

IN THE COUNTY COURT SITTING AT CENTRAL LONDON

Case No G20YY740

BEFORE HHJ BAUCHER

Date 26th January 2024

BETWEEN:

ALEXANDER MICHAEL REED

Claimant

and

TESCO STORES LIMITED

Defendant / Part 20 Claimant

and

MUBARIK QAAJE

Part 20 Defendant

Mr Aaron Pulford (instructed by Keoghs LLP) for the Defendant/ Part 20 Claimant

Hearing dates: 22nd January 2024

HHJ BAUCHER:

1. The Claimant, Alexander Michael Reed, pursued a claim against Tesco Stores Limited (Tesco) in relation to a collision between a Mercedes Benz registration KT15 USG and an Iveco Daily Van registration BT15 VKO driven by Tesco’s driver, the Part 20 Defendant, (Mubarik Qaaje), on 04 November 2019. For ease of reference, I shall refer to the parties by name throughout this judgment.
2. Before commencing proceedings Mr Reed received £12,010 in respect of the pre-accident value of his vehicle which Tesco paid on a without prejudice basis. Mr Reed served a Claim Form, Particulars of Claim, Schedule of Special Damages and medical report from Dr Bagga (dated 21.04.2020), in which he sought to recover general damages for personal injury and special damages in respect of credit hire. The pleaded value of the claim was limited to £10,359.70. Tesco filed a Defence, Counterclaim and Part 20 proceedings alleging that Mr Reed and Mr Qaaje had deliberately driven into each other and pleading deceit and conspiracy.
3. Mr Qaaje has taken no part in these proceedings and Judgment was entered against him on 27 September 2021. The Defence to Counterclaim was struck out and the Claim was struck out on 23 September 2022. Following the strike outs, judgment was entered in Tesco’s claims for deceit and conspiracy. The case therefore proceeds for Assessment of Damages in relation to the actions against Mr Reed and Mr Qaaje.
4. Tesco also identified a further litigated 12 cases which are linked to this action and other non-litigated linked cases. All the claims 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- Hashim (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)

5. Mr Pulford appeared for Tesco. There was no appearance by Mr Reed or Mr Qaaje. I am grateful for the careful manner in which Mr Pulford presented his case, conscious of his overriding duty to the court.

Dramatis Personae

6. The following individuals featured in the claim:

	Claimant	Assessment of Damages	Defendant	Driver
Alexander Reed				
Mubarik Qaaje	P20 Defendant	Assessment of Damages	Defendant	Tesco Driver
Mohamed Suleman	/	/	Witness	Tesco Driver
Stalin Salazar	/	/	Witness	Tesco Driver

Jumana Nusseibeh	/	/	Witness	Witness
Graham Douglas	/	/	Witness	Fraud Analyst
Julie Hawkins	/	/	Witness	Tesco Fleet Legal Manager
Julie Plumb	/	/	Witness	Tesco Insurable Risk Manager
Karen Caramiello			Expert	Handwriting expert
Peter Etherington		/	Expert	Expert Forensic Engineer

7. Tesco relied upon written evidence from Mr Suleman, Mr Palenta, Mr Salazar, Ms Nusseibeh, Mr Douglas, Ms Hawkins, Mrs Plumb, Ms Caramiello and Mr Etherington pursuant to the directions given in this matter and the associated actions.

8. Tesco’s case is that this accident was staged by Mr Reed and Mr Qaaje 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 in the Counterclaim and Part 20 Claim 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.

9. 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.

10. 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.
11. Tesco also relied upon expert evidence from Mr Etherington, Forensic Collision expert whose evidence I unequivocally accepted in the cases of Yaman, Morgan, Bahceci and Alghafagi.
12. Mr Etherington prepared a detailed report in this matter and concluded:

“I am of the opinion that the damage to the Mercedes nearside doors and the nearside rear wheel arch would be consistent with the collision in the dashcam footage. It is possible that the nearside front wing could also be damaged I am of the opinion that the nearside rear wheel and tyre, the nearside B post, SRS components and the roof rail damage were not caused in this incident. I confirm having reviewed the dashcam footage from the Iveco in detail and I am of the opinion that the dashcam footage illustrates that the nearside curtain air bag did not deploy in this incident and the actions of the Mercedes, and the Iveco suggest that this is a deliberate collision.”

