



PRIVATE

Michael Carroll & Co
Solicitors
DX 36206
Edmonton

ALSO BY FAX 020 8365 0500

4th March 2014

01MS0218813/SAR/CC

Dear Sir Madam

DEFENDANT(S): Simon Paul CORDELL

URN: 01MS0218813

COURT AND HEARING DATE: Woolwich Crown Court 18th March, 2014

We write further to our telephone conversation with regard to the above and attach our response to your section 8 application.

We respond by way of the service of ongoing disclosure under cover of our letter of even date.

Yours faithfully

MRS. C. CAMPBELL
Senior Crown Prosecutor

Enc. By DX only

Trial Preparation Team Croydon CC, Kingston CC & Woolwich CC

3rd Floor
One Drummond Gate
Pimlico
London
SW1V 2QZ

DX: 161330 Victoria 19

Email: croydonkingston&woolwichcrown@cps.gsi.gov.uk

Please Note: With Effect from Wednesday 4th September 2013 the Kingston Crown Court work will be dealt with by the Inner London and Southwark Team. All electronic communications in relation to Kingston Crown Court work to be sent to Innerlondon&southwarkcrown@cps.gsi.gov.uk

5005393

Claim - Liability & Adjustment

Cunningham Lindsey

Instruction History Report

Insured Name	: R Patel & D Patel	Cause / Peril	: Malicious Damage
Business	: .	Date of Loss	: 16th February 2013
Status	: Allocated	Claim Amount	: £1,001.00
Lead Client	: AXA Commercial		

Event	Completed	By	Comments
Tel To PH	22/02/2013 15:19:00	Jonathan Buxton (Commercial Property - Redhill C)	Mr H Patel 0207 252 1441, visit confirmed for Nikki on 28.2.2013 PM, Nikki please call him an hour before visit thanks Jon

Paul Field
Claims and Support Director

Centor Insurance & Risk Management Ltd
9 Bonhill Street
London EC2A 4PE

UK Broker Awards 2012 - Winner - Claims Service of the Year

Authorised and regulated by the Financial Services Authority

Voice: +44 020 7330 8702
Fax: +44 020 7256 9455
Email: pwf@centor.co.uk
Web: www.centor.co.uk

Centor Insurance & Risk Management Limited is a company registered in England. Company Number 1151611. Registered Office: 9 Bonhill Street London EC2A 4PE

-----Original Message-----

From: Carlin, Estefania [mailto:Estefania.Carlin@cl-uk.com]
Sent: 01 March 2013 11:45
To: Paul Field
Subject: RE: R Patel & D Patel - Unit 3-4,Horizon Industrial Estate,Haymerle Road,LONDON,SE15
6SA: 5005393 2013/00206

Good Morning Paul,

Our Loss Adjuster Nikki Diamond visited the property yesterday and has yet to provide details of the visit on the our system.

However,

You can call Nikki Diamond to discuss further on 07766 785 5525 or 01737 784 625

Kind Regards

-----Original Message-----

From: Paul Field [mailto:pwf@centor.co.uk]
Sent: 01 March 2013 11:42
To: Carlin, Estefania
Subject: RE: R Patel & D Patel - Unit 3-4,Horizon Industrial Estate,Haymerle Road,LONDON,SE15
6SA: 5005393 2013/00206

Has the adjuster been out yet and if so can you ask them to provide me with some feedback.

Thank you.

Paul Field
Claims and Support Director

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-----Original Message-----

From: Paul Field
Sent: 22 February 2013 15:11
To: 'estefania.carlin@cl-uk.com'
Subject: RE: R Patel & D Patel - Unit 3-4, Horizon Industrial Estate, Haymerle Road, LONDON, SE15 6SA

Hi Estefania,

Summary of cover attached.

A few problems making contact with the client just let me know.

Many thanks

Paul Field
Claims and Support Director

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-----Original Message-----

From: estefania.carlin@cl-uk.com [mailto:estefania.carlin@cl-uk.com]
Sent: 22 February 2013 15:03
To: Paul Field
Subject: Re: R Patel & D Patel - Unit 3-4, Horizon Industrial Estate, Haymerle Road, LONDON, SE15 6SA

Cunningham Lindsey Ref : 5005393
Insurer's Claim Ref : 1849692
Re : R Patel & D Patel Insurance Claim

Good Afternoon Paul,

I would be grateful if you would send a copy of the policy schedule.

