

From: Lorraine Cordell [lorraine32@blueyonder.co.uk]

Sent: 08 February 2015 19:46

To: 'Wood, Peter'

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

Dear Peter

We have had to have a meeting today with a solicitor re the appeal case for my son.

the reason for this is due to something about chain of evidence and submitting the tapes as exhibits to the court i think that was why the CPS and judge said to us last time we were in court we would need a section 9 witness statement.

please can you address the email from Josephine Ward from MICHAEL CARROLL & CO that has been sent to you i have forwarded it below.

This court appeal is a lot harder then i had ever dreamed.

Regards

Lorraine

From: Josephine Ward [mailto:josie@michaelcarrollandco.com]

Sent: 08 February 2015 19:02

To: Peter.Wood@canopius.com; andrew.austin@canopius.com

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