

**From:** Wood, Peter <Peter.Wood@canopius.com>  
**Sent:** 09 February 2015 11:30  
**To:** Josephine Ward  
**Cc:** lorraine32@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  
**Attachments:** Witness Statement 060215 S Cordell.docx

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**

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**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