

Exhibit ref.

1st Statement of the Defendant  
Miss Irene Sara Spalletti

Case ref: M00ED350

IN THE COUNTY COURT AT EDMONTON

IN THE TRUSTS OF LAND AND  
APPOINTMENT OF TRUSTEES ACT 1996

BETWEEN:

Mr Alexander Michael Luke Wolf Walker

Claimant

– and –

Defendant

Miss Irene Sara Spalletti

---

Family Law Act proceedings

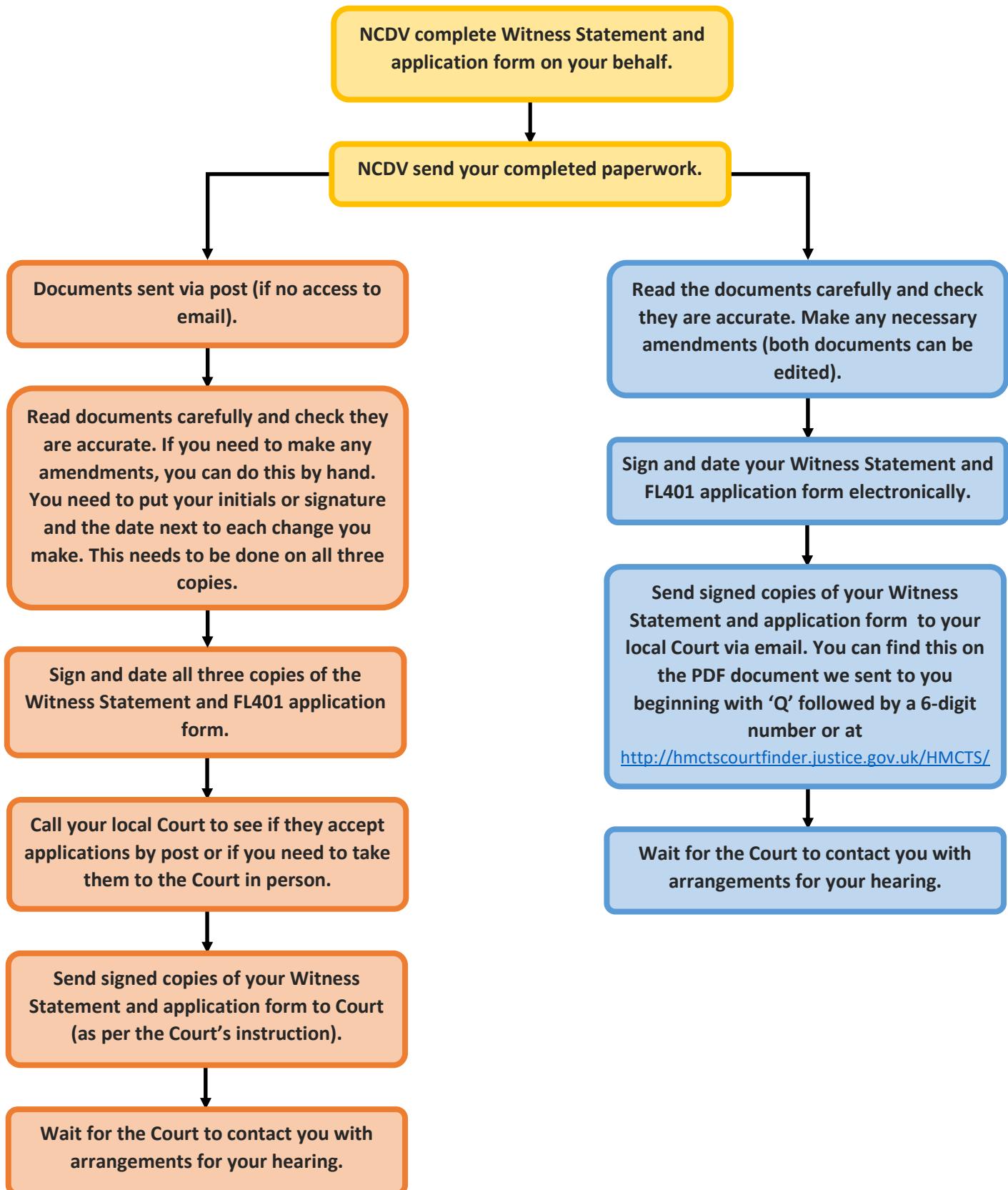
*Exhibited in response to para. 32  
of the Claimant's 1st Statement*

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In the run up to the return hearing, I made multiple proposals to provide the fullest possible range of undertakings including not to return to the property (save that I did not agree to Irene's monetary demands). These were ignored resulting in both the significant costs of preparing a statement in reply dated 21 November 2024 and attending the hearing on 26 November 2024.



## COURT APPLICATION PROCESS FOR LITIGANT IN PERSON



hearing and how it is to be held. It will also set out whether it is to be served by the Court or whether you have to arrange **service**.

- This will need to be served on the Respondent, along with your witness statement, FL401 and any exhibits. It is a legal requirement that it **must** be served a **minimum of two clear working days** prior to the date of the hearing. However, it is better that this is served as soon as possible.
- If, in the period between service of the on-notice hearing and the actual date of the hearing, there is further abuse, harassment or intimidation by the Respondent, you should return to Court and re-lodge your application for a hearing without notice. You should also inform the police of the Respondent's behaviour.
- At the on-notice hearing, the Court will consider whether an Order should be made.

