<u>Contains</u>: Email then an Attachment.
Weblinks used as Exhibits are:
<dir.> Homes Folder 28-04-26
<u>Files to use</u>:
01. Main 17-06-2026 - Dad Aunt and Uncle.pdf
<Dir> 06. WhatsApp Uncle
<Dir> 07. WhatsApp Aunt
<Dir> 11. WhatsApp Mother
Sms-Aunt-20260513172913.PDF
Sms-Uncle-Andrew-20260513172913.PDF
Sms1-Mother-20260513172913.pdf

Dear Barnes & Partners,
I acknowledge receipt of your Letter of Claim dated **<u>22 June 2026</u>**, which the mail person did not deliver to me until **<u>17 July 2026 — 25 days later</u>**, making compliance with your stated 14-day deadline impossible. Despite this, and despite the pressure caused during a period of bereavement, I respond fully and constructively.
Your letter relies on the Practice Direction on Pre-Action Conduct and Protocols. I therefore confirm that this reply I provide is **in full compliance with the Protocol**, supported by evidence your clients have not requested, reviewed, or disclosed.
Your Letter of Claim was issued **without any disclosure whatsoever**. You have not asked for my evidence, reviewed my evidence, or acknowledged the extensive communications, recordings, and my defence documents that contradict every allegation made. The narrative presented is incomplete, omits key facts, and misrepresents both the history of the Property and my lawful occupation.
What follows is a detailed, evidence-supported account drawn from WhatsApp messages, SMS records, and PDF documents — materials your clients have avoided — showing a very different picture: one of long-standing family occupation, agreed arrangements, delegated responsibilities, and repeated access by your clients, **not exclusion**.

<u>1. Ownership of the Property</u>
Your letter states that My Mother, Aunt and Uncle held the Property 280 Durant's Road as **joint tenants at law,** but **tenants are in common in equity**. You then claim legal title passed automatically to Andrew and Sheila **"<u>By Survivorship,</u>"** while simultaneously admitting that **a tenancy in common carries no right of survivorship**.
The two statements cannot both be true.
If survivorship does not apply — as you correctly acknowledge — then Andrew and Sheila did **not** automatically acquire my mother's share. Her one-third beneficial interest remains part of her estate.
You further state that my mother died intestate and that her estate passes equally to her three children. On your own analysis, once probate gets completed, her one-third share will be divided equally between myself, Tyrone, and Deon — **one-ninth each**.
You also confirm that my mother's estate has **not** been administered and that no Grant of Letters of Administration has been obtained. Without a Grant, no one has legal authority to rely on fixed beneficial shares or to demand sale, occupation rent, or conditions on occupation.
Your stated shares of 1/3, 1/3, 1/9, 1/9, and one-ninth are therefore **speculative** and carry no legal weight until probate is completed.

2. My Lawful Occupation

Your letter alleges that I occupy the Property **"To the Exclusion"** of your clients. This is incorrect. Evidence shows:

- Andrew, Sheila, And Other Family Members Had **Keys** to The Property.
- They Accessed the Property **Freely and Voluntarily**.
- They Arranged Boiler Visits, Repairs, Rubbish Removal, Damp Checks, And Parcel Collections.
- They Asked Me to Be Present for These Visits.
- My Aunt Attended 280 Durrants road to Discuss House Matters and Was Never Refused Entry as she has her own keys to gain entry.

I did not exclude your clients. They accessed and used the Property whenever they wished.

You allege I pay **"No Rent, Mortgage Contribution or Outgoings."** This is misleading:

- 280 Durant's Road Has **No Mortgage**.
- There Is **No Rent** Payable Between Co-Owners.
- I Paid Agreed Utility Contributions Set by Andrew.
- I Paid My Mother Directly for Electricity Before She Passed.
- I Purchased Materials and Conducted Repairs with Her Knowledge and Approval.

Your claim that I pay **"Nothing"** is false.

You allege **"frequent visitors at unsociable hours"** and **"Suspected Drug-Related Activity."** These allegations are unsupported. You installed a camera doorbell to monitor me and found **no evidence** of wrongdoing. The only drug-related incident involved a friend of Tyrone at **23 Byron Terrace**, not **280 Durant's Road.** Police records confirm this.
These allegations are irrelevant to TOLATA and appear designed to damage my character. I reserve the right to pursue defamation if such claims continue.

