

Mr Ahmet Jaffer
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London W1U 2RA

Ms N Klosterkotter-Dit-Rawé
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21 May 2008

(Delivery by hand, including copy of documents, on 21 May 2008)

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

Dear Mr Jaffer

COPY OF MY DOCUMENTS

FROM MY 6 MAY 2008 'LIST OF DOCUMENTS: STANDARD DISCLOSURE'

Although I have not received a request from you for a copy of the documents I listed in my 6 May 2008 Standard Disclosure, I thought it best to supply you with a copy now.

Relative to my 6 May 2008 list, there are a few amendments due to some initial errors: (1) in dates; (2) in 'to' / 'from'. The amendments are highlighted in yellow on the attached list¹. As a result, it has led to some re-ranking relative to the original list, namely:

Document	Original document number	New document number
Letter from Sir Toby Harris to Defendant	25	22
Email from Resident M to LVT	33	32
Email from Resident C to LVT	31	33
Land Registry title, BGL 43656, flat 7	114	133
Land Registry title, flat 35A	173	177
Land Registry title, NGL 373333	177	178
Land Registry title, BGL 51266, Airspace	139	187
Letter from MRJ to LVT	49	(Unaffected)
Fax from Defendant to WLCC	224	(Unaffected)

Other highlights on the list:

- 4 documents highlighted in green. I have not yet been able to identify them.
- 3 documents highlighted in grey, at the end of the list.

Aside from document number 241, Chronology of events, which I will produce closer to the hearing, I will ensure delivery of the others to you by Friday 23 May.

Yours sincerely

N Klosterkotter-Dit-Rawé

¹ 21 May 2008 – List of documents supplied

1	86.03.10	Defendant's Lease
2	91.03.25	Sun Alliance insurance policy for Jefferson House <i>(Note: addition of '25')</i>
3	95.01.15	Extracts from flat 23 lease supplied with 29 November 2002 claim
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	02.07.11	Letter from Sir Toby Harris to Defendant <i>(Note: date changed from 02.08.04)</i>
23	02.07.15	Letter from MRJ to "All Lessees"
24	02.07.17	Service charge demand from MRJ to Defendant
25	02.08.01	CKFT letter to Kensington & Chelsea housing
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 Defendant to MRJ <i>(Note: Reversed order)</i>
29	02.08.30	Letter from MRJ to Defendant
30	02.09.20	Letter from MRJ to Defendant
31	02.10.07	Letter from CKFT to Defendant
32	02.10.19	Email from Resident M to LVT <i>(Note: date is 19th, instead of 20th)</i>
33	02.10.20	Email from Leaseholder C to LVT <i>(Note: day is 20th instead of 2nd)</i>
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 <i>(Note: Yet to identify)</i>
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	03.01.20	Letter from MRJ to LVT <i>(Note: date is 20th, instead of 22nd)</i>
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 <i>(Note: Yet to be identified)</i>
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 <i>(Note: Yet to be identified)</i>
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 NGL 373 333, Steel Services
115	04.04.26	Land Registry titles, 101949, 69437, 69051, Jefferson House Ltd
116	04.05.19	Letter from Defendant to MRJ
117	04.05.26	Letter from CKFT to Defendant (<i>Note: order reversed</i>)
118	04.05.28	Letter from CKFT to Defendant
119	04.06.06	Letter from Defendant to Kensington & Chelsea housing
120	04.06.25	Kensington & Chelsea Housing S.21 request to MRJ
121	04.06.29	Defendant letter to Lord Falconer of Thoroton
122	04.07.01	Wandsworth County Court Defendant's Consent Order with Steel Services
123	04.07.14	Letter from CKFT to Defendant
124	04.07.14	Letter from MRJ to Defendant
125	04.07.16	Letter from MRJ to Kensington Chelsea housing
126	04.07.18	Letter from Defendant to MRJ
127	04.07.19	Letter from Kensington & Chelsea housing to MRJ
128	04.07.22	Letter from Defendant to Kensington & Chelsea housing
129	04.08.02	Wandsworth County Court judgment against 5th Defendant
130	04.08.02	Letter from MRJ to "All Lessees"
131	04.08.04	Letter from MRJ to Defendant
132	04.08.11	Defendant letter to MRJ
133	04.08.12	Land Registry title, BGL 43 656, flat 7 (<i>Note: date changed from 04.04.26</i>)
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	04.11.05	MRJ letter to Kensington & Chelsea housing
140	04.11.16	Invoice from MRJ to Defendant
141	04.11.22	Defendant letter to Parliamentary Ombudsman
142	04.11.xx	Mansell - Brian Gale "description of works"
143	04.12.16	Notice from MRJ to Defendant
144	04.12.20	Summary of complaint by Defendant to Law Society against CKFT
145	04.12.31	Service charge demand from MRJ to Defendant
146	04.12.31	2004 year-end accounts for Jefferson House
147	04.12.31	Norwich Union insurance policy for Jefferson House
148	05.01.27	Reply from Bar Council to Defendant's complaint against Mr Gallagher

