* **The 2nd Injunction Order / Lemmy / pub Book Issue: 1!**

The Enfield Councils File / Telephone call Mr. Markandu/ Zena Ndereyimana

**/ Page Numbers:** 52,53

|  |  |
| --- | --- |
| **IN THE EDMONTON COUNTY COURT**  **BETWEEN:**  **{CLAIMANT}**  **THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF ENFIELD**  **-AND-**  **(DEFENDANT)**  **MR SIMON CORDELL**  **DIRECTIONS ORDER** | |
| **Page Number: 53** | |
|  | **14/11/17**  **Telephone conversation** with Mr Markandu Mathiyalagan 117 Burncroft Avenue, Enfield, EN3  Mr Mathiyalagan telephoned me this morning to report an incident that occurred at 11:30am on **11th November 2017.** He reported that his wife was alone inside their flat when the Mr Cordell came to their front door, opened the letterbox and peeped through it to see who was inside the flat. Mr Mathiyalagan stated that Mr Cordell started swearing and shouting abuse and banging on his front door as soon as he saw his wife. He then ran downstairs when his wife went to get her mobile phone to record the incident. He stated that his wife called the police, CAD No. 3230 of **11th November 2017** and the police attended and went and spoke to Mr Cordell and came and informed his wife that he denied coming to their front door and therefore they are unable to take any action against him.  I asked whether his wife recorded the incident and he said, that Mr Cordell left when his wife went to get her mobile phone. He also stated that there were no witnesses as his wife was alone in the flat at the time. I asked whether his wife showed a copy of the injunction and power of arrest to the police officers that attended, and he said no that she did not. I advised him that in future, they must show the court order to the police as the officers that will attend may not be aware of the injunction.  Lemmy Nwabuisi ASB Co-Ordinator  File Note |
| **END** | |

* **The 2nd Injunction Order / Lemmy / pub Book Issue: 1!**

THE SECOND WITNESS STATEMENT OF MARKANDU MATHIYALAGAN/ Application for Injunction/

**Page Numbers:** 5,6,7,8

|  |  |
| --- | --- |
| 1. Made on behalf of the Claimant 2. Witness Statement of Markandu Mathiyalakan 3. Statement No. 1 4. Dated **5 January 2018**   **IN THE EDMONTON COUNTY COURT CLAIM, NO:**  **BETWEEN:**  **THE MAYOR AND BURGESSES OF THE LONDON BOROUG OF ENFIELD -and-**  **MR SIMON CORDELL**  **SECOND WITNESS STATEMENT OF MR MARKANDU MATH IYALAG AN** | |
| **Page Number: 5** | |
|  | 1. I am the tenant of Flat 113 Burncroft Avenue, Enfield, EN3 7JQ. My flat is located two floors above the Defendant's. I live there with my wife and children. I have been housed to this Property with my family on **11th September 2014** by Waltham Forest District Council. The Property was given to me as a temporary accommodation. |
| **Page Number: 6** | |
|  | 1. I make this Witness Statement in support of the Claimant’s application for committal as the Defendant is in breach of the Injunction Order with Power of Arrest made against him In the County Court at Edmonton on **9th August 2017.** |
| **Page Number: 6** | |
|  | 1. The Defendant’s abusive behaviour towards my family and I stopped for some time after the Claimant obtained the injunction against him although he continued to make general comments towards us whenever he sees me or my wife entering or leaving the block. |
| **Page Number: 6** | |
|  | 1. On **11th November 2017** between 11:30am and 12pm, my wife was at home when the Defendant came up to our front door, opened the letterbox and peeped through it to see who was inside our flat. He started swearing and shouting abuse and banging on the door as soon as he saw my wife. He then ran downstairs when my wife went to get her mobile phone to record the incident. My wife telephoned the police and reported the incident, CAD No. 3230 of 11/11/17. The police attended about two hours later, went and spoke to the Defendant and came informed my wife that he denied coming to our front door, |
| **Page Number: 6** | |
|  | 1. On **2nd January 2018** at 6:30pm, my wife was inside our flat trying to assemble a cupboard that we bought from Ikea. Our three-year-old daughter and my cousin who was asleep at the time were also in the flat. Suddenly my wife heard someone banging on our front door and she went to the door with her phone and overheard the Defendant shouting that there was noise coming from our flat. My wife told him that she was trying to assemble a cupboard, but he called her a liar and accused her of deliberately banging on the floor. The Defendant then stood outside our front door for more than twenty minutes swearing and shouting abuse at my wife. |
| **Page Number: 7** | |
|  | 1. The Defendant went away and returned half an hour later, he lifted our letterbox flap, stuck his mobile phone through the letterbox and started to record my family while swearing and shouting abuse. This went on for about ten to fifteen minutes. The matter was reported to the police, **CAD No. 5121 of 2/1/18.** |
| **Page Number: 7** | |
|  | 1. On **3rd January at 9:30am,** I was inside our flat with my wife and daughter when the Defendant came and started banging on our front door. I went and asked him what the problem was, and he stated that my wife was banging on the floor yesterday for about an hour. I told him that my wife was not banging on the floor, that she was trying to assemble a cupboard, but he called me a liar and continued to shout and swear at us. He threatened to kill us and burn down our property and stated that we will not be safe no matter where we are. The Defendant then forced his way into our fiat, but my wife managed to push him out and double-locked the door. I called the police and they came and advised us to report the matter to the council, **CAD No. 2098 of 3/1/18**. The officers refused to listen to the audio recording of the incident and advised that we should ask the council to rehouse us. |
| **Page Number: 7** | |
|  | 1. The recent abuse and threats to kill from the Defendant have made it difficult for us to live in our own home. My wife is afraid to stay in our flat alone with our daughter or leave the flat alone without me or my cousin accompanying her. The Defendant’s behaviour is also causing a Jot of distress and anxiety not only to me and my wife but also to our three-year- old daughter. |
| **Page Number: 7 + 8** | |
|  | Statement of Truth  I believe the facts in this Witness Statement are true. Name: Mr Markandu Mathiyalagan Dated this **05 January 2018** |
| **END** | |

**The 2nd Injunction Order / Lemmy / pub Book Issue: 1!**

The Enfield Councils File Note Meeting with Mr. and miss Mathiyalagan/

**Page Numbers:** 54,55, 56,

|  |  |
| --- | --- |
| **IN THE EDMONTON COUNTY COURT**  **CLAIM, NO: DQ2ED073**  **BETWEEN:**  **THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF ENFIELD Claimant**  **-and-**  **MR SIMON CORDELL**  **EXHIBIT LN3**  This is the exhibit LN3 of the witness statement of Lemmy Nwabuisi dated 08th January **2018**.  **Defendant** | |
| **Page Number: 55** | |
| **05/01/2018** | **File Note 5/1/18**  Meeting with Mr and Mrs Mathiyalagan 117 Burncroft Avenue, Enfield, EN3  Mr and Mrs Mathiyalagan attended the Civic Centre. |
| **Page Number: 55** | |
| **05/01/2018** | to report recent incidents that occurred on 2nd and **3rd January 2018**. Mr Mathiyalagan stated that on **2nd January 2018 at 6:30pm,** his wife was inside their flat trying to assemble a cupboard with their three-year-old daughter and his cousin who was asleep at the time. He stated that suddenly his wife heard someone banging on their front door. She went to the door with her phone and overheard Mr Cordell shouting that there was noise coming from their flat. His wife told Mr Cordell that she was trying to assemble a cupboard, but he called her liar and accused her of deliberately banging on the floor. Mr Mathiyalagan stated that Mr Cordell then stood outside his front door for more than twenty minutes swearing and shouting abuse at his wife.  Mr Mathiyalagan stated that Mr Cordell then went away and returned half an hour later, lifted his letterbox flat, stuck his mobile phone through the letterbox and started to record his family while swearing and shouting abuse at his wife. This went on for about fifteen minutes until his wife threatened to call to call the police. The matter was reported to the police, CAD No. 5121 of **2nd January 2018.** |
| **Page Number: 55 +56** | |
| **05/01/2018** | Mr Mathiyalagan also stated that on **3rd January 2018 at 9:30am,** Mr Cordell came to his front door and started banging on the door and was swearing and shouting abuse at him and his wife. He went and asked him what the problem was, and he complained that his wife was banging on the floor the previous day for about an hour. He explained to him that his wife was not banging on the floor, that she was trying to assemble a cupboard, but he called him a liar and continued to swear and shout abuse at him and his wife. Mr Mathiyalagan also stated that Mr Cordell then threatened to kill him and his family and burn down his property and said to him that they will not be safe from him no matter where they are.  Mr Mathiyalagan stated that Mr Cordell then forced his way into their flat by either using an object to open or by pushing it very hard, he is not sure how he did it, but his wife managed to push him out and double-locked the door. He called the police, CAD No. 2098 of **3rd January 2018** and police officers attended and advised them to report the matter to the council.  Mr Mathiyalagan stated that him and his wife recorded the incidents on their mobile phones and played the recordings to me. One of the recordings clearly showed a person whom I believe to be Mr Cordell looking through Mr Mathiyalagan’s letterbox with a mobile phone on one hand. On the other recordings, l could clearly hear a person whom I also believe to be Mr Cordell shouting and swearing at Mr and Mrs Mathiyalagan, using threatening language and threatening to kill and burn down their property.  Lemmy Nwabuisi ASB Co-Ordinator |
| **END** | |

