

**From:** Josephine Ward <josie@michaelcarrollandco.com>  
**Sent:** 08 February 2015 19:02  
**To:** Peter.Wood@canopius.com; andrew.austin@canopius.com  
**Cc:** lorraine32@blueyonder.co.uk  
**Subject:** Appeal against conviction for no insurance Regina v. Simon Paul Cordell on 5th March 2015 at Kingston Upon Thames Crown Court

Dear Mr Wood

I have been instructed by Mr Simon Paul Cordell and Miss Lorraine Cordell to assist in the appeal against conviction that is due to be heard at Kingston Upon Thames Crown Court on 5th March 2015 at 10am.

Miss Cordell has played two recordings that she received from KGM which are pertinent to the appeal but at present as the telephone recordings have not been produced as an exhibit by KGM they will not be admissible at court.

Can you therefore please write a section 9 statement confirming that:

- (a) all recording equipment was working correctly
- (b) KGM produced two recordings at the request of Ms Lorraine Cordell
- (c) Confirmation that the recording of S Cordell call from police 141113 Recording was provided by KGM from their recorded calls and is authentic
- (d) Confirmation that the recording between the Car Pound and Kelly Tiller was also provided from the KGM recorded calls and is authentic

If we are in possession of a section 9 statement producing the recordings then we will not have to apply to the court for a Third Party Summons to compel an employee from KGM to attend to produce the recordings. This would be a complete waste of your time when all we require is a section 9 attesting to the recordings being retrieved from the system and exhibited as two separate recordings.

If you require assistance with drafting a section 9 statement then we would be happy to draft it and email it over. We would require the name of the person who retrieved the recordings. the dates that the recordings were retrieved, the dates the recordings relate to, confirmation that the recordings were sent to Lorraine Cordell by email so that she can produce CD's of the recordings so that they can be played in court and specifically refer to the email containing the recordings so that there is continuity in the chain of evidence. Ideally we would like KGM to produce the CD's and exhibit them but failing this we will try to get the CPS to agree the CD's as produced from the email of Miss Cordell. We stress that the section in relation to the search and retrieval of the KGM database is essential and critical to ensuring that the chain of evidence is intact.

We can serve these recordings on the CPS and the Court so that they are agreed in advance of the Appeal hearing.

We thank you in advance for your anticipated co-operation in this matter and hope that we do not have to apply for a Third party Witness Summons to compel the attendance of a KGM employee at the Appeal on the 5th March 2015.

We confirm that Miss Cordell is forwarding an email confirming that we are instructed and authorised to request this information.

Yours faithfully

**MICHAEL CARROLL & CO.**