### SERVING AN ORDER

- It is very important that an order is served as soon as possible and that service is done properly, as it will remain ineffective and unenforceable until it is.
- Whilst it is a legal requirement that service must be done a **minimum of two clear working days** prior to the date of the hearing, you should not delay service, because, as detailed above, an order is not enforceable unless it has been served.
- Service means that a copy of the order, along with a copy of your witness statement and FL401 form (both of which have been stamped by the Court) must be given to the Respondent. Any exhibits you refer to in your witness statement must also be given to the Respondent.
- The Court usually requires these documents to be served by '**personal service**', which is when they are personally handed to the Respondent. However, the Courts may allow '**substituted service**', which allows the documents to be served via email, text or WhatsApp.
- You, as the Applicant, **MUST NOT** serve the documents personally on the Respondent.
- In theory, service can be carried out by anyone over the age of 16, but they will have to follow certain guidelines and produce a Certificate of Service (**FL415**) to confirm the order has been served. **Please, however, bear in mind the risk of serving an order on someone who may react aggressively or violently, and it is advised that service is done through one of the other options provided below.**

**Court bailiffs:** often, they will serve the order on your behalf and this will usually be free of charge. However, you need to check with the Court that they are able to do this. You may need to complete a risk assessment form for this.

**The Police:** they may also serve civil orders but, as it is not a criminal matter, they are not obligated to do so. There is no charge if the police are serving the order.

**NCDV:** We have a firm of **process servers** who will be able to assist with immediate service. You will need to pay a fixed-fee of £100 for this and it can be arranged by contacting Assist Process Serving on 0203-326-4955/4953. You will need to send a copy of the Order, your Witness Statement (along with any exhibits) and the stamped FL401 form to NCDV. The quickest way to do this is by forwarding the email with the documents from the Court to [orders@ncdv.org.uk](mailto:orders@ncdv.org.uk) or scanning the documents in and then emailing them.

- You will then be provided with the statement of service and Certificate of Service from the Process Server. You should then file these documents with the Court. Any correspondence sent to the Court must feature the names of the parties and case reference number, along with the hearing date and time.
- **Please note, if an occupation order is granted, you should make a copy of the order and the FL401 you receive from the court to serve on the landlord or mortgage company. This may be done by email or first-class post, although it is advisable to retain proof of postage.**
- It is a good idea to take a photograph of the Order and keep it on your mobile phone so that you always have a copy if needed.

#### AFTER AN ORDER HAS BEEN SERVED

- Once service has taken place, you must file the Certificate of Service and Statement of Service with the Court if you have organised service either by serving yourself through substituted service or if NCDV has served the documents for you. You need to file them by email prior to the date of the Return Hearing or On-Notice hearing. Any correspondence to the Court must feature the names of the parties and the case reference number along with the hearing date and time.
- As soon as the Order has been served on the Respondent, it is enforceable and will be filed at your local police station, as well as being uploaded onto a national database ‘ASSIST’ (if served through NCDV’s Assist Process Serving team).
- If the Respondent does anything in **breach** of the order, they will be guilty of an offence and you will need to notify the police (Family Law Act 1996, s.42A (1)). They can then act immediately and can arrest the Respondent without the need to obtain a warrant.
- The maximum punishment for a breach of a Non-Molestation order in the Magistrates Court is a six-month prison sentence and/or a fine. If the breach is severe or repeated, it may be sent to the Crown Court and the Respondent can face up to a maximum of five years’ imprisonment for the most serious cases and/or a fine. (Family Law Act 1996, s.42A (5))
- It is a good idea to take a photograph of the Order and keep it on your mobile phone so that you always have a copy if needed.
- If your order has been served by the Court or the police, it can still be put on our national database ASSIST. You will need to email a copy of the order and other documents to [orders@ncdv.org.uk](mailto:orders@ncdv.org.uk) requesting that it be placed on the database. Please make it clear in the email that the order has already been served on the Respondent.

#### RETURN HEARINGS

- If an Order was granted at a without notice hearing, a return hearing will be scheduled.
- The Respondent has the right to apply to the Court at any time and without warning until the return date, to set aside, vary or revoke this order. They must give 48 hours written notice of the application to you. If they intend to rely on any evidence in support of their application, they must also provide this to you in advance.

- If there is an application for an occupation order, this will normally be dealt with at this hearing. It is helpful if you are able to have a copy of your tenancy or mortgage agreement available.
- If the hearing is being held at Court and you have requested **special measures**, you should telephone the Court the day before the hearing to ensure these have been organised.
- The return hearing is a good opportunity to ask for any changes to the terms of the Order (if needed). These need to be reasonable and necessary for your protection. You will therefore need to explain to the Court why you are seeking these changes.
- At the return hearing/on-notice hearing, there are several possible outcomes:

If the Respondent does not attend and the Court is satisfied there is proof the Order has been served, **the Judge can make the Order final**. Alternatively, if it is an ‘on notice’ hearing and the Court are satisfied the Notice of Application has been served on the Respondent, it is at the discretion of the Court whether an Order is made there and then or whether a further date is fixed.

If the Respondent attends, they may not object to the order continuing, but may want **the Court to record that there have been no finding made against them** i.e. none of what you have alleged in your statement has been proven by the **Court hearing** sworn evidence.

The Respondent may **offer Undertakings in place of an Order**, or the Judge may suggest this. Undertakings can have the same terms as a non-molestation order and/or occupation order. However, an Undertaking is a promise to the Court and a breach is not a criminal offence. It is a civil **contempt of Court**, which means the police have no power to either arrest or charge the Respondent if the terms of the Undertaking are breached.

- If the Undertaking is breached, it is your responsibility to take action. You have to make an application to the family Court for Contempt of Court. There is a £225 fee to make this application, although there may be exceptions depending on your income.
- It is up to you if you agree to the Respondent signing Undertakings. Everyone is different and has different personal circumstances that affect whether they decide to agree to resolve the proceedings by Undertakings. You will need to make what decision is right for you. However, if you agree to Undertakings, you should ask for these to be ‘until further notice.’ That means that they will be in place until the Court lifts them.
- However, please be extremely careful if **Cross-Undertakings** are proposed. This is when both you and the Respondent sign undertakings. If you have not acted in the way the Respondent alleges, think carefully before agreeing to a Cross-Undertaking.

If the Respondent attends the return hearing and states they wish to **contest the Order**, a ‘fact-finding’ or ‘**contested**’ hearing will be scheduled. This is like a trial, at which both you and the Respondent will give evidence.