PURGERY 1911

* **The 2nd Injunction Order / Lemmy / pub Book Issue: 1!**

2nd Injunction App / Application for Injunction/

**Page Numbers:** 1,2

|  |  |
| --- | --- |
| **IN THE EDMONTON COUNTY COURT**  **BETWEEN:**  **{CLAIMANT}**  **THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF ENFIELD**  **-AND-**  **(DEFENDANT)**  **MR SIMON CORDELL**  **DIRECTIONS ORDER** | |
| **Page Number: 2** | |
|  | The grounds of this application are set out in the written evidence of (6) LEMMY NWABUISI, MARKANDU MATHIY ALA GAN, sworn (signed) on **05th and 08th January 2018**  Signed  Dated **08 August 2017** |
| **END** | |

PURGERY 1911

* **The 2nd Injunction Order / Lemmy / pub Book Issue: 1!**

Miss Revathy Mathiyalagan**/ Page Numbers:** p09 to 11 + New Pages: 106,107,108,

Updated 25/04/**2018** by Hand Post into My Letter Box!

|  |  |
| --- | --- |
| **1.** Made on behalf of the Claimant  **2.** Witness Statement of Ravathy Mathiyalagan  **3.** Dated **20 April 2018**  20/04/**2018**  **CLAIM NO:** E00ED049  **IN THE EDMONTON COUNTY COURT**  **BETWEEN:**  **{CLAIMANT}**  **THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF ENFIELD**  **-AND-**  **(DEFENDANT)**  **MR SIMON CORDELL**  **AFFIDAVIT OF MRS** **REVATHY MATHIYALAGAN** | |
| **Page Number: 106** | |
|  | I, Mrs Revathy Mathiyaiagan, of Flat 117, Burncroft Avenue, Enfield, EN3 7JQ make this statement believing it to be true and understand that it may be placed before court. Insofar as the content of this witness statement is within my own personal knowledge it is true and insofar as it is not within my persona! knowledge it is true to the best of my knowledge.  **I WILL SAY AS FOLLOWS**  A lie made up in MRS REVATHY MATHIYALAGAN AFFIDAVIT stating that they have gotten housed to 109 Burncroft Avenue En3 7jq with her family by the London Borough of Waltham Forest and have occupied the Property since  **11 September 2016**  This is not true as can be checked with Mathiyalagans Statements and the fact that they lived in the building since  **2013?**  **1.** I am the tenant of Flat 117 Burncroft Avenue, Enfield, EN3 7JQ. My flat is located two floors above Mr Cordell (thereafter ’the Defendant’). I live there with my husband Markandu and my child who is 3 years old. I have been housed to this Property with my family by the London Borough of Waltham Forest and have occupied the Property since  **11 September 2016**  The Property was given to me as a temporary accommodation. |
| **Page Number: 107** | |
|  | **2.** I make this affidavit in support of the Claimant’s (my husband) application for the Defendant’s committal on the basis of a breach of the interim injunction order made by the Edmonton County Court on  **09 January 2018**  **05/03/2018**  event witness wife of Mathiyalagan “REVATHY”  **20/04/2018**  affidavit  My police interview is on cd |
| **Page Number: 107** | |
|  | **3.** I witnessed the terrible assault committed by the Defendant on my husband on **05 March 2018** and confirm the facts stated in my husband s affidavit dated  **20 April 2018** |
| **Page Number: 107** | |
|  | **4.** Mr Cordell harassed, abused and repeatedly punched my husband on his face, causing him to bleed and to break two of his teeth, I tried to stop him, but he would not listen to me. |
| **Page Number: 107** | |
|  | **5.** We contacted the police who arrested both Mr Cordell and my husband. My husband was kept by the police overnight while he was a victim of the assault. The police could see the facial injuries, bleedings and damages sustained to his face and teeth but decided to keep him at the police station while he was a victim of the assault. Surprisingly I heard that Mr Cordell was arrested, interviewed and released on the same day. The police decided not to charge him for some unknown reasons. |
| **Page Number: 107** | |
|  | **6.** I believe that the Police decision was wrong, as there is Clear evidence of assault, I was not interviewed while being a key witness to the incident. The Defendant should have been arrested and brought back to the Court following the breach of the injunction order so it could decide on his arrest. |
| **Page Number: 107 + 108** | |
|  | **7.** I fear for my family safety and feels that the interim injunction with the London Borough of Enfield obtained on  **09 January 2018**  is not providing me and my family protection as the police refuses to enforce the terms of the order despite clear evidence that Mr Cordell has breached the terms. **The situation has left me and my family terrified. There’s a letter from my GP which confirm that, as seen under exhibit RM1.**  --  **Si Note:**  Dated:  **20/04/2018**  REVATHY more Accused incidents of harassment dated  **11/11/2017**  **02/01/2018**  **03/01/2018**  **01/03/2018**  **26/02/2018** |
| **Page Number: 108** | |
|  | **8.** There were further incidents on  **11 November 2017**  On  **02-03 January 2018**  **01 March 2018**  And  **26 February**  where Mr Cordell harassed me, but the police did nothing despite evidence of him breaching the injunction order. All they would do will be to attend the Property, speak to him and leave without investigating the incidents. |
| **Page Number: 108** | |
|  | **9.** I feel let down by the system and constantly fear for my safety. I contacted my local authority (the London Borough of Waltham Forest) to be moved out of the estate as myself, husband and 3-year-old are afraid to stay there. However, Waltham Forest is not taking any actions at the moment. |
| **Page Number: 108** | |
|  | **10.** I feel that the existence of the injunction has not provided the adequate protection to me and my family. As things stand the Defendant feels that the injunction is ineffective as the lack of actions from the police currently encourages him to act badly towards me and my family. We therefore hope that the Court will support us and take appropriate actions following the breaches. |
| **Page Number: 108** | |
|  | **11.** Iwould therefore ask the Court to consider the application in light of the recent incidents, to commit the Defendant to an arrest and impose a sentence following his breaches of the injunction. |
| **Page Number: 108** | |
|  | OFFICER OF THE COURT APPOINTED BY THE JUDGE TO TAKE AFFIDAVITS  Dated this  **20 day of April 2018**  **20/04/2018**  EDMONTON COUNTY COURT 59 FORE STREET EDMONTON LONDON N18 2TN  LONDON BOROUGH OF ENFIELD  **Dated:** **20 April 2018=** |
| **END** | |

PURGERY 1911

* **The 2nd Injunction Order / Lemmy / pub Book Issue: 1!**

Draft Order Miss Revathy & Markandu Mathiyalagan**/ Page Numbers:** p14 to 25 + New Pages: DRAFT ORDER: Pages:111,112,113,114,115,116,117,118,119,120,121,122

Updated 25/04/**2018** by Hand Post into My Letter Box!

