

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

**Sent:** 10 August 2013 12:23

**To:** Lorraine Cordell; michael@michaelcarrollandco.com

**Subject:** Regina v. Simon Cordell for plea and case management hearing on 4th September 2013 at Woolwich Crown Court

Dear Lorraine / Simon

Thank you for your telephone call today.

I am copying Michael Carroll into this email as he is now overseeing and monitoring all the work that I undertake in this case to ensure that I am preparing your case properly and to your satisfaction and complying with your instructions.

I set out below the main content of our conversation but if I have left anything out please come back to me as soon as possible.

### **INSTRUCTIONS:**

Simon you confirmed that your benefits had been suspended and you did not have the funds to attend the police station every day. You stated that Edmonton Police Station is a 2 mile walk from where you currently live. You have asked me to make an application to remove this bail condition.

Secondly, you have asked that your curfew be suspended for an up and coming festival in Enfield.

Thirdly, you have asked me to consider the merits of making an application to dismiss the charges against you based on the fact that you entered a building that was being squatted in and therefore you were not a trespasser.

Fourthly you stated that the photographs sent to you were of poor quality and were in black and white.

Fifth, you complained that the barrister did not present your case properly.

Six, you requested your case papers from the Winchester case.

I will deal with each of the points that you have raised and the agreed action.

Point (1) I can make this application to remove the reporting the condition. I can source a map from the internet to show the distance and I can also show bus prices on an Oyster card £2.80 per day in fares as I assume only one bus is required. If I am wrong in this assumption can you please confirm by email the number of buses and the routes that the buses take at your earliest convenience. Can you also please ask your mother to email over the letters that you have sent to the Benefits Agency appealing and requesting the re-instatement of your benefits as this will assist my application.

Point (2) Again I can make an application to suspend your curfew on the dates of the festival but again I need the documentation from the Council regarding this to support your application.

Point (3) I will have to consider this point in more detail but if I can illustrate an analogy to you which I believe that the Judge will also use. Your case is that you were not a trespasser when you entered the building due to notices on both buildings which confirmed they were legal squats. You may well be right.

The law on burglary consists of entry to a building or part of a building, as a trespasser with intent to