

From: Lorraine Cordell <lorraine32@blueyonder.co.uk>
Sent time: 09/02/2016 05:07:12 PM
To: Josephine Ward <josie@michaelcarrollandco.com>; JOSEPHINE WARD <josephinewardsolicitor@gmail.com>; Rewired Rewired <re_wired@ymail.com>
Subject: RE: Simon's updated statement

Dear Josey

The statement we have been asking you to request from Superintendent Coombes since Sep 2015 will help this case Josey I can not understand how you can say it will not. Simon was not in Essex which will show in Superintendent Coombes statement. it will show that Superintendent Coombes contacted the met police and spoke to a Superintendent and give them all the information and told the MET to keep a close eye on this event as it could happen within the METs bounders. It will say Superintendent Coombes asked for an officer name that would be on duty in the met police that weekend in case of problems.

It will show that Superintendent Coombes made many phone calls to the organisers of the rave way before the day that the event was due to take place to try and get them to stop. None of this will come back to Simon. And it will also show more information then this so how can this not help.

Just the met police knowing about this event and getting the person name who spoke to Superintendent Coombes will mean a great deal as this will clearly show the MET police was warned about this event before it even started. so in turn the MET police would have known where it was moved to.

Please tell me how this will not help?

Josey the public order unit no full well who was the organisers of most of the dates within this ASBO application. is it right they got information on there system showing who was the real organisers which is not Simon yet a case is put in Simon name.

Josey people can have friends it does not mean they know what people are doing does it.

Josey the case for illegal raves has not been proven at the trial already and can never be proven as there is no trespass to the applications case. The team raves can not be used in a legal team read Simon 90 page document and you will see the law there in it.

Why do you think in the new Skeleton Argument the word illegal has been taken out within the whole document and the word rave has only been used? But they can not use this team in the application as said above the team raves can not be used in a legal team.

So now what is the case Simon acted in an anti-social manner, well clearly this is the case that was proven at trial but I can not understand why and no one else can even the councils I have spoken to do not know how this was proven, as not one police officer stood up at trial and said Simon acted in a rude or anti-social manner towards them, they said he spoke to them and done what they asked of him. The witness statements not one of them can give an ID of Simon so how do they know it was Simon that has acted in an anti-social manner?

Josey to prove this case the burden has to be of high standard and it is not or they would have been able to prove illegality at trial which could not be proven.

Josey there was a reason the application was done in the way it was they could not prove outright Simon acted in a way to prove he:

- That the offender has acted, at any time since XXXXXX in an anti-social manner, that is to say in a manner that caused or was likely to cause harassment, alarm or distress to one or more persons not of the same household as himself, and
- An order under this section is necessary to protect persons in any place in England and Wales from further anti-social acts by him.

The reason being Simon did not act in an anti-social manner to any person and this is proven in there own application. AS said above Simon was not rude to anyone even the police he spoke to them so this is not acting, in an anti-social manner that is to say in a manner that caused or was likely to cause harassment, alarm or distress to one or more persons not of the same household as himself.

But if he was the organisers of these illegal raves then he would be the person that was overall reasonable for any person that caused or was likely to cause harassment, alarm or distress.

They can not prove Simon was the organisers of these illegal raves.

Once you have had time to look after Simon document tonight can you please supply bullets of all points you feel he has issues.

Would it also please be possible to ask the court for more time in order to get the document in as Simon does not want to run out of time in order to get this all addressed and all documents in and the list of witness that will need to be called that was due in yesterday to the court.

Regards

Lorraine

From: JOSEPHINE WARD [mailto:josephinewardsolicitor@gmail.com]
Sent: 09 February 2016 15:59
To: Lorraine Cordell
Subject: Re: Simon's updatedstatement

Lorraine

I am sorry that you have not been well.

As the updated statement is not yet completed by Simon please indicate when this statement will be ready. This is not a rushed request as you seem to suggest, you were aware of this from before Christmas break so please do not blame me.

The information that you are asking me to request from does not assist Simon's case and if anything will lead to an inference that he is involved with the organisers of the rave. If Simon insists on this being requested then I will of course request this but it does not help Simon. I have not delayed any information from being included in the bundles. It is for Simon to provide this information in a timely manner. Simon's appeal is based on the definition of whether the events cited in the respondent's application were raves by definition. Legal aid funding does not remunerate me for sitting through meeting after meeting. This is why I asked for Simon's statement in advance of the meeting so the meeting would be constructive.

Your perception of the strengths and weaknesses in the case differ from my interpretation as does your belief in information that is being sought and how this assists Simon's case/ appeal. I am giving you my honest view on the Police evidence.

If Simon's statement is not ready and I assume it is not then please email it this evening and I can reschedule for 4.30pm tomorrow.

Regards

Josephine

On Tue, Feb 9, 2016 at 3:27 PM, Lorraine Cordell <lorraine32@blueyonder.co.uk> wrote:
Dear Josey

due to not getting replies to my emails since the new year asking if anything else was needed to be done by as and getting no reply I have not had time since yesterday to deal with getting a statement re Dwayne, but I think that is covered already as Jamie Duffy was there and he has already wrote a statement.

I told you before Christmas Dwayne was due to go away to complete his trip that he has to cut short due to my mum's death. I told you he is back packing so would be very hard to get hold of once he left which was a few days after you asked me to get the tickets to show when he was leaving and the hall details. and when you told me about Dwayne would need to attend i told you that would be impossible as he was due to leave a few days after you asked me. I even called him in your office Josey so you can not say you did not know this.

Yes I should be able to get statement of other people and in your last email you did not say you needed these statements today in the daytime you said by tomorrow evening. Which is tonight.

I am sorry you now feel you have to rush things as they have not been done but that is not my fault or Simon's

Josey you know I have many health problems and I have only just had a huge amount of injections into my spine on the 17/01/2016 and I am not aloud to run around and do things for 6 to 8 weeks after having these done. I also got the flu really badly and have not been well for the last 2 weeks., but have still tried to get things due that was needed, but getting no replies to myemails did not help.

Josey you have had Simon 65 page statement for months I think since Oct 2015 at the last meeting you aloud him to attend it was given to you. It is this statement he is updating again since we got the information from the cps in an email on the 04/02/2016.

Simon is trying to get things done so you do not have so much to do. I have done the same thing. Me and Simon from the start of this case have done all that was asked of us and much more,

We were asking for things to be done since this case started which was not and only started to be done when the appeal was put in.

If you feel the need to re-schedule the meeting which has happened many times before then please update us, but this meeting is to

deal with Simon updated statement Josey which he has never had a chance to do.

Regards

Lorraine

From: JOSEPHINE WARD [mailto:josephinewardsolicitor@gmail.com]

Sent: 09 February 2016 14:53

To: Lorraine Cordell; too smooth

Subject: Simon's updated statement

Lorraine / Simon

I note that I have not received the updated statement from Simon, nor any additional statements from any witnesses re Dwayne's leaving party. I advised you previously that Dwayne was required to attend court, clearly he cannot as he is travelling, hence the request for alternative witnesses to back up Simon's alibi.

If the updated statement is not received by 3.30pm then I will have to re-schedule the meeting for until such time as the updated statement is received.

Regards

Josephine