13. I have no hesitation in accepting that evidence.
14. Mr Qaaje reported the facts of the collision on the date of the accident. The report he made was:

“The insured vehicle was travelling forwards exiting onto the roundabout from Clitterhouse Road. The tp vehicle was travelling forwards on Claremont Road travelling straight over the roundabout to continue on Claremont Road. The insured driver has failed to see the tp on the roundabout as the insured has continued to be exiting onto the roundabout this has resulted in the contact between the front nearside of the insured and the near side of the tp.”

15. I have reviewed the dashcam footage. This shows Mr Qaaje’s vehicle driving forwards proceeding from a side road in a residential area. As Mr Qaaje approaches the junction Mr Reed’s vehicle veers to the left thereby deliberately colliding with Tesco’s vehicle. The dashcam footage clearly demonstrates that Mr Qaaje’s account of the accident circumstances is a complete fabrication of the true accident circumstances.

16. To understand the extent of the conspiracy it is necessary to examine the Similar Fact Evidence.

Similar Fact Evidence

17. 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.
18. The modus operandi of the accident shares remarkable features with other Tesco Greenford depot crashes. There are 11 cases where the accident occurs when the Tesco driver is moving forward. This case also involves an accident with a prestige vehicle on a residential street, at night, with a Greenford Depot driver moving from a minor to a major road where the other vehicle sustains impact damage to the side. Those key features are replicated in Cases 1, 2, 7, and 17.
19. The relevance of the Similar Fact Evidence is that Mr Reed is a business partner with Ghaith Al-Waili. Mr Reed's vehicle had been insured on a policy linked to Biar Hawazi. Mr Reed also purchased his vehicle from Biar Hawazi. Bower Lally (Cases 14 and 15) operates a garage, BL Motors, from the same address as W3 Car Repairs and Larini Car Sales Limited which is operated by Moussa Issa. W3 Car Repairs operates from the same address as Wish Lounge a business currently operated by Ghaith Al-Waili. Ghaith Al-Waili is a business partner with Noel Khuashaba and is directly known to: Alex Reed (the claimant in this matter) as business partners for Wish Lounge, Samatar Jama (Tesco driver in Case 1) and Mazlum Bahceci (Case 1). Mazlum Bahceci received payment in October 2019 in the sum of £24,000 which came from Berkeley Motors Limited MB17MAZ (run by Biar Hawazi and Noel Khuashaba). Mazlum Bahceci (the claimant in Case 1) received a payment from Al-Waili GM in the sum of £81.90 on 01 August 2019.
20. Rinas Ahmed (Case 16) had a collision with Mohammed Namdar (Case 2) in an accident on 20.04.2019. Rinas Ahmed's company R & A Repairs Limited shares an address with BL Motors Limited run by Bower Lally. Manish Parmar staged a collision with Florin Danila, who has pursued two claims against Tesco (Cases 25 and 28) and who used Prime Auto Care which is the same garage

used by Al Shamary (claimant in Case 26) and Uwe Kirschner (claimant in Case 32). Mr Namdar was involved in a prior collision on 20.04.2019 with a vehicle which was insured by both Rinas Ahmed and Bower Lally.

21. Further, Mr Reed's vehicle was allegedly stored at Berkeley Motors; the false reporting of the location, storage and inspection of the vehicle is a feature in Cases 1, 2, 4, 5, 6, 9, 13, 15, 16, 19, 27, 29 and 30. Mr Reed's vehicle also sustained incompatible damage which is a feature in Cases 1, 2, 3, 4, 9, 11, 13 and 16. The car also had incompatible damage to the outer edge of the roof rail which is reported in Cases 1, 2, 6, 9, 13 and 16.
22. The extent of the conspiracy is further demonstrated by the fact that Mr Reed collided with Mr Qaaje who had a second Tesco vehicle crash with Uwe Kirschner (Case 32). Mr Kirschner operates a garage whose address is the same as the garage used in Case 14 and whose employee is the husband of the claimant in Case 5. Further Uwe Kirschner collided with Florin Danila (claimant in Cases 25 and 28) who used the same garages (Prime Auto Care) as two other claimants (Al Shamary and Uwe Kirschner – Cases 26 and 32) which share the same address as Uwe Kirschner's own business Car Care Motors Limited.
23. Mr Pulford submitted that the links in this action put Mr Reed at the "heart and centre" of this substantial conspiracy. He said Mr Reed had used three garages connected to the key players and Mr Reed operates a business which connects him to businesses used by multiple claimants. In my view, irrespective of the myriad of other connections, the clear association with Wish Lounge demonstrates the central role Mr Reed has played in this conspiracy. Mr Qaaje's role is demonstrated by the links to the two crashes in which he was involved when driving a Tesco delivery van.

