

Mr Ahmet Jaffer
Portner and Jaskel
Solicitors
63/65 Marylebone Lane
London W1U 2RA

Ms N Klosterkotter-Dit-Rawé
[]
[]
London

30 June 2007

(By 'Special delivery')

Ref: Your West London County Court claim, **7WL 00675**, dated 27 February 2007

Dear Mr Jaffer

Further to your letter of 8 June 2007:

- Your letters of 4 and 8 May 2007

These letters, sent by Mr Jeremy Hershkorn, were received.

Mr Hershkorn's letter of 4 May 2007 refers to his letter of 17 April in which he stated having received a cheque for £1,069.31 from an individual named [], claiming to be making this payment on my behalf. This is not true. I do not know this person. He sent a comment on my website (www.leasehold-outrage.com) leading to an exchange of emails. As can be seen from my 9 April 2007 email (attached ¹) to Mr [] – in reply to his 5 April 2007 email (attached ²) – I had no knowledge of his intention. I do not know why he did this and, as blatantly obvious from my correspondence to the court, I certainly did not ask him to do this.

In relation to the rest of Mr Hershkorn's letter of 4 May 2007, see my 30 June 2007 letter (attached ³) to West London County Court.

The following addresses Mr Hershkorn's letter of 8 May 2007 and yours of 8 June 2007.

- Your request "*Evidence in support of my application contesting the court's jurisdiction*"

The guidance notes sent by West London County Court with the claim, ref. 7WL 00675, filed against me by Mr Hershkorn on 27 February 2007 did not state that I should send you my evidence for contesting the court's jurisdiction.

This lack of information led me to consult the Civil Procedure Rules, Part 11 - "*Disputing the court's jurisdiction*". It does **not** stipulate a requirement to serve a copy of the evidence on the other party.

Enclosed is a full copy of my evidence document to West London County Court, dated 4 April 2007 ⁴ – and sent to the court on that date.

URGENT AND IMMEDIATE

I refer to my letter of 25 February 2007 (attached ⁵) to your firm, in reply to the 16 February 2007 letter (attached ⁶) from Mr Jeremy Hershkorn in which he threatened me with bankruptcy if I did not pay the sum of £8,937.28 he claimed I owed his client, "*Rootstock Overseas Corp*".

¹ My 9 April 2007 email reply to []

² 5 April 2007 email from []

³ My 30 June 2007 letter to West London County, and supporting enclosures

⁴ My 4 April 2007 evidence to West London County Court

⁵ My 27 February 2007 letter to Portner and Jaskel

⁶ 16 February 2007 letter from Mr Jeremy Hershkorn (then at Portner and Jaskel)

In my 25 February 2007 letter I asked for an explanation as to the identity of "*Rootstock Overseas Corp*" as I had never heard of it before Mr Hershkorn's letter of 16 February 2007 and, consequently, with which I have no relationship contractual or otherwise. I also asked to be supplied with the enclosure referred to by Mr Hershkorn in his 16 February 2007 letter as he omitted to enclose it.

To date I have received no reply or even an acknowledgement.

Not only did you ignore my requests, you opted to immediately (27 February 2007) file a claim against me in West London County Court, ref. 7WL 00675, in the name of this unidentified company.

You will be aware that, under English law, there can be no claim for monies owed unless evidence can be produced of goods or services rendered under contract. In simple terms, what services or goods does "*Rootstock Overseas Corp*" claim it has supplied to me - since the Particulars of Claim supplied with the 7WL 00675 West London County Court claim refer only to Steel Services Ltd – my landlord?

What is the connection between Steel Services Ltd. and "*Rootstock Overseas Corp.*"?

Since it is you who filed the claim against me, the onus is upon you to furnish me with the evidence in support of your claim.

You must also fulfil your legal obligations under: Section 1.3 of the CPR, "*Duty of the parties: The parties are required to help the court to further the overriding objective*" (1.1 "*Overriding objective*" "...enabling the court to deal with cases justly")

I - yet again - request that you supply me with:

- (1) information on the identity of "*Rootstock Overseas Corp*"
- (2) your grounds for believing "*Rootstock Overseas Corp*" assertion for the origin of any claim of monies against me, as well as all evidence in support of such claims.
- (3) the missing enclosure to Mr Hershkorn's letter of 16 February 2007,

and also ask that you concurrently supply the aforementioned to West London County Court.

As my requests have been outstanding for more than four months, I require that you supply this information by return of post.

You have had my skeleton argument since 4 May 2007. I require that you provide me with your skeleton argument within seven days of receipt of this letter, so that I can make my own preparations for the forthcoming court hearing.

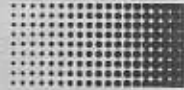
Should you fail to meet my requests I shall ask the Court to adjourn the hearing and direct you to provide the documentary evidence or reiterate that your claim be dismissed on the grounds that it is vexatious and wasteful of court time. I shall be seeking my full costs on an indemnity basis, including interest.

Yours sincerely

N K-Dit-Rawé

cc. West London County Court, inc. all enclosures – except my 4 April 2007 evidence, already supplied to the Court

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guaranteed by 1pm

next day

to

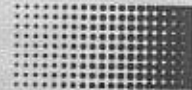
Name: Amel Jaffer
Address: Portman Square
63/65 Marylebone Lane
London
Postcode: W1U 2RA

Moneyback guarantee for delay. You can claim compensation of up to £500 for lost or damaged items.

- Tick if you want a higher than standard compensation limit (this costs more).
Tick one level Up to £1,000 Up to £2,500
- Write your address below.
- Hand this label and your package in at a Post Office® branch.

Ref: ZV 3669 6738 4GB

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next day

to

Name: Carol King
Address: West London County Co
1817 Algarth Road
London
Postcode: W6 8DN

Moneyback guarantee for delay. You can claim compensation of up to £500 for lost or damaged items.

- Tick if you want a higher than standard compensation limit (this costs more).
Tick one level Up to £1,000 Up to £2,500
- Write your address below.
- Hand this label and your package in at a Post Office® branch.

Ref: ZV 3669 6718 5GB

TOTAL £10.30 + £20.56 = £30.86



Post Office Ltd.
Your Receipt

Ludgate Circus
16 - 18 New Bridge Street
London
Greater London
EC4V 6HX

VAT REG No. 243 1700 02
03/07/2007 12:33
SESSION : 5-1584911-2

Post Label SD		
1 @	4.30	4.30
Post Label SD		
1 @	6.00	6.00
TOTAL DUE TO POST OFFICE		10.30
Cash	FROM CUSTOMER	10.30
BALANCE		0.00

PLEASE RETAIN THIS RECEIPT AS PROOF OF POSTING FOR ITEMS LISTED BELOW

ITEM NO	BUILDING NAME OR NUMBER	POSTCODE
1
2
3
4

Thank You

Prontaprint St Pauls & The City
1 Creed Lane
London
EC4V 6SR

Tel: 020 7236 7365 Fax: 020 7248 4848
VAT No: 524 8245 46

12:55:37 28/06/2007
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01 1 x 17.50 B&W Copy	17.50
Payment - Cash	20.56
=====	
Sub-Total:	17.50
VAT @ 17.5%	3.06
Total:	20.56
Tendered:	20.56
Change:	0.00

Thank you for your custom.

sales@stpauls-city.prontaprint.com
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