

provided to the insurance company? We request the date that these invoices were provided to the police. The estimate itemising the damage dated 5th September 2013 appears to correspond to damage itemised in a telephone call to the insurance broker by Nicola Diamond on 2nd April 2013 at 15:04:00 with additions. The estimate for this damage is £39420.00. Mr Patel in his statement dated 8th May 2013 estimates the damage as being between £8,000 - £10,000. Yet the invoice dated 5th September 2013 substantially increases the estimate by some £30,000. The invoices dated in March only refer to re-bricking one wall at a cost of £600 yet Nicola Diamond refers to at least three entry points.

The statement of Mr Rakesh Patel dated 10th March 2014 gives us cause for concern as he has produced two invoices that never appear to have been provided to his insurance company. He also makes reference to his manager reporting the burglary but not been given a crime reference. We request that a statement be taken from this Manager and in particular that the Manager confirms the damage that was caused and the value of the stock stolen and how this amount was reconciled to stock in the warehouse.

We are also concerned as police attended on the night of the raves in May 2013 and the damage to the wall would have been apparent to the police. In addition we find it bizarre that there were no additional police patrols in the area on the night of a rave. Our client is adamant that police officers attended on the night in question and were powerless to stop the rave / private party from taking place because there were people squatting inside the premises and notices on the walls clearly stating that the premises were being used as legal squats. The police officers who attended on the night of the rave / private party can confirm that there was damage already in existence and also that the premises were a legal squat. This would contradict the statement of Inspector Mc Millan dated 31st March 2014 who stated that there were no obvious notices / signs indicating squatters rights.

We therefore request that the officer in the case make enquiries in relation to the Bianca Road address as referred to in the section 80 notices.

We request that this case be listed for mention on Wednesday 21st May 2014 in order that the above can be clarified and also that our client's bail conditions are clarified, in particular our client seeks the return of his passport.

We await the confirmation of the listing in due course.

Yours faithfully

MICHAEL CARROLL & CO.