Scegli Selezione Argomenti Opzioni Aggiorna

Cerca... Rispondi Rispondi a Inoltra Elimina Spam Contrassegna Azioni

**Item shared with you: "Untitled document.pdf"**

Da Irene Spalletti (via Google Drive) il 2024-11-12 10:52 Dettagli Testo semplice

Per proteggere la tua privacy le risorse remote sono state bloccate. Permetti

### Irene Spalletti shared an item

Irene Spalletti (irene.spalletti@gmail.com) has shared the following item:

Untitled document.pdf

This email grants access to this item without logging in. Only forward it to people you trust.

[Open](#)

If you don't want to receive files from this person, [block the sender](#) from Drive

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA  
You have received this email because irene.spalletti@gmail.com shared a file or folder located in Google Drive with you.

## FAO Ms Irene Spalletti - FLA proceedings, Undertakings and 92 Ollerton Road [HFC-HFC.FID176697]



Da [Sarah M Y. Walker](#) il 2024-11-05 18:21

 [Dettagli](#)  [Testo semplice](#)  [Scarica tutti gli allegati](#)

-  [Letter to Irene Spalletti \(2024.11.05\) - FLA proceedings\(3644489.1\).pdf \(~154 KB\)](#) ▾
-  [Letter to Irene Spalletti \(2024.11.05\) - Undertakings\(3644490.1\).pdf \(~160 KB\)](#) ▾
-  [Letter to Irene Spalletti \(2024.11.05\) - 92 Ollerton Road\(3644493.1\).pdf \(~174 KB\)](#) ▾
-  [Enclosures to letter regarding 92 Ollerton Road \(2024.11.05\)\(3644492.1\).pdf \(~1,6 MB\)](#) ▾

Dear Mr Pennisi

Please see attached three letters, which I send for the attention of Ms Irene Spalletti.

Please confirm by return that you have forwarded the attached correspondence onto Ms Spalletti.

Yours sincerely

Sarah Walker

**Sarah M Y. Walker**  
Senior Associate Solicitor

Hughes Fowler Carruthers  
Academy Court  
94 Chancery Lane  
London WC2A 1DT

Tel: +44 (0)20 7421 8383

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Web: [www.hfclaw.com](http://www.hfclaw.com)



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SOLICITORS



Hughes Fowler Carruthers



Hughes Fowler Carruthers



Our ref: BJ.SW.bs.WAL023

FAO: Ms Irene Spalletti

By email: [info@mrpennisi.com](mailto:info@mrpennisi.com)

5 November 2024

Dear Ms Spalletti

**You and Alexander Walker – Family Law Act proceedings**

I have been instructed by Alexander Walker in relation to the matters arising from the break down of your relationship.

You exhibit a number of audio files to your witness statement in support of your application for a non-molestation order and an occupation order. As my client has been served with only a paper copy, I am unable to access the audio files. Please arrange for those to be sent to me electronically forthwith.

Yours sincerely



**SARAH WALKER**

Our ref: BJ.SW.bs.WAL023

FAO: Ms Irene Spalletti

By email: [info@mrpennisi.com](mailto:info@mrpennisi.com)

5 November 2024

Dear Ms Spalletti

### You and Alexander Walker – Undertakings

My client has now had the opportunity to consider your application for a non-molestation and occupation order together with your lengthy statement in support and accompanying exhibits. My client is naturally shocked and upset by the allegations that you make against him, which are strenuously denied, and he reserves the right to address those allegations in detail if necessary.

To be clear, while my client does not consider it at all appropriate or necessary, he is willing to provide the following undertakings to avoid the emotional and financial cost to both of you of the return hearing on 26 November:

1. He shall not use or threaten violence against you;
2. He shall not threaten or intimidate you;
3. He shall not go to enter or attempt to enter 92 Ollerton Road (the “**property**”).

The undertakings shall commence from the date of this letter and remain in place for a period of 6 months.

The non-molestation order made by District Judge Cohen on 25 October 2024 shall be discharged by way of a consent order and it shall be recorded on the face of the order that the undertakings are on the basis of no admissions by my client and no findings being made by the court. It shall also be recorded on the face of the order that my client shall be entitled to arrange for a third party of his choosing or agent to attend the property on his behalf, as and when required. Such visits are to be arranged in writing at least 24 hours in advance and your consent to the visit(s) shall not be unreasonably withheld.

Now that my client is no longer living at 92 Ollerton Road arrangements do need to be made in relation to the property and I refer you to my separate letter also of today’s date.

If agreed, then my client will sign the undertakings and I will circulate a draft order vacating the hearing on 26 November for your review.

I advise you to take legal advice on the contents of this letter. I look forward to hearing from you or your solicitor.

Yours sincerely



**SARAH WALKER**

## Molly Claridge

---

**From:** Sarah M Y. Walker <S.Walker@HFCLAW.COM>  
**Sent:** 08 November 2024 11:55  
**To:** 'info@mrpennisi.com'  
**Cc:** Bryan Jones  
**Subject:** FAO Irene Spalletti [HFC-HFC.FID176697]  
**Attachments:** Letter to Irene Spalletti (2024.11.08) - Mortgage repayments(3647405.1).pdf

Dear Mr Pennisi

Please see the attached correspondence which I ask that you pass on to Ms Spalletti.

Please can you also confirm safe receipt of my three letters dated 5 November and confirm by return that these have been passed onto Ms Spalletti.

Yours sincerely

Sarah Walker

**Sarah M Y. Walker**  
Senior Associate Solicitor

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## Molly Claridge

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**From:** Sarah M Y. Walker <S.Walker@HFCLAW.COM>  
**Sent:** 11 November 2024 11:07  
**To:** Manuele R. Pennisi - Senior Digital Designer  
**Cc:** Bryan Jones  
**Subject:** RE: FAO Irene Spalletti [HFC-HFC.FID176697]  
**Attachments:** Letter to Irene Spalletti (2024.11.05) - FLA proceedings(3644489.1).pdf

Dear Mr Pennisi

Thank you for your email. I do need an urgent response to all of my letters but in particular the attached, which should be easy for Ms Spalletti to comply with as she will have already compiled all of the audio files for her witness statement.

