

IN THE CENTRAL LONDON COUNTY COURT
BEFORE HHJ BAUCHER

CASE NO. H01CL553

DATE 9TH FEBRUARY 2024

BETWEEN:

TESCO STORES LIMITED

Claimant

and

SHIMAA KHATTAWI

First Defendant

and

DARRAN TAYLOR

Second Defendant

Mr Aaron Pulford (instructed by Keoghs LLP) for the Claimant

Hearing dates: 6th February 2024

HHJ BAUCHER:

1. On 29th November 2019 the First Defendant issued proceedings against the Claimant, under claim number F47YM017. The Particulars of Claim was served with a medical report from Dr Sahir Shaikh, and total loss report from Blakes Assessors. It was the First Defendant's pleaded claim that on 11th September 2019 the Claimant's employee, Darren Taylor, (the Second Defendant), negligently drove into collision with the First Defendant's vehicle, causing loss and damage with hire charges of £11,462.16 and personal injury in excess of £10,000. Prior to the issue of proceedings, the Claimant paid the First Defendant an interim payment of £27,108.
2. On 14th October 2019 the Claimant admitted liability for the accident. On 11th November 2020 the Claimant applied to withdraw its admission of liability and to amend its defence. The Claimant served on the First Defendant an amended Defence, alleging fraud, deceit and conspiracy, on the part of the First Defendant and/or the Second Defendant. On 19th February 2021 the First Defendant discontinued her claim against the Claimant.
3. On the 20th July 2021 the Claimant served the First and Second Defendants with a Claim Form and Particulars of Claim for damages arising from the torts of deceit and conspiracy. Judgment was entered against both defendants on 27th September 2021. The outstanding issue is the assessment of damages in respect of both defendants.
4. Having set out the procedural matrix and context of the parties I shall hereinafter refer to the parties by name in this judgment.
5. Tesco Stores Limited (Tesco) identified a further 12 litigated cases which are linked to this action and other non- litigated cases. All the cases are set out in the table below:

CASE NUMBER	LITIGATED ACTIONS
1	Mazlum Bahceci v Tesco Stores Limited v Samatar Jama

2	Mohamed Namdar v Tesco Stores Limited v Manish Parmar
3	Hanaa Alghafagi v Tesco Stores Limited v Donovan Rose (1) Zhraa Alghafagi (2) Zina Alghafagi (3)
4	Shireen Morgan v Sunil Shah (1) Tesco Stores Ltd (2)
5	Tesco Stores Limited v Shimaa Khattawi (1) Darran Taylor (2)
6	Adel Motlaghi Sayahi (1) Amineh Mohavi (2) v Tesco Stores Limited v Reyhan Safi
7	Shahin Majid Mouradi v Tesco Stores Limited v Manish Parmar (1) Tawfeeq Abdulwahid Tawfeeq (2) Jumana Nusseibeh (3)
8	Grzegorz Collins v Tesco Stores Limited v Darran Taylor
9	Alexander Reed v Tesco Stores Limited v Mubarik Quaje
10	Safaa Jasim v Tesco Stores Limited v Darran Taylor
11	Hashim Al- Hashimi (1) Zainab Mohamed (2) v Tesco Stores Limited v Darran Taylor
12	Mohamed Baktiyar Abdulla v Tesco Stores Limited v Manish Parmar
13	Eda Yaman v Manish Parmar (1) Tesco Stores Limited (2) v Mustafa Zada
	PRE-LITIGATED ACTIONS

14	Bower Lally v Tesco Stores Limited (Tesco Driver – Ramy El-Fayoumi)
15	Bower Lally v Tesco Stores Limited (Tesco Driver – Owen Reason)
16	Rinas Ahmed v Tesco Stores Limited (Tesco Driver – Rakesh Lakhman)
17	Bernardo Picari (1) Guxim Symltaj v Tesco Stores Limited (Tesco Driver – Rakesh Lakhman)
18	Waleed Hayder Mohamed v Tesco Stores Limited (Tesco Driver – Samatar Jama)
19	Saman Hussain v Tesco Stores Limited (Tesco Driver – Donovan Rose)
20	Abdul Gader Allenizi (1) Richard Feghaly (2) v Tesco Stores Limited (Tesco Driver – Donovan Rose)
21	Mohamed Almaki (1) Salem Almaki (2) v Tesco Stores Limited (Tesco Driver – Donovan Rose)
22	Oktan Yagli v Tesco Stores Limited (Tesco Driver – Reyhan Safi)
23	Ahmed Khalil v Tesco Stores Limited (Tesco Driver – Samatar Jama)
24	Hayder Garousi v Tesco Stores Limited (Tesco Driver – Reyhan Safi)
25	Florin Danila v Tesco Stores Limited (Tesco Driver – Darran Taylor)

26	Ali Al- Shamary v Tesco Stores Limited (Tesco Driver – Reyhan Safi)
27	Ibrahim Nour v Tesco Stores Limited (Tesco Driver – Ajay Bangar)
28	Florin Danila V Tesco Stores Limited (Tesco driver- Manish Parmar)
29	Monika Rogaliwicz (1) Sebastian Rogaliwicz (2) v Tesco Stores Limited (Tesco Driver – Rachidy Alkilmaki)
30	Tariq Faris (1) Rawan Abbas (2) v Tesco Stores Limited (Tesco Driver – Rachidy Alkilmaki)
31	Habib Said (1) Mwenye Madasheeky (2) v Tesco Stores Limited (Tesco Driver – Samatar Jama)
32	Uwe Kirschner v Tesco Stores Limited (Tesco Driver – Mubarik Quaje)

6. Mr Pulford appeared for Tesco. There was no appearance by Mrs Khattawi or Mr Taylor. I am grateful for the diligent and careful manner in which Mr Pulford presented his case.

Dramatis Personae

7. The following individuals featured in the claim:

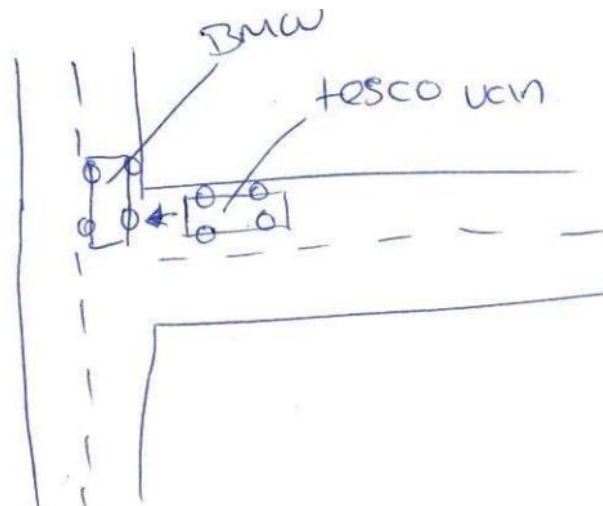
Name	Title	State of Proceedings	Role	Position
Shimaa Khattawi	First Defendant	Assessment of Damages	Defendant	Driver
Darran Taylor	Second Defendant	Assessment of Damages	Defendant	Tesco Driver