Damages

24. Tesco paid £12,010 on an interim basis to Mr Reed in respect of damage to his vehicle and they are entitled to recover that sum. I am satisfied from the statement of Mrs Plumb Tesco is entitled to recover a further compensatory element. I do not consider it appropriate to reduce those damages because Tesco

employ persons in any event to investigate fraud. Had this conspiracy not been pursued those individuals could have been deployed on other tasks. Thus, Tesco is entitled to recover a total of £13,786 and accrued interest of £4569.79 from Mr Reed, and £1786 and accrued interest of £353.02 from Mr Qaaje.

25. 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 for exemplary damages against Mr Reed and Mr Qaaje in his written submissions. However, in his closing submissions Mr Pulford invited me to distinguish any award to reflect the extent of Mr Reed's overall involvement.

26. 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.”

27. 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.

28. In this case Mr Reed submitted a Claim Notification Form, Claim Form, Particulars of Claim and Reply all supported with a statement of truth. He also bolstered those representations with a claim for fictitious injury. 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 £12,010. However, the accident was a sham. Mr Qaaje parked his vehicle from 18.40 until 19.48 that evening. I find he was waiting for Mr Reed to arrive. I have no doubt he did so because he had been paid “cash to crash” as is clearly set out in the evidence of Mr Suleman, Mr Palenta and Mr Salazar. I find Mr Reed also paid for this “service” in the same manner as witnessed by Ms Nusseibeh (See findings in Mouradi). Thus, Mr Reed lied in court documents thereby damaging the integrity of the justice system. He, and others unknown, also induced a trusted employee in a position of responsibility to breach that trust. Mr Qaaje motivated by avarice committed a gross breach of trust. He deliberately crashed his Tesco van into Mr Reed’s car. He then lied to Tesco about the accident circumstances and his lies coupled with those of Mr Reed caused immediate loss to Tesco through the release of an interim payment. That payment was made in respect of damage which was not sustained in this crash as is clear from Mr Etherington’s comprehensive report. Mr Qaaje’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.

29. 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.
30. Neither Mr Reed nor Mr Qaaje have furnished this court with any information as to their income. I have taken into account Mr Pulford's representations. I consider there is force in his submission that given the extent of Mr Reed's involvement in the conspiracy there should be a distinction between the parties as to the award of damages. I do not consider £17,000 is sufficient to deter Mr Reed and Mr Qaaje and others, from engaging in "cash for crash" fraud. Mr Reed was heart, and centre, of the conspiracy and directly linked to a number of principal players. I have no doubt he was also the unseen hand in other stage-managed crashes. I consider that role must be marked by the centrality of his position as demonstrated pictorially at Appendix 2. 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 Mr Reed's position elevates the extent of his egregious conduct. He will therefore be ordered to pay £20,000 exemplary damages. I am satisfied Mr Qaaje's role was such that the award should be £18,000.
31. There will be judgment for Tesco accordingly.
32. 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

Similar Fact Evidence

SIMILAR FACT EVIDENCE

1. Graham Douglas has prepared a witness statement in which he details the commonalities, and connections between other claims within the Linked Action and which have been brought as a result of collisions with other drivers from the Tesco Greenford Depot. The similar facts relevant to this claim are as follows:

MUBARIK QAAJE

2. Mubarik Qaaqe while employed by Tesco has been involved in 2 collisions, as follows:
 - i. (The present matter) Alexander Reed (Case 9) on 04/11/2019; and
 - ii. Uwe Kirschner (Case 32) on 05/02/2020 (vehicle stored and recovered by Prime Autocare at 203 The Vale, London, W3 7QS).
3. In Case 32 the Claimant, Uwe Kirschner brought a claim for vehicle damage, recovery and storage charges and credit hire charges.
 - 3.1. Uwe Kirschner (Claimant in Case 32) is the director of Car Care Motors Limited (now Muth'Hilah Limited) which has the registered address of 203-205 The Vale, London, W3 7QS.
 - 3.1.1. 203 The Vale, London, W3 7QS is also the registered company address for Prime Autocare.

