

PORTNER AND JASKEL LLP
S O L I C I T O R S

63/65 MARYLEBONE LANE
LONDON W1U 2RA

Telephone: 020 7616 5300
Fax: 020 7258 8520
DX: 9067 West End

Members
Harvey Jaskel
Brian Portner
David Baker
Mitchell Griver

Consultants
Peter James

Our ref: AJ/vj/23208/2

Your ref:

Date: 26th September 2007

Ms N Y S Klosterkotter-Dit-Rawe

e-mail: ahmet.jaffer@portnerandjaskel.com

Dear Madam

ROOTSTOCK OVERSEAS CORP -V- YOURSELF
WEST LONDON COUNTY COURT
CLAIM NO. 7WL00675

We enclose by way of service our client's Defence to Counterclaim, receipt of which kindly acknowledge.

Yours faithfully



PORTNER AND JASKEL LLP

No! See my
comments on
WLCC's
03.04.07
notice

BETWEEN:

ROOTSTOCK OVERSEAS CORP

See my comments on
03.04.07 notice

For detail, see **Portner # 22**

Claimant /
Part 20 Defendant

-and-

NOËLLE YVONNE SYLVIE KLOSTERKOTTER-DIT-RAWÉ

Defendant /
Part 20 Claimant

DEFENCE TO COUNTERCLAIM

1. The Defendant served a Defence and Counterclaim on the Claimant on 12 September 2007.

2. The Claimant contends that **the Defendant's Defence and Counterclaim contains no counterclaim.**

Of course not! Because I had NOT been supplied with information to which I was legally entitled

3. The Claimant relies on a note taken by Counsel at the hearing on 24 August 2007 and avers that **Deputy District Judge McGovern granted the Defendant permission (out of time) to file a Defence, and file a counterclaim if appropriate.**

4. The Claimant contends that it must plainly be the case that the Defendant is under no obligation to file a counterclaim, if on the facts of her case there are no grounds for one. Notwithstanding the bare words of the typed court order, the Claimant contends that the court granted the Defendant permission to file a Defence and Counterclaim, one of the two, or neither.

- The game plan was for me to fall into the trap - on which the monsters jumped immediately by sending me a **27.09.07 letter masquerading as an 'order' attempting to defraud me of £1,700.**
- My **02.10.07** reply to this 'Defence to counterclaim' was 'not liked' by the **Ladsky - WLCC mafia - as they then went into silent mode for more than 3 months** e.g. my chaser letters of **14.10.07** and **28.10.07**...
...leading me to file a **13.11.07** complaint with HMCS that resulted in the typical 'Get lost!' replies: **WLCC # 18 ; Doc library # 1.7**

The reason I added 'counterclaim' was because I fell into the trap set by Deputy District Judge McGovern in his (outrageous) **24.08.07** Order (**WLCC # 11**)

LIAR! How that vermin spins its story! Because I filed a **04.04.07 Application contesting jurisdiction - I did NOT need to file a Defence.** As can be seen from the **24.08.07** Order, at the 24th Aug so-called 'hearing' **McGovern denied my Application.**

5. Further or alternatively, the Claimant relies on the Defendant's own pleading in reliance of the contention that it contains no counterclaim. In her pleading (at Page 2 of 20, at the heading numbered three, paragraphs 12 and 13), the Defendant states as follows:

"The third outcome of the 24 August 2007 hearing was an order for the Defendant to file her "Defence and Counterclaim" by 14 September 2007."

"This document represents the Defendant's Defence - still in her capacity as a Litigant in Person."

The Claimant submits that the Defendant refers to her pleading as a Defence. The Defendant does not assert in her pleading that the document is a counterclaim (save than in the title and statement of truth), and furthermore does not plead any counterclaim at all.

6. Without any admission whatsoever as to the merits of the pleading as a Defence, the Claimant asserts for the avoidance of doubt that this pleading does not contain a counterclaim.
7. Further or alternatively to paragraphs 2 - 6 above, any counterclaim is denied.

GREG WILLIAMS

STATEMENT OF TRUTH

The Claimant believes that the facts stated in this Defence to Counterclaim are true. I am duly authorised to sign this statement of truth.

Signed:



Name:

AHMET JAFFER

Capacity:

Litigation Executive

Date:

28/9/07

Solicitors Address for Service: Messrs Portner & Jaskell LLP, 63/65
Marylebone Lane, London W1U 2RA.

Partly true (the above lie)- but an improvement on the 'statement of truth' on the 27.02.07 claim...that resulted in a 06.06.08 Notice of Discontinuance of "ALL the claims against [me]"!

IN THE WEST LONDON COUNTY COURT

CLAIM NO: 7WL00675

BETWEEN

ROOTSTOCK OVERSEAS CORP

Claimant/
Part 20 Defendant

And

NOELLE YVONNE SYLVIE KLOSTERKOTTER-DIT-RAWE

Defendant/
Part 20 Claimant

DEFENCE TO COUNTERCLAIM

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London
W1U 2RA**

Tel: 020 7616 5300

Fax: 020 7258 8520

Email: ahmet.jaffer@portnerandjaskel.com

Solicitors for the Claimant/Part 20 Defendant

One of the multi-criminal
right hands...
...in **the gang of
racketeers...**
...of the multi-criminal
Rachman (**Extortion**)
Andrew David Ladsky