

From: JOSEPHINE WARD [josephinewardsolicitor@gmail.com]

Sent: 27 January 2014 11:02

To: too smooth; Lorraine Cordell

Subject: Regina v. Simon Cordell

Attachments: Letter to insurance company.doc

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 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