3. TOLATA 1996

You rely on sections 12–15 TOLATA but omit key facts:

- Section 12 Gives Beneficiaries A Right to Occupy Trust Land **If Held for Occupation**.
- 280 Durant's Road Has Always Been Treated as The **Family Home**.
- Messages Between Myself and My Mother Confirm My Long-Term Occupation.
- Family Discussions Confirmed the Property's Purpose Was Residential Use.

I therefore have a statutory right to occupy.

You allege **"Unilateral Decisions."** Evidence shows the opposite:

- Andrew And Sheila Did **Not** Function as Formal Trustees.
- They Delegated Day-To-Day Responsibility to Me.
- Andrew Asked Me to Organise Repairs, Check Rooms, Manage Contractors, Open Parcels, And Send Photos/Videos of Works.
- They Relied on Me to Manage the Property While Renting It Out Themselves.

They cannot now complain about unilateral decisions when they themselves placed me in that role. Your attempt to use TOLATA to restrict my occupation is misplaced and ignores both the factual history and statutory rights.

4. Procedural Issues

Your letter demands a response within **<u>14 days of 22 June 2026</u>**. It was delivered **<u>25 days late</u>**, making compliance impossible. Any cost threats based on non-response are unreasonable and contrary to the Protocol.
You also failed to provide basic disclosure:

- <u>Title Deeds</u>
- <u>Trust Documents</u>
- <u>Probate Documents</u>
- <u>Valuation</u>
- <u>Evidence Of Exclusion</u>
- <u>Evidence Of Damage</u>
- <u>Occupation Rent Calculations</u>

Without disclosure, meaningful engagement is impossible. This is a breach of the Protocol.

<u>5. My Positive Case Under TOLATA</u>
Your clients threaten proceedings under section 14 TOLATA. You state they will seek:

- <u>Order For Sale</u>
- <u>Declaration Of Beneficial Interests</u>
- <u>Occupation Rent</u>
- <u>Costs</u>

My position is as follows:

<u>5.1 Purpose of the Trust</u>
The Property's purpose has always been as a **family home**. A forced sale undermines that purpose.

<u>5.2 My Contributions</u>
I have significantly improved and preserved the Property:

- <u>Rebuilt Garden</u>
- <u>Fixed Drainage and Toilets</u>
- <u>Installed Kitchen Units</u>
- <u>Cleaned And Refurbished Rooms</u>

Andrew repeatedly praised the condition and relied on me to conduct work.

<u>5.3 ADR</u>
I am willing to engage in genuine ADR once full disclosure is provided. ADR must consider **all lawful outcomes**, including **"<u>Continued Occupation,</u>"** not only the **"<u>Forced Sale,</u>"** your client's demand.

<u>(Based on my evidence in</u> **"<u>01 Main, SMS-Mother, SMS-Aunt, Mother WhatsApp, Andrew.pdf, SMS-Uncle-Andrew)</u>"**
<u>SECTION 1 — FAMILY HISTORY & WHY 280 DURANTS ROAD MATTERS</u> I was raised at **280 Durant's Road** by my **nan and grandad**. This house is not just bricks — it is the **Cordell family home**, the place where our family has lived for decades and our family heritage is. I grew up there, slept there, ate there, and was raised by: • <u>My Nan & My Grandad At 280 Durant's Road but Also.</u> • <u>My Mother Lorraine with My Father at Their Address And.</u>

- <u>My Aunt Sheila at Her Address and This Also Includes.</u>
- <u>Their Closest Friends Who Stay a Part of Our Daily Life at Their Addresses.</u>

I was accepted into the Cordell family despite being mixed-race. This mattered because my uncle Andrew — the only biological son — chose to be gay and would not continue the Cordell bloodline. My nan and grandad accepted me as the one who would carry the Cordell name forward. Hese my birth certificate being Mr. Simon Paul Cordell and not Mr. Simon Paul Benjamin as you have named me wrongly in your official letter. Shelia and Andrew as well as Tyron and Deon are all very aware of this fact as my Exhibited Evidence also proves from their own additions.