Kind Regards

Estefania Carlin
Pre-visit Claims Handler

Cunningham Lindsey
225 Bath Street
Glasgow
G2 4GZ
Tel: 0141 240 2620
Fax: 0141 847 0493
Website: www.cunninghamlindsey.com

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To:	deven24@hotmail.com
Sent Date:	24/04/2013
Subject:	Re: Your Ref 1849692 (Our Ref SLCGA/NJD/5005393)
Message:	<p>Cunningham Lindsey Ref : 5005393 Insurer's Claim Ref : 1849692 Re : R Patel & D Patel Insurance Claim</p> <p>Good Afternoon,</p> <p>Further to Nikki Diamond's email to you on the 03.04.2013,</p> <p>Please provide us with the repair quotations and the crime reference number for our files</p> <p>Many Thanks</p> <p>Simone Sailman Claims Technician</p> <p>Cunningham Lindsey 3rd Floor, Aquila House London Road Redhill, RH1 1NJ Tel: 01737 784625 Fax: 0845 425 9987 Website: www.cunninghamlindsey.com</p>
Attachments:	None
CC:	pwf@centor.co.uk

Diamond, Nikki

From: Paul Field [pwf@centor.co.uk]
Sent: 02 April 2013 14:46
To: Diamond, Nikki
Subject: RE: R Patel & D Patel - Unit 3-4, Horizon Industrial Estate, Haymerle Road, LONDON, SE15
6SA: 5005393 2013/00206
Attachments: 2669_001.pdf

Dear Nikki - as promised our summary of cover attached.

The contacts I have for the insured are Deven Patel 07956 854602 deven24@hotmail.com and Rakesh Patel 07956 997551 rpg000@hotmail.co.uk

I would be grateful if you would keep us updated.

Kind regards

Paul Field
Claims and Support Director

Centor Insurance & Risk Management Ltd
9 Bonhill Street
London EC2A 4PE

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-----Original Message-----

From: Paul Field
Sent: 27 March 2013 11:47
To: Diamond, Nikki (Nikki.Diamond@cl-uk.com)
Cc: nigel.stothard@cl-uk.com; estefania.carlin@cl-uk.com
Subject: RE: R Patel & D Patel - Unit 3-4, Horizon Industrial Estate, Haymerle Road, LONDON, SE15
6SA: 5005393 2013/00206
Importance: High

Nikki - this is now the third time I have had to e-mail you to ask for a response.

If you are too busy to respond to the broker, I really need to know.

Paul Field
Claims and Support Director

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9 Bonhill Street

London EC2A 4PE

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-----Original Message-----

From: Paul Field

Sent: 13 March 2013 09:54

To: Diamond, Nikki (Nikki.Diamond@cl-uk.com)

Subject: RE: R Patel & D Patel - Unit 3-4,Horizon Industrial Estate,Haymerle Road,LONDON,SE15

6SA: 5005393 2013/00206

Importance: High

Dear Nikki - please can you respond on this one please.

Paul Field

Claims and Support Director

Centor Insurance & Risk Management Ltd

9 Bonhill Street

London EC2A 4PE

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-----Original Message-----

From: Paul Field

Sent: 01 March 2013 11:57

To: Diamond, Nikki (Nikki.Diamond@cl-uk.com)

Subject: FW: R Patel & D Patel - Unit 3-4,Horizon Industrial Estate,Haymerle Road,LONDON,SE15

6SA: 5005393 2013/00206

Hi Nikki - can you let me know how bad this one was when you have a minute. Any problems expected?

Many thanks

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From: Paul Field

Sent: 10 June 2013 16:46

To: 'Deven Patel'

Cc: simone.sailman@cl-uk.com; Diamond, Nikki (Nikki.Diamond@cl-uk.com)

Subject: RE: Breaks into units 3/4 Horizon I.Est

Dear Deven – Axa have noted this 3rd incident. Cunningham Lindsey will deal with this damage also. 3 x policy excess will apply.

By copy, Simone/ Nikki – could you provide me with an update please.

Kind regards

Paul Field
Claims and Support Director

Centor Insurance & Risk Management Ltd
9 Bonhill Street
London EC2A 4PE

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Email: pwf@centor.co.uk

Web: www.centor.co.uk

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From: Deven Patel [<mailto:deven24@hotmail.com>]

Sent: 24 May 2013 15:28

To: Paul Field

Subject: Breaks into units 3/4 Horizon I.Est

Dear Paul

I am having to email you again as we have had another incident regarding the property above on the 8/5/2013.