Mohamed Suleman	/	/	Witness	Tesco Driver
Krystof Palenta	/	/	Witness	Tesco Driver
Stalin Salazar	/	/	Witness	Tesco Driver
Graham Douglas	/	/	Witness	Fraud Analyst
Julie Hawkins	/	/	Witness	Tesco Fleet Legal Manager
Julie Plumb	/	/	Witness	Tesco Insurable Risk Manager
Karen Caramiello	/	/	Expert Witness	Expert Forensic Scientist Handwriting Expert

8. Tesco relied upon written evidence from Mr Suleman, Mr Palenta, Mr Salazar, Mr Douglas, Ms Hawkins, Mrs Plumb and Ms Caramiello pursuant to the directions given in this matter and the associated actions.
9. Tesco's case is that this accident was staged by Mrs Khattawi and Mr Taylor assisted by other, unknown individuals, and this accident was but one of a series of staged targeted accidents involving drivers employed at the Greenford depot to recover compensation from Tesco. Having obtained judgment against both parties the torts of deceit and unlawful means conspiracy are established. The task is to assess the extent of the damages in relation to those torts.

10. I handed down judgment in the cases of Yaman [2023] EW Misc 15 (CC), Mouradi [2023] EW Misc 16 (CC), Morgan [2023] EW Misc 17(CC), Bahceci [2023] EW Misc 18(CC) and Alghafagi [2023] EW Misc 18 (CC) on 17th November 2023. In those actions the torts of conspiracy and deceit were contested by various parties. In those judgments there was an extensive review of the evidence relied upon by Tesco. Tesco succeeded in all actions. I found that those cases and the other linked actions were part of an extensive conspiracy to defraud Tesco. In the light of my detailed findings in those cases in relation to the evidence of Mr Suleman, Mr Palenta and Mr Salazar there is no purpose to be gained from a further review of that evidence in this action.
11. Mr Taylor whilst employed by Tesco was involved in five accidents within three months on the 11th September 2019 (this accident), 2nd October 2019 (Case 25), 23rd October 2019 (Case 8), 6th November 2019 (Case10) and 21st November 2019 (Case 11).
12. I have viewed the dashcam footage which relates to this accident. The accident circumstances can only be described as bizarre. Mr Taylor reverses from a parked position on double yellow lines by traffic calming measures, increases speed to 7.9 miles an hour over a period of 3 seconds, before colliding with an unseen object. Following an all too familiar modus operandi his vehicle was also stationary from 20:04 to 20:16. I find that was because Mr Taylor was waiting for Ms Khattawi's vehicle to arrive as part of the prearranged instructions in relation to the staged crash.
13. When Mr Taylor reported the incident he described the damage as "a little dent barely visible."
14. He provided an account of the incident and produced a sketch plan:

I was parked on chaplin road. i got in the van to reverse around the bend and a bmw came from behind me and tried to squeeze through as i was reversing. there wasn't enough space and i ended up hitting her passenger side of her car.



15. When he was interviewed about his involvement in this matter and other incidents on the 21st July 2020 Mr Taylor was asked why he was reversing out of the road when the more direct route for his next visit was in the opposite direction. He said that he was just following the directions of the satellite navigation system and then moved forwards after the impact because he “panicked.”
16. In terms of expert evidence, I made findings in relation to the evidence of Ms Caramiello in the case of Mouradi at paragraphs 53 and 54 which are of direct application to the instant case.
17. The index accident also needs to be considered in the context of the Similar Fact Evidence.

Similar Fact Evidence

18. Graham Douglas provided two witness statements setting out details of the linked cases and the links relating to this claim. Those links were summarised by Mr Pulford and are attached as Appendices 1 and 2 of this judgment.
19. The modus operandi follows a distinct pattern. The accident involved a prestige vehicle, on a residential road, at night when a Tesco Greenford Depot driver was reversing from a minor road onto a major road and collides with the third-party vehicle hitting the side. The vehicle is then taken to Hano Autos for repair. Those features are all present in Cases 4, 6, 13 and 16. It is also one of twenty-one crashes where the Tesco driver reversed into a third-party vehicle. Further damage to the outer roof rail was reported. Similar damage to the outer roof rail was reported in Cases 1, 2, 6, 9, 13 and 16. The air- bag was also deployed as in Cases 1, 4 , 6, 9, 11, 28, 30 and 32. This was not a one- off crash but part of a series of crashes and a substantial web of conspiracy to defraud Tesco.
20. The relevance of the Similar Fact Evidence is also illustrated by the actions of Mr Taylor and the fact that his other four accidents generated Cases 8, 10, 11 and 25. The index accident provides links with Cases 14 and 32. The accident on the 21st November 2019 which resulted in a claim in Case 11 connects the index accident to Cases 6, 16 and 30 and to Awara Mario (the owner of Hano Autos). The Claimant in Case 25, Mr Danila, was also involved in another accident involving a Tesco vehicle; Case 28. The vehicles in Cases 25 and 28 were stored at Prime Autocare the same garage used in Cases 26 and 32.
21. Case 28 was a collision involving Tesco's driver Mr Parmar. Mr Parmar has confessed to five stage-managed crashes when he was to be paid for his actions; Cases 2, 7, 12, 13 and 28. In Cases 2 and 13 the vehicle was allegedly taken for inspection at Hano Autos at 2 Creek Road. That false inspection address has also been provided in Cases 1, 4, 6, 8, 15, 16, 19 and 29 and the instant case. Links from Hano Autos extend to Cases 11,12, 18 and 29.
22. In her Claim Form Mrs Khattawi provided her residential address as 183 Conway Crescent which is very close to the address provided by Mr Danila of

177 Conway Crescent (Claimant in Cases 25 and 28) to the DVLA in Case 26. Further 226 Conway Crescent is an address linked to Anatoly Megush who is a friend of Monika Rogalewicz. (Claimant in Case 29). Monika Rogalewicz stored her vehicle at 226 Conway Crescent.

