

Tel: 029 2034 5531
Fax: 029 2039 8206
DX 122723 Cardiff 12



One Kingsway
Cardiff CF10 3DS
www.dolmans.co.uk

Mr M Kirk
BY EMAIL ONLY

OUR REF: APO.SWP001-138
YOUR REF:
DATE: 11th April 2016
EMAIL: adriano@dolmans.co.uk

Dear Sir

MAURICE JOHN KIRK (1st Action, 2nd Action & 3rd Action)

We refer to the above matter and your document dated 4th February 2016 entitled "Claimant Position Statement" in which you sought disclosure of the following items from the Defendant and the Court and you stated that:

1. *"The Claimant's custody first few pages of police records of the Prince Charles/Garrotte type incident (Action 1 claim 8.6, 20 May 1993 arrest at Grand Avenue Cardiff) appear missing."*
2. *"In the light of The Claimant already having been lied to by several members of the South Wales Police, concerning the official PACE regulated interview tape taken under caution, he now applies to inspect the original tape and his 52 arch lever files that had to be prematurely filed following the loss of his others during the Cardiff County Court and others attempt to register him a vexatious litigant without first informing the relevant parties."*

In respect of point 1, by way of email dated 5 February 2016, we provided you with a copy of the arrest information sheet and custody record regarding A1 Claim 8.6 that was contained in the Trial Bundle (paginated 234 – 241 in Trial Bundle Action 1. Vol 1).

The arrest information and custody record is incomplete and further enquiries were undertaken by the Special Legal Casework department of the Defendant. We have been advised that a complete copy of this document has not been located.

In respect of point 2, by way of email dated 5 February 2016, we noted that your request to inspect the original tape recording of your interview in respect of A1 Claim 8.6 appeared to be a repetition of requests you had made throughout these proceedings and in respect of which you had already corresponded at length. As a result of your request, a further review was undertaken by the Special Legal Casework department of the Defendant and whilst the original tape has not been recovered, we have been advised that a copy of the tape has been located.

The tape remains in the custody of the Defendant. Due to the fragility of the tape we have been advised that the Special Legal Casework department of the Defendant has not sought to access the tape. In the circumstances, the Defendant is unable to comment upon the contents of the tape.

We write to put you on notice that the tape will be produced to the Court at the hearing before His Honour Judge Seys-Llewellyn QC on 15 April 2016.

In respect of point 2, by way of email dated 5 February 2016, we also noted that you had directed a request to the Court to inspect the 52 arch lever files you had previously filed at Court.

We can confirm that a copy of this letter has been sent to the Court.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Dolmans', with a stylized initial 'D' and a trailing flourish.

DOLMANS