|  |  |
| --- | --- |
| **IN THE EDMONTON COUNTY COURT**  **CLAIM, NO: EQ0ED049 BETWEEN:**  **THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF ENFIELD Claimant**  **-and-**  **MR SIMON CORDELL Defendant**  **DRAFT ORDER** | |
| **Page Number: 111** | |
|  | Before District Judge sitting at the Edmonton County Court.  AN APPLICATION was made by the Claimant’s representatives and was attended by [Counsel for] the Defendant.  The Judge read the written evidence filed and the Order of **District Judge Taylor** dated **09 January 2018** in which it was ordered that the Defendant should be forbidden (whether by himself or by instructing or permitting any other person): |
| **Page Number: 111** | |
|  | 1. From engaging or threatening to engage in conduct that is likely to cause physical violence and verbal abuse to the claimant’s employees, tenants to the block of flats at Bumcroft Avenue, Enfield. |
| **Page Number: 111** | |
|  | 1. From engaging or threatening to engage in conduct that is likely to cause intimidation, harassment, alarm and distress to the Claimant’s employees, tenants and visitors to the block of flats at Burncroft Avenue, Enfield. |
| **Page Number: 111 + 112** | |
|  | 1. From engaging or threatening to engage in conduct that is likely to cause nuisance and annoyance to the claimant’s employees, tenants and visitors of flats at Burncroft Avenue, Enfield.   **AND UPON** the Court noting that a power of arrest being attached on the above AND THE COURT being satisfied that the Defendant has been guilty of contempt of court in failing to comply with the order dated **09 January 2018** [paragraphs 3-5] of the order dated **09 January 2018** by harassing, intimidating and assaulting one of his neighbours on **15 March 2018, 01** **March 2018 and 26 February 2018.**  **IT IS ORDERED** |
| **Page Number: 112** | |
|  | 1. that for his contempt the Defendant stands committed to HM Prison (name of prison) for a period of (number of days or as may be) from the date of his apprehension. |
| **Page Number: 112** | |
|  | 1. that for his contempt the Defendant pays to Her Majesty the Queen a fine of £ on or before (date payment due). |
| **Page Number: 112** | |
|  | 1. that the costs of the Claimant summarily assessed in the sum of £ 1,000 to be the subject of a detailed assessment be paid by the Defendant to the Claimant. |
| **Page Number: 112** | |
|  | 1. that the contemnor has permission to apply to the Court to clear his contempt and ask for his release or discharge.   Dated |
| **Page Number: 113** | |
|  | 1. **Incident of 15 March 2018**   On Thursday, **15th March 2018,** my wife and I took our 3-year-old daughter to school and as we came out of the block, we saw the Defendant standing outside the main entrance to Block 109-117 Burncroft Avenue. As we walked towards my car, the Defendant followed us swearing and shouting abuse at us. t could not remember the Defendant’s exact words but there were lots of swearing words like ‘fucking family, fucking bastards’ and lots of ‘bad words. As we got in his car, the Defendant walked back towards the block. As I went to drive out, I saw the Defendant standing by the main door to the block and videoing me and my family with his mobile phone and swearing and shouting abuse at us. I got out of his car, brought out my mobile phone and started to video the Defendant who continued swearing. I stopped videoing Mr Cordell and turned to get back inside my car, but the Defendant pushed me to the ground from behind. The Defendant sat on top of me and started to punch me on the face and repeatedly banged my head on the ground. After a while, I managed to push him off.  I then went to my car to get something to defend myself and picked a piece of metal from my boot but I decided against using it, the Defendant rushed at me again and punched me in the face and I fell backwards to the ground. The Defendant then sat on my chest and started to punch me repeatedly on the face. By this time, my wife and daughter were crying, and my wife was screaming for neighbours to help but nobody came out. My wife tried to pull Mr Cordell off him as I was not able to defend myself, but she could not. She then grabbed the piece of metal from my boot and hit the Defendant with it as self- defence to stop him. Some neighbours come out of their flat after a while and the Defendant got off me and went into his flat. By then I was bleeding profusely on my lips and forehead and both my wife and I called the police and ambulance service. |
| **Page Number: 114** | |
|  | 1. The Defendant’s mother Lorraine Cordell turned up as I was being attended to inside the ambulance and started to shout abuse at my wife and accused her of attacking her son. |
| **Page Number: 114** | |
|  | 1. The police took my mobile phone and my daughter’s scooter that was inside my boot. The ambulance officers advised me to go to the dentist immediately to have my teeth attended to as two of my front teeth was broken and another two were wobbly. The ambulance carried out an assessment of my injuries. A written report of my injuries can be seen in **exhibit MM1.** |
| **Page Number: 114** | |
|  | 1. The police phoned me as I was driving to the dentist and asked me to return to the estate. I was then arrested for assaulting the D even though I never assaulted him but all I kept on doing was to defend myself. I was held in a cell overnight and bailed the next day. |
| **Page Number: 114** | |
|  | 1. As a result of the assault, I had to have 3 teeth removed and replaced with dentures. A written report from my dentist can be seen in **exhibit MM2.** |
| **Page Number: 114** | |
|  | 1. The Defendant was also arrested, interviewed on the same day but released. I don’t understand how this could have happened, while I am being a victim of his assault was kept in a cell overnight. The Anti-social behaviour team made enquiries to find out why the D. was not charged with breaching the terms of the injunction order and they were told that no charges were made on the basis that I had apparently provoked the Defendant. This is untrue as all I did on the day was to ignore him to take my daughter to school. |
| **Page Number: 115** | |
|  | Incident **01 March 2018**   1. My wife was inside the bathroom giving our daughter a shower while my cousin was in the living room, I was at work. At about 11am, the Defendant came to our front door and started rattling the letterbox and knocking loudly on the door. My wife went to the door and asked who it was, and the Defendant replied why are you shouting’. My wife told him that she was not shouting and that she was inside her bathroom giving our daughter a shower. She asked him why he came to her front door, that he was not allowed to be there, but the Defendant ignored her and continued to bang and kick on the door. This went on for about 5 to 10 minutes and caused a great deal of distress to my wife and daughter and made them scared for their safety. My daughter started crying because of the commotion and loud banging. The Defendant left after my wife asked his cousin to call the police. |
| **Page Number: 115** | |
|  | 1. We telephoned the police on 101 to report the incident and was asked to go and make a statement at Edmonton police station. I did so in the morning of **Tuesday 06 March 2018.**   **Incident 26/02/2018** |
| **Page Number: 115** | |
|  | 1. I returned from work at 11:30pm and went to the kitchen to get something to eat; my wife and daughter were already asleep. |
| **Page Number: 115 + 116** | |
|  | 1. At about 11:45pm, while I was in the kitchen, I heard loud banging noises on his front door and rattling noises on his letterbox. I thought that my cousin had returned from work and was knocking on the door to be let in, I went to the door and spoke in my language but there was no response. I then opened the door and saw the Defendant standing outside of my front door. As soon as the   Defendant saw me, he ran away. The matter was referred to the police, but no actions took place.  15. I requested to be moved out of the estate as that they and their 3-year-old  are afraid to stay there. My wife and daughter have been left terrified, as confirmed by a written letter from my GP Dr Swedan as seen in exhibit MM3. |
| **Page Number: 116** | |
|  | 1. I contacted my local authority the London Borough of Waltham Forest and asked that I be rehoused somewhere else, they are trying to find me a suitable alternative temporary accommodation, but the process is taking long. |
| **Page Number: 116** | |
|  | 1. I would therefore ask the Court to consider the application in light of the recent incidents and to commit the Defendant to an arrest. |
| **Page Number: 116** | |
|  | Dated this **20 day of April 2018**  OFFICER OF THE COURT APPOINTED BY THE JUDGE TO TAKE AFFIDAVITS  ROUGH |
| **Page Number: 122** | |
|  | 9th April 2018  To Whom It May Concern:  **RE**: Revathy Mathiyalagan 26.07.1971  14 Netley Road, Walthamstow, E17 7QD Mobile No: 07891740939  **Si Note:** Pen used to write down other address of Revathy 109 Burncroft Avenue Enfield EN3 7JQ |
| **END** | |

