

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

**Sent:** 14 August 2013 18:12

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

**Subject:** Regina v. Simon Cordell for PCMH at Woolwich Crown Court on 4th September 2013

Simon

I have now read through all your case papers, interview transcript and unused material.

Areas for discussion:

1. Premises - need full address of where the rave took place
2. Any emails / facebook notification of the rave / booking your sound system for the party / any invoices given to the people hosting the party
3. Full contact details for Mohammed in order that I can take a statement confirming the sale to you
4. Receipt that Mohammed gave you, presumably this itemises the goods sold and date of purchase by you - pg of your interview you make reference to leaving with your sound system and then being offered a job lot of chairs - need specifics on this see 5 below. Please also read your bottom page 20 of your ROTI "I bought it of the person who put the 144 notice on both of them premises that was living there and was a registered squatter to them buildings. What made you believe that Mohammed had a right to the property? Where did he tell you he got the property from?
5. I need confirmation of the date you purchased the items; the location where the sale took place
6. What made you believe that both premises were linked? For all intents and purposes they appear to be separate buildings and entry to Unit 3 appears to have been gained through a hole in the wall not a natural doorway. This is criminal damage and therefore illegal.
7. Confirmation of where the Notices were displayed. Any photographs from the rave to back this up would be very useful
8. Neighbours who can confirm the date the gazebo was erected
9. More information on the hole in the wall - photographs would be helpful from rave photographs and also any persons who were living there in the Unit 3 squat
10. Recordings of conversation between you and police before entering the party. Any shoulder numbers of officers who attended the premises so we can request statements etc from them re damage.
11. What proof do you have that Unit 3 was not barricaded with wood as the Director alleges and the barricades were not simply moved prior to your arrival?

Simon I will have a full discussion with you regarding the law etc on Friday but if you can concentrate on the above and collating the requested information.

I will draft your defence case statement after I have taken a full proof of evidence (statement) from you.

Regards

Josephine