

FAX-CONFIDENTIAL

Page 1 of 8

To: Ms Lisa McLean

Piper Smith & BASHAM

FAX. 020 7630 6976. // Date 2 October 2003

From: Noëlle RAWÉ - (LM.R360/1)  
(FAX: [REDACTED])

Dear Lisa,

Thank you for FAXing me earlier on the Amended list of documents for the Court.

I have noted further amendments on attached:

- Doc # 4 ... MRS [REDACTED]
- " # 5 ... MRS [REDACTED]
- " # 6 ... MR LADSKY
- " # 7 ... MRS [REDACTED]
- " # 107 ... for All flats

I have nonetheless signed and dated each of the five pages.

'Form - List of documents - 2nd disclosure'

of the two pages, I have amended and signed the first page -

There are no amendments on the second page - I have signed and dated the page.

Therefore, in addition to Miss covering letter, I am attaching seven pages - thereby making eight in total -

Yours sincerely

Noëlle

MEMORY TRANSMISSION REPORT

PAGE : 001  
TIME : 02-10-03 12:20  
TEL NUMBER: + [REDACTED]  
NAME : [REDACTED] FX 900

FILE NUMBER : 114  
DATE : 02-10 12:17  
TO : 902076306976  
DOCUMENT PAGES : 008  
START TIME : 02-10 12:18  
END TIME : 02-10 12:20  
SENT PAGES : 008  
STATUS : OK

FILE NUMBER : 114 \*\*\* SUCCESSFUL TX NOTICE \*\*\*

FAX-CONFIDENTIAL [Page 1 of 5]  
TO: Ms Lisa McLean  
Piper Smith - BASHAM  
FAX: 020 7630 6976 // Date 2 October 2003  
From: Noelle RAWE - (L.M. R360/1)  
CFAX: [REDACTED]

Dear Lisa,  
Thank you for faxing me earlier on the amended list of documents for the court. I have noted further amendments on attached:  
Doc # 4 - ... MRS [REDACTED]  
" # 5 - ... MRS [REDACTED]  
" # 6 - ... MR Ladsky  
" # 7 - ... MRS [REDACTED]  
" # 107 - ... for all flats

I have nonetheless signed and dated each of the five pages.  
Form - List of documents - '3rd disclosure'  
of the two pages, I have amended and signed the first page -  
There are no amendments on the second page - I have signed and dated the page.  
Therefore, in addition to this covering letter, I am attaching seven pages - thereby making eight in total -  
Yours sincerely  
Noelle

# List of documents: standard disclosure

In the West London County Court	
Claim No.	WL203537
Claimant <small>(including ref.)</small>	Steel Services Ltd Ref: RLS/BDF/LAD/8
Defendant <small>(including ref.)</small>	Noel Yvonne Sylvie Klosterkotter-Dit-Rawe & Ors Ref: LM/R360-1
Date	22 September 2003

**Notes:**

- The rules relating to standard disclosure are contained in Part 31 of the Civil Procedure Rules.
- Documents to be included under standard disclosure are contained in Rule 31.6
- A document has or will have been in your control if you have or have had possession, or a right of possession, of it or a right to inspect or take copies of it.

**Disclosure Statement**

I state that I have carried out a reasonable and proportionate search to locate all the documents which I am required to disclose under the order made by the court on *(insert date)* 26 August 2003

(I did not search for documents -

1. pre-dating ~~the course of action~~ year 2000
2. located elsewhere than in my home or in my solicitor's office
3. in categories other than that relevant to the cause of action

*I should have amended the above date as well.*

I certify that I understand the duty of disclosure and to the best of my knowledge I have carried out that duty. I further certify that the list of documents set out in or attached to this form, is a complete list of all documents which are or have been in my control and which I am obliged under the order to disclose.

I understand that I must inform the court and the other parties immediately if any further document required to be disclosed by Rule 31.6 comes into my control at any time before the conclusion of the case.

~~(I have not permitted inspection of documents within the category or class of documents (as set out below) required to be disclosed under Rule 31(6)(b) or (c) on the grounds that to do so would be disproportionate to the issues in the case.)~~

Signed

*[Signature]*  
Defendant

~~(Claimant) (Defendant) (Solicitor friend)~~

Date

~~22 September 2003~~

*2 October 2003*

Position or office  
Please state why you

*I ended up making my own amendment hoping that it would be alright*

company)  
e disclosure statement.