3.2. 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.

3.2.1. 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.

3.3. Uwe Kirschner was involved in a road traffic accident on 09/09/2020. This collision did not involve a Tesco Vehicle. The 'Third Party' is detailed as 'Florine Danila'.

FLORIN DANILA

3.4. Florin Danila (date of birth 16/02/1980) has brought 2 claims against Tesco as follows:

- i. Case 25 – 02/10/2019 in which Prime Autocare was the storage, recovery and repair garage,
- ii. Case 28 – 06/12/2019 in which Prime Autocare was the storage, recovery and repair garage.

3.4.1. Prime Autocare is the garage at which the storage, recovery and repair took place in both Florin Danila cases, Case 25 & Case 28.

3.4.1.1. 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.

- 3.4.1.2. The registered company address for Prime Autocare is 203 The Vale, London, W3 7QS.
- 3.4.1.3. 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.
- 3.4.2. Florin Danila has also been in a road traffic accident on 23/10/2020 with Ali Al Shamary (Claimant in Case 26). Florin Danila's vehicle was inspected at 189d Brent Crescent (the address detailed on Prime Autocare's invoices).
- 3.4.3. Prime Autocare is also the storage, recovery and repair garage in Case 26, the claimant Al Shamary who had a collision with Tesco driver Reyhan Safi.
- 3.4.3.1. The Tesco Driver in Case 26 is Reyhan Safi who is also the driver in:
- Case 6 Sayahi – 16/09/2019.
 - Case 22 Yagli – 08/07/2019.
 - Case 24 Garousi – 02/09/2019.
- 3.4.3.2. In Case 24 (Garousi) the Claimant brought a claim for recovery and storage charges. The recovery and storage providers were Logistic Solutions 613 Limited of 14 – 16 Wadsworth Road, Perivale, UB6 7JD.

JOHNSON HOUSE / MARTAZA AL HAMADI

- 3.5. 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.
- 3.6. Martaza Al Hamadi was Director of Logistic Solutions 613 Ltd.
- 3.6.1. Martaza Al Hamadi is also listed as the Director of Perivale Motor Group.
- 3.6.2. 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.
- 3.6.3. 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.
- 3.6.3.1. 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.
- 3.6.3.2. 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.

- 3.7. Florin Danila in (Case 28) drove into collision with Manish Parmar on 06.12.2019. Manish Parmar admits the collision was staged intentionally in exchange for money.

MANISH PARMAR

- 3.8. Manish Parmar has been the Tesco driver in five collisions, all of which he has confessed were staged collisions in exchange for payment:

- i. Namdar the present matter (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 Hano Autos, 2 Creek Road, London, SE8 3EL,
- 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 and Zada (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.

DARRAN TAYLOR

4. It is submitted that in Case 25 Darran Taylor drove into collision with Florin Danila.

- 4.1. The Claimant in Case 25, at the scene of the collision, gave his name as Daniel Florin Costel. In a credit hire agreement form that Claimant gave his address as Flat 14 Leemark House, Granville Road, Littlehampton BN17 5JS and date of birth as 16/02/1980.

- 4.2. Auto Logistic Solutions acting on behalf of the same 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.
- 4.3. Florin Danila in Case 25 brought a claim for vehicle damage, recovery and storage charges and credit hire charges.
- 4.4. In Case 28 the Claimant Florin Danila, provided his address as Flat 14 Leemark House, Granville Road, Littlehampton BN17 5JS and the date of birth (16/02/1980).
- 4.5. Darran Taylor, while employed by Tesco and driving vehicles owned by Tesco was the driver in 5 collisions in the space of 3 months:
 - Khattawi (Case 5) – 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.

ALEXANDER MICHAEL REED

THE CLAIMANT'S VEHICLE

- 4.6. The DVSA provided an MOT history, contained within those records revealed the following:
 - 4.6.1. On 12/12/2019 the Claimant's Vehicle KT15 USG was MOT assessed at Golden Car limited Unit 2 Sheraton Business Centre, Wadsworth Close, Perivale Greenford UB6 7JB.