The incident was another break in in exactly the same manner as the previous incident. Access to next doors warehouse and through the same wall into our warehouse.

After the first incident we had not only made sure the internal wall was secured but also made sure that next doors warehouse was secure as well.

There has been further damage to the parting wall as well as further graffiti to the internal walls.

We have been in contact with the owner of next door requesting him to either rent or sell his warehouse to try and reduce the vulnerability of our abiding wall.

The police were contacted and they did attend the scene. The cad number provided is

CAD 3556-08-May13

if there is anything else that you require please do not hesitate to contact me.

Regards

Deven.

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5005393

Claim - Liability & Adjustment

Cunningham Lindsey

Instruction History Report

Insured Name : R Patel & D Patel
Business : .
Status : Allocated
Lead Client : AXA Commercial

Cause / Peril : Malicious Damage
Date of Loss : 16th February 2013
Claim Amount : £1,001.00

Event	Completed	By	Comments
Tel To Broker	02/04/2013 15:04:00	Nicola Diamond (Commercial Property - Redhill 1)	Paul Field - Explained the circumstances surrounding the claim. Access was forced through from neighbouring commercial unit - over 100 people were attending a rave in the neighbouring unit, they had forced entry into that location also. Two access holes were knocked through in the walls to gain access. The damage is in the form of the entrance/exit routes, damaged roof sheeting in a number of places and graffiti on the walls. At visit a second forced entry was discovered. Third entrance point to front door, and alarm system cut. Will refer to insurers to apply two excess' but deal with one claim as no way to differentiate which damage was caused when.

5005393

Claim - Liability & Adjustment

Cunningham Lindsey

Instruction History Report

Insured Name : **R Patel & D Patel**
Business : .
Status : **Allocated**
Lead Client : **AXA Commercial**

Cause / Peril : Malicious Damage
Date of Loss : 16th February 2013
Claim Amount : £1,001.00

Event	Completed	By	Comments
Tel To PH	03/04/2013 16:14:00	Nicola Diamond (Commercial Property - Redhill 1)	Discussed claim with Mr Patel - Two claims and two excess' agreed. He will arrange for quotations for repairs. Two quotes at present, if roof costs seem higher then will receive three and we may arrange for Surveyor to validate the works.

5005393

Claim - Liability & Adjustment

Cunningham Lindsey

Instruction History Report

Insured Name : R Patel & D Patel
Business : .
Status : Allocated
Lead Client : AXA Commercial

Cause / Peril : Malicious Damage
Date of Loss : 16th February 2013
Claim Amount : £1,001.00

Event	Completed	By	Comments
Tel To Client	03/04/2013 15:51:00	Nicola Diamond (Commercial Property - Redhill 1)	Two claims in relation to this property. Both will be dealt with under this claim reference as it is impossible to differentiate. Two excess' will be applied.

Diamond, Nikki

From: Diamond, Nikki
Sent: 03 April 2013 17:00
To: Stothard, Nigel
Subject: FW: Unit 3-4 Horizon Industrial Estate Our Ref: 5005393

Hi Nigel,

Please see below an e-mail to the Insured today, which summarises the claim.

Basically the unit is a large commercial warehouse comprised of three different structures. It is used as a Warehouse for stock for the retail company "Marks Wholesale".

Break in was through the party wall to neighbouring unit, and left side external wall.

There was a second break in between the date of the incident and my visit in which the front fire door was smashed through. Insurers have agreed to manage both claims under one but with the application of two excess'.

The largest of costs will be the roof repair, although the Insured may opt for a patch repair – have agreed to wait for his quotes before deciding if I need to appoint SS and amend the reserve.

I understand from the Broker that there isn't any contents cover in place.

Photo's and prelim are on Document Handling.

If you need any more info just let me know.

Kind Regards,

Nikki Diamond BSc(Hons) Cert CILA
Property Adjuster
Cunningham Lindsey
3rd Floor, Aquila House,
London Road,
Redhill, RH1 1NJ
Tel: 01737 784625
F 0845 425 9987
Mobile: 07766 785525
Website: www.cunninghamlindsey.com

From: Diamond, Nikki
Sent: 03 April 2013 16:55
To: 'deven24@hotmail.com'
Cc: 'Paul Field'
Subject: Unit 3-4 Horizon Industrial Estate Our Ref: 5005393

Dear Mr Patel,

Thank you for your time on the phone today to discuss the above claim.