Please can you arrange for her to share them with me forthwith?

Kind regards

Sarah

**Sarah M Y. Walker**  
Senior Associate Solicitor

Hughes Fowler Carruthers  
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## Molly Claridge

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**From:** Sarah M Y. Walker <S.Walker@HFCLAW.COM>  
**Sent:** 12 November 2024 13:39  
**To:** 'Manuele R. Pennisi - Senior Digital Designer'  
**Cc:** Bryan Jones  
**Subject:** RE: FAO Irene Spalletti [HFC-HFC.FID176697]

Dear Mr Pennisi

Thank you for your email. I understand that you are acting only as an intermediary but as I am prevented from contacting Ms Spalletti directly all of my correspondence and requests must be directed through you.

As you will know, I have not received a response from Ms Spalletti to any of my letters. Please can you ask her when I can expect to receive a response.

I appreciate your assistance with this.

Yours sincerely

Sarah Walker

**Sarah M Y. Walker**  
Senior Associate Solicitor

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## Molly Claridge

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**From:** Sarah M Y. Walker <S.Walker@HFCLAW.COM>  
**Sent:** 14 November 2024 14:22  
**To:** 'Manuele R. Pennisi - Senior Digital Designer'  
**Cc:** Bryan Jones  
**Subject:** URGENT - FAO Irene Spalletti [HFC-HFC.FID176697]  
**Attachments:** Letter to Irene Spalletti (2024.11.14) - Undertakings(3653533.1).pdf  
  
**Importance:** High

Dear Mr Pennisi

URGENT

Please see the attached correspondence for the urgent attention of Ms Spalletti.

Please can you highlight to her that we need a response to the attached by no later than noon on 18 November 2024. Otherwise my client reserves his right to refer the court to all relevant correspondence on the issue of costs and if he is forced to attend the hearing on 26 November, then he will seek an order that Ms Spalletti pay his legal costs associated with preparing for and attending that hearing.

Yours sincerely

Sarah Walker

**Sarah M Y. Walker**  
Senior Associate Solicitor

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Our ref: BJ.SW.bs.WAL023

FAO: Ms Irene Spalletti

By email: [info@mrpennisi.com](mailto:info@mrpennisi.com)

**URGENT**

14 November 2024

Dear Ms Spalletti

**You and Alexander Walker – Undertakings**

I write further to my letter dated 5 November 2024 to which, disappointingly, I have not received a response.

I reiterate that my client strongly denies the allegations that you have raised in your application for a non-molestation order and occupation order, the supporting statement and the accompanying exhibits.

Despite the above, my client maintains that it is in neither of your interests to incur the financial cost or emotional strain involved in the return hearing on 26 November 2024. With that in mind (although he does not consider it necessary), he is prepared to broaden the proposed undertakings and undertake the following on the conditions set out below. My client shall not:

1. use or threaten violence to, intimidate, harass or pester you and shall not instruct, encourage or in any way suggest that any other person should do so;
2. go to, enter, or attempt to enter 92 Ollerton Road (the “**Property**”) or any property where he knows you to be living or staying without your prior written consent; and
3. contact or attempt to contact you via telephone, WhatsApp, text message, email or any other means of communication (including via social media or other forms of electronic messaging) and shall not instruct, encourage or in any way suggest that any other person should do so (with the exception of instructing an agent or third party to contact you in relation to arrangements for

the Property and/or professionals to communicate with you as part of these proceedings and any other legal proceedings).

As previous, the undertakings shall commence from the date of this letter and remain in place for a period of 6 months.

The non-molestation order made by District Judge Cohen on 25 October 2024 shall be discharged by way of a consent order and it shall be recorded on the face of the order that the undertakings are on the basis of no admissions by my client and no findings being made by the court. It shall also be recorded on the face of the order that my client shall be entitled to arrange for a third party of his choosing or agent to attend the Property on his behalf, as and when required. Such visits are to be arranged in writing at least 24 hours in advance and your consent to the visit(s) shall not be unreasonably withheld.

If agreed, then my client will sign the undertakings and I will circulate a draft order vacating the hearing on 26 November for your review.

If the hearing proceeds, my client will be required to instruct a barrister to represent him. The barrister's fee for that hearing deems at close of business on 18 November. Therefore, please confirm your acceptance of the undertakings **by no later than midday on 18 November 2024**. My client reserves his right to refer the court to all relevant correspondence on the issue of costs and if he is forced to attend the hearing on 26 November, then he will seek an order that you pay his costs associated with preparing for and attending the hearing.

I advise you to take legal advice on the contents of this letter. I look forward to hearing from you or your solicitor.

Yours sincerely



**SARAH WALKER**

## Molly Claridge

---

**From:** Sarah M Y. Walker <S.Walker@HFCLAW.COM>  
**Sent:** 18 November 2024 11:59  
**To:** Manuele R. Pennisi - Senior Digital Designer  
**Cc:** Bryan Jones  
**Subject:** FW: URGENT - FAO Irene Spalletti [HFC-HFC.FID176697]  
**Attachments:** Letter to Irene Spalletti (2024.11.14) - Undertakings(3653533.1).pdf  
  
**Importance:** High

Dear Mr Pennisi

Please can you urgently let me know if Ms Spalletti is going to respond to the attached letter?

Our client's legal fees for the hearing listed for next Tuesday fall in today and, as you know if he is forced to attend the hearing because of Ms Spalletti's failure to engage with his reasonable proposals to adjourn the hearing on the basis of undertakings, then my client will have no choice but to seek an order that Ms Spalletti pay his legal costs associated with preparing for and attending that hearing.

I look forward to hearing from you.

Yours sincerely

Sarah Walker

**Sarah M Y. Walker**  
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## FAO Irene Spalletti - Draft court bundle index [HFC-HFC.FID176697]



Da [Sarah M Y. Walker](#) il 2024-11-20 11:37

[Dettagli](#) [Testo semplice](#)

[Draft Court Bundle Index for Hearing on 26 November 2024\(3658449.1\).docx \(~30 KB\)](#)

Dear Mr Pennisi

Ahead of the hearing on 26 November, I attach a draft court bundle index for Ms Spalletti's review.