23. Mrs Khattawi's husband is a Sales Manager at JRJ Limited. This is same garage where Bower Lally, the Claimant in Cases 14 and 15 (and intimated Claim 33) stored his vehicle. JRJ Limited operates its business from 14-16 Wadsworth Road. That address is linked to Noel Khuashaba who bought the vehicle in Case 14. He is a friend of the Claimant in Case 29. It is also linked to Biar Hawaizi who bought the vehicle in Case 1. The same address was used for the repair invoice in Case 23. 5 Wadsworth Road is a trading address for W3 Car Repairs operated by Mussa Issa. The cars in Cases 27 and 30 were stored at that address. W3 Car Repairs also purchased the vehicle in Case 6. Ms Khattawi's vehicle was also MOT assessed on the Abbey Industrial estate.
24. I have no doubt given the nature of the accident and the multiplicity of links established by the Similar Fact Evidence this accident was one of a series of stage-managed accidents and Mrs Khattawi and Mr Taylor were a party to a substantial conspiracy. Mr Pulford submitted that Mrs Khattawi was central to the conspiracy. I consider that is clearly demonstrated by the links to Mrs Khattawi's residential address and the operation of her husband's business. Given Mrs Khattawi's inter-relationship with a number of the key players and garages that repeatedly feature in these claims I am satisfied she was at the heart and centre of this conspiracy.

Damages

25. Tesco paid Mrs Khattawi £27,108 as an interim payment. Tesco also spent £232.73 (net of VAT) repairing their own vehicle. I am satisfied Tesco is entitled to recover those sums. I am also satisfied, from the statement of Mrs Plumb, that Tesco is entitled to recover the cost of the internal work of the investigation in the sum of £1,677.60 from each party.

26. Tesco also seeks an award of exemplary damages. Mr Pulford relying on Axa Insurance Plc v 1) Financial Claims Solutions 2) Mohammed Aurangzaib 3) Hakim Mohammed Abdul [2018] EWCA Civ 1330 asked me to make an award of £17,000 against each party in his Skeleton argument. However, in his oral submissions Mr Pulford emphasised the key control played by Mrs Khattawi and asked me to reflect her role in any award.
27. Exemplary damages are an exception to normal tortious principles. Their award and a distillation of the principles and the law in cases such as this case is set out at paragraphs 25 – 35 of that judgment which I gratefully adopt. At paragraph 35 LJ Flaux said:
- “As I have said, this case is a paradigm one for the award of exemplary damages. As to the amount of such damages, as was stated by Arden LJ in Ramzan v Brookwide at [82], the sum must be principled and proportionate. As in that case, given the need to deter and punish the outrageous conduct and abusive behaviour in the present context, the principled basis is to make a punitive award. The respondents have chosen not to place before the court any evidence as to their means so that it is not appropriate to limit the amount of any award by reference to ability or inability to pay Given the seriousness of the conduct of the respondents and the need to deter them and others from engaging in this form of "cash for crash" fraud, which has become far too prevalent and which adversely affects all those in society who are policyholders who face increased insurance premiums, I consider that the appropriate award of exemplary damages is that each of the first, second and third respondents should be liable to pay £20,000.”
28. In that case one of the Respondents acted as if it were a firm of solicitors authorised to conduct litigation, which it was not, thereby committing a criminal offence under s14 of the Legal Services Act 2007. The Court of Appeal described the fraud itself as “sophisticated, well-planned and brazen” which “involved serious abuse of the process of the court.” It involved fictitious credit hire documents and medical reports in relation to five claims in respect of two separate accidents with two Axa insured drivers. Axa refused indemnity in each case. There are therefore some similarities but also differences with the instant case. The Court of Appeal was primarily concerned with the principle of making such an award but made an award of exemplary damages of £20,000 in respect of each of the three Respondents. Whilst Mr Pulford said the case is a “useful high watermark” I do not consider the decision should be taken as

setting any particular benchmark. In every case it is for the judge to assess the extent of the outrageous conduct. However, any decision as to the amount of damages must be principled and proportionate as per Arden LJ in Ramzan v Brookwide Ltd [2011] EWCA Civ 985 at paragraph 82.

29. In this case Mrs Khattawi submitted a Claim Notification Form, Claim Form, Particulars of Claim all supported with a statement of truth. She also bolstered that claim with a fictitious claim for personal injury. In that medical report Mrs Khattawi said she was parking her car when the accident happened. Tesco was entitled to rely on those representations, all of which were untrue. On receipt of the initial claim based on dishonest representations Tesco advanced an interim payment of £27,108. However, the accident was a sham. Mr Taylor waited for Mrs Khattawi to arrive and then deliberately reversed his vehicle into her car. I have no doubt he did so because he had been paid “cash for crash” as is clearly set out in the evidence of Mr Suleman, Mr Palenta and Mr Salazar. I also find that Mrs Khattawi paid for this “service” in the same manner as witnessed by Ms Nusseibeh (see findings in Mouradi). Thus, Mrs Khattawi lied in court documents therefore damaging the integrity of the justice system. She did so to recover substantial compensation from Tesco and to enjoy the benefits of the use of a prestige hire vehicle incurring credit charges of £11,462.16. Further when she appreciated the conspiracy had been unearthed, she sought to abandon her claim in a vain attempt to avoid her actions being scrutinised in court proceedings. Tesco was therefore put to further expense of issuing proceedings in its own name.
30. Mrs Khattawi, and others unknown, also induced Mr Taylor, a trusted employee, in a position of responsibility to breach that trust. Mr Taylor motivated by avarice committed a gross breach of trust. He deliberately reversed his vehicle into Mrs Khattawi’s car. He then lied about the initial accident and the extent of the damage. He further lied when interviewed when he blamed his actions on his satellite navigation system (the same excuse he later gave in Case 8). Blaming the satellite navigation was a feature in the Bahceci and Yaman cases. His seeming success in relation to his lies ultimately embolden Mr Taylor to “crash for cash” a further four times. Mr Taylor’s lies coupled with those of

Mrs Khattawi caused immediate loss to Tesco through the payment of an interim sum. Mr Taylor's actions also damaged Tesco's relations with other employees, as they too fell under suspicion. Ms Hawkins also advised that, partly due to this claim, and others, Tesco updated the CCTV cameras on their entire fleet of vehicles at substantial cost. This is another aggravating factor.

31. However, what distinguishes this case and the other linked actions from other matters which have proceeded to the courts for exemplary damages award is the wholesale nature of the fraud and the extent of the conspiracy which is set out in the Similar Fact Evidence. This is not a case of two accidents and five passengers as in Axa. This is a fraud and conspiracy of unprecedented scale which engaged this court in five weeks of continuous Tesco litigation involving the consideration and reference to 31 related matters embodied in 60,000 documents. After the conclusion of those five trials the court has been required to consider the Assessment of Damages claims in eight further matters where claims were pursued. The sheer scale of the fraud must be reflected in the amount of exemplary damages awarded.
32. Mrs Khattawi and Mr Taylor have not furnished this court with any information as to their income and assets. I have taken into account Mr Pulford's representations. I am satisfied that given the extent of the outrageous conduct and the size of this conspiracy as set out in the Similar Fact Evidence Mrs Khattawi's position elevates the extent of her egregious conduct. She will therefore be ordered to pay £20,000 exemplary damages. I am satisfied Mr Taylor's role was such that the award of exemplary damages in his case should be £18,000.
33. There will be judgment for Tesco accordingly. I shall ask Counsel to calculate the appropriate interest and to prepare the final order.
34. Finally, this case, and others, would not have been brought to light without the diligence and forensic work undertaken by those instructed on behalf of Tesco. It is to their credit that they have worked tirelessly to ensure all the evidence is put before the court in a comprehensive objective manner. Further they have complied with all my directions in relation to that presentation thereby ensuring

all the parties have had every opportunity to consider it and respond accordingly. Their endeavours have also enabled me to release the judgment at the earliest opportunity. I am grateful for their assistance.