My mother kept me registered as **Cordell** at birth, even though my father was angry and wanted me to register as **Benjamin**. In Sms1-Mother-20260513172913.pdf, she explained she took advice from Aunt Sheila, Nan, and Grandad, and that is why she kept me as Cordell. This meant that my father never bonded with me correctly and my security and stability lay with my mother.

My siblings were registered as Benjamin. My aunt's children have different surnames other than Cordell due to marriage and father surname being kept. My uncle Andrew has no children meaning that I am the **only living Cordell descendant in London** able to carry the name and continue the family line.

This is why 280 Durant's Road is not just a house — it is the **last remaining Cordell home**.

<u>SECTION 2 — UNCLE ANDREW'S ABSENCE & RETURN</u>

My uncle Andrew left the family home at around **age 16** after disputes with Nan and Grandad. He did not return for **8–10 years at a time**. He only appeared occasionally — funerals, emergencies, or rare visits.

He has his own **council flat** and lived independently.

<u>He Was Not Present During</u>:

- <u>A Large Part Of My Childhood</u>
- <u>My Teenage Years</u>
- <u>And Adult Life Even Though He Has Been Around More of My Adult Age Group.</u>

Andrew only returned to 280 Durant's Road after Nan passed away. Before her death, Nan had been staying at my mother's home and was later admitted to North Middlesex Hospital. I was the only person with her the moment she passed away, as my mother had briefly left to get changed. When I recently obtained Nan's death certificate, I noticed for the first time that Andrew had registered the death and stated that he was present when she passed. This is not accurate, as he was not there at the time. I only became aware of this discrepancy a couple of weeks ago when requesting the certificate.

After Nan's funeral, during the gathering at 280 Durant's Road, Andrew Cordell was present and made the following announcement:

"<u>I'm Selling the House.</u>"

<u>I told him:</u>

<u>"No. This Is the House We Lived in For Years with Nan and Grandad While You Were Gone."</u>

<u>I asked him for first refusal if the house was ever to be sold, because:</u>

- <u>I Lived There</u>
- <u>I Was Raised There</u>
- <u>I Carried the Cordell Name</u>
- <u>I Wanted to Preserve the Family Heritage</u>

- I Wanted Stability
- I Wanted to Honor Nan and Grandad's Hard Work
- Selling The House Would Destroy Everything They Built in That Day and Age and Even of This Dated Letter!

I also explained that selling the house would financially ruin the family because:

- Everyone Has Less Than £16,000
- A £50,000 Payout Would Push Us Over the Benefits Threshold
- We Would Lose Housing Benefits and Council Tax Support
- The Money Would Get Spent Mostly on Rent
- Only The Big Shareholders Would End Up with Fair Opportunity, And I And the Rest Would End Up Worse Off Dependent on Our Requirements or Habits.

Andrew ignored all of this.

SECTION 3 — AUNT SHEILA'S POSITION BEFORE MY MOTHER DIED

My aunt Sheila also has her own **council flat**. She never lived at 280 Durrants Road after nans passing.
In Sms-Aunt-20260513172913.PDF (23 December 2024), she told me clearly:

- She Did **Not** Want Power of Attorney
- She Did **Not** Want Control of My Mother's Share
- She Did **Not** Want To **"Take Over"** Anything
- My Mother's Share Would Split Between **Me, Tyrone, And Deon**
- Her Own Share Would Go to **Her Children**
- Andrew's Share Was **"Down to Him"**

She said it was **hurtful** that anyone would think she wanted control.
This is written evidence.

SECTION 4 — MY MOTHER'S WISHES

My mother never made a formal will, but she made her intentions clear in writing.

SMS-Mother:
Sms1-Mother-20260513172913.pdf
"My share is my share, and I'm giving you, Tyrone and Deon my share."

Mother WhatsApp:
<Dir> 11. WhatsApp Mother
"Sheila's Shares Will Be to Her Kids. Mine Will Be to My 3 Kids."
She refused to sell the house. She said Andrew and Sheila could do what they wanted with their shares, but **her share was for her children only**.
She never changed her mind. She never revoked her wishes. She never wrote anything different, like:
"We Must Sell Our Shares for Cash, Or We Must Do Unlike What She Has Done!"