Please can Ms Spalletti let me have any comments on the attached by no later than 12pm tomorrow, otherwise I will arrange for the bundle to be lodged as drafted.

Yours sincerely

Sarah Walker

**Sarah M Y. Walker**  
Senior Associate Solicitor

Hughes Fowler Carruthers  
Academy Court  
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## FAO Ms Irene Spalletti [HFC-HFC.FID176697]



Da [Sarah M Y. Walker](#) il 2024-11-21 17:41

 Dettagli  Testo semplice

 2024.11.21 - First statement of Alexander Michael Luke Wolf Walker(3660737.1) - signed.pdf (~498 KB) 

Dear Mr Pennisi

I am disappointed not to have heard anything all from Ms Spalletti. Ahead of the hearing on Tuesday, I enclose by way of service on you my client's statement. Please follow this link to the enclosures: <https://acrobat.adobe.com/id/urn:aaid:sc:EU:1516682d-a30a-4b23-be1c-ea75e54da0db>

We will be including the attached documents in the court bundle, which we will circulate tomorrow.

Yours sincerely

Sarah Walker

**Sarah M Y. Walker**  
Senior Associate Solicitor

Hughes Fowler Carruthers  
Academy Court  
94 Chancery Lane  
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COMPANY REGISTRATION No. 7160275

## FAO Irene Spalletti [HFC-HFC.FID176697]



Da Alessia Davi il 2024-11-21 18:20

 Dettagli  Testo semplice

Dear Mr Pennisi

Please find the bundle for the hearing on Tuesday 26 November through the below link:

<https://acrobat.adobe.com/id/urn:aaid:sc:EU:63aa05e3-8a1f-46c3-a44b-7eb836a2968c>

The same will be lodged with the court tomorrow morning.

Please do let me know if you have any issues accessing it.

Yours sincerely

Alessia

**Alessia Davi**

Paralegal

Hughes Fowler Carruthers

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Email: [a.davi@hfclaw.com](mailto:a.davi@hfclaw.com)

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**Hughes Fowler Carruthers**

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PRIVY COUNCIL AGENTS



## FAO Irene Spalletti [HFC-HFC.FID176697] ↗



Da Alessia Davi il 2024-11-22 09:36

✉ Dettagli ⌂ Testo semplice

📎 Walker N260 Signed.pdf (~418 KB) ▾

Dear Mr Pennisi

I enclose by way of service on you our client's N260 form.

If you have any issues accessing it, please do let me know.

Yours sincerely

Alessia Davi

**Alessia Davi**

Paralegal

Hughes Fowler Carruthers  
Academy Court  
94 Chancery Lane  
London WC2A 1DT

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COMPANY REGISTRATION No. 7160275

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## FAO Irene Spalletti [HFC-HFC.FID176697] ↗



Da Alessia Davi il 2024-11-22 10:18

✉ Dettagli ⌂ Testo semplice

✉ FP8 Walker.pdf (~728 KB) ▾

Dear Mr Pennisi

I enclose by way of service on you our client's FP8 form.

If you have any issues accessing it, please do let me know.

Yours sincerely

Alessia Davi

**Alessia Davi**

Paralegal

Hughes Fowler Carruthers  
Academy Court  
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London WC2A 1DT

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COMPANY REGISTRATION No. 7160275

REGISTERED OFFICE ADDRESS: Academy Court, 94 Chancery Lane, London WC2A 1DT



## FAO Irene Spalletti [HFC-HFC.FID176697]



Da Rica Lee il 2024-11-25 15:25

 Dettagli  Testo semplice

Dear Mr Pennisi

Ahead of the hearing tomorrow, please could you confirm whether Ms Spalletti is intending on filing a position statement?

Yours sincerely

Rica

**Rica Lee**

Associate Solicitor

Hughes Fowler Carruthers  
Academy Court

94 Chancery Lane  
London WC2A 1DT

Tel: +44 (0)20 7421 8383

Email: [r.lee@hfclaw.com](mailto:r.lee@hfclaw.com)

Web: [www.hfclaw.com](http://www.hfclaw.com)



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## FAO Irene Spalletti [HFC-HFC.FID176697]



Da Rica Lee il 2024-11-25 16:43

 Dettagli  Testo semplice

 ED24F00300 - Spalletti v Walker - Respondnet's Position Statement (final).pdf (~230 KB) 

Dear Mr Pennisi

Ahead of the hearing tomorrow, please find attached by way of service our client's position statement.

Yours sincerely

Rica

**Rica Lee**

Associate Solicitor

Hughes Fowler Carruthers

Academy Court

94 Chancery Lane

London WC2A 1DT

Tel: +44 (0)20 7421 8383

Email: r.lee@hfclaw.com

Web: www.hfclaw.com



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Our ref: BJ.SW.bs.WAL023

FAO: Ms Irene Spalletti  
Via DC Jonty Proudfoot

**By email: [jonty.proudfoot@met.police.uk](mailto:jonty.proudfoot@met.police.uk)**

10 March 2025

**WITHOUT PREJUDICE SAVE AS TO COSTS**

Dear Ms Spalletti

**You and Alexander Walker – 92 Ollerton Road (the “Property”)**

Thank you for your proposal for settlement dated 19 February 2025. I apologise for the delay in responding, as I have only just recently returned from holiday.

There is much in your letter that my client does not agree with, but my client will not run up unnecessary costs responding to every point. Where he has not addressed something in your letter that should not be taken as acceptance by him of a particular point. It is, however, important to him to respond to your accusation that he has attempted to “exert undue pressure” on you by proposing that you buy him out of his share of the house. This is simply not correct; my client made this proposal because he thought you might like to stay in the house, and he thought your parents may have been able to assist you financially (as they have done in the past) to achieve this. This was absolutely not an attempt by him to “secure an advantage by intimidating” you as you state and was in fact intended to be conciliatory. In any event my client only proposed this after you repeatedly failed to engage with him about selling the property and because your mother had suggested to him that you would like to stay in the house.

