aluminium composite system...". For the avoidance of doubt, Rydon disputes this contention. However, Rydon understands that this is likely to be a matter of evidence for Phase 2, particularly in circumstances where an aluminium composite system was required as an alternative by the Employer's Requirements (which predated Rydon's Tender and also predated the Pre-Construction Agreement and the Minutes cited in the G4 BSRs' Opening).

On this basis, we do not consider that such issues are properly the subject of submissions during Phase 1 Openings (which are focused on the events of the night of 14 June 2017 and its aftermath) and our client fully reserves its position accordingly.

Yours faithfully,



**DAC Beachcroft LLP**

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