She wanted:

- Stability
- Security
- A Future for Her Children
- Her Share to Stay in the Family

She did not want Andrew or Sheila to control her estate.

SECTION 5 — MY MOTHER'S ILLNESS & ANDREW'S INFLUENCE

Around **2020**, my mother became seriously ill with kidney disease. Andrew took a significant role in supporting her during this time, but he also pressured her to sell the house.
She refused.

My evidence shows:

- She Told Me She Did Not Want to Sell
- She Told Me Her Share Was for Her Children
- She Told Me Aunt Sheila Said the Same
- She Told Me Dad Had Nothing to Do with Her Share
- She Told Me She Did Not Want Andrew to Control Anything of Hers and Ours.

This is all in
<Dir> 11. WhatsApp Mother
Sms1-Mother-20260513172913.pdf

SECTION 6 — OTHER FAMILY MEMBERS LIVING AT 280 DURANTS ROAD

My Cousin Lived There For 2+ Years

He broke up with his partner and moved into 280. No one asked him for rent. No one told him to leave. No one accused him of excluding anyone. This shows that family members were allowed to live in the house without rent or problems.

My Father Lived and Still Lives There

He moved into the small room around 2014/2015 after breaking up with my mother. He has lived there ever since.

- **Andrew Stays Responsible for Him — Not Me:** Andrew lived with my father for years. Andrew moved out to support my mother and left my father in the house. Andrew collects rent from him. Andrew managed everything to do with my father's occupation. My mother let Andrew deal with those family affairs, as she stayed inside of her own Council property, number 23. I was **not** responsible for my father living at 280 Durant's Road. I did **not** place him there. I did **not** collect rent. I did **not** manage his tenancy.
- **They Have Never Served My Father Notice to Leave**: They have never served my father any notice to leave or vacate 280 Durant's Road, which shows they accepted him living there and had no issue with it and because they are legally not allowed to collect rent from him, they will now deny ever collecting it. I have documented it in Exhibited Evidence but even if they deny it, that still means they are and were happy for him to live there rent-free — yet now they want to charge me as a beneficial homeowner with a share. This is not acceptable.
- **The Property Is Registered as A Non-Primary Home**: Even **£45** a week rent covers council tax and basic costs. So, they cannot claim they **"Lost Money"** or that I owe rent. And when you calculate it properly: **£45 × 52 weeks = £2,340** a year. Council tax on a non-primary home is around **£1,800 a year**, gas, and electricity together average **£1,000 a year**, and ground maintenance is **£65** a year. That totals **£2,865**. Even at **£75** a week rent **(£3,900 a year**), everything is fully covered with money left over. So, any claim that they were losing money is false, and any claim that I owe rent is not acceptable.

- **<u>I Lived There Under My Mother's Instructions</u>**: This was normal. This was accepted. This was allowed. Andrew and Sheila agreed I could stay while my mother was alive. Her death did not change this arrangement because she never revoked her words.

<u>SECTION 7 — THEFT OF MY SAVINGS</u>

I legally saved money for years from my benefits, curfew period, and selling items. I kept two separate savings:

- **<u>£7,000</u>**: hidden under the freezer at **109 Burncroft Avenue**
- **<u>£23,000</u>**: saved overtime and kept by my mother at **23 Byron Terrace**

Total savings: £30,000

A. **<u>The £7,000 — Taken From 109 Burncroft Avenue</u>**
   02/08/2025 — The day I was arrested.
   - I was sitting outside waiting for the ambulance.
   - Aunt Sheila was present.
   - I told her where the £7,000 was hidden under the freezer.
   - I asked her to give it to my mother for safekeeping.

   She later confirmed:
   <u>"I Gave Your Money to Mum… She Put It Under Her Pillow."</u>
   After that moment, **I never saw the £7,000 again.**

B. **<u>The £9,000 — Andrew Admitted Throwing It Away</u>**
   Inside the PDF, Andrew admits he threw away the money while cleaning my mother's room, thinking it was "£900" not £9,000.
   Key facts:
   - <u>Andrew Was Living in The House at The Time.</u>
   - <u>Andrew Was the **Only Key Holder** Due To the New Front Door.</u>
   - <u>Andrew Had **Full Access** to My Mother's Bedroom.</u>
   - <u>I Had **No Access**.</u>
   - <u>He Admitted He Threw It Away.</u>

   This is not a mistake — it is destruction of my property.