Since your relationship with my client came to an end in the summer of last year, my client’s primary focus has simply been to finalise the works that need to be carried out so the house can be readied for sale to enable you and my client to each go your separate ways. The unnecessary and misconceived applications made by you under the Family Law Act have been an unwelcome and expensive distraction from this, and it is clear to my client that your applications were entirely motivated by your desire to block the sale of the house. The judge at the hearing on 5 February

# Statement of Costs (summary assessment)

(CPR PD44 9.5)

In the  
Family Court at Edmonton  
Case ED24F00300  
Reference

## Judge/Master

Judge

**Case Title** Irene Sara Spalletti and Alexander Michael Luke Wolf Walker

## Respondent's Statement of Costs for the hearing on 26 November 2024

### Description of fee earners\*

(1) Name	Bryan Jones	grade A	rate £490.00
(2) Name	Sarah Walker	grade B	rate £380.00
(3) Name	Rachael Burton	grade B	rate £345.00

### Solicitors' Grades

Grade A - Solicitors and Chartered Legal Executives with over eight years post qualification experience including at least eight years litigation experience.

Grade B - Solicitors and Chartered Legal Executives with over four years post qualification experience including at least four years litigation experience.

Grade C - Other solicitors and Chartered Legal Executives and fee earners of equivalent experience.

Grade D - Trainee solicitors, paralegals and other fee earners.

"Chartered Legal Executive" means a Fellow of the Chartered Institute of Legal Executives (CILEx). Those who are not Fellows of CILEx are not entitled to call themselves Chartered Legal Executives and in principle are therefore not entitled to the same hourly rate as a Chartered Legal Executive.

### Attendances on (party)

#### Personal attendances

(1) (number)		hours at £	490.00	£	0.00
(2) (number)		hours at £	380.00	£	0.00
(3) (number)		hours at £	345.00	£	0.00

#### Letters out/emails

(1) (number)		hours at £	490.00	£	0.00
(2) (number)	2.4	hours at £	380.00	£	912.00
(3) (number)		hours at £	345.00	£	0.00

#### Telephone

(1) (number)		hours at £	490.00	£	0.00
(2) (number)	1.9	hours at £	380.00	£	722.00
(3) (number)		hours at £	345.00	£	0.00

### Attendances on opponents (including negotiations):

**Personal attendances**

(1) (number)	<input type="text"/>
(2) (number)	<input type="text"/>
(3) (number)	<input type="text"/>

hours at £	490.00	£	0.00
hours at £	380.00	£	0.00
hours at £	345.00	£	0.00

**Letters out/emails**

(1) (number)	<input type="text"/>
(2) (number)	0.3
(3) (number)	0.7

hours at £	490.00	£	0.00
hours at £	380.00	£	114.00
hours at £	345.00	£	241.50

**Telephone**

(1) (number)	<input type="text"/>
(2) (number)	<input type="text"/>
(3) (number)	<input type="text"/>

hours at £	490.00	£	0.00
hours at £	380.00	£	0.00
hours at £	345.00	£	0.00

**Attendance on others:**

**Personal attendances**

(1) (number)	<input type="text"/>
(2) (number)	<input type="text"/>
(3) (number)	<input type="text"/>

hours at £	490.00	£	0.00
hours at £	380.00	£	0.00
hours at £	345.00	£	0.00

**Letters out/emails**

(1) (number)	<input type="text"/>
(2) (number)	1.3
(3) (number)	<input type="text"/>

hours at £	490.00	£	0.00
hours at £	380.00	£	494.00
hours at £	345.00	£	0.00

**Telephone**

(1) (number)	0.2
(2) (number)	0.8
(3) (number)	0.4

hours at £	490.00	£	98.00
hours at £	380.00	£	304.00
hours at £	345.00	£	138.00

**Site inspections etc.**

(1) (number)	<input type="text"/>
(2) (number)	<input type="text"/>
(3) (number)	<input type="text"/>

hours at £	490.00	£	0.00
hours at £	380.00	£	0.00
hours at £	345.00	£	0.00

Work done on documents, as set out in schedule:

£  3,726.00

**Attendance at hearing:**

(1) (number)	<input type="text"/>
(2) (number)	0.5
(3) (number)	<input type="text"/>

fixed costs

hours at £	490.00	£	0.00
hours at £	380.00	£	190.00
hours at £	345.00	£	0.00

(1) (number)		hours travel and waiting time £	490.00	£	0.00
(2) (number)		hours travel and waiting time £	380.00	£	0.00
(3) (number)		hours travel and waiting time £	345.00	£	0.00
<b>Sub Total £</b>					6,939.50

Brought forward £

6,939.50

Counsel's fees (name) (year of call)

Tadhg Barwell O'Connor (2019)

Fee for [advice/conference/documents]

£

Fee for hearing

£

1,500.00

Other expenses

Court fees

£

Others  
(give brief  
description)

£

**Total**

£

8,439.50

Amount of VAT claimed

on solicitors and counsel's fees

£

1,687.30

on other expenses

£

**Grand Total £**

10,126.80

The costs stated above do not exceed the costs which the (party) is liable to pay in respect of the work which this statement covers. Counsel's fees and other expenses have been incurred in the amounts stated above and will be paid to the persons stated.

