

List of documents: standard disclosure

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.

In the West London County Court, 181 Talgarth Road, London W6 8DN	
Claim No.	7WL00675
Claimant (including ref)	Rootstock Overseas Corp/Steel Services - JHESVM232082
Defendant (including ref)	Noëlle Y S Klosterkotter-Dit-Rawé
Date	6 May 2008

Disclosure Statement

I, the above named

Claimant Defendant

Party (if party making disclosure is a company, firm or other organisation identify here who the person making the disclosure statement is and why he is the appropriate person to make it)

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 (date of order)

I did not search for documents:-

pre-dating

located elsewhere than

in categories other than

for electronic documents

I carried out a search for electronic documents contained on or created by the following:
(list what was searched and extent of search)

I did not search for the following:-

documents created before

documents contained on or created by the Claimant Defendant

- | | |
|---|---|
| <input checked="" type="checkbox"/> PCs | <input checked="" type="checkbox"/> portable data storage media |
| <input checked="" type="checkbox"/> databases | <input checked="" type="checkbox"/> servers |
| <input checked="" type="checkbox"/> back-up tapes | <input checked="" type="checkbox"/> off-site storage |
| <input checked="" type="checkbox"/> mobile phones | <input type="checkbox"/> laptops |
| <input checked="" type="checkbox"/> notebooks | <input checked="" type="checkbox"/> handheld devices |
| <input checked="" type="checkbox"/> PDA devices | |

documents contained on or created by the Claimant Defendant *NB: Unclear on P*

- | | |
|--|---|
| <input type="checkbox"/> mail files | <input type="checkbox"/> document files |
| <input type="checkbox"/> calendar files | <input type="checkbox"/> web-based applications |
| <input type="checkbox"/> spreadsheet files | <input type="checkbox"/> graphic and presentation files |

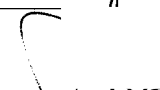
documents other than by reference to the following keyword(s)/concepts
(delete if your search was not confined to specific keywords or concepts)

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



~~(Claimant)~~ ~~(Defendant)~~ ~~(Litigation friend)~~

Date

6 May 2008

List and number here, 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

I have control of the documents numbered and listed here. I do not object to ~~you~~ ~~inspecting them~~/producing copies.

My list of documents is to support my objective of demonstrating in my witness statement and at trial that I continue to be the innocent victim of fraud - aided and abetted since 2002 by a supporting cast comprising of lawyers, surveyors, accountants and their professional associations, the Court Service, LVT, housing departments, Ombudsmen, Land Registry and the police. That - in addition to suffering defamation of my name and character - in the process, I have suffered breach of covenants in my lease, of my statutory rights, as well as rights under court rules - and have been subjected to harassment and bullying.

1•86.03.10•Defendant's Lease

2•91.03.xx•Sun Alliance insurance policy for Jefferson House

3•95.01.15•Extracts from flat 23 lease supplied with 29 November 2002 claim

(cont'd on attached FIVE single sided sheets)

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:

Say what your objections are

I object to you inspecting these documents because:

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.