*I also opted to cross the date out and put the actual date.*

Defendant

List of documents:

N265 standard disclosure (4.99)

continued overleaf

*(page 1 of 2 of form)*

in a convenient order,  
the documents (or  
bundles of documents  
if of the same nature,  
e.g. invoices) in your  
control, which you do  
not object to being  
inspected. Give a  
short description of  
each document or  
bundle so that it can be  
identified, and say if it  
is kept elsewhere  
i.e. with a bank or  
solicitor

inspecting them/producing copies. I do not object to you

Please see attached.

---

List and number here,  
as above, the  
documents in your  
control which you  
object to being  
inspected.  
(Rule 31.19)

I have control of the documents numbered and listed here, but I object to you inspecting them:

Correspondence passing between the Defendant and her solicitors, instructions to Counsel and to expert, draft memoranda prepared by the Defendant's solicitors.

Say what your  
objections are

I object to you inspecting these documents because:

They are by their very nature privileged from disclosure

---

List and number here,  
the documents you  
once had in your  
control, but which you  
no longer have. For  
each document listed,  
say when it was last in  
your control and where  
it is now.

I have had the documents numbered and listed below, but they are no longer in my control.

All those documents marked as originals that are now with their respective addresses.

(Page 2 of 2 of form)

*[Handwritten signature]*  
2 Oct 2003

**STEEL SERVICES LTD -v- NOËLLE YVONNE SYLVIE KLOSTER  
KOTTER-DIT-RAWE**

**LIST OF DOCUMENTS**

<b>No.</b>	<b>Description</b>	<b>Date</b>
1.	Defendant's letter to Martin Russell Jones	10.07.00
2.	Letter from Martin Russell Jones to Defendant	03.08.00
3.	Defendant's letter to Martin Russell Jones	10.09.00
4.	Letter from Mr [redacted] to Resident Association Committee Members	18.12.00
5.	Letter Mr [redacted] to Defendant	14.01.01
6.	Letter from Mrs [redacted] to the residents	25.01.01
7.	Letter from Mr [redacted] to the residents	31.01.01
8.	Defendant's letter to Martin Russell Jones	06.05.01
9.	Martin Russell Jones letter to residents	07.06.01
10.	CKFT letter to Mr [redacted] and Mr [redacted]	11.10.01
11.	Steel Services letter to Citizens Advice Bureau	14.10.01
12.	Renewal of 1998 planning application – penthouse flat	21.11.01
13.	Martin Russell Jones letter to residents	21.12.01
14.	Defendant's email to Martin Russell Jones	26.01.02
15.	Front page of condition surveys	02.02
16.	Martin Russell Jones letter to Defendant	26.03.02
17.	Martin Russell Jones letter to residents	26.03.02
18.	Martin Russell Jones letter to residents	15.07.02
19.	Martin Russell Jones demand for payment	17.07.02
20.	Letter from Mr [redacted] to Martin Russell Jones	03.08.02

*JAW*  
*JAW*  
*JAW*

2 Oct 03 *JAW*

1 of 5

21.	Martin Russell Jones applied to LVT for determination	07.08.02
22.	Defendant's reply to Martin Russell Jones	11.08.02
23.	Defendant's letter to Martin Russell Jones	11.08.02
24.	Martin Russell Jones letter to all lessees	20.08.02
25.	Martin Russell Jones reply to Defendant	30.08.02
26.	Defendant's letter to Martin Russell Jones	16.09.02
27.	Martin Russell Jones request for payment	20.09.02
28.	Letter from [REDACTED] to Martin Russell Jones	24.09.02
29.	CKFT letter to Defendant threatening to start legal proceedings on 14 <sup>th</sup> October	07.10.02
30.	LVT Letter to Defendant	08.10.02
31.	Defendant's letter to CKFT	17.10.02
32.	Letter from [REDACTED] to LVT	19.10.02
33.	Email from [REDACTED] to LVT	20.10.02
34.	CKFT reply to Defendant	21.10.02
35.	Defendant's submissions to LVT	22.10.02
36.	Directions set by the LVT	29.10.02
37.	Defendant's confirmation to the LVT	10.11.02
38.	Martin Russell Jones letter to Defendant	07.11.02
39.	Defendant's letter to Martin Russell Jones	12.11.02
40.	Defendant's letter to LVT	25.11.02
41.	Planning application – infill of lightwell	25.11.02
42.	Martin Russell Jones letter to LVT	01.12.02
43.	Claim form filed by Steel Services	06.12.02
44.	Defendant's letter to LVT	09.12.02
45.	Defendant's letter to West London County Court	10.12.02
46.	LVT letter to Defendant	11.12.02

