

DATE 26<sup>th</sup> January 2024

BETWEEN:

GRZEGORZ COLLINS

(Otherwise known as GRZEGORZS DANIEL COLLINS

Otherwise known as GRZEGORZS CHMIELEWSKI

Otherwise known as GRZEGURZS CHMIELEWSKI

Otherwise known as GRZEGORZS COHEN)

Claimant

and

TESCO STORES LIMITED

Defendant/Part 20 Claimant

and

DARRAN TAYLOR

Part 20 Defendant

Mr Xavier (Solicitor) for the Claimant

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

Hearing dates: 22nd January 2024

**HHJ BAUCHER:**

1. The Claimant, Mr Collins, pursued a claim against Tesco Stores Limited (Tesco) in relation to a collision between a Porsche registration GGZ 6086 and an Iveco Daily Van registration BA15 DGV driven by Darran Taylor (Part 20 Defendant), on 23 October 2019. For ease of reference, I shall refer to the parties by name throughout this judgment.
2. Prior to the commencement of proceedings Tesco made an interim payment of £15,560 to Mr Collins in respect of vehicle damage. The payment of £15,560 was made on a without prejudice basis.
3. Mr Collins served a Claim Form, Particulars of Claim, Schedule of Special Damages and medical report from Dr Khand on 21 October 2020, in which he sought to recover damages for vehicle damage in the sum of £15,560, credit hire of £7,974.96, and general damages for personal injury limited to £10,000.
4. On 19 November 2020 Tesco filed and served a Defence, Counterclaim and Part 20 Additional Claim challenging the veracity of the claim and alleging deceit and conspiracy against Mr Collins and Mr Taylor. On 15 July 2021 Mr Collins filed a Notice of Discontinuance of his claim.
5. Mr Taylor failed to file a Defence, disclose any documents or serve any witness evidence. On 29 September 2021 following a failure to respond to proceedings judgment was entered against the Mr Collins and Mr Taylor. The matter was therefore listed for an Assessment of Damages hearing in relation to the Counterclaim and Part 20 proceedings.
6. Tesco identified a further litigated 12 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)<br>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                                |
|    | <b>PRE-LITIGATED ACTIONS</b>   |
| 14 | Bower Lally v Tesco Stores Limited<br>(Tesco Driver – Ramy El-Fayoumi)                               |
| 15 | Bower Lally v Tesco Stores Limited<br>(Tesco Driver – Owen Reason)                                   |
| 16 | Rinas Ahmed v Tesco Stores Limited<br>(Tesco Driver – Rakesh Lakhman)                                |
| 17 | Bernardo Picari (1) Guxim Symltaj v Tesco Stores Limited<br>(Tesco Driver – Rakesh Lakhman)          |
| 18 | Waleed Hayder Mohamed v Tesco Stores Limited<br>(Tesco Driver – Samatar Jama)                        |
| 19 | Saman Hussain v Tesco Stores Limited<br>(Tesco Driver – Donovan Rose)                                |
| 20 | Abdul Gader Allenizi (1) Richard Feghaly (2) v Tesco Stores Limited<br>(Tesco Driver – Donovan Rose) |
| 21 | Mohamed Almaki (1) Salem Almaki (2) v Tesco Stores Limited<br>(Tesco Driver – Donovan Rose)          |
| 22 | Oktan Yagli v Tesco Stores Limited<br>(Tesco Driver – Reyhan Safi)                                   |
| 23 | Ahmed Khalil v Tesco Stores Limited<br>(Tesco Driver – Samatar Jama)                                 |
|    |  |

|    |  |
|----|--|
| 24 | Hayder Garousi v Tesco Stores Limited<br>(Tesco Driver – Reyhan Safi)  |
| 25 | Florin Danila v Tesco Stores Limited<br>(Tesco Driver – Darran Taylor)   |
| 26 | Ali Al- Shamary v Tesco Stores Limited<br>(Tesco Driver – Reyhan Safi)   |
| 27 | Ibrahim Nour v Tesco Stores Limited<br>(Tesco Driver – Ajay Bangar)  |
| 28 | Florin Danila V Tesco Stores Limited<br>(Tesco driver- Manish Parmar)  |
| 29 | Monika Rogaliwicz (1) Sebastian Rogaliwicz (2) v Tesco<br>Stores Limited<br>(Tesco Driver – Rachidy Alkilmaki) |
| 30 | Tariq Faris (1) Rawan Abbas (2) v Tesco Stores Limited<br>(Tesco Driver – Rachidy Alkilmaki)                   |
| 31 | Habib Said (1) Mwenye Madasheeky (2) v Tesco Stores<br>Limited<br>(Tesco Driver – Samatar Jama)                |
| 32 | Uwe Kirschner v Tesco Stores Limited<br>(Tesco Driver – Mubarik Quaje)   |

7. Mr Pulford appeared for Tesco. Mr Xavier represented Mr Collins. There was no appearance by Mr Taylor. At the outset of the hearing Mr Xavier advised his client had made a series of Admissions pursuant to CPR 14.2 whereby Mr Collins agreed to reimburse Tesco for the interim payment and damages for the compensatory element in the sum of £22,568.44 and £17,000 in respect of exemplary damages. Mr Pulford did not ask the court to go beyond the terms of the admission and the case accordingly proceeded to quantum in respect of Mr Taylor alone. I am grateful for Mr Pulford's diligent preparation and

presentation which I have no doubt had considerable bearing on the admissions made and consequent saving in court time.

