

The Appellants mother proceeded to explain this is why the Appellant wanted to talk to Mr Locke before going into Court, as this is part of the Non-disclosure being requested.

The barrister explained he only knew about the schedule, to which the Appellant mother replied, the schedule had been asked for by the Judge in addition to the letter that had been handed in and this was also when the Judge said it could be used as the Appellants skeleton argument and that this had happened when Miss Ward was in the Court on the date of the 04/04/2016 when she was also taking notes, so Miss Ward knew exactly what the Judge had asked for.

The Appellants mother had made a call to the Appellants solicitor and enquired as to what the Judge had asked for on the 04/04/2016 in regards to the disclosure, Ms Ward stated she could not remember, the Appellant mother being dumbfounded by this said in reply to her:- "you was sitting in the back of the Courtroom taking notes," and continued to explain that only last week from the date in mention, will have everything that the Judge had asked for in his original disclosure, plus what was asked for in the Appellants letter, that was handed to the judge and Miss Ward also explained that the Judge had made other additions in addition to the mentioned.

At no point did Ms Ward ever make the Appellants mother feel she did not know what was due to be disclosed, before and while still on the phone, if she had ever done this the Appellant and the Appellant mother would have asked her to relist the case to the Court and asked for this to be clarified, as the disclosure that we was asking for was very important to the ongoings of the Appeal.

The Appellant mother then handed the Appellant the phone the Appellant asked Ms Ward about the letter he was supposed to have sent to the Court and the prosecuting barrister, the Appellant was still thinking she was talking about the letter handed to the Judge on the 04/04/2016 when Miss Ward was not.

Also in Court on this date, it was said the Appellant had written this letter himself, which was not the case.

In truth The Appellant agreed for a letter that Miss Ward had written in reply to the Judge's letter for the Appellant to be amended, he had amended it himself and it was to be handed into the court, the Appellant solicitor was at Court so she knew the Appellant had amended the letter, this is to be inclusive of it being sent to her by email, as she was in the court on this date to.

On this date when Miss Ward was a court she said to the judge that the Appellant had drafted the letter when the Appellant had only amended it, Miss Ward continued to say, that she did not draft the Letter and that the Appellant wrote it, this is not true, at this the Appellant did call Miss Ward a liar as the Appellant knew Miss Ward had drafted the letter herself at first.

The Appellant later explained to Miss Ward on the phone that he could prove the truth and said I have the emails you sent to me and my mother of the letter we talk about and me amending it, in return for you. It was also explained to all that we have kept copies of all other correspondence between our persons and this is to include (Since the start of the Court proceedings.

The Appellant mother has checked the dates for when this letter was drafted by The Appellant solicitor and then returned to her, the date was on the 03/04/2016 please see attached email and letter (marked 03/04/2016 Ms Ward).

The Appellant barrister was listening to the phone call and after the Appellant ended the barrister got up and said I will need to think about still representing you as you called your solicitors a liar, the Appellant stated that he can prove that Miss Ward wrote the letter and she's denying as to doing so and further expressed himself in question the line of investigation by saying:- "how would anyone body else's feel, if she had lied about them," the Appellant barrister then replied that if he was still going to represent the Appellant then there would need to be a meeting at the Appellant barrister chambers, at this point the meeting concluded, with nothing else really spoke of about the Appellant Appeal yet again, this was days before the Appeal hearing was due to start once again.

Up to here for now:-

A while after the Solicitor wrote a letter and sent it to the Appellant and the Appellants mother, the date of this received email is dated 20/09/2016 and a copy had also been sent to the Court, this application was put in so for the acting solicitor to once again attempt to be removed from therecord this was done to our surprise and was listed in Court to be heard on the 21/09/2016.

There were large sections of this letter that were incorrect and did not happen so therefore are not true; this can also be proven by the Court transcripts from the 16/09/2016.

On the 21/01/2016 we were on our way to Court and got caught in traffic, we contacted the Court to get a message to the Judge to say that we were going to be five to ten minutes late, "I know the Judge got the message."

When we got to the Court, there was a barrister that Michael Carroll and Co had sent to the Court to deal with the application; this was so for them to be removed from the record for the second attempt.

The Barrister informed us she did not want to leave the Court before explaining what had happened it seemed the Judge had called this into Court without us being present and removed the solicitors from the record.

We question how could this have happened? Considering, the Appellant was not present at Court? And there was not a senior Partner from Michael Carroll and Co?; "this question is due to what had been previously said by His Honour Judge Morrison on 19/02/2016 in regards to this not being allowed to happen."

The Barrister said the Judge wanted to see us and we would need to wait in Court until we were called, as the Judge was dealing with a trial and we would be called in after it.

Around 16:00 hours we were called into Court, the Respondent did make the Judge aware at this point that what had been said by His Honour Judge Morrison on the 19/02/2016 stating that a Senior Partner was not present at Court, the Judge replied that he could not force a solicitor to carry on with a case they clearly did not want to and that the Appellant could represent himself, he continued to state; that the case was in a much better order now, but as is known the Appellant has learning difficulties and health problems which the Court are also well aware of, there were only a few days until the Appeal hearing was due to start once again, how could a Judge believe that a person with learning difficulties and health problems could be ready and cope with dealing with a three-day Appeal hearing on his own?.

We did try to get the Judge to adjourn the Appeal hearing so we could try and get representation put in place due to knowing the Appellant could not cope or handle this case on his own, which was due to start on the 26/09/2016 for a three-day hearing, the Judge said he would not allow this and that the Appeal hearing would go ahead no matter what. It seems again that the Appellant was being blamed for what was ongoing in this case, when the Appellant and the Appellant mother had done all they could, so for them to have this case ready to be heard.

How can a Judge expect someone that is known to be ill and have learning difficulties to be able to handle this case on their own?, considering there were only four days until the three-day Appeal hearing was due to start. Nothing was put in place by the Judge to help the Appellant in any way. The Appellant was just meant to get on with the case all on his own under the circumstances.

Once again the solicitors had done nothing for this case and the Judge had allowed them to walk away when this was said to not be allowed and it seems as if everything was being blamed on the Appellant.

It was also noted while we had been waiting outside the Court that the bundles we had been working from was the very first set of the application bundles and since that time everything had been updated, without us being informed, this included more statements from the police officer in charge of the case, there were lots of documents missing from within the first bundle due to the update, so until he was given the updated bundles, the Appellant had never seen them additional documents.

It was stated by the respondent they had sent new bundles to the acting solicitors Michael Carroll and co three times since the being of January 2016, we had never been given a set of new bundles since this case had started in 2014, we had never been told about new bundles been sent and never given a new copy of any bundle. This meant that bundle we had would have had all wrong page numbers