- 4.6.2. On 13/12/2018 the Claimant's Vehicle KT15 USG was MOT assessed at Hybrid MOT Centre Limited 44 Bideford Avenue, Perivale, Greenford, UB6 7PP.
- 4.7. The DVLA provided a full keeper history and associated documents. Of relevance within those documents is the following:
 - 4.7.1. The first keeper of the Claimant's Vehicle was Ms Banar Hawaizi of Flat 1, 63 Russell Road, London, W14 8JD. This is an address associated with Biar Hawaizi at which he has a 'Very High' residency score,
 - 4.7.2. Banar Hawaizi was only the keeper of the vehicle for 1 day,
 - 4.7.3. The Claimant's Vehicle then changed keeper to B1 Capital Cars Limited of 5 Sabichi House, Wadsworth Road, UB6 7JD. Biar Hawaizi is the director of this company and the Claimant's Vehicle was insured under the companies' insurance policy,
 - 4.7.4. On 02/11/2019 the vehicle was acquired from B1 Capital Cars Limited by the Claimant Alexander Reed,
 - 4.7.5. After the index accident on 04.11.2019 Alexander Reed disposed of the vehicle on 18/12/2019. The vehicle was acquired by a new keeper on 01/02/2020.
- 4.8. DPA requests relating to Alex Reed identified that:
 - 4.8.1. The Claimant applied for Vehicle Finance in the sum of £26,612.80 in respect of the Claimant's Vehicle KT15 USG. The Claimant entered into the finance agreement on 01.02.2020. The Claimant failed to make any repayments under that agreement.

- 4.8.2. The Claimant's Vehicle KT15 USG was insured under a policy of insurance taken out by B1 Capital Cars Limited, Unit 1a Belvue Business Centre, Belvue Road, Northolt Middlesex, UB5 5QQ. Three claims were made against the policy on 25/10/2017, 13/07/2018 and 17/07/2019.
- 4.9. CUE Searches identify the following claims intimated by Alexander Reed:
 - 4.9.1. 04/11/2019 – the index accident,
 - 4.9.2. 27/03/2019,
 - 4.9.3. 15/11/2016 – Southern Rock Insurance updated the CACHE search to show that whilst a claim for injury from Reed was intimated this claim was subsequently repudiated. No further details are known.
- 4.10. Following the collision, the Claimant's Vehicle was reported to have been recovered and stored by Berkley Motors, 5 Sabichi House, Wadsworth Road UB6 7JD.
5. In the present claim Blake Assessor's report that the Claimant's Vehicle was allegedly stored and inspected at Berkley Motors, 5 Sabichi House, Wadsworth Road UB6 7JD. This is disputed and dealt with at paragraph 27.13 below.

BIAR HAWAIZI

- 5.1. Biar Hawaizi is or has been the director of the following companies:
 - aa. BH Cars Limited (Company Number 09127857) is now registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD,

- bb. BH Car Repairs Limited (Company Number 09128288) previously had a registered address of 44 Bideford Avenue, UB6 7PP Eagle Coachcrafts 007 Limited (Company Number 06597739) previously had a registered address of 42 Bideford Avenue, UB6 7PP,
 - cc. Antonella Wine Bars Limited (Company Number 07002654),
 - dd. A1 Performance Solutions Ltd (Company Number 07002654) previously had a registered address of 44 Bideford Avenue, UB6 7PP,
 - ee. Fast Performance Limited (Company Number 09410193) is registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD,
 - ff. Auto Empire Limited (Company Number 09961022) is registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD,
 - gg. Berkeley Motors Limited (Company Number 10472101) is now registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD,
 - hh. B1AR X Logistics Limited (Company Number 11309385) is registered at Unit 4 Sabre House, 1 Belvue Road, Northolt, UB5 5QJ,
 - ii. B1 Capital Cars Limited (Company Number 09739859) is now registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD.
- 5.2. B1 Capital Cars Limited (run by Biar Hawaizi) had a policy of insurance on which Vehicle registration KT15 USG was insured. Vehicle KT15 USG was purchased by Alexander Reed (claimant in the present matter)

on 02 November 2018 and is the Vehicle Alexander Reed was driving in his collision with the Tesco Driver.