4	96.11.21	Letter to Defendant from Laytons solicitors
5	96.11.22	Land Registry title NGL 373 333 Steel Services
6	99.01.12	ICAEW letter to Chair of Campaign for Abolition of Residential Leasehold
7	00.08.03	Letter from MRJ to Defendant
8	00.12.13	"Notice of first refusal" issued by Laytons solicitors
9	00.12.31	Norwich Union insurance policy for Jefferson House
10	01.01.25	Mr Andrew Ladsky's letter to Defendant and Defendant's comments
11	01.06.07	Letter from MRJ to "All leaseholders"
12	01.10.11	Letter from CKFT to a Jefferson House Leaseholder
13	01.11.13	Planning application for penthouse flat
14	01.12.31	2001 year-end accounts for Jefferson House
15	02.02.19	Letter from Defendant to MRJ
16	02.02.26	Central London County Court claim filed by PJ
17	02.02.xx	Extracts from Brian Gale "Condition survey" of Jefferson House
18	02.02.xx	Extracts from Bashford lift survey report
19	02.03.26	Letter from MRJ to Defendant
20	02.04.18	Email from Resident E to Defendant
21	02.05.05	Defendant letter to Sir Toby Harris, Chair MPA
22	02.07.15	Letter from MRJ to "All Lessees"
23	02.07.17	Service charge demand from MRJ to Defendant
24	02.08.01	CKFT letter to Kensington & Chelsea housing
25	02.08.04	Letter from Sir Toby Harris to Defendant
26	02.08.07	Steel Services-MRJ application to LVT
27	02.08.08	British Virgin Islands authorities reply to Defendant
28	02.08.11	Letter from MRJ to Defendant
29	02.08.30	Letter from MRJ to Defendant
30	02.09.20	Letter from MRJ to Defendant
31	02.10.02	Email from Leaseholder C to LVT
32	02.10.07	Letter from CKFT to Defendant
33	02.10.20	Email from Resident M to LVT
34	02.10.21	Letter from CKFT to Defendant
35	02.10.23	Letter from Kensington & Chelsea housing to MRJ
36	02.10.29	LVT pre-trial hearing directions
37	02.10.29	"Applying to a Leasehold Valuation Tribunal", LVT publication
38	02.11.01	Letter from Leaseholder F to Defendant
39	02.11.05	Invoice from MRJ to Defendant
40	02.11.28	Letter from CKFT to Defendant
41	02.11.29	Particulars of Claim for WLCC Claim WL203 537
42	02.12.10	Letter from Defendant to WLCC
43	02.12.12	Letter from Resident D solicitors to CKFT
44	02.12.13	Brian Gale "Expert Witness" report to LVT
45	02.12.16	Letter from MRJ to Defendant
46	02.12.17	Defendant reply to Steel Services WLCC claim WL203 537
47	02.12.18	Letter from MRJ to Defendant
48	02.12.31	2002 year-end accounts for Jefferson House
49	03.01.22	Letter from MRJ to LVT
50	03.01.23	Letter from CKFT to Defendant
51	03.01.27	Letter from Kensington & Chelsea police to Defendant

52	03.02.04	Letter from CKFT to Defendant
53	03.02.11	Defendant letter to Kensington & Chelsea police
54	03.02.24	Extracts from Brian Gale "Expert report" to the LVT
55	03.03.04	Letter from MRJ to Brian Gale
56	03.03.22	Letter from Defendant to MRJ
57	03.04.07	Letter from Defendant's solicitors to MRJ
58	03.04.09	Letter from Piper Smith Basham to Defendant's solicitors
59	03.04.xx	Defendant analysis of electricity charges
60	03.05.23	CKFT application to WLCC
61	03.06.01	Letter from Defendant to MRJ
62	03.06.17	Leasehold Valuation Tribunal determination, LVT/ SC/007/120/02
63	03.06.22	Letter from Defendant to WLCC
64	03.06.23	Letter from WLCC to Defendant
65	03.06.23	Letter from Piper Smith Basham to Defendant's solicitors
66	03.06.24	Case Summary and Draft Order supplied by CKFT at hearing
67	03.06.24	"Major works apportionment 24th June 2002 revised" 6 flats, from MRJ
68	03.06.24	WLCC Order to Defendant
69	03.06.25	Letter to Defendant from CKFT
70	03.07.06	Letter from Defendant to MRJ
71	03.07.14	Letter from MRJ to Defendant
72	03.07.15	Letter from Defendant to WLCC
73	03.07.17	Letter from CKFT to WLCC
74	03.07.17	Letter to Defendant from CKFT
75	03.07.17	"Revised price" for works sent to Defendant by CKFT
76	03.07.17	Letter from CKFT to LVT
77	03.07.18	Letter from Defendant to MRJ
78	03.07.21	Letter from CKFT to the LVT
79	03.07.21	Letter from LVT to CKFT
80	03.07.24	Letter to Defendant from CKFT
81	03.07.31	Assessment of Steel Services 17 July 2003 "Revised price" by Defendant's surveyor
82	03.08.05	Letter from CKFT to Defendant
83	03.08.05	Letter from MRJ to Defendant
84	03.08.06	CKFT's Summary Judgement application to WLCC
85	03.08.06	"Major works apportionment 24th June 2002 revised" 35 flats, from MRJ
86	03.08.07	Letter to Defendant's solicitors from CKFT
87	03.08.09	Letter from Defendant to WLCC
88	03.08.19	Letter from MRJ to Defendant
89	03.08.26	WLCC Order
90	03.09.06	Letter from Defendant to S McGrath, Head LVTs
91	03.09.12	Letter from S McGrath, Head LVTs, to Defendant
92	03.10.03	Consent Order from Steel Services to Defendant
93	03.10.06	Letter from Defendant to S McGrath, Head LVTs
94	03.10.06	Letter from Office of Deputy Prime Minister to Defendant
95	03.10.09	Letter from Defendant to MRJ
96	03.10.19	Defendant's Witness Statement
97	03.10.21	Steel Services 'offer' to Defendant
98	03.11.09	Letter from Defendant to S McGrath, Head LVTs
99	03.11.13	Draft Notice of Acceptance and draft Consent Order from Piper Smith Basham to CKFT

