

From: JOSEPHINE WARD [josephinewardsolicitor@gmail.com]

Sent: 29 January 2014 15:57

To: Lorraine Cordell

Subject: Re: Regina v. Simon Cordell

Hi Lorraine / Simon

Sorry to hear that you have been unwell.

The date of 30th April 2013 is not significant and does not add to the prosecution case. This is the date preferred by the prosecution. As you are aware the premises being checked and being secured by Mr Patel will be open to rigorous cross-examination. The date used by me in my letter is the date specified in the indictment that is before the court.

I will amend my letter and specify that Simon was there to hire his equipment. It would be helpful if Simon can bring to the meeting on Friday a copy of the invoice confirming this and also any company accounts that he has kept since the start of his company to show that he is in business.

The statement from Nikki Diamond will follow after the Insurance company discloses the claims made by Mr Patel, whether voluntarily or by Third Party disclosure. I am in possession of the interview tape of Simon which you can listen to at my office. I will see if Anthony can burn a copy so that Simon can bring it to you.

I will update you once I receive confirmation from the insurance company.

Regards

Josephine

On Wed, Jan 29, 2014 at 3:32 PM, Lorraine Cordell <lorraine32@blueyonder.co.uk> wrote:

Hi Josey

Sorry for the late reply to your email I have been very unwell; Simon can come for the meeting at your office on Friday.

As for the letter there are some mistakes please see below.

- Between 30th April 2013 and 9th May 2013 having entered a building, namely Unit 3, Horrisons Industrial Estate as a trespasser stole therein a chair and a gazebo.

The dates are wrong Mr Patel left the building at 14.00 on the 1st May 2013 and then did not return till 8th May 2013 at 10.30 so he knew the building was ok until the 1st May 2013 not sure why the 30th April 2013 has been put in. also Simon was charged with Burglary and this is what we have told the insurance company he was charged with when we had the meeting.

- Our client has denied any involvement in the burglary matter but concedes that he was a DJ at

a party hosted by persons who had established a legal squat at the commercial premises. Our client further contends that when he arrived at the premises in May 2013 the wall had already been damaged and he also contends that this damage had been done at an earlier date back in February 2013 when there was another private party.

He was not a DJ at the party he was there due to Hiring his sound system out.

Also Simon still wants a statement from Nikki Diamond taken, as he feels if the statement was taken then this could help his case now in the fact if this was shown to the crown they would have to look at this impact on the case, it would also help Simon case for her to stand up in court in front of the jury and say what went on within the claim that Mr Patel made.

Simon / Lorraine

From: JOSEPHINE WARD [mailto:josephinewardsolicitor@gmail.com]

Sent: 27 January 2014 11:02

To: too smooth; Lorraine Cordell

Subject: Regina v. Simon Cordell

Dear Simon / Lorraine

Thank you for your email.

I am writing to confirm that Jemi has drafted the section 8 application that requires minor amendments before it can be served. I am also attaching the letter that I am proposing to forward to the insurance company. There is a process that I must go through in order to secure an application for Third Party Disclosure and one of the processes is requesting the insurance files from the Loss Adjustors. I anticipate that they will be refused and this will then form the basis of the Third Party Disclosure application.

I regret that I was unable to submit the application to vary your bail conditions for your birthday. This was due to a number of factors as follows:

There is a procedure which must be satisfied, namely writing to the court and giving five clear days notice. (Bail variations are different to applications to bail which must be heard within 24 hours if the request to list is made before 10am on the previous day.) This could not be done in this case as I was waiting confirmation of the dates and location of the restaurant, night club etc. The added difficulty is the attitude of the Court to previous bail applications and also to our defence case statement.

Can you please let me know your views on the proposed letter to Miss Diamond. I would like to get this document emailed to her today so that I can then apply for the Third Party Disclosure.

Simon can you please attend my office on Friday 31st January 2014 at 3pm so that I can finalise your proof of evidence. If this appointment is not convenient then please confirm this so that I can make alternative arrangements.

I will forward the amended section 8 application in due course.

Regards

Josephine