C. **<u>The Bedroom Camera Was Turned Off — Proof of Tampering</u>**
   The bedroom camera (the room where my mother kept my money) was turned off on **27 January**, the day after my mother went into hospital.
   Only admins could turn off cameras:
   - <u>My Mother</u>
   - <u>My Brother</u>
   - <u>My Sister</u>
   - <u>My Uncle</u>
   - <u>Possibly My Aunt</u>

   I was **not** an admin.
   Every room had its own camera, including the back garden, front garden, and doorbell. Only my mother's bedroom camera was turned off, and the house was **not** broken into.
   This is critical because:
   - <u>Only Someone with Keys Could Enter the Room.</u>

- <u>Only Someone with Admin Access Could Disable the Camera.</u>
- <u>The Camera Was Turned Off **Before** the Money Went Missing.</u>
- <u>It Matches the Period Andrew and Sheila Were "Sorting Out" The Room.</u>
- <u>It Matches the Period They Refused to Give Me Keys.</u>
- <u>It Matches the Period They Were Searching Bags, Cupboards, Drawers, And the Loft.</u>

Turning off the camera is deliberate concealment.

D. <u>The Remaining Money — Bringing the Total Missing to £30,000</u>

After the £9,000 was said to be **<u>"Thrown Away,"</u>** Aunt Sheila entered my mother's bedroom.

<u>Timeline of Events</u>

My mum went into hospital on **27 January 2026**, the day after my birthday.
At the same time, Me and my brother and others had already chipped into getting a special medical bed for my mother's birthday present just prior. Aunt Sheila was organizing the new bed so, she went to the house and organized the removal of the old bed first.

While she was in hospital:

- <u>Uncle Andrew also Went into Her Bedroom.</u>
- <u>And this is when The Cameras Were Turned Off.</u>
- <u>Money Went Missing.</u>

At the same time, Me and my brother and others had already chipped into getting a special medical bed for my mother's birthday present just prior. Aunt Sheila was organizing the new bed for fitting, so, she went to the house and organized the removal of the old bed first.
When my mother came out of hospital, she noticed the money was gone. She called my brother Tyrone upstairs and asked him to look for it. Then she called Andrew upstairs. Andrew said he had thrown the money away. They searched through the bins but could not find it. No one told me the truth.

<u>This Is When My Mother Noticed:</u>

- **<u>£7,000 was still present.</u>**
- **<u>£9,000 was gone.</u>**

My mother then admitted herself back into hospital. While there, she said:

- <u>My Father</u>
- <u>My Aunt Sheila</u>

exactly what Andrew had done. They both hid this from me.
At a later point in time at the hospital, I found my mother unconscious in bed, close to death with my Aunt Sheila and Aunt Sonia.
Uncle Andrew did not turn up until after she died. Andrew took my mother's phone, computer, and everything, and left with everyone. I was the only person left with my mum when she passed away.
Afterwards, Sheila and Andrew refused to give me the keys to my mother's house.

<u>My Eldest Cousin's Involvement</u>

I found my eldest cousin inside mine and my mother's house, months after her death as they had refused to give me the keys. That same day he told me he had no access. But I found him in the house, and he got me arrested for **<u>"Walking Past His Arm."</u>** Police left him inside the house searching it. **<u>He had</u>**:

- <u>No ID</u>
- <u>No right to the house</u>
- <u>His own home elsewhere</u>
- <u>And I had everything to prove my occupation of the premises and complained of these facts' mutable times.</u>

He was no longer helping my mum — she had already passed away — and I had been asking for the keys for months.
When the police finally released me from the police station, Sheila finally gave me a key to our home at **23 Byron Terrace** and handed me **£2,000**. As I searched for the safe in my mother's room, I discovered that Sheila had already taken the safe to her own house while I was under arrest. She told me that the £2,000 she gave me was <u>**"What Was Left"**</u> of my money, and that the gold in the house and in the safe was <u>**"Costume Jewelry."**</u>
I then found out that while I was in the police station, Sheila **split all the gold and belongings** with my brother and sister **behind my back** because Tyrone Later, admitted this was not true — as he needed to give parts of the gold to his children to keep and I would find it and work it out.