Appendix 1

DARRAN TAYLOR

1. Darran Taylor (Second Defendant) while employed by Tesco has been involved in 5 collisions in the course of 3 months, as follows:

- Khattawi (Case 5 – Index Matter) – 11.09.2019.
- Gregorz Collins (Case 8) – 23/10/2019.
- Jasim & Khalil (Case 10) – 06/11/2019.
- Florin Danila (Case 25) – 02/10/2019.
- Al Hashimi & Mohammed (Case 11) – 21/11/2019.

PRESENT CASE

- 1.1. On 11.09.2019 Darran Taylor (the Second Defendant) reversed into collision with Shima Khattawi at 8.16pm.
- 1.2. In the recording during which the Second Defendant reported the facts of the collision and the damage to the other vehicle in the collision he stated "...I was reversing slowly..." (@ 19.01). In respect of the damage he stated "it's just a little dent it's barely visible..." (@ 19.56) and further that the damage to the other vehicle was that it was "dented and scratched."

GREGORZ COLLINS

- 1.3. On 23/10/2019 Darran Taylor reversed into collision with Gregorz Collins (Case 8). Grzegorz Collins has the following connections to this and other cases within the Linked Action:

- 1.3.1. Grzegorz Collins brought a claim for personal injury, vehicle damage and credit hire charges.
- 1.3.2. Gregorz Collins is a director of the following companies:
- PWC London Ltd with a registered address of 16a Badminton Close – appointed 14/08/2019.
 - Collins Brothers Group Limited with a registered address of 16a Badminton Close – appointed 14/08/2019. This company operates as ‘Collins Brothers Customs.’
- 1.3.3. A Facebook profile was identified for Collins Brothers Customs which linked to Prestige Wrap & Customs.
- 1.3.4. The Instagram account for Grzegorz Collins confirms on his biography he is the owner of Prestige Wrap.
- 1.3.5. A mobile number of ‘07821609694’ was provided by Gregorz Collins. A Google search on this number was carried out and the result confirmed the number is for Prestige Wrap, Unit 5 Belvue Business Centre, London.
- 1.3.6. Prestige Wrap is in close proximity to the following businesses:
- Fast Ten – directed by Noel Khuashaba.
 - First Fast Repairs – directed by Noel Khuashaba.
 - B1AR X Logistics Ltd – directed by Biar Hawaizi.
 - B1 Capital Cars Ltd – directed by Biar Hawaizi.
 - Carter Motors Ltd – directed by Bower Lally.
 - BL Motors Ltd – directed by Bower Lally.
 - HR Smith Ltd – directed by Bower Lally.
 - Exclusive Car Repairs Ltd – directed by Mousa Issa.
 - Larini Car Sales Ltd – directed by Mousa Issa.
 - Wish Lounge – directed by Alex Reed (Claimant in Case 9) & Ghaith Al-Waili.

- 1.3.7. Prestige Wrap previously operated from Unit 4/8 Logic House, Belvue Road, Northolt, UB5 5QJ prior to moving to the Belvue Business Centre (adjacent road).
- 1.3.8. Logic House, Belvue Road, Northolt, UB5 5QJ is the address given for Wish Lounge.
 - a
 - 1.3.8.1. Alex Reed (the Claimant in Case 9) was a Director of Wish Lounge.
 - 1.3.8.2. Ghaith Al Waili is the current Director of Wish Lounge.
 - 1.3.8.3. Ghaith Al-Waili is friends on Facebook with Samatar Jama (Tesco driver in Case 1).
- 1.3.9. Blake Assessors is the engineering company which inspected the Gregorz Collin's vehicle in Case 8. Blake Assessors is also the company which has provided expert engineer's reports in 15 other cases throughout the Linked Action.
- 1.3.10. Gregorz Collins is Facebook friends with Noel Khuashaba.

SAFAA JASIM AND FIRAS KHALIL

- 1.4. On 06/11/2019 Darran Taylor reversed into collision with Safaa Jasim and Firas Khalil (Case 10). Safaa Jasim has the following connections to this and other cases within the Linked Action:
 - 1.4.1. Safaa Jasim brought a claim for personal injury, vehicle damage and credit hire. Firas Khalil brought a claim for personal injury and physiotherapy charges.

- 1.4.2. Darran Taylor was scheduled to make a delivery to 149 Wiltshire Close, Draycott Avenue, London SW3 2NY. At 18:10 Darran Taylor drove a Tesco van to Rosemoor Street, Chelsea, London SW3 2GB, immediately adjacent to 149 Wiltshire Close.
- 1.4.3. Darran Taylor in the Tesco van remained on Rosemore Street for 37 minutes as shown by the GPS vehicle tracking log.
- 1.4.4. Tesco was first notified of the collision with Safaa Jasim's vehicle on 08 November 2019 when Accident Exchange, a credit hire company, notified Tesco of the collision in writing. As a result of the late notification of the alleged collision Tesco was prevented from retrieving the dashboard camera's footage which was automatically erased.
- 1.4.5. Darran Taylor reported that he reversed the Tesco Van as there was a fire engine blocking his path to proceed forwards, forcing him to reverse and visibility was poor due to the flashing lights of the fire engine, when he collided with Safaa Jasim's vehicle.
- 1.4.6. Following a request for information, London Fire Brigade confirmed that no fire engine was engaged at that location at the date and time of the incident.

FLORIN DANILA

- 1.5. On 02/10/2019 Darran Taylor drove into collision with Florin Danila in Case 25. Florin Danila has the following connections to this and other cases within the Linked Action:
 - 1.5.1. The Claimant in Case 25, at the scene of the collision, gave his name as Daniel Florin Costel. The address provided was Flat 14 Leemark House, Granville Road, Littlehampton BN17 5JS and the date of birth was provided as 16/02/1980 on the credit hire agreement form.

