From:	Wood, Peter <peter.wood@canopius.com></peter.wood@canopius.com>
Sent:	01 April 2015 16:02
То:	'Lorraine Cordell'
Subject:	RE: Appeal against conviction for no insurance Regina v. Simon Paul Cordell on 5th March 2015
	at Kingston Upon Thames Crown Court

### Hi Lorraine,

Fantastic holiday thanks, really great time, went by far too quickly and now its back to normal, took me a while to get my head back in the game I must say.

I didn't realise there was more than 1 court case! This is going to take some time to sort out but I'm glad to hear you got the right result on the recent case.

I guess all I can say for the moment is let me know how things go and of course I will respond again after I have received and considered details of the Police stops/vehicle seizures we are waiting on.

### All the best.

Regards

Peter Wood UK Specialty Operations Manager | UK Specialty Division of Canopius Group KGM House | 14 Eastwood Close | London | E18 1RZ D +44 (0) 20 8530 9120 | www.kgminsurance.co.uk | www.canopius.com

# From: Lorraine Cordell [mailto:lorraine32@blueyonder.co.uk] Sent: 01 April 2015 15:00 To: Wood, Peter Subject: RE: Appeal against conviction for no insurance Regina v. Simon Paul Cordell on 5th March 2015 at Kingston Upon Thames Crown Court

### **Dear Peter**

Thank you for the email and i hope you had a great holiday.

I am waiting for the police compound to get back to us with the data for the seizers, but they just take so long with everything.

There are still court cases for no insurance that are still ongoing there are 2 left where Simon did not get any summons form the court and was found guilty due to not knowing. One is due to be heard in May 2015 and we are waiting for the last date.

DVLA have now taken of the ban on the 18/03/2015 so the insurance my son has been paying for the last year and could not be used due to this can now be used as he can drive now. But there is still the 12 points on his licence due to the other 2 court cases for no insurance DVLA do know the 12 points should not be on there in fact they have also been in contact with the courts they are not happy, but they cannot remove the points until the cases are heard in court.

But an update to what happened in court case were the police officer lied was Simon won the case and the judge was very upset at the police officer and put notes that it needed addressing.

The complaint is ongoing with the police office that lied, at this time that may take some time as the police officer may be charged. We won't know fully until the Serious Misconduct Investigation Unit Directorate of Professional Standards completes there investigation into what the police officer did and what the crown court judge said as the judge knows he lied to 2 judges and Simon was found guilty when he had done nothing wrong. We had a meeting about this on the 26/03/2015 but the person dealing with this is waiting for the crown court documents as to what the judge said, we should have the court transcript from Kingston Crown Court just after the Easter holidays.

I will keep you updated as to the data you need its just waiting for it from the police compound as requests had to be made for the data,

Simon did try to get the information without the requests but the police was not having it so the request had to be put in for it.

## Regards

### Lorraine

From: Wood, Peter [mailto:Peter.Wood@canopius.com]
Sent: 31 March 2015 09:25
To: 'Lorraine Cordell'
Subject: RE: Appeal against conviction for no insurance Regina v. Simon Paul Cordell on 5th March 2015 at Kingston Upon Thames Crown Court

Hello Lorraine,

I trust you and Simon are well.

I was wondering if you could update me on whats been happening please? I would like to make sure there is nothing else we can do and of course to bring this matter to a conclusion if we can.

Regards

Peter Wood UK Specialty Operations Manager | UK Specialty Division of Canopius Group KGM House | 14 Eastwood Close | London | E18 1RZ D +44 (0) 20 8530 9120 | www.kgminsurance.co.uk | www.canopius.com

From: Lorraine Cordell [mailto:lorraine32@blueyonder.co.uk]
Sent: 11 February 2015 12:45
To: Wood, Peter
Subject: RE: Appeal against conviction for no insurance Regina v. Simon Paul Cordell on 5th March 2015 at Kingston Upon Thames

Crown Court

Hi Peter

Thank you so much for all your help, and i hope you have a wonderful holiday.

Regards

Lorraine

From: Wood, Peter [mailto:Peter.Wood@canopius.com]
Sent: 11 February 2015 11:40
To: Lorraine Cordell; Josephine Ward (josie@michaelcarrollandco.com)
Cc: Austin, Andrew

**Subject:** RE: Appeal against conviction for no insurance Regina v. Simon Paul Cordell on 5th March 2015 at Kingston Upon Thames Crown Court

Hello,

Please find attached signed statement as requested.

The original is in the post to the Burncroft Ave address.

If you need anything else please ask Andy in my absence.