100	03.11.14	Email from Piper Smith & Basham to Defendant
101	03.11.26	Letter from S McGrath, Head LVTs, to Defendant
102	03.12.19	Notice of acceptance from Defendant to CKFT
103	03.12.31	Letter from Defendant to MRJ
104	03.12.31	2003 year-end accounts for Jefferson House
105	04.01.16	Letter from solicitors to CKFT on behalf of Defendant
106	04.01.27	Letter from CKFT to Defendant
107	04.02.16	Letter from Defendant to CKFT
108	04.02.17	Letter from CKFT to Defendant
109	04.02.27	Letter from Defendant to CKFT
110	04.03.16	Summary of complaint by Defendant to Law Society against Piper Smith Basham
111	04.03.22	Letter from Defendant to CKFT
112	04.03.26	Letter from MRJ to "All Lessees"
113	04.04.05	Summary of complaint to Bar Council against Mr Gallagher
114	04.04.26	Land Registry title, BGL 43 656, flat 7
115	04.04.26	Land Registry title NGL 373 333, Steel Services
116	04.04.26	Land Registry titles, 101949, 69437, 69051, Jefferson House Ltd
117	04.05.19	Letter from Defendant to MRJ
118	04.05.26	Letter from Defendant to CKFT
119	04.05.28	Letter from CKFT to Defendant
120	04.06.06	Letter from Defendant to Kensington & Chelsea housing
121	04.06.25	Kensington & Chelsea Housing S.21 request to MRJ
122	04.06.29	Defendant letter to Lord Falconer of Thoroton
123	04.07.01	Wandsworth County Court Defendant's Consent Order with Steel Services
124	04.07.14	Letter from CKFT to Defendant
125	04.07.14	Letter from MRJ to Defendant
126	04.07.16	Letter from MRJ to Kensington Chelsea housing
127	04.07.18	Letter from Defendant to MRJ
128	04.07.19	Letter from Kensington & Chelsea housing to MRJ
129	04.07.22	Letter from Defendant to Kensington & Chelsea housing
130	04.08.02	Wandsworth County Court judgment against 5th Defendant
131	04.08.02	Letter from MRJ to "All Lessees"
132	04.08.04	Letter from MRJ to Defendant
133	04.08.11	Defendant letter to MRJ
134	04.08.23	Court Service Customer service letter to Defendant
135	04.08.30	Defendant letter to Councillor Shireen Ritchie
136	04.09.30	Letter from Councillor Shireen Ritchie to Defendant
137	04.10.05	Letter from MRJ to "All Lessees"
138	04.10.21	Invoice from MRJ to Defendant
139	04.10.22	Land Registry title, BGL 51266, Jefferson Hse 'Airspace'
140	04.11.05	MRJ letter to Kensington & Chelsea housing
141	04.11.16	Invoice from MRJ to Defendant
142	04.11.22	Defendant letter to Parliamentary Ombudsman
143	04.11.xx	Mansell - Brian Gale "description of works"
144	04.12.16	Notice from MRJ to Defendant
145	04.12.20	Summary of complaint by Defendant to Law Society against CKFT
146	04.12.31	Service charge demand from MRJ to Defendant
147	04.12.31	2004 year-end accounts for Jefferson House