* **The 2nd Injunction Order / Lemmy / pub Book Issue: 1!**

WITNESS STATEMENT OF MR LEMMY NWABUISI/

**Page Numbers:** 09,10,11,12,13,14,15,16

|  |  |
| --- | --- |
| 1. **Made on behalf of the Claimant** 2. **Witness Statement of Lemmy Nwabuisi** 3. **Statement No. 2** 4. **LN01-LN03** 5. **Dated 08 January 2018**   **IN THE EDMONTON COUNTY COURT CLAIM, NO: D02ED073**  **BETWEEN:**  **THE MAYOR AND BURGESSES**  **OF THE LONDON BOROUGH OF ENFIELD Claimant**  **-and-**  **MR SIMON CORDELL Defendant**  **WITNESS STATEMENT OF MR LEMMY NWABUISI** | |
| **Page Number: 09 + 10** | |
|  | 1. I am employed by the London Borough of Enfield as an Anti-Social Behaviour Coordinator in the Community Safety Unit. I have held this employment since **August 2016**. My role as an Anti-Social Coordinator consists of investigating and dealing with reports of anti-social behaviour involving council and non-council tenants. My involvement with the Defendant was due to allegations of verbal abuse, threats, harassment and intimidation made against him by some of his neighbours. |
| **Page Number: 10** | |
|  | 1. I make this Witness Statement in support of the Claimant’s application dated **08th January 2018.** This is my second witness statement in the above proceedings. |
| **Page Number: 10** | |
|  | 1. The Claimant obtained an interim injunction against the Defendant on **09th August** **2017** under claim number D02ED073. On **13th December 2017,** the Court made an order striking out the Claimant’s claim on the basis that it failed to file its direction questionnaire on **17th November 2017** as directed. The Court stated that it received the Claimant's questionnaire on 20th **November 2017** and therefore ordered that the Claim be struck out and that the interim injunction order be discharged. |
| **Page Number: 10** | |
|  | 1. The Claimant's solicitor emailed the Edmonton County Court on **14th November 2017** asking that the Claim be reinstated as it had filed its direction questionnaire on 17th November at 11.59 and was therefore within time. The email has not been responded to until today. |
| **Page Number: 10** | |
|  | 1. On **03rd January 2018,** the Claimant filed an application notice at the Court by email asking for the Claim to be reinstated. The application was filed after the Court served an order dated **02nd January 2018** ordering the Claimant to pay the Defendant’s legal costs. A copy of the application notice can be found under exhibit LN01. |
| **Page Number: 10 + 11** | |
|  | 1. Mr Mathiyalagan who is one of the Defendant’s neighbours and resident at Flat 117 Burncroft Avenue, Enfield contacted me and complained about further incidents of anti-social behaviour he was subjected to by the   Defendant, ft is also to be noted that Mr Mathiyaiagan provided evidence in support of the initial injunction order |
| **Page Number: 11** | |
|  | 1. On **14th November 2017** Mr Mathiyaiagan telephoned me to report an incident that occurred at 11:30am on **11th November 2017.** He reported that his wife was alone inside their flat when the Defendant came to their front door, opened the letterbox and peeped through it to see who was inside the flat. Mr Mathiyaiagan stated that the Defendant started swearing and shouting abuse and banging on his front door as soon as he saw his wife. He then ran downstairs when his wife went to get her mobile phone to record the incident. He stated that his wife called the police, CAD No. 3230 of **11th November 2017** and the police attended and went and spoke to the Defendant and came and informed his wife that he denied coming to their front door. A file note of this report is under exhibit LN02. |
| **Page Number: 11 + 12** | |
|  | 1. On **5th January 2018** Mr and Mrs Mathiyaiagan met with me to report recent incidents that occurred on **2nd and 3rd January 2018.** Mr Mathiyaiagan reported that on **2nd January 2018** at 6:30pm, his wife was inside their flat trying to assemble a cupboard, she was with their 3-year- old daughter and a cousin who was asleep at the time. He stated that suddenly his wife heard someone banging on their front door. She went to the door with her phone and overheard the Defendant shouting that there was noise coming from their flat. His wife told the Defendant that she was trying to assemble a cupboard, but he called her a liar and accused her of deliberately banging on the floor. The Defendant then stood outside his front door for more than twenty minutes swearing and shouting abuse at his wife. Mr Mathiyaiagan stated that the Defendant went away and returned half an hour later, he lifted his letterbox flap, stuck his mobile phone through the letterbox and started to record his family while swearing |
| **Page Number: 12** | |
|  | 1. Mr Mathiyalagan also stated that on **3rd January 2018** at 9:30am, the Defendant came to his front door and started banging on the door. He went and asked him what the problem was, and he complained that his wife was banging on the floor the previous day for about an hour. He explained to the Defendant that his wife was not banging on the floor, that she was trying to assemble a cupboard, but he called him a liar and continued to swear and shout abuse at him and his wife. Mr Mathiyalagan also stated that the Defendant threatened to kill him and his family and said to him that they will not be safe from him no matter where they are. Mr Mathiyalagan stated that the Defendant then forced his way into their flat but his wife managed to push him out and double-locked the door. He called the police, CAD No. 2098 of **3rd January 2018** and police officers attended and advised them to report the matter to the council. A file note of this report is under exhibit LN3. |
| **Page Number: 12** | |
|  | 1. Mr Mathiyalagan stated that him and his wife recorded the incidents on their mobile phones and played the recordings to me. One of the recordings dearly showed a person whom l believes to be the Defendant looking through Mr Mathiyalagan’s letterbox with a mobile phone on one hand. On the other recordings, I could clearly hear a person whom I also believe to be the Defendant shouting, swearing and making death threats to Mr and Mrs Mathiyalagan. |
| **Page Number: 12 + 13** | |
|  | 1. Mr. and Mrs. Mathiyalagan have stated the Defendant's behaviour is causing him and his family a lot of distress and anxiety. They have reported that they are afraid to live in their own home because of the Defendant’s recent threats to kill. Mr Mathiyalagan have also stated that his wife and three-year-old daughter are afraid to stay in the flat on their own or leave the flat alone without him or his cousin accompanying them. He stated that the recent threats from the Defendant has made it difficult for them to live in their own home and that they are constantly having to double lock their front door for fear that the Defendant may break into their flat again. |
| **Page Number: 13** | |
|  | **ORDER SOUGHT FROM THE COURT**  **• Request that the Claim and interim injunction order of 09th August 2017 be reinstated** |
| **Page Number: 13** | |
|  | 1. The Claimant has in its application notice dated **03rd January 2018** provided evidence that it filed its questionnaire on time. As such the Claim should have never been struck out and the Court is asked respectfully, to reinstate the Claim and the injunction order. |
| **Page Number: 13** | |
|  | 1. The Claimant’s legal department contacted the police on **05th January 2018** and enquired as to the reasons why no arrests were made to the Defendant on **11th November 2017** while a civil injunction was in place. The police officer looked at the file notes and explained that at the time the incident was reported by Mr Mathiyalagan, they were not aware of the injunction although it was served to a different department. The Defendant also denied the incident and Mr Mathiyalagan could not prove that the incident took place. The police have now referred this incident to an investigating officer and created a crime reference number 5200 37618. |
| **Page Number: 13 + 14** | |
|  | 1. The Claimant also advised the police of the incidents dated **02nd and 3rd January 2018** but the police confirmed that they could not take actions as at the time of the incidents the civil injunction was discharged by the Court. The police advised that had the injunction been in place, the Defendant could have well been arrested in light of Mr Mathiyalagan being able to evidence the incident by way of the audio recordings. |
| **Page Number: 14** | |
|  | 1. The recent incidents and death threats are extremely serious and i have concerns that the Defendant may escalate his actions further. Mr Mathiyalagan and his family do not feel safe anymore and on that basis, it would be of great assistance if the Claim and injunction order be reinstated as soon as possible.   **Declaration from the Court that the injunction order has been effective throughout the period of 13th December 2017 to present** |
| **Page Number: 14** | |
|  | 1. The interim injunction order was discharged purely because of a technicality, however had the Court realised that the Claimant had filed the questionnaire on time, it would not have struck out the Claim. |
| **Page Number: 14** | |
|  | 1. The Court should note that the Defendant started to act anti-socially again, soon after he was notified by the Court that the interim order has been discharged. Unfortunately, because the Claim was struck out the Claimant and the police are currently not able to take any actions against the Defendant. It is on that basis that we would like to ask the Court for a declaration that that the interim injunction order has been effective since **13th December 2017** and that the Defendant has been in breach of the interim injunction order dated **09th August 2017.** |
| **Page Number: 14 + 15** | |
|  | 1. However, in the event that the Court cannot make such a declaration, we would ask the Court to make a new injunction order to cover the recent incidents dated 02nd and **3rd January 2018** and enclose a new claim for an injunction for the Court's consideration. **Permission to bring and serve an application for the Defendant’s committal under CPR 81.** |
| **Page Number: 15** | |
|  | **19**. In the event that the Court agrees to reinstate the injunction and to make a declaration that the Defendants has acted against the terms of the injunction dated **09th August 2017**, it is the Claimant’s intention to bring an application for committal against the Defendant. Therefore, we would like permission from the Court to bring and serve an application for the Defendant’s committal under CPR 81 for breaches of the terms of the injunction for the incidents dated **11th November 2017,** **02nd and 3rd January 2018.** |
| **Page Number: 15** | |
|  | **Statement of Truth**  I believe the facts in this Witness Statement are true.  Dated this **08th January 2018** |
| **Page Number: 16** | |
|  | **This is the exhibit LN1 of the witness statement of Lemmy Nwabuisi dated 08th January 2018** |
| **END** | |

