

**From:** JOSEPHINE WARD <josephinewardsolicitor@gmail.com>  
**Sent time:** 08/09/2016 04:01:40 PM  
**To:** Lorraine Cordell <lorraine32@blueyonder.co.uk>; too smooth <re\_wired@ymail.com>  
**Subject:** Re: Proposed letter for Commissioner of Metropolitan Polcie  
**Attachments:** Specific disclosure requests by Simon Cordell 08.09.2016.docx

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Lorraine / Simon

Simon I do not believe that it is in your best interests for me to serve the suggested amendments to the letter that I proposed sending to the Ms Sally Gilchrist. The reason for this advice is similar to the advice given to you by Mr Morris on 4th April 2016 and you decided to ignore his advice. A lot of the matters you raise I have previously advised you can be dealt with by cross examination. Your instructions are simply that you have not organised, provided equipment or been concerned in the organisation of illegal raves. In relation to all events with the exception of Millmarsh Lane you dispute providing equipment or any intention to hold any events. In some you are visiting friends who are homeless and have a LAPSO notice up confirming they are treating the building as their residence. The legal technicality you refer to i.e. absence of trespass does not prevent any parties from being held at the buildings in question as amounting to anti social behaviour. You are well aware of how anti social behaviour is defined and loud music being played over two nights would satisfy this definition as it undoubtedly causes noise nuisance and distress to neighbours. Your defence to Progress Way is denying being in attendance inside the premises on any occasion and you merely dropped off keys. The question as to whether the premises were being squatted and the appropriate notice was on display to prevent trespass does not affect whether anti social behaviour was caused. I have advised you that championing the rights of persons squatting in a building to hold a party where a couple of hundred people attend and justifying the event as not being a rave due to lack of trespass does not prevent the event from causing anti-social behaviour. Anti social behaviour was clearly caused as a result of the Progress Way event. There is a significant risk that you will alienate the Judge if you advance the argument that anyone squatting can hold a loud party. The loud parties cause anti-social behaviour regardless of trespass / rave definition being satisfied.

I ask you to reconsider whether the attached document should be served on the Respondent. This document I have copied and pasted from the amendments you made to the letter that I sent to you. The views you expressed in the letter and the requests made were your requests and legal challenges so I have changed "we" to, "I, Simon Cordell" to reflect this. My view is that this document should not be sent but if you insist then please confirm this in writing. Type in your signature and email back to me please.

Mr Andy Locke is available for a conference on 13th September 2016 at his Chambers and following this conference a decision will be made whether to list the case for lack of disclosure or not.

Please confirm your instructions on the service of the attached word document. I reiterate that I do not believe that it is in your interests to serve the document.

Regards

Josephine

On Thu, Sep 8, 2016 at 2:15 PM, Lorraine Cordell <[lorraine32@blueyonder.co.uk](mailto:lorraine32@blueyonder.co.uk)> wrote:

Josey please see letter back from Simon

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**From:** JOSEPHINE WARD [mailto:[josephinewardsolicitor@gmail.com](mailto:josephinewardsolicitor@gmail.com)]  
**Sent:** 08 September 2016 12:51  
**To:** Lorraine Cordell  
**Subject:** Proposed letter for Commissioner of Metropolitan Polcie

Lorraine

Please confirm whether there are any additions that Simon wants included in this letter. I need to send this document across within the next hour.