5.3. Eagle Coachcrafts 007 Limited which now has the registered address of The Pavilion, Rosslyn Crescent, Harrow, HA1 2SZ. Biar Hawaizi was the Company Secretary for this company.

5.3.1. The Companies House record for Logistic Solutions 613 Ltd shows the previous registered address is The Pavilion, Rosslyn Crescent, Harrow, HA1 2SZ.

5.3.2. Logistic Solutions 613 Limited is dealt with at 24.5 above.

5.3.3. 44 Bideford Avenue, Perivale, Greenford, UB6 7PP is the address for the following companies controlled by Biar Hawaizi, Noel Khuashaba and Bower Lally as follows:

- i. B H Car Repairs Ltd.
- ii. A1 Performance Solutions Ltd.
- iii. B & L Bodywork Ltd.

5.3.3.1. Logistical Solutions 613 Limited was also registered at 40 – 44 Bideford Avenue.

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

NOEL KHUASHABA

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

5.5. 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 (claimant in Case 8),

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

5.6. Noel Khuashaba was previously or is still the director of the following companies all found at:

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

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

cc. Club 10 Limited (Company Number 14001416),

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).

5.6.1. Noel Khuashaba and Ghaith Al-Waili were both directors of Expert Rock Limited. The two are also 'friends' on Facebook.

5.6.2. Noel Khuashaba is director of Fast Ten Limited and Berkeley Motors. Fast Ten and Berkeley Motors, these garages feature in the following cases within the Linked Action:

- Case 1 (Mazlum Bahceci),
- Case 2 (Nohammed Namdar),
- Case 4 (Shireen Morgan),
- Case 5 (Shimaa Khattawi),
- Case 9 (Alex Reed),
- Case 13 (Eda Yaman and Mustafa Zada),
- Case 16 (Rinas Ahmed),
- Case 27 (Ibrahim Nour),
- Case 30 (Tariq Faris and Rawan Abbas).

5.6.3. 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.

5.6.3.1. Mousa Issa is the Director of W3 Car Repairs Limited.

MOUSA MOHAMAD ISSA

5.7. 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.

5.7.1. W3 Car Repairs Limited was formerly registered at 7 Essex Park Mews W3 7RJ.

5.7.2. 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 (Blake Assessors) report.

5.7.3. 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.

5.8. Mousa Mohamad Issa is the director of Larini Car Sales Ltd.

5.8.1. 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,

5.8.2. Mousa Mohamad Issa therefore purchased the Claimant in Case 6's vehicle following the collision with a Tesco Driver.

GHAITH AL WAILI

5.9. Ghaith Al Waili and Alexander Reed, the Claimant in the index matter Case 9, were both Directors of Wish Lounge at the address of Unit 2 Belvue Road Belvue Road, Northolt, UB5 5QJ.

5.9.1. The advertised address of Wish Lounge Limited is Johnsons House, Johnsons Way, Coronation Road, Park Royal, London, NW10 7PF.

5.9.2. An Instagram account for Wish Lounge Limited has been identified under the account @wishlounge.

5.9.2.1. 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 – This appears to be the same Instagram account for Mazlum Bahceci but he has amended the profile name from @mazlumbahceci to @itzmazzz.

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

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

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

5.9.4.2. 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 - the account of Samatar Jama,
- iii. Mr_b1arx – the account of Biar Hawaizi.

5.9.4.3. Mazlum Bahceci Claimant in Case 1 received a payment from Al-Waili GM in the sum of £81.90 on 01 August 2019.

5.9.4.4. The address for Wish Lounge, Belvue Road, Northolt, UB5 5QJ is the same address of B1 Capital Cars Limited which is controlled by Biar Hiawazi.

5.9.4.5. The address for Wish Lounge, Belvue Road, Northolt, UB5 5QJ is the same address BL Motors Limited which is directed by Bower Lally.

BOWER LALLY

5.10. 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.

5.11. 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 [0.068]. 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.

5.12. Bower Lally is the Claimant in Cases 14 and 15. Bower Lally brought a further claim against Tesco in February 2022.

- 5.13. 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.
- 5.13.1. 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.
- 5.14. 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.
- 5.15. 100c Welley Road, Staines, TW19 5HQ is the address of BL Motors Limited (run by Bower Lally) and is also the registered address of R & A Repairs Limited which is directed by Rinas Ahmed.