Alexander Walker

Signed

22.11.2024

Dated

Bryan Jones

Name of Partner signing

Hughes Fowler Carruthers

Name of firm of solicitors

### Schedule of work done on documents

Item	Description of work <i>(one line only)</i>	Grade A hours	Grade B hours	Grade C hours	Grade D hours	Total £
1	Considering Documents / drafting statement and exhibit		7.00		1.00	2,415.00
2	Instructions and papers to counsel		0.80			276.00
3	Preparation for hearing		3.00			1,035.00
<b>TOTAL</b>		0.00	10.80	0.00	1.00	3,726.00

# Statement of Costs (summary assessment)

(CPR PD44 9.5)

In the  
Family Court at Edmonton  
Case ED24F00300  
Reference

## Judge/Master

Judge

**Case Title** Irene Sara Spalletti and Alexander Michael Luke Wolf Walker

## Respondent's Statement of Costs for the hearing on 5 February 2025

### Description of fee earners\*

(1) Name	Bryan Jones	grade A	rate £530.00
(2) Name	Sarah Walker (2024)	grade B	rate £380.00
(3) Name	Sarah Walker (2025)	grade B	rate £395.00
(4) Name	Rica Lee	grade C	rate £315.00

### Solicitors' Grades

Grade A - Solicitors and Chartered Legal Executives with over eight years post qualification experience including at least eight years litigation experience.

Grade B - Solicitors and Chartered Legal Executives with over four years post qualification experience including at least four years litigation experience.

Grade C - Other solicitors and Chartered Legal Executives and fee earners of equivalent experience.

Grade D - Trainee solicitors, paralegals and other fee earners.

"Chartered Legal Executive" means a Fellow of the Chartered Institute of Legal Executives (CILEx). Those who are not Fellows of CILEx are not entitled to call themselves Chartered Legal Executives and in principle are therefore not entitled to the same hourly rate as a Chartered Legal Executive.

### Attendances on (party)

#### Personal attendances

(1) (number)		hours at £ 530.00	£ 0.00
(2) (number)		hours at £ 380.00	£ 0.00
(3) (number)		hours at £ 395.00	£ 0.00
(4) (number)		hours at £ 315.00	£ 0.00

#### Letters out/emails

(1) (number)		hours at £ 530.00	£ 0.00
(2) (number)	0.6	hours at £ 380.00	£ 228.00
(3) (number)	0.7	hours at £ 395.00	£ 276.50
(4) (number)		hours at £ 315.00	£ 0.00

#### Telephone

(1) (number)		hours at £ 530.00	£ 0.00
(2) (number)	0.2	hours at £ 380.00	£ 76.00

(3) (number)	1.5
(4) (number)	

hours at £	395.00	£	592.50
hours at £	315.00	£	0.00

**Attendances on opponents (including negotiations):**

Personal attendances

(1) (number)	
(2) (number)	
(3) (number)	
(4) (number)	

hours at £	530.00	£	0.00
hours at £	380.00	£	0.00
hours at £	395.00	£	0.00
hours at £	315.00	£	0.00

Letters out/emails

(1) (number)	
(2) (number)	0.1
(3) (number)	
(4) (number)	

hours at £	530.00	£	0.00
hours at £	380.00	£	38.00
hours at £	395.00	£	0.00
hours at £	315.00	£	0.00

Telephone

(1) (number)	
(2) (number)	
(3) (number)	
(4) (number)	

hours at £	530.00	£	0.00
hours at £	380.00	£	0.00
hours at £	395.00	£	0.00
hours at £	315.00	£	0.00

**Attendance on others:**

Personal attendances

(1) (number)	
(2) (number)	
(3) (number)	
(4) (number)	

hours at £	530.00	£	0.00
hours at £	380.00	£	0.00
hours at £	395.00	£	0.00
hours at £	315.00	£	0.00

Letters out/emails

(1) (number)	0.1
(2) (number)	0.5
(3) (number)	
(4) (number)	

hours at £	530.00	£	53.00
hours at £	380.00	£	190.00
hours at £	395.00	£	0.00
hours at £	315.00	£	0.00

Telephone

(1) (number)	
(2) (number)	
(3) (number)	2
(4) (number)	0.2

hours at £	530.00	£	0.00
hours at £	380.00	£	0.00
hours at £	395.00	£	790.00
hours at £	315.00	£	63.00

**Site inspections etc.**

(1) (number)	
(2) (number)	
(3) (number)	

hours at £	530.00	£	0.00
hours at £	380.00	£	0.00
hours at £	395.00	£	0.00

(4) (number)	<input type="text"/>	hours at £	<input type="text" value="315.00"/>	£	<input type="text" value="0.00"/>
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Work done on documents, as set out in schedule: £

**Attendance at hearing:**

(1) (number)	<input type="text"/>	hours at £	<input type="text" value="530.00"/>	£	<input type="text" value="0.00"/>
(2) (number)	<input type="text"/>	hours at £	<input type="text" value="380.00"/>	£	<input type="text" value="0.00"/>
(3) (number)	<input type="text" value="1.5"/>	hours at £	<input type="text" value="395.00"/>	£	<input type="text" value="592.50"/>
(4) (number)	<input type="text"/>	hours at £	<input type="text" value="315.00"/>	£	<input type="text" value="0.00"/>

fixed costs £

(1) (number)	<input type="text"/>	hours travel and waiting time £	<input type="text" value="530.00"/>	£	<input type="text" value="0.00"/>
(2) (number)	<input type="text"/>	hours travel and waiting time £	<input type="text" value="380.00"/>	£	<input type="text" value="0.00"/>
(3) (number)	<input type="text"/>	hours travel and waiting time £	<input type="text" value="395.00"/>	£	<input type="text" value="0.00"/>
(4) (number)	<input type="text"/>	hours travel and waiting time £	<input type="text" value="315.00"/>	£	<input type="text" value="0.00"/>

**Sub Total £**

Brought forward £ 5,030.00

Counsel's fees (name) (year of call)

Charles Richards (2022)

Fee for [advice/conference/documents]

£   
£ 1,125.00

Fee for hearing

Other expenses

Court fees

£   
£

Others  
(give brief  
description)

**Total**

£ 6,155.00

Amount of VAT claimed

on solicitors and counsel's fees

£ 1,231.00

on other expenses

£   
£   
**Grand Total £** 7,386.00

The costs stated above do not exceed the costs which the (party) is liable to pay in respect of the work which this statement covers. Counsel's fees and other expenses have been incurred in the amounts stated above and will be paid to the persons stated.