* **The 2nd Injunction Order / Lemmy / pub Book Issue: 1!**

The witness statement of service of Mr. Andy PHILIPPOU

**/ Page Numbers:** 71,72,73

|  |  |
| --- | --- |
| Statement filed on behalf of the Claimant Deponent: Andy Philippou Statement No: One Exhibits: One  **IN THE COUNTY COURT AT EDMONTON**  **BETWEEN CASE NO: E00ED049**  **THE LONDON BOROUGH OF ENFIELD Claimant -and- SIMON CORDELL Defendant WITNESS STATEMENT OF SERVICE**   1. I Andy Philippou, a Process Server of Global Investigation Services Limited, Earnscliff House, London N9 9AB 2. Acting under the instructions of: -   **The London Borough of Enfield, Legal Services Department, P.O. Box 50 Civic Centre, Silver Street, Enfield, Middlesex EN1 3XA**  **STATE AS FOLLOWS** | |
| **Page Number: 71** | |
|  | 1. That I am over sixteen years of age. |
| **Page Number: 72** | |
|  | 1. That l did on Wednesday **10 January 2018** at approximately 10.20.am attend at the offices of VLS Solicitors, Gibson House, 800 High Road, Tottenham, London N17 0DH in order to meet with the Defendant's Solicitor. That I did at approximately 10,30.am meet and personally serve Suzanne Ozdemir (receptionist) of VLS Solicitors with the following:   An Injunction Order dated **09 January 2018** with Notice of Hearing on **05/02/2018** at 2.pm A General Form of Judgement or Order dated **09 January 2018** A Power of Arrest dated 09 January **2018** An N244 Application Notice A Statement of Lemmy Nwabusi dated **08 January 2018**, with exhibits A Court Order  A Statement of Ludmilla lyavoo dated **03 January 2018,** with exhibits |
| **Page Number: 71 + 72** | |
|  | 1. That I did on the same date at approximately 11.30.am and in the absence of a response from the Defendant's address of 109 Burncroft Avenue, Enfield, Middlesex EN3 7JQ post through the letterbox of 109 Burncroft Avenue, Enfield, Middlesex EN3 7JQ copies of the aforementioned documents in a sealed plastic wallet for the attention of the defendant. |
| **Page Number: 72** | |
|  | 1. That I did on the same date having had notification from the Claimant Solicitor of the Defendant's arrest the previous evening attend at Wood Green Police Station in order to meet and personally serve the defendant with the aforementioned documents. That I did after having had to wait post interview and having the matter referred to the duty Sergeant by Officer Tahir Razzaq; meet and serve the above-named defendant with the aforementioned documentation in the presence of five officers in the doorway of holding cell 9. |
| **Page Number: 72** | |
|  | 1. That at the time of service the aforementioned defendant admitted his identity to me as Simon Cordell, namely an adult male of mixed race, possibly in his mid-20's, approximately 5'10" tall and slim build. |
| **Page Number: 72** | |
|  | 1. This statement is true to the best of my knowledge and belief and I make it knowing that, if it were tendered in evidence, I would be liable to prosecution if I wilfully stated in it anything which I know to be false or did not believe to be true.   **10/01/2018** |
| **Page Number: 73** | |
|  | Statement filed on behalf of the Claimant Deponent: Andy Philippou Statement No: One Exhibits: One  CASE NO: E00ED049  IN THE COUNTY COURT AT EDMONTON BETWEEN  THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF  HARINGEY  Claimant  -and-  ANTHONY MORRIS Defendant  "A  This is the exhibit marked "A" and referred to in the Statement of Andy Philippou Signed:  10/01/2018 |
| **END** | |

**MAIN FILE FOR SECOND APPLICATION**

* **The 2nd Injunction Order / Lemmy / pub Book Issue: 1!**

A WITNESS STATEMENT OF MR LEMMY NWABUISI/

**Page Numbers:** 76,77,78

|  |  |
| --- | --- |
| 1. Made on behalf of the Claimant 2. Witness Statement of Lemmy 3. Dated **02nd February 2018**   **IN THE EDMONTON COUNTY COURT**  **CLAIM, NO:**  **BETWEEN:**  **THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF ENFIELD**  **Claimant**  **-and-**  **MR**  **SIMON**  **CORDELL**  **Defendant**  **WITNESS STATEMENT OF MR LEMMY NWABUIS!** | |
| **Page Number: 76** | |
|  | **1.** I am employed by the London Borough of Enfield as an Anti-Social Behaviour Coordinator in the Community Safety Unit. I have held this employment since **August 2016.** My role as an Anti-Social Behaviour Coordinator consists of investigating and dealing with reports of anti-social behaviour involving council and non-council tenants. My involvement with the Defendant was due to my role in investigating allegations of verbal abuse, threats, harassment and intimidation made against the Defendant by his neighbours. |
| **Page Number: 77** | |
|  | 1. I make this Witness Statement in support of the Claimant’s application to vary the interim injunction order of **09th January 2018.** This is my second statement in the above proceedings. |
| **Page Number: 77** | |
|  | 1. On **9th January 2018** at about 12:18pm, the Defendant telephoned me and accused me of killing his baby. He accused me of forging documents to get an Anti-Social Behaviour Order (ASBO) against him thereby making him a prisoner inside his own home and that this is now personal between us. He stated that he knows where I live in Enfield and that me and my family are not safe from him. He also stated that he has watched me leave the office and have followed me home, that he can 'get me’ any time he likes and that I should watch my back. |
| **Page Number: 77** | |
|  | 1. The Defendant telephoned me again about thirty minutes later and left a voice message for me. He again accused me of killing his baby, that I was biased against him and that l was a criminal. He mentioned one of my colleagues by name and stated that he knows that she has a flat in Winchmore Hill and that she fives in Edmonton. He stated that he has 'stripped' our computers and obtained personal information about us. He made references to my company accounts, the university I attended and the course I studied. He also stated that he knows where all our houses are and that we are not safe. |
| **Page Number: 77** | |
|  | 1. The matter was reported to the police, Crime Reference: 5200718/18 and the Defendant was arrested at about 8:00pm on **9th February 2018** and released on bail on **10th February 2018** pending further investigation. He is due to report back to Woodgreen Police Station on **5th February 2018,** |
| **Page Number: 78** | |
|  | **6**. The interim injunction order which was made by the Court on **09th January 2018** excludes the Defendant from causing distress and harassment to the Claimant’s employees. However, the interim injunction order is limited to the area of Burncroft Avenue, Enfield, EN3 and not necessary to my personal address or workplace. In view of the Defendant's past conduct I have concerns that he may attempt to harass me and my family and would like the order to be varied to exclude the Defendant or his associates from approaching me at my work and home address. |
| **Page Number: 78** | |
|  | Statement of Truth  I believe the facts in this Witness Statement are true.  Signed  Dated this **2nd day of February 2018** |
| **END** | |
|  |  |