- 1.5.2. Auto Logistic Solutions acted on behalf of the Claimant in Case 25 provided a form of authority. Within that form the Claimant gave the name Florin Danila rather than Daniel Florin Costel which was the name given at the scene. The address provided was Flat 14 Leemark House, Granville Road, Littlehampton BN17 5JS.
- 1.5.3. Florin Danila in Case 25 brought a claim for vehicle damage, recovery and storage charges and credit hire charges.
- 1.5.4. In Case 28 the Claimant was Florin Danila, who provided the address Flat 14 Leemark House, Granville Road, Littlehampton BN17 5JS and the date of birth (16/02/1980).
- 1.5.5. Florin Danila in Case 28 brought a claim for vehicle damage, recovery and storage charges and credit hire charges.
- 1.5.6. Evans Harding Engineers is the company which inspected the vehicles in both Cases 25 & 28.
- 1.5.6.1. This same company feature as the engineer for the Claimants in Cases 7, 11, 12, 18, and 32.
- 1.5.7. Prime Autocare is the same garage at which the storage, recovery and repair took place in both Florin Danila cases, Case 25 & Case 28.
- 1.5.7.1. Prime Autocare is the storage, recovery and repair garage used in:
- Case 25 Danila.
 - Case 26 Al Shamary.
 - Case 28 Danila.
 - Case 32 Uwe Kirschner.

- 1.5.7.2. The registered company address for Prime Autocare is 203 The Vale, London, W3 7QS.
- 1.5.7.3. Uwe Kirschner, the Claimant in Case 32 is the director of Car Care Motors Limited (now Muth'Hilah Limited) which shares the registered address of 203-205 The Vale, London, W3 7QS.
- 1.5.7.4. Uwe Kirschner is also the director of Jag & Land UK Parts Limited which has a previous registered address of 14-16 Wadsworth Road, Perivale, UB6 7LD. This was the address given on the 'storage invoice' provided by JRJ Limited.
- 1.5.7.5. JRJ Limited features in:
- Case 14 (Bower Lally) as the recovery and storage garage.
 - Case 5 (Khattawi) as the Claimant's husband, Faisal Dawood, is confirmed to be a Sales Manager at JRJ Ltd.
- 1.5.7.6. Uwe Kirschner was involved in a road traffic accident on 09/09/2020. The 'Third Party 3' is detailed as 'Florine Danila.'
- 1.5.8. In his first Tesco collision (Case 25) Florin Danila drove into collision with Darran Taylor. In his second collision (Case 28), Florin Danila collided with Manish Parmar the Tesco driver.
- 1.5.8.1. Manish Parmar has confessed that while driving for Tesco he staged the following collisions in exchange for the payment of money:

- i. Namdar (Case 2) in which the Claimant's Vehicle was allegedly stored at Hano Autos, 2 Creek Road, London, SE8 3EL.
- ii. Mouradi (Case 7) in which the Claimant's Vehicle was allegedly stored at Herdi Bikes, 35 Youngs Court, Charlotte Despard Avenue, Battersea, SW11 5JD.
- iii. Abdulla (Case 12) in which the Claimant's Vehicle was allegedly stored at ROJ Motors, 20b Abbey Industrial Estate, Mount Pleasant, Wembley, HA0 1RE.
- iv. Yaman (Case 13) in which the Claimant's Vehicle was allegedly stored at Hano Autos, 2 Creek Road, London, SE8 3EL.
- v. Danila (Case 28) in which the Claimant's Vehicle was allegedly stored at Prime Autocare at 189D Brent Crescent, London, NW10 7XR.

1.5.9. Florin Danila has also been in a road traffic accident on 23/10/2020 with Ali Al Shamary. Florin Danila's vehicle was inspected at 189d Brent Crescent (the address detailed on Prime Autocare's invoices).

HASHIM AL HASHIMI AND ZAINAB MOHAMMED

1.6. On 21/11/2019 Darran Taylor drove into collision with Hashim Al Hashimi (Case 11). Hashim Al Hashimi brought a claim for personal injury, vehicle damage, credit hire and storage and recovery charges. Zainab Mohammed, the Second Claimant in Case 11 brought a claim for Personal injury.

1.6.1. Hashim Al Hashimi is the director of Cars77 Limited a garage involved in the sale of used cars.

1.6.2. Hashim Al Hashimi's Facebook account is 'friends' with an account of Omar Al Hashimi. The account of Omar Al Hashimi comments and 'likes' images on the Facebook account of Nadeem Jawaheri.

1.6.3. Nadeem Jawaheri is also 'friends' via Facebook with the following people:

- Adel Motlaghi Sayahi Claimant in Case 6.
- Rinas Ahmed (Facebook profile Rinas Osman), Claimant in Case 16.
- Tariq Faris, Claimant in Case 30.
- Biar Hawaizi.
- Awara Mario.

SHIMAA KHATTAWI

THE FIRST DEFENDANT'S ADDRESS

2. The First Defendant (Shimaa Khattawi) in her Claim Form and CNF provided her address as 177 Conway Crescent, Perivale, Greenford, UB6 8JE.

2.1. 177 Conway Crescent, Perivale, Greenford, UB6 8JE is in close proximity to the following addresses/people:

- 183 Conway Crescent – address provided by Florin Danila to DVLA for vehicle BT15MMV involved in the accident in Case 26.
- 226 Conway Crescent – Anatoly Megush had a low residency score at this address. Anatoly Megush is a friend of Monika Rogalewicz (the Claimants in Case 29) and at whose house Monika Rogalewicz stored her vehicle.

THE FIRST DEFENDANT'S HUSBAND

3. The First Defendant's husband, Mr Faisal Dawood is a Sales Manager at JRJ Limited.

3.1. JRJ Limited is the company at which Bower Lally, the Claimant in case 14, stored his vehicle. In the invoice for that storage JRJ Limited provided the address of 14-16 Wadsworth Road, Perivale, UB6 7LD.

3.1.1. 14-16 Wadsworth Road, Perivale, UB6 7LD is the previous registered address of Jag & Land UK Parts Limited. Uwe Kirschner is the director of this company.

THE FIRST DEFENDANT'S VEHICLE

4. The First Defendant's Vehicle, GK62 VTN was subject to a finance agreement with BMW Finance.

4.1. On 20/10/2019 the First Defendant settled the outstanding balance on the vehicle, in the sum of £31,931.28.

5. The DVSA provided a full MOT history, contained within those records is the following:

5.1. On 18/09/2018 the First Defendant's Vehicle was MOT assessed at 'Autobike MOT Centre Limited at Abbey Industrial Estate, Mount Pleasant, Wembley, HA0 1UD.

5.2. On 10/09/2019 the First Defendant's Vehicle was MOT assessed at UK Hybrid Automotive Limited at 42B Bideford Avenue, Perivale, Greenford, UB6 7PP.

5.3. On 03/10/2020 the First Defendant's Vehicle was MOT assessed at Venus Motors Limited, at 59 Bideford Avenue, Perivale, Greenford, UB6 7PP.

6. Blake Assessors is the engineering company which inspected the Claimant's vehicle in this claim.

6.1. Blake Assessors feature as the Claimant engineer on 15 other cases in The Linked Action:

- i. Case 1 Bahceci.
- ii. Case 2 Namdar.