Regards

Peter Wood UK Specialty Operations Manager | UK Specialty Division of Canopius Group KGM House | 14 Eastwood Close | London | E18 1RZ D +44 (0) 20 8530 9120 | www.kgminsurance.co.uk | www.canopius.com

From: Lorraine Cordell [mailto:lorraine32@blueyonder.co.uk]
Sent: 10 February 2015 18:07
To: Wood, Peter
Subject: RE: Appeal against conviction for no insurance Regina v. Simon Paul Cordell on 5th March 2015 at Kingston Upon Thames Crown Court

### **Dear Peter**

Sorry for the late reply yes Josephine Ward has said this is fine and can be signed off. thank you for all the help in this matter.

I hope you have a great time on holiday.

Regards

Lorraine

From: Wood, Peter [mailto:Peter.Wood@canopius.com]
Sent: 10 February 2015 16:38
To: Josephine Ward; Wood, Peter
Cc: Iorraine32@blueyonder.co.uk; Austin, Andrew
Subject: RE: Appeal against conviction for no insurance Regina v. Simon Paul Cordell on 5th March 2015 at Kingston Upon Thames Crown Court

Good Afternoon,

Please can I have your confirmation that the draft section 9 statement is acceptable asap? If I do not hear back by 11.30 tomorrow I will have to assume it is and sign it off and send out as I will be in meetings and on holday after that time.

Thanks

Pete Wood

From: Wood, Peter <<u>Peter.Wood@canopius.com</u>>

Date: 9 February 2015 11:29:00 GMT

To: Josephine Ward < josie@michaelcarrollandco.com >

Cc: Austin, Andrew <<u>Andrew.Austin@canopius.com</u>>,lorraine32@blueyonder.co.uk <<u>lorraine32@blueyonder.co.uk</u>>

Subject: RE: Appeal against conviction for no insurance Regina v. Simon Paul Cordell on 5th March 2015 at Kingston Upon Thames Crown Court

Dear Ms Ward,

I have drafted a section 9 statement as requested. Before I sign it off can you review it and confirm it satisfies all of your requirements please? As soon as you do so I will sign it off, scan a copy over to you and put the original in the post.

Let me know if you need anything else and of course if you need me to amend the attached in any way.

Lorraine/Andy – FYI.

Regards

Peter Wood UK Specialty Operations Manager | UK Specialty Division of Canopius Group KGM House | 14 Eastwood Close | London | E18 1RZ D +44 (0) 20 8530 9120 | www.kgminsurance.co.uk | www.canopius.com

From: Josephine Ward [mailto:josie@michaelcarrollandco.com]
Sent: 08 February 2015 19:02
To: Wood, Peter; Austin, Andrew
Cc: lorraine32@blueyonder.co.uk
Subject: Appeal against conviction for no insurance Regina v. Simon Paul Cordell on 5th March 2015 at Kingston Upon Thames Crown Court

Dear Mr Wood

I have been instructed by Mr Simon Paul Cordell and Miss Lorraine Cordell to assist in the appeal against conviction that is due to be heard at Kingston Upon Thames Crown Court on 5th March 2015 at 10am.

Miss Cordell has played two recordings that she received from KGM which are pertinent to the appeal but at present as the telephone recordings have not been produced as an exhibit by KGM they will not be admissible at court.

Can you therefore please write a section 9 statement confirming that:

(a) all recording equipment was working correctly

(b) KGM produced two recordings at the request of Ms Lorraine Cordell

(c) Confirmation that the recording of S Cordell call from police 141113 Recording was provided by KGM from their recorded calls and is authentic

(d) Confirmation that the recording between the Car Pound and Kelly Tiller was also provided from the KGM recorded calls and is authentic

If we are in possession of a section 9 statement producing the recordings then we will not have to apply to the court for a Third Party Summons to compel an employee from KGM to attend to produce the recordings. This would be a complete waste of your time when all we require is a section 9 attesting to the recordings being retrieved from the system and exhibited as two separate recordings.

If you require assistance with drafting a section 9 statement then we would be happy to draft it and email it over. We would require the name of the person who retrieved the recordings. the dates that the recordings were retrieved, the dates the recordings relate to, confirmation that the recordings were sent to Lorraine Cordell by email so that she can produce CD's of the recordings so that they can be played in court and specifically refer to the email containing the recordings so that there is continuity in the chain of evidence. Ideally we would like KGM to produce the CD's and exhibit them but failing this we will try to get the CPS to agree the CD's as produced from the email of Miss Cordell. We stress that the section in relation to the search and retrieval of the KGM database is essential and critical to ensuring that the chain of evidence is intact.

We can serve these recordings on the CPS and the Court so that they are agreed in advance of the Appeal hearing.

We thank you in advance for your anticipated co-operation in this matter and hope that we do not have to apply for a Third party Witness Summons to compel the attendance of a KGM employee at the Appeal on the 5th March 2015.

We confirm that Miss Cordell is forwarding an email confirming that we are instructed and authorised to request this information.

Yours faithfully

# MICHAEL CARROLL & CO.

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