<u>**The Numbers Also Do Not Add Up**</u>:

- <u>£9,000 (thrown away by Andrew)</u>
- <u>£2,000 (given to me by Sheila) = **£11,000**, not £10,000.</u>

To work it all out there was **£1,000** put in the safe by my mother as my mother had borrowed £1,000 out of £10,000 previously — so where did the **extra £1,000** come from that Shelia gave me back?
<u>**This raises a clear question**</u>:

- Where did the additional £1,000 come from, and was it from my other £7,000 bundles of cash?

<u>**Sheila's Changing Stories**</u>
<u>**My evidence shows**</u>:

- <u>She Changed Her Story Multiple Times.</u>
- <u>She Said She Left the Money Under My Mother's Pillow.</u>
- <u>She Told Me She Found the Money While My Mother Was in Hospital and Would **"Put It Safe,"** Then Denied It.</u>
- <u>She Failed To Tell Me About the Missing £9,000, Even Though My Mother Told Her Directly.</u>
- <u>She Entered The House Again And Then Moved Items, And Later Blamed Andrew.</u>
- <u>She Said She Had not Seen It Since She Gave It To My Mother While She Was Bedridden.</u>
- <u>She Said No One Touched Anything.</u>
- <u>She Refused To Give Me The Keys So I Could Collect Or Find The Money That Andrew Had Hindered Its Existence.</u>
- <u>She Said I Would not Get The Keys Unless I Moved Out Of 280 Durrants Road Knowing That I am A Part Owner.</u>
- <u>Her Son Got, Me Arrested After I Found Him Inside The House Trespassing.</u>

This is blackmail and deliberate control.

<u>**Access Control During This Period**</u>

- <u>Andrew And Sheila Had Full Access.</u>
- <u>I Had Zero Access.</u>
- <u>They Were “**Sorting Out**” My Mother’s Bedroom With Deon And Others.</u>
- <u>They Were Searching Bags, Cupboards, Drawers, And The Loft.</u>
- <u>They Were Looking For Money — Confirmed In Deon’s Threats And Messages.</u>

By the time I finally gained access, **the remainder of my savings were gone**.

Total Missing

- £7,000 — taken from 109 Burncroft Avenue
- £9,000 — admitted by Andrew as “thrown away.”
- £14,000 — missing from my mother’s bedroom

Total: £30,000 missing

E. <u>My Mother Told Them the Truth — They Hid It From Me</u>

<u>While in hospital, my mother said</u>:

- <u>My Dad</u>
- <u>My Brother</u>
- <u>My Aunt Sheila</u>

exactly what Andrew had done.
They all knew. They all hid it from me. None told me until after she passed away.
I was the last person with her before she died. Everyone else had already left.
This shows deliberate concealment.

F. <u>My Eldest Cousin — Illegal Access and Arrest</u>

<u>At 23 Byron Terrace:</u>

- <u>My Eldest Cousin Was Inside The House.</u>
- <u>He Denied Being There.</u>
- <u>He Denied Having Keys.</u>
- <u>He Blocked Me From Entering.</u>
- <u>He Called The Police.</u>
- <u>He Got Me Arrested.</u>
- <u>He Has His Own Address.</u>
- <u>He Was Not Supposed To Be Living There.</u>

I am the only person registered to the property and the only person on the police database for the address.

<u>Evidence shows:</u>

- <u>He Was Inside Looking For Money.</u>
- <u>He Was Acting With Sheila And Andrew.</u>
- <u>He Was Part Of The Concealment.</u>
- <u>He Blocked Me From Finding Out The Truth.</u>

<u>This matches the timeline of:</u>

- <u>The Camera Being Turned Off.</u>
- <u>The Keys Being Withheld.</u>
- <u>The Room Stripped.</u>
- <u>The House Being Searched.</u>

- When The Money Went Missing.