- iii. Case 4 Morgan.
- iv. Case 5 Khattawi (index matter).
- v. Case 6 Sayahi.
- vi. Case 8 Collins.
- vii. Case 9 Reed.
- viii. Case 10 Jasim.
- ix. Case 13 Yaman.
- x. Case 15 Lally.
- xi. Case 16 Ahmed.
- xii. Case 19 Hussain.
- xiii. Case 27 Nour.
- xiv. Case 29 Rogalewicz
- xv. Case 30 Faris.
- xvi. Case 31 Said.

6.2. In this case Blake Assessors say that they inspected the Claimant's vehicle at Hano Autos at 2 Creek Road, SE8 3EL. The images taken by the engineer appear to show that the vehicle was inspected at the end of Belvue Road, Northolt, UB5. This same issue occurs on the following case:

- Case 2 Namdar, Fast Ten, Belvue Road.
- Case 4 Morgan, Fast Ten.
- Case 13 Yaman, Fast Ten.
- Case 16 Ahmed, Fast Ten.
- Case 27 Nour, Fast Ten.

PREVIOUS COLLISION

7. RSA provided a Data Protection Action response to a request, contained within that is the following:

7.1. The First Defendant was in a collision on 20/10/2014, following which she entered into a credit hire agreement with JRJ Limited of 14-16 Wadsworth Road, Perivale, UB6 7LD.

MOUSA ISSA W3 CAR REPAIRS

- 7.2. Sabichi House, 5 Wadsworth Road, Perivale, Greenford, UB6 7JD is the registered address of W3 Car Repairs Limited, a company directed by Mousa Mohamad Issa.
- 7.2.1. W3 Car Repairs Limited was formerly registered at 7 Essex Park Mews W3 7RJ.
- 7.2.2. W3 Car Repairs Limited was the garage in:
- i. Faris (Case 30) where the Claimant's vehicle was reported to be stored at W3 Car Repairs Limited 7B Essex Park Mews W3 7RJ as was confirmed in the Claimant's engineers (Blake Assessors) report.
 - ii. Nour (Case 27) where the Claimant's vehicle was reported to be stored at W3 Car Repairs Limited 7B Essex Park Mews W3 7RJ as was confirmed in the Claimant's engineers (Blakes Assessors) report.
- 7.2.3. W3 Car Repairs has an Instagram account was located under the @w3carrepairs with an account name W3 Car Repairs Ltd. The account is 'followed' an account under the name @berkeleymotorslimited with an account name of 'Berkeley Motors Limited'. This is a company run by Biar Hawaizi.
- 7.3. Mousa Mohamad Issa is the director of Larini Car Sales Ltd.
- 7.3.1. On 22/11/2021 the vehicle LM18XVU owned by Sayahi, Claimant in Case 6 was acquired by W3 Car Repairs Limited before being transferred to Larini Car Sales Ltd of Unit 4/8 Logic House, Belvue Road, Northolt, UB5 5QJ.
- 7.3.2. Mousa Mohamad Issa therefore purchased the Claimant in Case 6's vehicle following the collision with a Tesco Driver.

AWARA MARIO/ HANO AUTOS

- 7.4. Awara Mario has a Facebook account in which he is friends with Nadim Jawaheri and on which he ‘loved’ a post made by Nadim Jawaheri (ندیم جواهری).
- 7.5. Awara Mario in his LinkedIn profile reports he is the director of Hano Autos Limited.
- 7.6. Hano Autos 2 Creek Road, Deptford, SE8 3E is the alleged inspection locations provided by Blake Assessors in the following:
- i. Case 1 Mazlum Bahceci.
 - ii. Case 2 Mohammed Namdar.
 - iii. Case 4 Shireen Morgan.
 - iv. Case 5 Shimaa Khattawi.
 - v. Case 6 Adel Motlaghi Sayahi.
 - vi. Case 13 Eda Yaman.
 - vii. Case 15 Bower Lally.
 - viii. Case 16 Rinas Ahmed.
 - ix. Case 19 Saman Hussain.
 - x. Case 29 Monika Rogalewicz.
- 7.6.1. Hano Autos Ltd registered address is 7 Westmoreland House, Cumberland Park, Scrubs Lane, London, NW10 6RE.
- 7.6.2. There are two further companies bearing the name ‘Hano’:
- 7.6.2.1. Hano Autos UK Limited’s registered address is also 7 Westmoreland House, Cumberland Park, Scrubs Lane, London, NW10 6RE and is directed by Niaz Saleh who filed a CH01 with Companies House

having changed his name from Awara Saleh to Niaz Saleh on 19.02.2015.

7.6.2.2. Hano UK Limited's registered address is also 7 Westmoreland House, Cumberland Park, Scrubs Lane, London, NW10 6RE.

7.6.3. The three apparently distinct companies; Hano Autos UK Limited, Hano UK Limited and Hano Autos Ltd all share directors in Niaz/Awara Saleh/Awara Mario and Argosh Rasheed Nori and share the following addresses:

7.6.3.1. Unit 4-6 Abbey Industrial Estate, Mount Pleasant, Wembley, Middlesex, HA0 1QT.

7.6.3.1.1. This address was identified via a DPA response from AXA Insurance dated 18/05/2021 received in Case 6 (Sayahi) in respect of a road traffic accident which occurred on 23/02/2020. The engineers report (prepared by Blake Assessors) indicates that Sayahi's vehicle was inspected at Hano Autos with a given address of Unit 4-6 Abbey Industrial Estate, Mount Pleasant, Wembley, Middlesex, HA0 1QT.

7.6.3.2. 7 Westmoreland House, Cumberland Park, Scrubs Lane, London, NW10 6RE the current registered address (as set out above).

- 7.6.3.3. 2 Creek Road, Deptford, London SE8 3EL: in Case 15 Bower Lally provided an invoice from Hano Autos UK Limited for vehicle repairs showing the address 2 Creek Road, Deptford, London SE8 3EL. The Blake Assessors report alleged the Claimant's Vehicle was stored at Carter Motors, Unit 7 Sabre House, Belvue Road, London, UB5 5QJ.
- 7.6.4. Hano Autos therefore appears to operate from 4 addresses:
- i. 7 Westmoreland House, Cumberland Park, Scrubs Lane, London, NW10 6RE.
 - ii. Unit 4-6 Abbey Industrial Estate, Mount Pleasant, Wembley, Middlesex, HA0 1QT.
 - iii. 2 Creek Road, Deptford, London SE8 3EL.
 - iv. Unit 7 Sabre House, Belvue Road, London, UB5 5QJ.
- 7.6.5. 7 Westmoreland House, Cumberland Park, Scrubs Lane, London, NW10 6RE (the address for Hano Autos UK Limited, Hano Autos Ltd and Hano UK Limited) is the former registered address of P&A Motors UK Limited which is directed by Arkan Ibrahim:
- 7.6.5.1. Arkan Ibrahim is the registered director of Alaska Motors t/a Lola Trading Limited with the former registered address of Unit 9a Abbey Industrial Estate Mount Pleasant Wembley HA0 1NR.
- 7.6.5.2. The Claimant's Vehicle in Case 21 was recovered, inspected and repaired by a business trading as Alaska Motors under the registered company name 'Lola Trading Limited', at address Unit 9a Abbey Industrial Estate Mount Pleasant Wembley HA0 1NR.