148	04.12.31	Norwich Union insurance policy for Jefferson House
149	05.01.27	Reply from Bar Council to Defendant's complaint against Mr Gallagher
150	05.02.02	Summary of Defendant complaint to RICS against MRJ
151	05.02.08	Law Society reply to Defendant's complaint against CKFT
152	05.02.09	Letter from Local Government Ombudsman to Defendant
153	05.02.27	Defendant letter to Local Government Ombudsman
154	05.02.28	Letter from MRJ to Defendant
155	05.03.30	Letter from Defendant to MRJ
156	05.04.14	Email from Local Government Ombudsman to Defendant
157	05.04.15	Letter from Pridie Brewster to Defendant
158	05.04.17	Letter from Defendant to Pridie Brewster
159	05.05.09	Letter from Defendant to Pridie Brewster
160	05.07.11	Legal Services Ombudsman reply to Defendant's complaint against Law Society (re. CKFT)
161	05.07.19	Letter from Defendant to ICAEW
162	05.07.26	Letter from Defendant to MRJ
163	05.08.04	Letter from ICAEW to Defendant
164	05.08.08	Defendant photographs of her flat
165	05.08.19	Letter from MRJ to Defendant
166	05.08.30	Reply from Legal Services Ombudsman to Defendant's complaint against Bar Council
167	05.09.01	Letter from Defendant to ICAEW
168	05.09.21	Notice from MRJ to Defendant and Defendant comments
169	05.09.xx	and 02.07.xx Defendant's photographs of Jefferson House
170	05.10.19	Letter from Mr Brian Gale to Leaseholders
171	05.11.04	RICS final reply to Defendant's complaint against MRJ
172	05.11.04	Kintyre Ltd v Romeomarch Property Management Ltd, HM Land Registry
173	05.12.16	Land Registry, BGL 56122, flat 35A
174	05.xx.xx	Defendant's photos of area outside her windows in 2005
175	05.xx.xx	Defendant's photos of corridor area by her flat in 2005
176	06.01.09	Invoice from MRJ to Defendant
177	06.01.31	Land Registry title, NGL 373333
178	06.01.xx	"2006 Steel Services estimated expenditure" from MRJ to Defendant
179	06.02.10	"Notice of first refusal" from PJ to Defendant
180	06.02.22	Land Registry title, BGL 56358, flat 33A
181	06.02.22	Land Registry, title BGL 56546, flat 18A
182	06.02.22	Land Registry title, BGL 43 656, flat 7
183	06.02.22	Land Registry title, NGL 421 710, flat 35
184	06.02.22	Land Registry title, NGL 450 907, flat 34
185	06.02.22	Land Registry title, NGL 554 128, flat 5
186	06.02.22	Land Registry title, BGL 37 920, flat 21
187	06.02.22	Land Registry titles, 101949, 69437, 69051, Jefferson House Ltd
188	06.02.27	Land Registry title, BGL 56 642, Lavagna Enterprises Ltd
189	06.02.27	Land Registry title, BGL 54458, penthouse flat
190	06.02.xx	Defendant's mapping ownership of Jefferson House
191	06.03.28	Defendant letter to Land Registry
192	06.03.30	Letter from Defendant to PJ
193	06.04.03	Letter from PJ to Defendant
194	06.04.04	Land Registry letter to Defendant
195	06.04.30	Letter from Defendant to PJ