I confirm on behalf of Insurers that liability is accepted.

As agreed, there have been two separate incidents of forced entry into the Warehouse and as such Insurers will apply two excess' of £300 each. The work will be all agreed under this claim.

As discussed I note the scope of damage to be as follows:

1. Two sites of brick repair to the areas of forced entry.
2. Repair to the front fire door
3. Repair to the staircase
4. Removal of graffiti
5. Repair to broken sheets on the roof.
6. Repair to damaged alarm.

At this stage I would be grateful if you could arrange for two quotations for the repairs, however depending on the cost for the roof repair, it may be that a further quotation is sought or we may appoint our Surveying Services team to validate the costs.

I would also be grateful if you could please provide me with the Crime Ref No. for my file.

Kind Regards,

Nikki Diamond BSc(Hons) Cert CILA
Property Adjuster
Cunningham Lindsey
3rd Floor, Aquila House,
London Road,
Redhill, RH1 1NJ
Tel: 01737 784625
Fax: 0845 425 9987
Mobile: 07766 785525
Website: www.cunninghamlindsey.com

5005393

Claim - Liability & Adjustment

Cunningham Lindsey

Instruction History Report

Insured Name : **R Patel & D Patel**
Business :
Status : **Allocated**
Lead Client : **AXA Commercial**

Cause / Peril : Malicious Damage
Date of Loss : 16th February 2013
Claim Amount : £1,001.00

Event	Completed	By	Comments
Instruction Receipt	22/02/2013 13:38:32	Claire Hannaway (Regional Booking Team (North))	Darwin process 1
Allocation To Incident Manager	22/02/2013 13:38:32	Claire Hannaway (Regional Booking Team (North))	Claire Hannaway (GLCNA)
Correspondence Received	22/02/2013 13:38:32	Estefania Carlin (Regional Booking Team (North))	Documents transferred from Darwin
Payment Opt-In Actioned	22/02/2013 13:38:32	Claire Hannaway (Regional Booking Team (North))	
Broker Contact	22/02/2013 14:28:00	Estefania Carlin (Regional Booking Team (North))	Claim papers requested? : No Schedule requested? : Yes Bespoke policy wording? : No If yes, copy requested? : No Attending the Meeting? : No Copied into correspondence? : Yes Settlement details only? : No Cheque via broker? : Yes Other Information: Please ensure Paul is kept fully updated on this claim.
Broker Contact	22/02/2013 14:28:00	Estefania Carlin (Regional Booking Team (North))	Confirmed involvement with Carmilla
Tel To PH	22/02/2013 14:30:00	Estefania Carlin (Regional Booking Team (North))	Mr Patel 0207 242 1441 Rang out. No voicemail available
KH Questions Answered	22/02/2013 14:37:00	Estefania Carlin (Regional Booking Team (North))	

5005393

Claim - Liability & Adjustment

Cunningham Lindsey

Instruction History Report

Insured Name : **R Patel & D Patel**
Business : -
Status : **Allocated**
Lead Client : **AXA Commercial**

Cause / Peril : Malicious Damage
Date of Loss : 16th February 2013
Claim Amount : £1,001.00

Event	Completed	By	Comments
Instruction Receipt	22/02/2013 13:38:32	Claire Hannaway (Regional Booking Team (North))	Darwin process 1

5005393

Claim - Liability & Adjustment

Cunningham Lindsey

Instruction History Report

Insured Name : **R Patel & D Patel**
Business :
Status : **Allocated**
Lead Client : **AXA Commercial**

Cause / Peril : Malicious Damage
Date of Loss : 16th February 2013
Claim Amount : £1,001.00

Event	Completed	By	Comments
Appointment Booked	22/02/2013 15:19:19	Jonathan Buxton (Commercial Property - Redhill C)	Nicola Diamond(SLCGA) to visit SE15 6SA on 28/02/2013 - first appt offered

5005393

Claim - Liability & Adjustment

Cunningham Lindsey

Instruction History Report

Insured Name : **R Patel & D Patel**
Business : .
Status : **Allocated**
Lead Client : **AXA Commercial**

Cause / Peril : Malicious Damage
Date of Loss : 16th February 2013
Claim Amount : £1,001.00

Event	Completed	By	Comments
Tel To P11	22/02/2013 14:40:00	Estefania Carlin (Regional Booking Team (North))	Mr Patel 07956854602 Details provided - Please see genabs