ROJ MOTORS

7.7. Unit 20b Abbey Industrial Estate, Mount Pleasant, Wembley, HA0 1NR is the address at which ROJ Motors is reported to operate from.

7.7.1. ROJ Motors is alleged to have provided storage and repair services in the following cases:

- i. Case 11 Hashimi Al Hashim.
- ii. Case 12 Bakiyar Abdulla and
- iii. Case 18 Waleed Hayder Mohamed.

7.7.2. ROJ Motors is not a limited company, therefore there is no information available on the Companies House database.

7.7.3. Online searches for ROJ Motors have produced no results whatsoever.

7.7.4. An invoice for storage and recovery charges from ROJ Motors has been provided in Case 11, Case 12 and Case 18 on which the contact number “02089031259” was provided.

7.7.4.1. A Google search was carried out for the telephone number ‘02089031259’ which shows the owner of the telephone number is a business under the name of ‘JJ Motor Body Repairs’ located at 23a Abbey Industrial Estate, Mount Pleasant, Alperton, Wembley, HA0 1RA.

7.7.5. Further matches also confirm an address of Unit 17 Abbey Industrial Estate Mount Pleasant, Wembley of JJ Motor Body Repairs.

- 7.8. A further Google search was carried out for ‘20b Abbey Industrial Estate’ and a copy of the results are available.
- 7.9. A Google images show the address ‘20b’ on the Abbey Industrial Estate.
- 7.9.1. There is no signage to confirm that Roj Motors operates from this location.
- 7.10. Unit 9B Abbey Industrial Estate, Mount Pleasant, Wembley, HA0 1NR is the address given for the storage and inspection location for the Claimant’s vehicle in Case 3 and Case 20.
- 7.11. Unit 9a Abbey Industrial Estate Mount Pleasant Wembley HA0 1NR is the same address as Dimaa Motors Limited which was the garage used in Case 3: invoice and a recovery invoice.
- 7.11.1. Dimaa Motors Limited is directed by Zhraa Alghafagi, one of the three claimants in Case 3 and is also the garage used by the First Claimant in Case 3.

150 COLES GREEN ROAD, NW2 7JL

- 7.12. Unit 9a Abbey Industrial Estate Mount Pleasant Wembley HA0 1NR is the same address as HS Motors Limited which is the garage used by the Claimant in Case 20.
- 7.12.1. “HS Motorss Limited” is directed by Hayder Sharif (D.O.B. June 1989) and has a registered address of Unit 9b, Abbey Industrial Estate, Mount Pleasant, Wembley, HA0 1NR.
- 7.12.2. Hayder Sharif (D.O.B. June 1989) was also the director of Abbey Auto Sales Limited (09307575) at the registered address of Suite 21a Unimix House, Abbey Road, London, United Kingdom, NW10 7TR.

7.12.3. Haider Sharif (D.O.B. June 1989) was the director of Inter Car Solutions Limited. The registered address of Inter Car Solutions is 150 Coles Green Road, NW2 7JL.

7.12.3.1. 150 Coles Green Road, NW2 7JL, the address of Haider Sharif's company, is also the registered company address for Cars77 Limited, the director of which is Hashim Al Hashim, (Claimant in case 11).

7.12.4. Haider Sharif provides his correspondence address as Unit 9b Abbey Industrial Estate Mount Pleasant Wembley HA0 1NR.

NOEL KHUASHABA

7.13. Unit 7 Sabre House, Belvue Road, London, UB5 5QJ is one of the addresses used by Hano Autos which is also used by Noel Khuashaba.

7.14. Noel Khuashaba was previously or is still the director of the following companies:

aa. Club 10 Limited (Company Number 14001416).

bb. First Fast Repairs Limited (Company Number 11311526) is registered at Unit 4 Sabre House, 1 Belvue Road, Northolt, UB5 5QJ.

cc. Fast Ten Limited (Company Number 09788865) is registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD.

dd. Fast Performance Limited (Company Number 09410193) is registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD.

ee. B H Car Repairs Limited (Company Number 09128288) is registered at 44 Bideford Avenue, UB6 7PP.

ff. Expert Rock Limited (Company Number 09670400).

7.14.1. Fast Ten Limited carried out repairs and provided the invoice in Case 29. The contact number on that invoice “07551511515” is registered to Mousa Mohamad Issa.

7.15. Noel Khuashaba has a Facebook account under the name NoelYNoel as explained at paragraph 67 of the statement of Graham Douglas.

7.15.1. Noel Khuashaba is friends on Facebook with:

aa. Sebastian Rogaliwicz (the Claimant in Case 29).

bb. Biar Hawaizi.

cc. Greg Daniel Collins (the Facebook name for Gregorz Collins – the Claimant in Case 8).

dd. Ghaith Al-waili and Ghaith GhattMan Al Waili: and

a. Ghaith Al-Waili is friends on Facebook with Samatar Jama (Tesco driver in Case 1).

7.16. Noel Khuashaba and Ghaith Al-Waili were both directors of Expert Rock Limited.

GHAITH AL WAILI

7.17. As well as directing both directing Expert Rock Limited, Noel Khuashaba and Ghaith Al-Waili are also ‘friends’ on Facebook.

7.17.1. Ghaith Al-Waili is friends on Facebook with Samatar Jama (Tesco driver in Case 1.

7.18. Ghaith Al Waili and Alexander Reed, the Claimant in Case 9, were both Directors of Wish Lounge.

7.19. Wish Lounge Limited's Instagram profile is friends with the following:

- i. Biar Hawaizi.
- ii. Noely.88 an Instagram account linked to Noel Khuashaba
- iii. Berkeleymotorslimited.
- iv. Vip_supercars.
- v. Itzmazzz (page 28) – This appears to be the same Instagram account for Mazlum Bahceci but he has amended the profile name from @mazlumbahceci to @itzmazzz.

7.20. Ghaith Al Waili is the project manager at Petrichor Designs Limited.

7.20.1. The Instagram account for Petrichor Designs Limited is @p.designsltd It can also be seen that the Facebook profile, <https://www.facebook.com/ghaith.alwaili.1> that he is a project manager for Petrichor Designs Ltd.