196	06.05.03	Letter from PJ to Defendant
197	06.05.24	Land Registry TR1 title, Rootstock-Steel Services
198	06.06.02	Defendant analysis of electricity charges
199	06.06.16	Invoice from MRJ to Defendant
200	06.07.06	Defendant letter to MRJ
201	06.08.29	Reply from ICAEW to Defendant's complaint against Pridie Brewster
202	06.09.xx	Defendant's calculations of service charge paid by Leaseholders
203	06.10.03	Letter from PJ to Defendant's ex. ISP
204	06.10.05	Letter from Defendant to PJ
205	06.10.28	Printscreen of summary of LVT SC00712002 report on LVT database
206	06.12.08	Defendant analysis of insurance sum insured for Jefferson House
207	07.02.16	Letter from PJ to Defendant
208	07.02.25	Letter from Defendant to PJ
209	07.02.28	Defendant complaint to Law Society against PJ
210	07.03.01	Invoice from MRJ to Defendant
211	07.03.16	Email from Kensington & Chelsea police to Defendant's ISP
212	07.03.20	Email from Kensington & Chelsea police to Defendant's ISP
213	07.03.22	Defendant's acknowledgement of service
214	07.03.30	SRA reply to Defendant's complaint against PJ
215	07.04.03	Notice from WLCC to PJ
216	07.05.01	Letter from PJ to WLCC
217	07.05.03	Defendant's skeleton argument
218	07.05.03	WLCC order (hearing 24 August 2008)
219	07.06.30	Letter from Defendant to PJ
220	07.07.12	Letter from PJ to Defendant
221	07.07.20	Defendant photographs of her flat
222	07.07.31	Defendant photographs of her flat
223	07.08.12	Letter from Defendant to PJ
224	07.08.16	Fax from Defendant to WLCC
225	07.08.22	Claimant's skeleton argument
226	07.08.24	WLCC Order following hearing
227	07.09.12	Defendant defence
228	07.09.27	Letter from WLCC to Defendant
229	07.10.02	Defendant letter to WLCC
230	07.10.12	Knight Frank brochure penthouse flat
231	07.10.14	Letter from Defendant to WLCC
232	07.10.28	Letter from Defendant to WLCC
233	07.11.13	Defendant complaint to HMCS against WLCC
234	07.12.05	Defendant letter to HMCS customer service
235	07.12.27	Defendant letter to HMCS customer service
236	08.01.04	WLCC order ("Stricking out counterclaim")
237	08.01.26	Defendant letter c/o WLCC
238	08.01.28	Defendant letter to HMCS customer service
239	08.03.07	WLCC Order to Defendant for allocation questionnaire
240	08.04.09	WLCC case management directions
241	08.05.xx	Chronology of events, compiled by Defendant
242	08.05.xx	Defendant compilation of sums in 27 Feb 07 claim on a yearly basis
243	08.05.xx	Defendant compilation of essential reading in document disclosure

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Thank You

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

Ms N Klosterkotter-Dit-Rawé
[]
[]
[]

6 May 2008

(By 'Recorded delivery')

Ref: West London County Court claim, Rootstock Overseas Corp / Steel Services Limited
7WL 00675, 27 February 2007

Dear Mr Jaffer

My 'List of documents: Standard disclosure' as per West London County Court's 9 April 2008 case management order

In compliance with the 9 April 2008 case management directions issued by District Judge Ryan, stating:

"2) Disclosure of documents shall be dealt with as follows: a) Both parties shall give to each other standard disclosure by list, the lists to be served by 4pm on Wednesday 7th May 2008"

please find enclosed my 6 May 2008 'List of documents: Standard disclosure' ¹

As explained in the introduction to my list of documents:

"My list of documents is to support my objective of demonstrating in my witness statement and at trial that I continue to be the innocent victim of fraud - aided and abetted since 2002 by a supporting cast comprising of lawyers, surveyors, accountants and their professional associations, the Court Service, LVT, housing departments, Ombudsmen, Land Registry and the police. That - in addition to suffering defamation of my name and character - in the process, I have suffered breach of covenants in my lease, of my statutory rights, as well as rights under court rules - and have been subjected to harassment and bullying"

Should I assume that your 4 February 2008 'List of documents: Standard disclosure' is still valid?

Yours sincerely

N Klosterkotter-Dit-Rawé

cc. Letter only - Court Manager, West London County Court, 181 Talgarth Road, Hammersmith, London W6 8DN

¹ My 6 May 2008 'List of documents: Standard disclosure'