

Response Pack

This claim is FRAUDULENT - see e.g. LVT, WLCC, Cawdery Kaye Fireman & Taylor (CKFT) and the 21 Oct 03 'offer'; My Diary 22 Nov 08. Another fraudulent claim was filed against me, also in West London County Court, on 27 Feb 07 - see also Andrew Ladsky's other crooked solicitors, Portner and Jaskel

You should read the 'notes for defendant' attached to the claim form which will tell you when and where to send the forms

Included in this pack are:

- either Admission Form N9A (if the claim is for a specified amount) or Admission Form N9C (if the claim is for an unspecified amount or is not a claim for money)
- either Defence and Counterclaim Form N9B (if the claim is for a specified amount) or Defence and Counterclaim Form N9D (if the claim is for an unspecified amount or is not a claim for money)
- Acknowledgment of service (see below)

	Complete
If you admit the claim or the amount claimed and/or you want time to pay	the admission form
If you admit part of the claim	the admission form and the defence form
If you dispute the whole claim or wish to make a claim (a counterclaim) against the claimant	the defence form
If you need 28 days (rather than 14) from the date of service to prepare your defence, or wish to contest the court's jurisdiction	the acknowledgment of service
If you do nothing, judgment may be entered against you	

Acknowledgment of Service

Defendant's full name if different from the name given on the claim form

In the	
WEST LONDON COUNTY COURT	
Claim No	WL 203537
Claimant	Sheel Jewicest Ltd
Defendant	Noelle Klosterkottel - Dr - Rawe

Address to which documents about this claim should be sent (including reference if appropriate)


	if applicable	
	fax no.	
	DX no.	
	Ref. no.	
	e-mail	

Tick the appropriate box

- I intend to defend all of this claim
- I intend to defend part of this claim
- I intend to contest jurisdiction

If you file an acknowledgment of service but do not file a defence within 28 days of the date of service of the claim form, or particulars of claim if served separately, judgment may be entered against you.

If you do not file an application within 28 days of the date of service of the claim form, or particulars of claim if served separately, it will be assumed that you accept the court's jurisdiction and judgment may be entered against you.

Signed 
(Defendant)(Defendant's solicitor)
(Litigation friend)

See Attached Re LVT
Position or office held
(if signing on behalf of firm or company)



17 Dec 2007
Date

The court office at

43 NORTH END ROAD, WEST KENSINGTON, LONDON W14 8SZ

is open between 10 am and 4 pm Monday to Friday. When corresponding with the court, please address forms or letters to the Court Manager and quote the claim number.

**CLAIMED FILED IN WEST LONDON
COUNTY COURT**

Ms N Dit-Rawe
Flat 3 Jefferson House
11 Basil Street
Knightsbridge
London
SW3 1AX

STATEMENT

REF: STE/03

DATE 25 Nov 2002

Landlord: Steel Services Ltd, c/o C.K.F.T., 25-26 Hampstead High
Street, Hampstead, London, NW3 1QA

Ref: Jefferson House Flat 3

From	To	Description	Transaction	Settled
19 Jan 2000 -	17 Apr 2000	Electricity as Attached	34.33	10.28
24 Jun 2000 -	24 Dec 2000	Half Yearly S/Charge in Advance	509.70	468.90
18 Apr 2000 -	12 Jul 2000	Electricity Charges	30.24	10.28
27 Oct 2000 -		Electricity Charge as Attached	36.83	16.87
21 Oct 2000 -	18 Jan 2001	Electricity Charges	49.88	31.76
19 Jan 2001 -	27 Mar 2001	Electricity Charges	51.72	25.77
18 Jul 2001 -		Electricity Charges as Attached	48.45	27.70
12 Jul 2001 -	21 Jan 2002	Electricity Charges	78.17	0.00
24 Apr 2002 -		Cheque received	-100.00	-50.00
29 Apr 2002 -		Electricity Charges as Attached	48.25	19.77
15 Apr 2002 -	8 Jul 2002	Electricity Charges as Attached	37.56	0.00
17 Jul 2002 -		Major Works Contribution	14,400.19	0.00
1 Jan 2001 -	31 Dec 2001	End of year balancing charge	283.14	0.00
5 Nov 2002 -		Electricity as per Attached Letter	42.70	0.00
			15,549.16	
Balance to Pay:				£14,987.83

