

From: Josephine Ward <josie@michaelcarrollandco.com>
Sent time: 02/03/2016 10:11:01 AM
To: re_wired@ymail.com; Andrew.Morris@legalaids.gsi.gov.uk
Subject: Simon Cordell v. The Commissioner of Police of the Metropolis for mention on 4th April 2016 at Wood Green Crown Court

Simon

Can you please review the initial response to the Respondent's application to adduce the hearsay evidence. I have included some of the points that you take issue with. A full skeleton legal argument will be served addressing all points you wish raised following our meeting on Friday morning at 11am subject to you confirming that you can attend. I need a response to the email which I am proposing on sending over to the court so that our objection to the hearsay evidence is noted.

Please confirm in writing your specific instructions with regards to the email below and confirm your authorisation for me to send it, in addition to any amendments that you wish me to consider including. I need a response to this before 3pm today, 2nd March 2016 please.

Regards

Josephine

Dear Sir or Madam

We refer to the hearsay application dated 23rd February 2016, received in the DX at our office 1st March 2016.

We require all witnesses to attend as listed on page 5 - 66 to be cross examined.

We confirm that we object to the Respondent's application to adduce hearsay evidence contained in the CRIMINT reports pages 79 - 92, 109 - 121 of the Respondent bundles.

CRIMINT - YERT00376728 - Aaron King is required to attend to be cross examined

CRIMINT - YERT00376227 - PC Chandler is required to attend to be cross examined

CRIMINT - YERT00376229 - PC Edgoose is required to attend to be cross examined. The Appellant also specifically requests disclosure of police checks made on the vehicle he was driving and the vehicle he was alleged to have been driving bumper to bumper to. The Appellant also requests specific confirmation in a statement from PC Edgoose the following: (a) why he was not arrested for any offences in relation to his driving as PC Edgoose makes specific reference to the driver he was following confirming that the Appellant had been driving in the same manner from YR. (b) Summons for any road traffic violations (c) CADS / communications concerning name checks

CRIMINT - YERT00376024 - PS Skinner is required to attend to be cross examined. The Appellant seeks specific disclosure as to the vehicle checks carried out on PE52 UHW. Whether Simon Cordell was ever stopped in this vehicle in the past? Whether Simon Cordell was ever stopped in company with Elliot Laidler in the past? Why was the music system not seized? Full names of all other persons inside the premises to confirm the number of people present. Results of the search of the premises, in addition to the keys found at the premises? Whether any other persons were arrested, if so what for? Disclosure of CADS / statements / complaints regarding anti social behaviour? Whether any allegations of criminal damage / commercial burglary was made? What enquiries were made from the owners of the building as to the premises being occupied?

CRIS 1914855/14 - Statements from officers who attended the premises, confirming from whom the sound system was seized?