Alexander Michael Luke Wolf Walker

Signed

04/02/2025

Dated

Bryan Jones

Name of Partner signing

Hughes Fowler Carruthers

Name of firm of solicitors

### Schedule of work done on documents

Item	Description of work <i>(one line only)</i>	Grade A hours	Grade B hours	Grade C hours	Grade D hours	Total £
1	Considering Documents		1.00	1.00		710.00
2	Instructions and papers to counsel		0.90	1.00		670.50
3	Preparation for hearing		1.50	0.50		750.00
<b>TOTAL</b>		0.00	3.40	2.50	0.00	2,130.50

Ms Sarah Walker  
Hughes Fowler Carruthers  
Academy Court  
94 Chancery Lane  
London  
WC2A 1DT

Irene Sara Spalletti

Your Ref: BJ.SW.bs.WAL023

04 April 2025

**WITHOUT PREJUDICE SAVE AS TO COSTS**

Dear Ms Walker

**Re: 92 Ollerton Road, London, N11 2LA**

I apologise for the delay. I had instructed my solicitor over two weeks ago; however, she only informed me today that she would not be taking my case. Going forward, I request that all communication from you be limited to one response per letter sent from me, and that it be directed to this email address:  
[property\\_92@yahoo.com](mailto:property_92@yahoo.com).

Ms. Walker, I had previously requested in December that you fact-check your statements before making certain accusations, and I would appreciate it if you could begin doing so.

*"There is much in your letter that my client does not agree with, but my client will not run up unnecessary costs responding to every point. Where he has not addressed something in your letter that should not be taken as acceptance by him of a particular point. It is, however, important to him to respond to your accusation that he has attempted to "exert undue pressure" on you by proposing that you buy him out of his share of the house. This is simply not correct; my client made this proposal because he thought you might like to stay in the house, and he thought your parents may have been able to assist you financially (as they have done in the past) to achieve this. This was absolutely not an attempt by him to "secure an advantage by intimidating" you as you state and was in fact intended to be conciliatory. In any event my client only proposed this after you repeatedly failed to engage with him about selling the property and because your mother had suggested to him that you would like to stay in the house."*

Your client's proposal that I buy him out was not only absurd but had already been rejected as early as July 2024.

- i. Your client was fully aware that my financial situation does not allow me to buy him out, nor would I be able to take over the mortgage on an income of £400 per month in Universal Credit payments.
- ii. The proposed overinflated house valuation of £903,000, sourced from the internet without formal valuation, is wholly inconsistent with paragraph 4 (Proportionality) of the Practice Direction on Pre-Action Conduct and Protocols (PDPAC).
- iii. Your client's additional demand for £15,000 in compensation. Given that your client is currently facing criminal allegations for domestic abuse, coercive control, financial abuse, and harassment, it is entirely unreasonable for him to claim additional financial compensation

This offer was never a viable option, and your client's insistence on reintroducing it is both coercive and an attempt to exert undue pressure on me. This has already been explained in the [WP Letter, 19 February 2025, \(p.03\)](#).

Your client's demand that "All furniture and chattels must be divided equally by value" despite having

no claim to any of the furniture, as well as compensation requests in relation to assets that do not Despite repeatedly accusing me of being financially motivated, the reality is this. The only financial reimbursement I have requested is £900, solely related to the costs of printing 400 pages of documented abuse I have endured. Meanwhile, your client has made excessive and baseless financial demands exceeding £150,000, which include:

- Over-inflating the property value
- Threats of legal fees
- Unjustified demands for compensation
- Attempts to force an early sale under unfavorable conditions.

Your client's actions reflect a clear pattern of financial coercion, designed to pressure me into accepting an unfair settlement.

*"The unnecessary and misconceived applications made by you under the Family Law Act have been an unwelcome and expensive distraction from this, and it is clear to my client that your applications were entirely motivated by your desire to block the sale of the house."*

- i. My application for a Family Law Act order was made following your client's arrest, and the police's decision to prosecute him. You may refer to the application as unnecessary because your client lost the case, but the application was never about the property—it was about my safety. The court granted the orders based on the clear risk of harm I faced, and it was not about financial or property disputes. Your lack of ethics is deeply concerning. If you are claiming that a victim of domestic abuse making an application to the court for a protective order is unnecessary, it becomes increasingly difficult for me to find a resolution with you.
- ii. The court specifically granted me permission to remain in the property until 25 October 2025, alone, acknowledging the abuse I have suffered. As part of that ruling, the court ordered that your client remains responsible for covering half of the property-related costs, including the mortgage and bills.
- iii. We are in the process of obtaining the court hearing transcripts. Both your barrister and your client, who were present at both hearings, are fully aware of the court's findings and the consequences. It is in your best interest to stop refusing to pay these bills, as two judges have clearly ruled otherwise.
- iv. Non-molestation and occupation orders are most typically handled without legal representation. The decision for your client to be represented by a barrister @ £550/hr was entirely your firm's choice, and I bear no responsibility for the legal costs arising from that decision.
- v. At the second hearing on 5 February, the judge did not dismiss my application based on merit, but rather due to legal technicalities, such as procedural limitations in the family court. I could not have known about these limitations, as I was not legally represented. However, your client's representative was fully aware of this and of the fact that his client didn't need a barrister for this court hearing.
- vi. Additionally, I am pleased that the court approved only a reimbursement of £1,625 against your client's claim of £7,386, as the judge's ruling clearly demonstrates that the inflated costs claimed were unsubstantiated.

*"The Property needs to be sold, he is disappointed that it has taken you so long to respond, which resulted in him incurring the costs of preparing his TOLATA application. My client has never wanted to go to court. It is in fact you who has instigated the two hearings in November 2024 and February 2025."*

I am finding it increasingly difficult to communicate with you, as it seems that the substance of my letters is being ignored. I understand that you may find it challenging to fully comprehend my situation and this case altogether as you apparently specialise in high value corporate law. Despite the challenges, I made every effort to respond within your deadlines. However, I have not received any