Please make cheques payable to Martin Russell Jones for the amount of
£14,987.83

Defence and Counterclaim (specified amount)

In the **WEST LONDON COUNTY COURT**

Claim No.	WL 203537
Claimant (including ref.)	Steel Services Ltd
Defendant	Noëlle Klosterkottel - Dit - Rawé

- Fill in this form if you wish to dispute all or part of the claim and/or make a claim against the claimant (counterclaim).
- You have a limited number of days to complete and return this form to the court.
- Before completing this form, please read the notes for guidance attached to the claim form.
- Please ensure that all boxes at the top right of this form are completed. You can obtain the correct names and number from the claim form. The court cannot trace your case without this information.

How to fill in this form

- Complete sections 1 and 2. Tick the correct boxes and give the other details asked for.
- Set out your defence in section 3. If necessary continue on a separate piece of paper making sure that the claim number is clearly shown on it. In your defence you must state which allegations in the particulars of claim you deny and your reasons for doing so. If you fail to deny an allegation it may be taken that you admit it.
- If you dispute only some of the allegations you must
 - specify which you admit and which you deny; and
 - give your own version of events if different from the claimant's.

- If you wish to make a claim against the claimant (a counterclaim) complete section 4.
- Complete and sign section 5 before sending this form to the court. Keep a copy of the claim form and this form.

Community Legal Service Fund (CLSF)

You may qualify for assistance from the CLSF (this used to be called 'legal aid') to meet some or all of your legal costs. Ask about the CLSF at any county court office or any information or help point which displays this logo.



1. How much of the claim do you dispute?

- I dispute the full amount claimed as shown on the claim form
- or
- I admit the amount of **£356.22** *(Pending Information)*
- If you dispute only part of the claim you must either:
- pay the amount admitted to the person named at the address for payment on the claim form (see How to Pay in the notes on the back of, or attached to, the claim form). Then send this defence to the court
 - or
 - complete the admission form and this defence form and send them to the court.
- I paid the amount admitted on (date) **17 Dec 02**
- or
- I enclose the completed form of admission (go to section 2)

2. Do you dispute this claim because you have already paid it? Tick whichever applies

- No (go to section 3)
- Yes I paid £ to the claimant on (before the claim form was issued)

Give details of where and how you paid it in the box below (then go to section 5)

3. Defence

Claim # WL 203 537

Charges		Item	Amount (£)	Paid (£)	Not paid (£)	Defence
19 Jan 2000	17 Apr 2000	Electricity	34.33	14.37	19.96	I paid £14.37 (not £10.28 as stated on the form) I am withholding £19.96 standing charge as Martin Russell Jones has not yet responded to my request for an explanation for the sudden 59% increase over the previous quarter. When proof from the electricity supplier is provided, I will settle
24 Jun 2000	24 Dec 2000	Half yearly service charge in advance	509.70	509.70		I have settled this amount
18 Apr 2000	12 Jul 2000	Electricity	30.24	10.28	19.96	Withholding £19.96 standing charge due to reason as per above
27 Oct 2000	No date	Electricity	{36.83}			What is this £36.83 for - given the entry on the next line? I deny this claim
21 Oct 2000	18 Jan 2001	Electricity	49.88		49.88	I informed Martin Russell Jones that I did not receive this invoice. They did not follow-up on my request. I will not settle until I receive an invoice. Hence, contrary to the form, I have not paid £31.76
19 Jan 2001	27 Mar 2001	Electricity	51.72	31.76	19.96	I paid £31.76 (not £25.77 as stated on the form) Withholding £19.96 standing charge due to reason as per above