149	05.02.02	Summary of Defendant complaint to RICS against MRJ
150	05.02.08	Law Society reply to Defendant's complaint against CKFT
151	05.02.09	Letter from Local Government Ombudsman to Defendant
152	05.02.27	Defendant letter to Local Government Ombudsman
153	05.02.28	Letter from MRJ to Defendant
154	05.03.30	Letter from Defendant to MRJ
155	05.04.14	Email from Local Government Ombudsman to Defendant
156	05.04.15	Letter from Pridie Brewster to Defendant
157	05.04.17	Letter from Defendant to Pridie Brewster
158	05.05.09	Letter from Defendant to Pridie Brewster
159	05.07.11	Legal Services Ombudsman reply to Defendant's complaint against Law Society (re. CKFT)
160	05.07.19	Letter from Defendant to ICAEW
161	05.07.26	Letter from Defendant to MRJ
162	05.08.04	Letter from ICAEW to Defendant
163	05.08.08	Defendant photographs of her flat
164	05.08.19	Letter from MRJ to Defendant
165	05.08.30	Reply from Legal Services Ombudsman to Defendant's complaint against Bar Council
166	05.09.01	Letter from Defendant to ICAEW
167	05.09.21	Notice from MRJ to Defendant and Defendant comments
168	05.09.xx	and 02.07.xx Defendant's photographs of Jefferson House
169	05.10.19	Letter from Mr Brian Gale to Leaseholders
170	05.11.04	RICS final reply to Defendant's complaint against MRJ
171	05.11.04	Kintyre Ltd v Romeomarch Property Management Ltd, HM Land Registry - Source: Estates Gazette, 25 February 2006 (Note: Source added)
172	05.xx.xx	Defendant's photos of area outside her windows in 2005
173	05.xx.xx	Defendant's photos of corridor area by her flat in 2005
174	06.01.09	Invoice from MRJ to Defendant
175	06.01.xx	"2006 Steel Services estimated expenditure" from MRJ to Defendant
176	06.02.10	"Notice of first refusal" from PJ to Defendant
177	06.02.16	Land Registry, BGL 56122, flat 35A (Note: Date changed from 05.12.16)
178	06.02.22	Land Registry title, NGL 373333 (Note: Date changed from 06.01.31)
179	06.02.22	Land Registry title, BGL 56358, flat 33A
180	06.02.22	Land Registry, title BGL 56546, flat 18A
181	06.02.22	Land Registry title, BGL 43 656, flat 7
182	06.02.22	Land Registry title, NGL 421 710, flat 35
183	06.02.22	Land Registry title, NGL 450 907, flat 34
184	06.02.22	Land Registry title, NGL 554 128, flat 5
185	06.02.22	Land Registry title, BGL 37 920, flat 21
186	06.02.22	Land Registry titles, 101949, 69437, 69051, Jefferson House Ltd
187	06.02.27	Land Registry title, BGL 51266, Jefferson Hse 'Airspace' (Note: date changed from 04.10.22)
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 (<i>Note: Yet to be identified</i>)
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	07.08.22	Fax from Defendant to WLCC (<i>Note: Date changed from 16th</i>)
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 ("Striking 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 (<i>Note: tb supplied later</i>)
242	08.05.xx	Defendant compilation of sums in 27 Feb 07 claim on a yearly basis (<i>Note: tb supplied later</i>)
243	08.05.xx	Defendant compilation of essential reading in document disclosure (<i>Note: tb supplied later</i>)



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RECEIVED TWO FOLDERS ON 21ST MAY 2008
AT 15.00.

BIANCA STUART

PORTNER & JASKEL

With Compliments