**Lemmy’s line manager**

* **The 2nd Injunction Order / Lemmy / pub Book Issue: 1!**

A WITNESS STATEMENT OF MS KAUNCHITA MAUDHUB/**Page Numbers:** 79,80,81,82

|  |  |
| --- | --- |
| 1. Made on behalf of the Claimant 2. First Witness Statement of Kaunchita Maudhub 3. Dated **05th February 2018**   **IN THE EDMONTON COUNTY COURT**  **CLAIM, NO: E0QED049**  **BETWEEN:**  **THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF ENFIELD Claimant**  **-and-**  **MR SIMON CORDELL Defendant**  **WITNESS STATEMENT OF MS KAUNCHITA MAUDHUB** | |
| **Page Number: 79 + 80** | |
|  | **1.** I am employed by the London Borough of Enfield as an Anti-Social Behaviour Team Leader in the Community Safety Unit; I have held this employment since  **March 2016**  My role as an ASB Team Leader consists of ensuring the effective management and co-ordination of the services within the Anti-social Behaviour Team, including line management of the ASB Officers. My involvement with the Defendant was due to me supervision of the work being carried out by Lemmy Nwabuisi - ASB Coordinator within my team. Mr Nwabuisi was managing the investigation of complaints of anti-social behaviour, threats and intimidation involving Mr Simon Cordell. |
| **Page Number: 80** | |
|  | 1. I make this Witness Statement in support of the Claimant’s application to vary the terms of the interim injunction order   **09th January 2018** |
| **Page Number: 80 + 81** | |
|  | **3.** On  **09th January 2018**  in a telephone message left by Simon Cordell (the Defendant) for Lemmy Nwabuisi, the Defendant referred to me as 'Kanichiwa’ and stated that he knew I had a property in Winchmore Hill and that I lived in Edmonton. It would therefore appear that Mr Cordell has identified my personal home address and stated that he knows where I live. The contents of the voicemail are as follows:  You killed my baby, it’s a very simple thing you are biased Lemmy yeh, you went to Westminster you are supposed to be good at fucking litigation, you are a criminal, there are no signatures on the first ASBO and I am being held hostage in here, you can go into your offices. Pat and Steve say it in your release forms to each other and Kanichiwa and all your managers fucking computers. You don’t know Lemmy I’ve stripped you computers not through Daniel Ellis, complaints, I went through the ombudsmen and they’ve stripped your computers Lemmy, 1 own your fucking computer and I know kanichiwa’s I know fucking rob leak owns 15 million pounds more and kanichiwa's got a house up in Winchmore Hill under the expenses of the company she’s got a house over in Edmonton ) know where you all fucking live, yeh, I’ve fucking looked at ail your expenses and your companies expenses and your passed companies, I’ve looked at everything to do with you all. I know Tracey Willis and her fucking loved ones and I know their houses, you all are, you lots are fucking biased you killed my baby and your avoiding disciplinary action this is fucking personal I’ll take it personal with you. I hope you fucking get me arrested cause I get to show everybody the report and the interview of what you’ve really fucking done Lemmy, come and get me arrested I know that you are gonna touch my fucking mother, your fucking mad Lemmy yeh, you’re gonna touch my fucking mother, you've already touching my fucking mother by forwarding the paperwork, Listen I know what you've done Lemmy you're fucking out of order you shouldn’t be working in that company, you've never checked the computers from before and you’ve allowed ail this to happen to me. Go to bristolspotlight.co.uk - Robert Taylor was the bloke that was my barrister before and he's done exactly the same to me to somebody else as what he's done to me - caused a sex scandal with you’d lot in somebody else's name, locked them out, kidnapped, done everything to them, yeh and I was phoning you I got bare recordings telling you that these guys are setting me up, and this is out of order what they're doing, I’m the black boy on the block, all the times, their first application is as fraudulent as your fucking application Lemmy, and you think your gonna walk around this town with your children, living your life getting the salary that you’re on and your gonna fucking earn the right to do this to people your supposed to be looking after and posting pictures that your all good at law, I am better than you at fucking law Lemmy, I'm better than the executive director at criminal law as well: |
| **Page Number: 81** | |
|  | **4.** The matter was referred to the police and he was arrested on  **09th January 2018**  for threats to kill and has been released on bail on the following conditions: Not to contact directly or indirectly Lemmy Nwabuisi and not to engage in threatening conduct that is likely to cause physical or verbal abuse to the employees of the London Borough of Enfield  He is bailed to return to the police station on  **05th February 2018**  at 19.00hrs |
| **Page Number: 82** | |
|  | **5.** The interim injunction order which was made by the Court on  **09th January 2018**  excludes the Defendant from causing distress and harassment to the Claimant’s employees. However, the interim injunction order is limited to the area of Burncroft Avenue, EN3 and not necessary to me personally and my workplace. In view of the Defendant’s past conduct I have concerns that he may attempt to harass me and would like the order to be varied to exclude the Defendant from approaching me directly at my personal address.  **Statement of Truth**  I believe the facts in this Witness Statement are true. |
| **Page Number: 82** | |
|  | **Statement of Truth**  I believe the facts in this Witness Statement are true.  **Dated:** this **05th day of February 2018**  **05/02/2018** |
| **END** | |

**Lemmy’s line manager**

* **The 2nd Injunction Order / Lemmy / pub Book Issue: 1!**

An AFFIDAVIT OF MS KAUNCHITA MAUDHUB/**Page Numbers:** 83,84,85,86,87

Dated **05th February 2018**

**4.** On

**24th January 2018**

|  |  |
| --- | --- |
| 1. Made on behalf of the Claimant 2. First Witness Statement of Kaunchita Maudhub 3. Dated **05th February 2018**   **IN THE EDMONTON COUNTY COURT CLAIM, NO: E0QED049**  **BETWEEN:**  **THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF ENFIELD Claimant**  **-and-**  **MR SIMON CORDELL Defendant**  **WITNESS STATEMENT OF MS KAUNCHITA MAUDHUB** | |
| **Page Number: 83 + 84** | |
|  | **1.** I am employed by the London Borough of Enfield as an Anti-Social Behaviour Team Leader in the Community Safety Unit. I have held this employment since  **March 2015**  My role as an ASB Team Leader consists of ensuring the effective management and co-ordination of the services within the Anti-social Behaviour Team, including line management of the ASB Officers and Co-Ordinators. My involvement with the Defendant was due to my supervision of the work being carried out by Lemmy Nwabuisi -ASB Co-Ordinator within my team. Mr Nwabuisi was managing the investigation of complaints of anti-social behaviour, threats and intimidation involving Mr Simon Cordell. |
| **Page Number: 84** | |
|  | **2.** I make this affidavit in support of the Claimant's application for the Defendant's committal on the basis of a breach of the Order made on  **09th January 2018** |
| **Page Number: 84** | |
|  | **3.** The Defendant was served personally on  **10th January 2018**  while he was in custody at the Wood Green Police Station. The documents were served personally by the process server, |
| **Page Number: 84** | |
|  | **4.** On  **24th January 2018**  the Defendant contacted me at work twice by telephone on an anonymous number. The first call was at approximately 16:50 and stated he was Simon Cordell. He said that Lemmy Nwabuisi must go to prison, he also stated to have stripped our computers without us knowing, he also added to have in his possession one of my colleagues' emails, named Miss Jeans. The Defendant further added to have the emails that witness protection had sent to him. I then proceeded to tell the Defendant that I was going to terminate the phone call and I put the phone down. |
| **Page Number: 84 + 85** | |
|  | **5.** The Defendant telephoned me again at approximately 16.53 on an anonymous number and left a voice recording the contents of which are as follows:  “It’s Mr Cordell, I think that you are putting the phone down on me when I'm explaining to you what the people that you’re in charge of are doing illegally to me. Lemmy understood what he was doing, I’ve recorded every conversation with Lemmy since the day the witness care team told you’d lot that I have no case to answer against Mr Mathiyalagan and you decided to make a possession order. That possession order says that I’ve got a possession order for having printers in my house which are legal to have arid | have them in the back garden now cause you’d lot won’t tell me what conditions I'm In breach of, basically I’ve got Lemmy on recording he admits to doing certain things and I'm 100% sure he should got to prison for what's happened and you as his manager should do something about this you're the one advising him to do it and I’m gonna see you at court and I'm gonna serve you lot my official report, I'm taking this case up to judicial review cause this lower court doesn't have the ability to deal with this case and the fraudulent activity and the sentences you lot should get 25 years you should be getting for ? in public office, that is more than 2 life sentences that’s what I believe that you lot deserve for breaching your statutory duties and the evidence I’ve got on you, I’ll be contacting, I'll see you in court "  The voice mail would be made available to the Court. The Defendant's acts constitute acts of harassment and intimidation and he is therefore in breach of paragraph 4 of the interim injunction Order. |
| **Page Number: 85** | |
|  | **6.** On  **09th January 2018**  the Defendant telephoned Lemmy Nwabuisi and accused him of killing his baby, he also stated that he knew where Lemmy lived and that him and his family were not safe and that he should watch his back. |
| **Page Number: 85 + 86 + 87** | |
|  | **7.** On  **09th January 2018**  in a telephone message left by the Defendant for Lemmy Nwabuisi, Mr Cordell referred to me as ‘Kanichiwa’ and stated that he knew I had a property in Winchmore Hill and that I lived in Edmonton. The contents of the voicemail are as follows:  "You killed my baby, it’s a very simple thing you are biased Lemmy yeh, you went to Westminster you are supposed to be good at fucking litigation, you are a criminal, there are no signatures on the first ASBO and I am being held hostage in here, you can go into your offices. Pat and Steve say it in your release forms to each other and Kanichiwa and all your managers fucking computers. You don’t know Lemmy I’ve stripped you computers not through Daniel Eilis, complaints, I went through the ombudsmen and they've stripped your computers Lemmy, I own your fucking computer and I know kanichiwa’s I know fucking rob leak owns 15 million pounds more and kanichiwa’s got a house up in Winchmore Hill under the expenses of the company she’s got a house over in Edmonton I know where you all fucking live, yeh, I’ve fucking looked at all your expenses and your companies expenses and your passed companies, I’ve looked at everything to do with you all. I know Tracey Willis and her fucking loved ones and E know their houses, you all are, you lots are fucking biased you kilted my baby and your avoiding disciplinary action this is fucking personal I’ll take It persona! with you. I hope you fucking get me arrested because I get to show everybody the report and the interview of what you’ve really fucking done Lemmy, come and get me arrested I know that you are gonna touch my fucking mother, your fucking mad Lemmy yeh, you’re gonna touch my fucking mother, you’ve already touched my fucking mother by forwarding the paperwork Listen I know what you’ve done Lemmy you’re fucking out of order you shouldn’t be working in that company, you’ve never checked the computers from before and you’ve allowed all this to happen to me. Go to bristolspotlight.co.uk — Robert Taylor was the bloke that was my barrister before and he’s done exactly the same to me to somebody else as what he’s done to me — caused a sex scandal with you’d lot in somebody else’s name, locked them out, kidnapped, done everything to them, yeh and I was phoning you I got bare recordings telling you that these guys are setting me up, and this is out of order what they’re doing, I’m the black boy on the block, all the times, their first application is as fraudulent as your fucking application Lemmy, and you think your gonna walk around this town with your children, living your life getting the salary that you’re on and your gonna fucking earn- the right to do this to people your supposed to be looking after and posting pictures that your all good at law, I’m better than you at fucking law Lemmy, I’m better than the executive director at criminal law as well”. |
| **Page Number: 87** | |
|  | **8.** The Defendant was arrested for threats to kill and released on bail. He is due to report back to the police station on  **05th February 2018**  at 09:00am. His bails conditions are as follows: ‘not to contact directly or indirectly Lemmy Nwabuisi and not to engage in threatening conduct that is likely to cause physical or verbal abuse to the employees of the London Borough of Enfield’. It is clear that in view of the phone calls and threats he made to me on  **24th January 2018**  the Defendant has also breached the terms of his bail conditions. |
| **Page Number: 87** | |
|  | **9.** We would therefore ask the Court to consider the application in light of the recent incidents and to commit the Defendant to an arrest. |
| **Page Number: 87** | |
|  | EDMONTON COUNTY COURT 59 FORE STREET. EDMONTON LONDON N18 PIN  OFFICER OF THE COURT APPOINTED BY THE JUDGE TO TAKE AFFIDAVITS  LONDON BOROUGH OF ENFIELD  **Sworn at:** “Marked as” Signed  **Before me:** Blank  **Signed:** “Marked as” Signed  Dated on:  **05th February 2018** |
| **END** | |