Charges			Defence			
		Item	Amount (£)	Paid (£)	Not paid (£)	
18 Jul 2001 28 Mar 2001	No date 11 Jul 2001	Electricity	46.45	25.77	20.68	Starting date on the form incorrect. No end date Relative to the last quarter of 1999 the standing charge has now gone up by 64%. I yet again pointed this out to Martin Russell Jones requesting an explanation. None has yet been provided
12 Jul 2001	21 Jan 2002	Electricity	78.17		78.17	Despite requests, to date I am still awaiting an invoice detailing 'cost of units' and 'standing charge' for this sum. Hence, I have not paid and will not until I am provided with an invoice
24 Apr 2002			-100.00 (?)			What does this mean? It 'appears' to refer to ground rent which I have paid in full up to Dec 2002
29 Apr 2002 9 Jan 2002	No date 14 Apr 2002	Electricity	48.25		48.25	Starting date on the form is wrong. No end date Will send £28.40 to claimant. Withholding £19.85 standing charge for reason stated above. (I have not paid £19.77 as stated on form)
29 Apr 2002 15 Apr 2002	8 Jul 2002	Electricity	37.56		37.56	Starting date on the form is wrong. No end date Will send £19.77 to claimant. Withholding £17.79 service charge due to lack of explanation about standing charge. (As pointed out to Martin Russell Jones I find it strange that after all these years they started to charge a variable amount - which, of course, I expect ought to have always been the case)
17 July 2002		Major works contribution	14,400.19		14,400.19	I deny the claim because no justification has been provided for the sum demanded Claimant already pursuing claim through the London LVT (LVT/SC/007/120/02) and process already fairly advanced The demand does not comply with the terms of my lease Part of my lease is different from that provided to the County Court
1 Jan 2001	31 Dec 2001	End of year balancing charge	283.14		283.14	Will send £283.14 to claimant - for the time being
5 Nov 2002 9 Jul 2002	No date 17 Oct 2002	Electricity	42.70		42.70	Starting date on the form is wrong. No end date Will send £24.91 to claimant. Withholding £17.79 service charge for same reason as per above. When I am given proof that I am being charged fairly for the standing charge, I will be happy to pay all that I truly owe

I am sending the claimant £356.22 (£28.40 + £19.77 + £283.14 + £24.91) as detailed above

What are your reasons for making the counterclaim?
If you need to continue on a separate sheet put the claim number in the top right hand corner

5. Signed
(To be signed by you or by your solicitor or litigation friend)

SKIN
*(I believe) (The defendant believes) that the facts stated in this form are true. *I am duly authorised by the defendant to sign this statement.
[Signature]
*delete as appropriate

Position or office held (if signing on behalf of firm or company)

Date

17 Dec 2002

Give an address to which notices about this case can be sent to you

Area

24/11/02

15/12/02

if applicable	
fax no.	
DX no.	
e-mail	

West London County Court
43 North End Road
West Kensington
London W14 8SZ

Ms N K-Dit-Rawé
3 Jefferson House
11 Basil Street
London SW3 1AX
Tel:

(Sent recorded delivery)

17 December 2002

Dear Madam/ Sir

Your Ref: Claimant No 203 537 - Steel Services Limited
ACTION TO BE STAYED

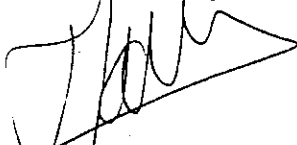
The purpose of my attached letter of 10 December 2002 was to report that the same action is being pursued by the same party in two jurisdictions:

- (1) yours;
- (2) the London Leasehold Valuation Tribunal (case: LVT/SC/007/120/02)

Consequently, I would like to suggest that **this action through your County Court be stayed** on the grounds that an action covering the same claim is currently under way before the London Leasehold Valuation Tribunal and has reached a fairly advanced stage – as detailed in my attached letter of 10 December 2002.

Please note that I will not be not be accessing my mail or telephone from Tuesday 17 December until Monday 6 January 2003.

Yours faithfully



N K-Dit-Rawé