

Continuation Sheet

Section 10- What information will you be relying on, in support of your application?

Mrs Lorraine Cordell has supported the Defendant throughout the proceedings, attended all hearings and represented the Defendant even when he was absent. The Defendant has also demonstrated some reluctance in accepting legal documents by sealing his letter box or returning the recorded delivery posts which would be sent to his home address. Mrs Lorraine Cordell was actually the main person who would make the Defendant aware of the ongoing proceedings and the hearings. On 14/05/2018 the Court even agreed to substitute personal service of two committal applications and allowed the Claimant to serve the applications upon Mrs Lorraine Cordell directlt by email.

The Claimant also believes that the proposed litigation friend, Mrs Lorraine Cordell satisfies the requirement of CPR 21.4 (3) as she appears to be able to act fairly and competently on behalf of the Defendant. She's the Defendant's mother and has no interest adverse to the Defendant.

Pursuant to CPR 21.8 (1) and (2) The Court should note that a copy of the application is being served upon

- 1) Mrs Lorraine Cordell (proposed litigation friend)
- 2) the Defendant's instructed solicitors (Stuart Miller Solicitors).

The Defendant has previously refused service of the documents in the past by sealing his letter box. We would therefore ask the Court to dispense with service given the difficulties and also given the fact that the representatives and proposed litigation friend are being served.