

Simon

Please accept this email as written confirmation that I am no longer prepared to represent you. I am satisfied that there has been a complete breakdown in solicitor / client relationship. I also have concerns as to your capacity to follow and participate in the appeal proceedings.

You are unwilling or incapable of listening to advice. You have questioned my professional and personal integrity. I have represented you for a very long time and continued to represent you in these proceedings because of the regard and respect that I have for your mother.

In April 2016 I requested that you be assessed by a Psychiatrist or give me access to your medical notes which you refused to do. You threatened to blacken my name on the Internet if I raised the issue again. You were recently sectioned in St Anne's hospital and you challenged that section and were released. I believe that you are not able to listen to advice. I believe that you are incapable of participating in proceedings. You insist on arguing points that are irrelevant and detrimental to your case. You do not allow the conferences to move on.

The allegation against you simply is that you organised raves / parties that caused antisocial or had the potential to cause anti social behaviour. See schedule forwarded to you on Friday. All the matters alleged you have already provided instructions and challenges to the allegations. Put as simply as possible you deny organising, providing sound equipment or sourcing premises for the purposes of holding raves / Parties. You challenged whether the events in question are illegal raves as trespass is not present. This argument has no bearing on your case as you deny and have repeatedly denied sourcing premises, providing equipment or organising any of the events with the exception of Mill Marsh Lane which you accept you were present for a small birthday party gathering (again no witness statement / witness details provided)

I have advised you that it is my view that regardless of whether Progress Way was a private party (LAPSO loophole) or a rave the bottom line is that anti social behaviour was caused due to noise nuisance / disorderly conduct.

You seek to use the appeal proceedings to challenge the law by arguing that any person living in a commercial building under a LAPSO notice can hold moving in parties. They are not holding a rave as trespass is not present but they are causing anti social behaviour to neighbouring residents when they hold events that cause extreme noise etc. On no occasion during your instructions did you say that you were living on the premises, nor did you state that your sound system had been seized.

You are appealing against the Magistrates Court decision that you organised these events, provided sound equipment or sourced premises.

You wish to introduce topics that have no bearing to the narrow issue which is did you organise or provide equipment for these events, which if they went ahead would or had the potential of causing anti social behaviour. I am under no obligation to argue points that are not relevant to your appeal.

I have copied Michael Carroll in in this email and you must now communicate with him as our relationship has irretrievably broken down.

The case is listed again for disclosure if required on Wednesday before HHJ PAWLAK. A disclosure request must be submitted by Michael Carroll & Co before 4pm on Monday 19th September 2016 with the Respondent replying by 20th September 2016.

Andrew Locke is declining to represent you also as he cannot hold a meaningful conference with you. You reject advice and have called me a liar.