

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 –

Miss Irene Sara Spalletti

Defendant

Attempts to agree sale

*Exhibited in response to para. 49
of the Claimant's 1st Statement*

Whilst my solicitors again wrote to Irene's solicitors on 20 January 2025 seeking a response by 24 January 2025 (six weeks from the initial letter before action), Irene's solicitors stated yet again on 21 January 2025 that they would not be able to provide a response within the required timeframe (again without providing a date by which they would be able to do so). On 30 January 2025, Irene's solicitors sent a further letter stating that they needed yet further time to respond substantively, despite them being instructed for at least three weeks at that stage. On 3 February 2025 I discovered through Irene's communication with the court that her solicitors are no longer instructed.

Defendant: Miss I – S Spalletti

EXHIBITS to Statement n°: 1

Exhibit n° ISS-49

n° of Exhibits: xx, pp.155-xxx

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BETWEEN:

Mr Alexander Michael Luke Wolf Walker

Claimant

- and -

Defendant

Miss Irene Sara Spalletti

referred to in **Paragraph 49**
ATTEMPTS TO AGREE SALE

Whilst my solicitors again wrote to Irene's solicitors on 20 January 2025 seeking a response by 24 January 2025 (six weeks from the initial letter before action), Irene's solicitors stated yet again on 21 January 2025 that they would not be able to provide a response within the required timeframe (again without providing a date by which they would be able to do so). On 30 January 2025, Irene's solicitors sent a further letter stating that they needed yet further time to respond substantively, despite them being instructed for at least three weeks at that stage.

On 3 February 2025 I discovered through Irene's communication with the court that her solicitors are no longer instructed.

Whilst my solicitors again wrote to Irene's solicitors on 20 January 2025 seeking a response by 24 January 2025 (six weeks from the initial letter before action), Irene's solicitors stated yet again on 21 January 2025 that they would not be able to provide a response within the required timeframe (again without providing a date by which they would be able to do so).

My solicitors therefore wrote again on 23 January 2025, making it clear that I have no confidence that Irene will engage constructively in the sale process and would therefore be making this application.

Our ref: BJ.SW.bs.WAL023

FAO: Ms Lucy Cornish
Third Floor, Crown House
47 Chase Side
London. N14 5PB

By email: lc@southgate.co.uk

20 January 2025

Dear Lucy

Irene Spalletti and Alexander Walker

Thank you for your letter dated 10 January 2025. I apologise for the delay in responding but, as your client will be aware, my client was previously prohibited from contacting your client through anyone other than Mr Pennisi until very recently. The bail conditions have now been amended so that I can communicate with you.

I will forward to you all of the correspondence that I have sent to Ms Spalletti (via Mr Pennisi) since I was instructed in November 2024, together with all of the documents arising from your client's unnecessary application for a non-molestation order and an occupation order, which was resolved by consent at a hearing on 26 November 2024. Regrettably your client forced my client to incur the costs of that hearing when (despite your client's application being wholly without merit), in an attempt to resolve matters, my client had offered a full suite of non-molestation undertakings in advance.

As you will see from the correspondence, our clients' relationship ended in mid-July 2024. Since then, my client has tried his very best to engage constructively with your client to resolve the matters arising from their separation, including in relation to the sale of their joint property, 92 Ollerton Road. Unfortunately, your client has not engaged substantively and until recently has ignored all of my correspondence about this, leaving my client with no choice but to send a letter before action notifying your client of his intention to commence TOLATA proceedings in the event of her ongoing failure to cooperate. He asked for a response by no later than 13 January 2025, having given your client a full month to respond to the letter before action and in circumstances where he has repeatedly invited your client to collaborate in relation to the property since last summer.

It is disappointing that it took until 15 January 2025 for my client to receive any response to his reasonable and practical proposals in respect of 92 Ollerton Road. I attach a letter that I received directly from your client in which she appears to suggest that, despite having previously indicated otherwise, she would be content: (i) for my client to buy her out of her share of the property; or (ii) for the house to be sold as soon as possible.

Since you are now instructed, I am not able to correspond with your client directly in relation to these proposals. Notwithstanding your client's unacceptably aggressive and hostile approach to matters, as you will see from my previous correspondence, my client is committed to resolving matters swiftly and amicably without the involvement of the court. However, it is now seven months since our clients separated and no progress has been made. My client is currently living between a friend's house and his mother's house. His current living situation is not sustainable and so the financial matters arising from our clients' separation do need to be resolved forthwith. Please, therefore, let me have your client's detailed proposals in relation to 92 Ollerton Road by no later than 4pm on Friday 24 January 2025.

Yours sincerely



SARAH WALKER

Enc.

Our ref: BJ.SW.bs.WAL023

FAO: Ms Lucy Cornish
Third Floor, Crown House
47 Chase Side
London. N14 5PB

By email: lc@southgate.co.uk

23 January 2025

Dear Lucy

Irene Spalletti and Alexander Walker – 92 Ollerton Road

I write in response to your email dated 21 January 2025.

My client is dismayed by how long it is taking for your client to respond to his straightforward proposals in relation to our clients' jointly owned property, 92 Ollerton Road. I first wrote about this issue on 5 November 2024 and my client has been attempting to engage constructively with your client about this since last summer. There can be no possible justification for the ongoing delay. My client has not been able to live in his own property since September 2024.

His current living situation is unsustainable and there must be a route to him being able to extract his share of the equity from the property so that he can appropriately house himself.

In addition to this, for the months of November 2024 and January 2025 your client has only paid 50% of her half share of the mortgage (i.e. 25% of the monthly payment due), leaving my client to pay the rest. This is completely unacceptable and if your client does not reimburse him forthwith, my client will be seeking that the overpayments he has been forced to make on your client's behalf are deducted from your client's share of the proceeds of sale of the property.

Your client has had more than six weeks to respond to my client's letter before action dated 13 December 2024 and she has since made a further application within the Family Law Act proceedings to vary an order that was *made by consent* on 26 November 2024. In light of this, my client has no confidence at all that your client will engage constructively in the sale process, and I therefore have instructions to make an application under the Trust of Land and the Appointment of Trustees Act 1996 for the court to make an order for sale forthwith.