20 Oct 03 [Signature]

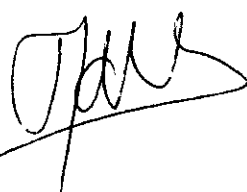
2 of 5

47.	Letter [REDACTED] to CKFT	12.12.02
48.	Martin Russell Jones letter to Defendant	16.12.02
49.	Expert witness report – Brian Gale Associates	16.12.02
50.	Defendant's letter to West London County Court attaching response to Court claim	17.12.02
51.	Defendant's defence	17.12.02
52.	Defendant's letter to LVT	18.12.02
53.	Martin Russell Jones letter to Defendant	18.12.02
54.	Defendant's letter to Martin Russell Jones	12.01.03
55.	Defendant's request to LVT	12.01.03
56.	Martin Russell Jones letter to LVT	20.01.03
57.	Letter from CKFT to Defendant	23.01.03
58.	Letter from West London County Court to Defendant	24.01.03
59.	Letter from Local Police Station to Defendant	27.01.03
60.	CKF I Letter to Defendant	04.02.03
61.	LVT letter to Defendant	06.02.03
62.	Letter from Local Police Station to Defendant	08.02.03
63.	Defendant's reply to Police Station	11.02.03
64.	Section 2 and 5 from Brian Gale's report	24.02.03
65.	Email from [REDACTED] to Defendant	24.02.03
66.	Defendant's reply to Brian Gale's report	13.03.03
67.	Notice of Charging Order	21.03.03
68.	Defendant's letter to Martin Russell Jones	22.03.03
69.	Defendant's Request to Court for action to be stayed	25.03.03
70.	Letter from West London County Court to Defendant	27.03.03
71.	Defendant's letter to Leasehold Valuation Tribunal	30.03.03
72.	Defendant's analysis of pattern of standing electricity	04.03

20th 03 07 [Signature]

3 09 5

	charge	
73.	Defendant's letter to West London County Court	01.04.03
74.	Consent Order	02.04.03
75.	Oliver Fisher letter to Martin Russell Jones and LVT	07.04.03
76.	Defendant's letter to Martin Russell Jones	15.04.03
77.	Defendant's letter to Martin Russell Jones	15.05.03
78.	Letter from CKFT to West London County Court	23.05.03
79.	Defendant's letter to Martin Russell Jones	01.06.03
80.	Notice of Hearing	12.06.03
81.	Defendant's letter to West London County Court	17.06.03
82.	LVT report	17.06.03
83.	Letter from CKFI to Defendant	18.06.03
84.	Defendant's letter to West London County Court	22.06.03
85.	Letter from West London County Court to Defendant	23.06.03
86.	Revised costs for six flats	24.06.03
87.	Draft Order	24.06.03
88.	Case Summary	24.06.03
89.	Court Order	25.06.03
90.	Defendant's letter to Martin Russell Jones	06.07.03
91.	Defendant's letter to West London County Court	15.07.03
92.	Letter from CKFT to Defendant	17.07.03
93.	Letter from CKFT to LVT	17.07.03
94.	Letter from CKFT to Defendant	21.07.03
95.	Letter from CKFT to Defendant	24.07.03
96.	Defendant's letter to LVT	30.07.03
97.	Assessment by Mr T Brook, LSM Partners of CKFT's revised costs	31.07.03

2 Oct 03 

98.	Invoice from Tim Brock	31.07.03
99.	Letter from Martin Russell Jones to Defendant	05.08.03
100.	Letter from CKFT to Defendant	05.08.03
101.	CKFT letter to Healys	07.08.03
102.	Defendant's letter to West London County Court	09.08.03
103.	Reply from LVT	14.08.03
104.	Notice of Case Management	18.08.03
105.	Letter from CKFT to Defendant	21.08.03
106.	Letter from CKFT I	22.08.03
107.	Martin Russell Jones revised costs for all <del>costs</del>	26.08.03
108.	Letter from LVT	29.08.03
109.	Defendant's calculation of Martin Russell Jones costs	09.03
110.	Defendant's letter to LVT	06.09.03
111.	Defendant's letter to LVT	09.06.03

FLATS  
~~Flats~~  
 Jones

2 Oct 03 *[Signature]*