From: JOSEPHINE WARD [josephinewardsolicitor@gmail.com]
Sent: 02 February 2014 23:58
To: Lorraine Cordell
Subject: RE: Simon Cordell - application to transfer legal representation

Hi Lorraine

It is 10.47pm. I do not have Simon's file at home with me. I will ask Jemi to respond to the allegations made by Simon re his conference on 13th December 2013. At the same time I will ask him and his clerks to respond to why the Christmas bail variation was not made on 19th December 2013.

As you are both aware I was on annual leave until 6th January 2014. Simon's case is listed for trial in June 2014. There is enough time to secure the information but there is a process.
With regards to the section 8 application Jemi has been on notice that this has been required since before Christmas. A detailed defence case statement was submitted and as a result of this document and the Crown's failure to disclose the requested items that the Third Party Disclosure arise as did the section 8 application. If the Insurance company believe Mr Patel has committed a fraud then it is their decision whether he is prosecuted.

Nikki Diamond has to confirm her unwilllingness to disclose the file before I can apply for Third Party Disclosure. I cannot take a statement from her as part of her statement will require her to disclose and exhibit as part of that statement the original insurance claims and she cannot do this as client confidentiality arises.

Re Simon's most recent request to vary bail he did not provide the information when requested. I have dealt with this point already as I have re the Third Party Disclosure and the section 8 application.

I am not prepared to have my professional judgement or integrity called into question. Simon threatened to blacken my name on Facebook Lorraine. I am reliant on instructions from my client re bail variations. I am reliant on Counsel drafting applications re section 8. I drafted Simon's original bail application and defence case statement well within the time limits. All other requests to vary bail I have made. Due to the number of bail variations Simon is aware of the process and trying to get the variations agreed administratively. He is also aware of the attitude if the Court to his case

The issues regarding Simon's case when I am on leave I have no control over.

Simon himself caused problems in this case by (a) his behaviour on arrest (b) his comments to police when the police were at his house re the number of items bought as a job lot. There was no evidence of this apart from what came from Simon himself. (c) The gazebo in his garden was easily dealt with as he had the original receipt (d) Simon ignoring legal advice in his interviews (e) Simon's inaccurate interpretation on the law on burglary and what squatters can and cannot do whilst squatting in a building.

There is a risk that Simon will be convicted in this case and this is not through the fault of Michael Carroll & Co or my representation but through his own conduct on his arrest and at the police station. To try to blame other people for the position he finds himself in is very wrong.

Simple questions to consider:

1. Did the police know about or have any evidence re the job lot - answer No until Simon himself revealed this
2. Could Simon explain his DNA in a moveable object - answer. Yes and he would have achieved the same result as Naomi
3. Could police prove the Venice chair came from warehouse - no. Information on this again came from Simon