

I believe also that it could be taken to the high court for a judicial review about my bail condition but I was never made aware of this. Seeing as the crown court attitude in this case has never been good as you have put it. And that the court is unwilling to see that I need to work or face losing my business.

(g) The bail conditions imposed by the Court are not unreasonable. They are imposed to prevent the commission of further offences and failure to surrender.

I have never tried to blame other people for the position I find myself in, what I am saying is I don't feel as if things are being done in a timely manner.

If you just look at the Third Party Disclosure, if you new that you had to write to Nikki Diamond and get her to say in writing her unwillingness to disclose the file before you could then apply for the Third Party Disclosure, why did you not write the letter back in Dec 2013 after the application was put into the court on the 19/12/2013 or after you come back from annual leave, due to knowing that you needed this before the 16/01/2014 that the judge had said.

(h) The information that forms part of Third-Party Disclosure was originally requested in your defence case statement. Your trial is now scheduled for June 2014 and yes in an ideal world I should have sent a letter to Nikki Diamond and the insurance company. Nikkii Diamond has to refuse to give the information first of all before the Court will even entertain an application for Third Party Disclosure and then the Court could direct the information to be brought to court for the trial. This is what happens in Social Services cases by way of example. We would request paper copies, failing that then a statement from Nikki Diamond. If the insurance file is served then Nikki Diamond is not required as a witness as the insurance claims and reports can be introduced under the hearsay rules.

I do understand you were waiting for Jemi to do the write up for the section 8 and that was out of your control. But the Third-Party Disclosure was not.

Also why was it when we told you about getting a statement from Nikki Diamond did you not say then you had to wait until the Third-Party Disclosure was given as she would not be able to do a statement without client confidentiality arising which would have caused issues.

You told me on the phone that if you got the statement from Nikki Diamond then the bail condition change, I wanted for my birthday should not be a problem.

(i) I said it was worth a try. I did not put it any higher than this. I do not recall saying it would not be a problem but words to the effect that it would be worth a try. We are covering old ground here as I was also reliant on specific information that you refused to give as you felt the court had no right to know your movements.

Can you also keep me updated as to the date for court so I can attend?

(j) No problem I am hoping to resolve this matter once I speak to Michael Carroll tomorrow in the afternoon so I will be asking for a hearing on either Thursday or Friday of this week.

Simon