* **The 2nd Injunction Order / Lemmy / pub Book Issue: 1!**

Lemmy Injunction 2nd Complaint solicitor firm

**/ Page Numbers:** 91

|  |  |
| --- | --- |
| **ENFIELD**  **Council**  Mr Simon Cordell 109 Burncroft Avenue Enfield  EN37JQ  **Please reply to:** Legal Services PO Box 50, Civic Centre Silver Street, Enfield EN1 3XA  **E-mail:** [Ludmilla.lyavoo@enfield.gov.uk](mailto:Ludmilla.lyavoo@enfield.gov.uk)  0208 379 8323  **Phone:** 0208 379 6492  **DX:** 90615 Enfield 1  **Fax:**  **My Ref: Your Ref:** LS/C/LI/155584  **Date: 28 February 2018**  **28/02/2018** | |
| **Page Number: 91** | |
|  | Dear Mr Cordell,  **Re:** The London Borough of Enfield v Cordell  Claim number: **E00ED049**  We have been advised by one of your neighbours that you attempted to harass and intimidate him and his family, yesterday around 11,30pm by standing right by his door and interfering with his letter box. We have been advised that as he opened the door and saw you at his doorstep, you ran down the stairs. This behaviour is not acceptable and represents a breach of the interim injunction order dated  **09th January 2018**  which specifically prevents you from harassing and intimidating your neighbours. We have to inform you that as a result of your conduct, we will be contacting the police and will advise them of the incident. We would also like to warn you that should further incidents of this nature were to occur again; we will be making an urgent application for your committal at the County Court without notice. However, we hope that such measures will not be necessary and that you will continue to comply with the terms of the interim injunction order.  Yours sincerely,  Ludmilla lyavoo Lawyer  **For the Director of Law and Governance**  **Jeremy Chambers Director of Law & Governance**  **Enfield Council**  **Civic Centre, Silver Street**  **Enfield EN13XY**  [**www.enfield.gov.uk**](http://www.enfield.gov.uk) |
| **END** | |

* **The 2nd Injunction Order / Lemmy / pub Book Issue: 1!**

2 Injunction Order Application Notice**/ Page Numbers:** p 3 to 6 + New Pages: 100,101,102,103

Updated 25/04/**2018** by Hand Post into My Letter Box!