G. **Andrew Is Now Hiding Behind a fabricated TOLATA with them all.**

Andrew agreed to repay the £9,000 he admitted throwing away. He has now blocked all contact. He refuses to repay anything. He refuses to explain anything. He refuses to disclose anything. He refuses to account for anything.
Instead of repaying me, he is now charging my dad rent.

This is legally relevant because:

- A Trustee Cannot Owe A Beneficiary Money And Then Claim The Beneficiary Is "**In Debit.**"
- A Trustee Cannot Destroy A Beneficiary's Savings And Then Demand Rent From The Same Beneficiary's Family.
- A Trustee Cannot Block Communication To Avoid Repayment.
- A Trustee Cannot Use TOLATA As A Shield To Avoid Accountability.
- A Trustee Cannot Hide Behind Legal Proceedings To Avoid Returning Stolen Or Destroyed Funds.

All Evidence Exhibited Is Supported In The Following Files:
<Dir> 06. WhatsApp Uncle
<Dir> 07. WhatsApp Aunt
<Dir> 11. WhatsApp Mother
Sms-Aunt-20260513172913.PDF
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Sms1-Mother-20260513172913.pdf
This is all in 01. Main 17-06-2026 - Dad Aunt and Uncle.pdf

SECTION 8 — BLACKMAIL OVER KEYS

After my mother died, Andrew and Sheila used her keys to blackmail me.

Andrew said:
"You're Not Getting the Keys to Your Mum's House Unless You Move Out Of 280."

Aunt Sheila said:
"This Is My Mother's House and Andrew's Mother's House. You Have No Authority."

But she had already told me:

- My Mother's Share Goes to Me, Tyrone, And Deon
- She Would Guarantee It
- I Had Nothing to Worry About

They lied.
This is all in
01. Main 17-06-2026 - Dad Aunt and Uncle.pdf
Sms-Aunt-20260513172913.PDF
Sms-Uncle-Andrew-20260513172913.PDF

SECTION 9 — MY OFFER TO BUY THE HOUSE

On **08 August 2025**, after court, I found out they were planning to sell their shares to Tyrone behind my back.

I offered:

- £30,000 Cash
- £10,000 Extra
- £1,000 A Month
- Selling My Equipment to Raise More

I offered this to Aunt Sheila only.

She refused and said she would sell privately. I accepted her decision. I did not argue. I did not fight. I respected her choice.

I later offered her **£40,000 cash**, plus **£1,000 a month**, and any extra money I could raise to pay her faster. At that time, she had agreed to consider selling for **£100,10,000**.

Shortly afterwards, Andrew's deal with Tyrone fell through. He then said he would not sell to family — only privately as well.

SECTION 10 — MY OCCUPATION OF 280 DURANTS ROAD

After my mother died, I stayed at 280 under court order.

The house was in a terrible state:

- Rotten food
- Dirty carpets
- Broken furniture
- Mold
- Mess everywhere

I Cleaned Everything:

- Jet Washing
- Carpet Cleaning
- Clearing Rotten Food
- Replacing Furniture
- Repairing Damage
- Rebuilding The Garden
- Fixing Drainage
- Installing A Kitchen
- Refurbishing Rooms

Andrew praised my work:

"It's Looking Good Simon."

This is all in

01. Main 17-06-2026 - Dad Aunt and Uncle.pdf

<Dir> 06. WhatsApp Uncle

<Dir> 11. WhatsApp Mother

Sms-Uncle-Andrew-20260513172913.PDF

SECTION 11 — THEIR ATTEMPTS TO MANIPULATE THE TRUTH

They:

- Lied

- Manipulated
- Blackmailed
- Use My Tag Against Me
- Broke Into My Bedroom
- Used The Tag Phone to Get It Removed from the House
- Tried To Use the Criminal Court to Remove Me from House 280 But Was Refused
- Tried To Get Me Arrested
- Got Me Arrested When I Returned To 280 After Aunt and Her Son Blocked My Entry To 23 Byron Terrace
- Lied To Police About Keys
- Took My Keys
- After Arrest, My Front Door Key No Longer Worked At 280
- I Replaced the Back Door Lock to Regain Lawful Entry
- Aunt Used Her Front Door Key to Get Me Arrested Again
- Police Checked and Confirmed I Had Lawful Access To 280
- They Tried to Push Me Out
- They Tried to Interfere with My Inheritance
- They Tried to Sabotage My Defence

I have not exhausted this list!