7.20.2. The followers of Petrichor Designs Limited can be seen. The account is followed by the following Instagram accounts: -

- i. Itzmazzz – account of Mazlum Bahceci. It can plainly be seen that all of the images, including the profile image of the account are of Mazlum Bahceci as can be cross referenced with those images of Mazlum Bahceci.
- ii. Mrswisss page 16 the account of Samatar Jama.

iii. Mr_b1arx – the account of Biar Hawaizi.

- 7.21. The address for Wish Lounge, Unit 1 Belvue Business Centre Belvue Road, Northolt, UB5 5QJ is the address of B1 Capital Cars Limited which is controlled by Biar Hiawazi.
- 7.22. A search on Google for ‘Wish Lounge’ identified that the business appears to have moved premises to the address of Johnson House, Johnsons Way, London, NW10 7PF.

JOHNSON HOUSE / MARTAZA AL HAMADI

- 7.23. Perivale Motor Group’s registered address is PMG House, Johnsons Way, London, NW10 7PF. Martaza Al Hamadi provided his correspondence address as 44 Bideford Avenue, Perivale, Greenford, UB6 7PP.
- 7.24. Martaza Al Hamadi was Director of Logistic Solutions 613 Ltd.
- 7.24.1. Martaza Al Hamadi is also listed as the Director of Perivale Motor Group.
- 7.24.2. 44 Bideford Avenue, Perivale, Greenford, UB6 7PP is the address for the following companies controlled by Noel Khuashaba, Biar Hawaizi, and Bower Lally as follows:
- i. B H Car Repairs Ltd.
 - ii. A1 Performance Solutions Ltd.
 - iii. B & L Bodywork Ltd.
- 7.24.3. Johnson House, Johnsons Way, London, NW10 7PF is the address at which recovery, storage or MOT Inspections took on the following cases: -
- i. Case 7 Shahin Mouradi.
 - ii. Case 10 Safaa Jasim.

- iii. Case 23 - Caljam Engineers inspected the Claimants' Vehicle in Case 23 and advised that the vehicle was inspected at Johnsons Way, London, NW10 7PF.

7.24.3.1. In Case 23 Logistic Solutions 613 Limited provided invoices with the address of "Unit 3 14-16 Wadsworth Road, Perivale, Greenford, UB6 7JD". This is not the registered address of Logistic Solutions 613 Limited.

7.24.3.2. Unit 3 14-16 Wadsworth Road, Perivale, Greenford, UB6 7JD is however a formerly registered addresses of "BH Cars Limited" a business directed by Biar Hawaizi.

BIAR HAWAIZI

7.25. Biar Hawaizi is or has been the director of the following companies:

- aa. Eagle Coachcrafts 007 Limited (Company Number 06597739) previously had a registered address of 42 Bideford Avenue, UB6 7PP.
- bb. Antonella Wine Bars Limited (Company Number 07002654).
- cc. A1 Performance Solutions Ltd (Company Number 07002654) previously had a registered address of 44 Bideford Avenue, UB6 7PP.
- dd. BH Cars Limited (Company Number 09127857) is now registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD.
- ee. BH Car Repairs Limited (Company Number 09128288) previously had a registered address of 44 Bideford Avenue, UB6 7PP.

- ff. Fast Performance Limited (Company Number 09410193) is registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD.

- gg. B1 Capital Cars Limited (Company Number 09739859) is now registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD.

- hh. Auto Empire Limited (Company Number 09961022) is registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD.

- ii. Berkeley Motors Limited (Company Number 10472101) is now registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD.

- jj. B1AR X Logistics Limited (Company Number 11309385) is registered at Unit 4 Sabre House, 1 Belvue Road, Northolt, UB5 5QJ.

7.25.1. B H Car Repairs Limited and Fast Ten Performance Limited were both directed by Biar Hawaizi and Noel Khuashaba.

7.25.2. B1 Capital Cars Limited (run by Biar Hawaizi) had a policy of insurance on which Vehicle registration KT15 USG was insured.

7.25.3. Alexander Reed (claimant in Case 9) purchased vehicle KT15 USG on 02 November 2018.

7.25.4. KT15 USG is the vehicle Alexander Reed was driving in his collision with the Tesco Driver.

BOWER LALLY

- 7.26. The address of Sabre House, Belvue Road, Northolt, UB5 5QJ and 42 & 44 Bideford Avenue, UB6 7PP are connected to Bower Lally as set out below.
- 7.27. Bower Lally is registered as the director of the following companies:
- aa. BL Motors Limited registered address is Sabre House, Unit 1, Belvue Road, Northolt, UB5 5QJ. The company has previously had registered office address as follows:
 - 100c Welley Road, Staines, TW19 5HQ between 13/11/2018 and 14/01/2019,
 - Sabichi House, 5 Wadsworth Road, Perivale, Greenford, UB6 7JD between 14/01/2019 and 05/06/2019,
 - 7 Essex Park Mews W3 7RJ between 05/06/2019 and 29/09/2020.
 - bb. HR Smith Limited registered at the address of Unit 1 Sabre House, Belvue Road, UB5 5QJ. Bower Lally was the sole director.
 - cc. B & L Bodywork Limited registered at the address of 44d Bideside Avenue, Perivale, Uxbridge, UB6 7PP which does not appear to exist.
 - However, upon searching the postcode it appears that the address is in fact 'Bideford Avenue UB6 7PP'.
 - 42 & 44 Bideford Avenue, UB6 7PP are registered office addresses for companies run by Noel Khuashaba and Biar Hawaizi as detailed above.

- dd. OK Valeting London Limited at the address of 36-39 The Green, Southall, UB2 4AN. The company remains active. Bower Lally is the sole director from the incorporation date until present.
- OK Valeting London Limited featured in the recent claim by Bower Lally against Tesco, accident dated 21/02/2022.
 - Carter Motors Limited.
- 7.28. Bower Lally is the Claimant in Cases 14 and 15. Bower Lally brought a further claim against Tesco in February 2022.
- 7.29. In Case 14 Bower Lally was driving a Mercedes Benz registration YE64 ZNT which he became the registered keeper of on 17.11.2014. Bower Lally entered into a finance agreement for the Vehicle on 20.05.2016.
- 7.29.1. On 16.01.2017 Bower Lally had a collision with a Tesco vehicle. Noel Khuashaba purchased the Mercedes Benz registration YE64 ZNT from Bower Lally on 31.03.2017.
- 7.30. In Case 15 Bower Lally provided an invoice from Hano Autos UK Limited for vehicle repairs showing the address 2 Creek Road, Deptford, London SE8 3EL. Blake Assessors reported the Claimant's Vehicle was stored at Carter Motors, Unit 7 Sabre House, Belvue Road, London, UB5 5QJ.

Appendix 2