|  |  |
| --- | --- |
| **N244**  **Application notice**  For help in completing this form please read the notes for guidance form N244Notes.  Claim no. **EOOED049**  Name of court Edmonton County Court  Fee account no.  (if applicable)  Help with Fees - Ref. no. (if applicable)  0079 006  Warrant no. (if applicable)  Claimant's name (including ref.)  The London Borough of Enfield  Defendant’s name (including ref.)  Mr Simon Cordell  **Date Top: 20/04/2018**  **Dated Bottom: 19/04/2018** | |
| **Page Number: 100** | |
|  | **1.** What is your name or. if your area legal representative, the name of your firm?  The London Borough of Enfield, Legal Services |
| **Page Number: 100** | |
|  | **2.** Are you Claimant: Marked as, yes |
| **Page Number: 100** | |
|  | **3.** What order are you asking the court to make and why?  **The Claimant Is seeking an order for the Defendant's committal for breaching the terms of the interim injunction order dated**  **09.01.2018**  **with has a power of arrest, pursuant to CPR 23 and 81.**  The Defendant to pay the Claimant's legal costs. |
| **Page Number: 100** | |
|  | **4. Have you attached a draft of the order you are applying for?** “Marked as” Yes |
| **Page Number: 100** | |
|  | **5. How do you want to have this application dealt with? Marked as,** “at hearing” |
| **Page Number: 100** | |
|  | **6. How long do you think the hearing will last?** “Marked as” 30  Is this time estimate agreed by all parties? |
| **Page Number: 100** | |
|  | **7. Give details of any fixed trial date or period:** Hearing on  **30/05/2018, 2pm** |
| **Page Number: 100** | |
|  | **8.** What level of Judge does your hearing need? |
| **Page Number: 100** | |
|  | **9.** Who should be served with this application? |
| **Page Number: 100** | |
|  | **9a.** Please give the service address, (other than details of the claimant or defendant) of any party named in question 9. |
| **Page Number: 101** | |
|  | **10.** What information will you be relying on, in support of your application?  **The attached witness statement: Marked as,** No  **The statement of case: Marked as,** No  **The evidence set out in the box below:** **Marked as,** Yes  **If necessary, please continue on a separate sheet: Marked as,** Blank |
| **Page Number: 101** | |
|  | **Statement of Truth**  (l believes) (The applicant believes) that the facts stated in this section (and any continuation sheets) are true.  Full name Ludmilla lyavoo  Name of applicant's legal representative's firm London Borough of Enfield, Legal Services Position or office held Solicitor  (if signing on behalf of firm or company)  11. Signature and address details  **Signed:** Marked as, yes  **Date Top:**  **20/04/2018**  **Dated Bottom:**  **19/04/2018** |
| **Page Number: 102** | |
|  | **Evidence in support of the application notice dated20.04.2018 (part 10)**   1. On **09/01/2018** the Court made an interim injunction order against Mr Cordell (the Defendant), attaching a power of arrest. The main terms of the order are summarised as follows:   The Defendant, Mr Cordell, be forbidden (whether by himself or by instructing or encouraging or permitting any other person:  **Clause 3:** from engaging or threatening to engage in conduct that is likely to cause physical violence and verbal abuse to the claimant’s employees, tenants to the block of flats at Burncroft Avenue, Enfield.  **Clause 4:** From engaging or threatening to engage in conduct that is likely to cause intimidation, harassment, alarm and distress to the Claimant’s employees, tenants and visitors to the block of flats at Burncroft Avenue, Enfield.  **Clause 5.** From engaging or threatening to engage in conduct that is likely to cause nuisance and annoyance to the claimant’s employees, tenants and visitors of flats at Burncroft Avenue, Enfield.  **Clause 7:** A power of arrest is attached to the above paragraphs. |
| **Page Number: 102** | |
|  | **Evidence in support of the application notice dated20.04.2018 (part 10)**   1. The Defendants have committed several breaches by committing several acts of anti-social behaviour against his neighbours. Mr and Mrs Mathiyalagan have been the victim of several incidents of harassment, intimidation and a serious assault on **45/03/2018.** Despite the matter being reported to the police, they have failed to take actions against the Defendant to enforce the terms of the injunction. |
| **Page Number: 102** | |
|  | **Evidence in support of the application notice dated20.04.2018 (part 10)**   1. The incidents are supported by the affidavit of Mr and Mrs Mathiyalagan dated **20/04/2018.** |
| **Page Number: 102** | |
|  | **Evidence in support of the application notice dated20.04.2018 (part 10)**   1. The most recent incident took place on **45/03/2018;** the Defendant assaulted Mr Mathiyalagan who then tried to defend himself. Mr Mathiyalagan sustained personal injuries to his face and had to some of his teeth removed as a result of the assault. The injuries are supported by the ambulance officers’ report, dentist records and letter from a GP which are exhibited in Mr Mathiyalagan affidavit dated **20/04/2018** and supporting this application. |
| **Page Number: 102** | |
|  | **Evidence in support of the application notice dated20.04.2018 (part 10)**   1. The Police arrested the Defendant, interviewed him and released him. |
| **Page Number: 102 + 103** | |
|  | **Evidence in support of the application notice dated20.04.2018 (part 10)**   1. **On 01/03/2018,** Mr Mathiyalagan stated that his wife was inside the bathroom giving their daughter a shower while his cousin was in the living room, he was at work. **At about 11am**, the Defendant came to their front door and started rattling the letterbox and knocking loudly on the door. His wife went to the door and asked who it was, and the Defendant replied, 'why are you shouting’. His wife told him that she was not shouting and that she was inside her bathroom giving her daughter a shower. She asked him why he came to her front door, that he was not allowed to be there, but the Defendant ignored her and continued to bang and kick on the door. This went on for about 5 to 10 minutes and caused a great deal of distress to his wife and daughter and made them scared for their safety. His daughter started crying because of the commotion and loud banging. The Defendant left after his wife asked his cousin to call the police. Mr Mathiyalagan stated that he telephoned the police on 101 to report the incident and was asked to go and make a statement at Edmonton police station. He stated that he did so in the morning of **Tuesday 06 March 2018.** |
| **Page Number: 103** | |
|  | **Evidence in support of the application notice dated20.04.2018 (part 10)**   1. On **26/02/2018,** Mr Mathiyalagan stated that he returned from work at 11:30pm and went to the kitchen to get something to eat; his wife and daughter were already asleep.   **At about 11:45pm,** while he was in the kitchen, he heard loud banging noises on his front door and rattling noises on his letterbox. He thought that his cousin had returned from work and was knocking on the door to be let in, he went to the door and spoke in his language but there was no response. He then opened the door and saw the Defendant standing outside his front door. As soon as the Defendant saw him, he ran away. The matter was referred to the police, but no actions took place. |
| **Page Number: 103** | |
|  | **Evidence in support of the application notice dated20.04.2018 (part 10)**   1. It is submitted that the Defendant should have been arrested, kept on remand and brought back to the County Court pursuant to CPR 65.47 which states as follows: 2. This rule applies where a person is arrested pursuant to – 3. a power of arrest attached to a provision of an injunction; or 4. a warrant of arrest. 5. The judge before whom a person is brought following his arrest may deal with the matter; or 6. adjourn the proceedings. |
| **Page Number: 103** | |
|  | **Evidence in support of the application notice dated20.04.2018 (part 10)**   1. The Police are aware of the injunction order as they have been served with a copy of the same. However, they have failed to enforce the terms of the interim injunction. |
| **Page Number: 103** | |
|  | **Evidence in support of the application notice dated20.04.2018 (part 10)**   1. The Claimant is therefore bringing an application for the Defendant’s committal. |
| **END** | |

* **The 2nd Injunction Order / Lemmy / pub Book Issue: 1!**

Statement of Markandu Math **/ Page Numbers:** p7 to 8 + New Pages: 104,105

Updated 25/04/**2018** by Hand Post into My Letter Box!

|  |  |
| --- | --- |
| **1.** Made on behalf of the Claimant  **2.** Witness Statement of Markantu Mathiyalagan  **3.** Dated **20 April 2018**  **20/04/2018**  **CLAIM NO:** E00ED049  **IN THE EDMONTON COUNTY COURT**  **BETWEEN:**  **{CLAIMANT}**  **THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF ENFIELD**  **-AND-**  **(DEFENDANT)**  **MR SIMON CORDELL**  **AFFIDAVIT OF MR MARKANDU MATHIYALAGAN** | |
| **Page Number: 104** | |
| **11/09/2018** | **1.** I am the tenant of Flat 117 Burncroft Avenue, Enfield, EN3 7JQ. My flat is located two floors above the Defendant’s. I live there with my wife arid a child I have been housed to this Property with my family by the London Borough of Waltham Forest and have occupied the **Properly since**  **11/09/2018**  The Property was given to me as a temporary accommodation. |
| **Page Number: 105** | |
|  | **2.** I make this affidavit in support of the Claimant’s application for the Defendant’s committal on the basis of a breach of the interim injunction order made by the Edmonton County Court on  **09th January 2018** |
| **Page Number: 105** | |
|  | **3.** The Defendant, Mr Simon Cordell was served personally on  **10th January 2018**  while he was in custody at the Wood Green Police Station. The documents were served personally by the process server. |
| **Page Number: 105** | |
|  | **4.** The terms of the interim injunction order granted by the Edmonton County Court attaching a power of arrest states the following:   1. Clause 3; from engaging or threatening to engage in conduct that is likely to cause physical violence and verbal abuse to the claimant's employees, tenants to the block of fiats at Burncroft Avenue, Enfield. 2. Clause 4: From engaging or threatening to engage in conduct that is likely to cause intimidation, harassment, alarm and distress to the Claimant’s employees, tenants and visitors to the block of fiats at Burncroft Avenue, Enfield. 3. Clause 5: From engaging or threatening to engage in conduct that is likely to cause nuisance and annoyance to the claimant's employees, tenants and visitors of flats at Burncroft Avenue, Enfield. 4. Clause 1: A power of arrest is attached to the above paragraphs. |
| **Page Number: 105** | |
|  | **5.** The following incidents/ breaches of the interim injunction order took place on the following days:  **Dated:** **20 April 2018**  **20/04/2018** |
| **END** | |

|  |  |
| --- | --- |
|  | |
| **Page Number: 98** | |
|  |  |
| **Page Number: 98** | |
|  |  |
| **Page Number: 98** | |
|  |  |
| **Page Number: 98** | |
|  |  |
| **Page Number: 98** | |
|  |  |
| **Page Number: 98** | |
|  |  |
| **Page Number: 98** | |
|  |  |
| **Page Number: 98** | |
|  |  |
| **Page Number: 98** | |
|  |  |
| **Page Number: 98** | |
|  |  |
| **Page Number: 98** | |
|  |  |
| **Page Number: 98** | |
|  |  |
| **Page Number: 98** | |
|  |  |
| **Page Number: 98** | |
|  |  |
| **Page Number: 98** | |
|  |  |
| **Page Number: 98** | |
|  |  |
| **Page Number: 98** | |
|  |  |
| **Page Number: 98** | |
|  |  |
| **Page Number: 98** | |
|  |  |
| **Page Number: 98** | |
|  |  |
| **Page Number: 98** | |
|  |  |