This Is My Short Closing

The Defendant Denies The Claimants' Characterisation Of His Occupation And Conduct: The asserted beneficial shares are premature and unsupported, as no grant of representation exists and the Estate of Lorraine Cordell remains frozen under an active caveat. The Defendant relies on his statutory right to occupy under **TOLATA 1996, s.12**.
Evidence from property records and SMS/WhatsApp communications with Andrew, Sheila, Tyrone, and the late Lorraine Cordell shows the Claimants had regular access, encouraged the Defendant's occupation, relied on him for repairs and management, and agreed financial contributions. Allegations of exclusion, non-payment, or misconduct are unparticularised, unsupported, and contradicted by their own communications.

The Defendant Kindly Invites The Court To Dismiss Any Claim For:

a) occupation rent or
b) forced sale,
c) or alternatively to regulate occupation pending lawful administration of the estate under the **Administration of Estates Act 1925**.

Given the procedural defects in the Letter of Claim and the absence of disclosure, I confirm that this matter should be treated as discontinued. However, if the Claimants intend to pursue any further claim against me, I require full disclosure of all documents relied upon when drafting the Letter of Claim. This includes written instructions, evidence supplied by the Claimants, and any materials considered relevant. As the Claimants' instructions appear incomplete and are contradicted by the evidence now provided, disclosure is necessary to understand the basis on which any future claim would be issued.
The Defendant also requests confirmation of Barnes & Partners' public liability and professional indemnity insurance, given the procedural irregularities and potential prejudice arising from the way this matter has been pursued.

PS: Caveat Misuse, TOLATA Misuse, and Capacity Exploitation!

It is important to state that **Barnes & Partners first placed a caveat against me**, blocking all probate activity and preventing the lawful administration of my late mother's estate, against me. My brother Tyrone's texts prove this: `<Dir>` 03.1. Exhibit A1 - From Tyrone - What's App
Mirror Weblink:
https://everyoneloginto.me/13.%20To%20Take%20280%20Away/03.1.%20Exhibit%20A1%20-%20From%20Tyrone%20-%20Whats%20App/

Despite knowing this, the firm then proceeded to **file a TOLATA claim**, fully aware that the estate was already frozen and that no beneficial shares could be lawfully calculated or relied upon. This means Barnes & Partners initiated legal proceedings that depend on probate information **after deliberately preventing probate from taking place**.

A caveat can only be issued for four reasons under the **Non-Contentious Probate Rules 1987**:

a) Contesting A Will
b) Disputing Identity
c) Challenging My Right To Administer The Estate
d) Alleged Lack Of Mental Capacity

The first three do not apply to me. This leaves only **mental capacity** — a ground never raised openly and for which no lawful evidence exists.

If this is the reason Barnes & Partners intend to rely on, in the **"CAVEAT"** then the firm has knowingly attempted to take advantage of what they believe to be a vulnerable person, in this **"TOLATA CLAIM"** contrary to:

- **Mental Capacity Act 2005**
- **Care Act 2014**: (financial exploitation)
- **Equality Act 2010**: (discrimination)
- **Fraud Act 2006, s.4**: (abuse of position)

Barnes & Partners acted for Andrew, Sheila, my brother, and my sister in attempts to obtain my grandmother's property, while never declaring this supposed **"Capacity Issue."** They then used the same undeclared belief to block me from administering my mother's estate by placing a caveat and **simultaneously pursued TOLATA against me after blocking probate**.

This means they:

- Blocked Me From Administering The Estate,
- Filed TOLATA Knowing Probate Was Blocked,
- Concealed The Caveat Reason,
- Relied On The Possibility Of A Capacity Allegation Without Declaring It,
- And Attempted To Exploit What They Believed Was A Weakness.

This behaviour amounts to **conflict of interest**, **abuse of process**, and **a breach of my human rights**, because no solicitor should be able to hide an alleged capacity concern, weaponise it when convenient, and use it across two different legal proceedings against the same person. Please respond!

Kind Regards
Mr. Simon Paul Cordell