RINAS AHMED

- 5.16. Rinas Ahmed the Claimant in Case 16 collided with Tesco Driver Rakesh Lakhman.
- 5.17. Rinas Ahmed is the director of R & A Repairs Limited.
- 5.17.1. R & A Repairs Limited (directed by Rinas Ahmed) is the name of the policy holder which collided with Mohammed Namdar - Claimant in Case 2 in his previous accident on 20.04.2019.
- 5.17.2. In respect of the vehicles insured by R&A Repairs Limited it is worthy of note that:

- 5.17.2.1. A DPA from Aviva reveals that M88 BWR is a BMW 120 with which Namdar collided in the Aviva incident on 20/04/2019. M88 BWR was added to the Aviva policy for R & A Repairs Limited on 12/03/2019 and was removed on 08/07/2019.
- 5.17.2.2. M88 BWR was also insured on an AXA Policy under policy number A19/07RR0073290 in the name of Bower Lally t/a B&L Motors' with an address of 4 Chatsworth Road, Hayes, UB4 9ES. The vehicle was marked as 'proposers own' and was insured on the AXA policy between 05/06/2019 and 06/06/2019.
- 5.17.2.3. W8 BWR a Mercedes C220 AMG was insured on the R & A Repairs Limited policy over 2 periods as follows: 12/03/2019 until 18/03/2019 and 13/05/2019 until 12/06/2019.
- 5.17.2.4. The same vehicle, a Mercedes C220 AMG registration number W8 BWR was also insured for Bower Lally t/a B&L Motors policy. The vehicle was marked as 'sales' and was insured on the policy between 12/02/2019 and 14/05/2019.
- 5.17.2.5. Rinas Ahmed and Bower Lally have therefore owned and insured the same vehicles M88BWR and W8BWR on policies of insurance.
- 5.17.3. R & A Repairs Limited is the name of the policy holder which collided with Mohammed Namdar – Claimant in Case 2 in his previous accident on 20.04.2019.

HANO AUTOS /AWARA MARIO

5.18. 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.

5.19. Awara Mario in his LinkedIn profile reports he is the director of Hano Autos Limited.

5.20. 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).

5.21. Hano Autos Ltd has the registered address of 7 Westmoreland House, Cumberland Park, Scrubs Lane, London, NW10 6RE.

5.21.1. There are two further companies bearing the name 'Hano':

5.21.1.1. Hano Autos UK Limited which also has the registered address 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.

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

5.22. 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:

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

5.22.2. 7 Westmoreland House, Cumberland Park, Scrubs Lane, London, NW10 6RE the current registered address (as set out above).

5.22.3. 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.

5.22.3.1. 2 Creek Road, Deptford, SE8 3E is the alleged inspection locations provided by Blake Assessors in the following Linked Actions:

- xi. Case 1 Mazlum Bahceci,
- xii. Case 2 Mohammed Namdar,
- xiii. Case 4 Shireen Morgan,
- xiv. Case 5 Shimaa Khattawi,
- xv. Case 6 Adel Motlaghi Sayahi,
- xvi. Case 13 Eda Yaman,
- xvii. Case 16 Rinas Ahmed,
- xviii. Case 19 Saman Hussain,
- xix. Case 29 Monika Rogalewicz.

5.22.4. 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.

5.22.5. 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:

5.22.5.1. 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,

5.22.5.2. 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.

NADEEM JAWAHERI

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

- Adel Motlaghi Sayahi, Claimant in Case 6,
- Omar Al Hashimi, who in turn is friends with Hashim Al Hashimi, Claimant in Case 11,
- Rinas Ahmed (Facebook profile Rinas Osman), Claimant in Case 16,
- Tariq Faris, Claimant in Case 30.

ROJ MOTORS

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

5.23.1. 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.

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

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

5.23.4. 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.

5.23.4.1. 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.

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

5.24. A further Google search was carried out for '20b Abbey Industrial Estate' and a copy of the results are available.

5.25. A Google images show the address '20b' on the Abbey Industrial Estate.

5.25.1. There is no signage to confirm that Roj Motors operates from this location.

5.26. 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.

5.27. 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.

5.27.1.1. 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.

Appendix 2