**Dramatis Personae**

8. The following individuals featured in the claim:

|                   |               |                       |           |                              |
|-------------------|---------------|-----------------------|-----------|------------------------------|
| Grzegor Collins   | Claimant      | Assessment of Damages | Defendant | Driver                       |
| Darran Taylor     | P20 Defendant | Assessment of Damages | Defendant | Tesco Driver                 |
| Mohamed Suleman   | /             | /                     | Witness   | Tesco Driver                 |
| Krzysztof Palenta | /             | /                     | Witness   | Tesco Driver                 |
| Stalin Salazar    | /             | /                     | Witness   | Tesco Driver                 |
| Jumana Nusseibeh  | /             | /                     | Witness   | Witness statement            |
| Graham Douglas    | /             | /                     | Witness   | Fraud Analyst                |
| Julie Hawkins     | /             | /                     | Witness   | Tesco Fleet Legal Manager    |
| Julie Plumb       | /             | /                     | Witness   | Tesco Insurable Risk Manager |

9. Tesco relied upon written evidence from Mr Suleman, Mr Palenta, Mr Salazar, Ms Nusseibeh, Mr Douglas, Ms Hawkins and Mrs Plumb pursuant to the directions given in this matter and the associated actions.
10. Tesco's case is that this accident was staged by Mr Collins 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 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 Mr Taylor's dishonesty.
11. 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 17<sup>th</sup> 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.
12. Mr Taylor whilst employed by Tesco was involved in five accidents within three months on the 11<sup>th</sup> September 2019 (Case 5), 2<sup>nd</sup> October 2019 (Case 25), the index accident on the 23<sup>rd</sup> October 2019, 6<sup>th</sup> November 2019 (Case 10) and 21<sup>st</sup> November 2019 (Case 11).
13. Mr Taylor also telephoned to report the accident. In that report he described how he was reversing and described the damage to the Porsche as "light." When he was subsequently interviewed about this accident and other incidents on 21<sup>st</sup> July 2020, he said that he must have been reversing as the "Tom Tom told me to."
14. The index accident also needs to be considered in the context of the Similar Fact Evidence.

### **Similar Fact Evidence**

15. 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.
16. The relevance of the Similar Fact Evidence is amply illustrated by the actions of Mr Taylor and the fact that his other four accidents generated Cases 5, 10, 11 and 25. The incident in Case 5 connects with Cases 14 and 32. The accident on the 21<sup>st</sup> 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.
17. 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, 5, 6, 15, 16, 19 and 29. Links from Hano Autos extend to Cases 11,12,18 and 29.
18. 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 Mr Taylor was a party to a substantial conspiracy.

### **Damages**

19. I am satisfied from the statement of Mrs Plumb that Tesco is entitled to recover £1441.65 for the internal work engaged in this investigation. 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.
20. 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 Mr Taylor.

21. 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.”

22. 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.

23. I am satisfied the accident was a sham and Mr Taylor had been paid “cash to crash” as set out in the evidence of Mr Suleman, Mr Palenta and Mr Salazar. I find Mr Collins also paid for this “service” in the same manner as witnessed by Ms Nusseibeh (see findings in Mouradi). Mr Collins, and others unknown, induced a trusted employee in a position of responsibility to breach that trust. Mr Taylor no doubt emboldened by the payments he had received in what he considered to be two earlier successful sham crashes committed a further gross breach of trust in the index accident. I find he deliberately crashed his Tesco van into Mr Collins. Mr Taylor then lied to Tesco about the initial extent of that damage in his Sopp telephone call and followed that up with an elaborate false description in his accident report. He further lied when interviewed when he blamed his actions on his satellite navigation system. Blaming the satellite navigation was a feature in the Bahceci and Yaman cases. Mr Taylor’s lies coupled with those of Mr Collins 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.
24. 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.
25. Mr Taylor has not furnished this court with any information as to his income and assets. I have taken into account Mr Pulford’s representations as to the

amount of any award but I do not consider damages of £17,000 to be sufficient to deter Mr Taylor and others, from engaging in “cash for crash” fraud. I am satisfied that given the extent of the egregious conduct and the extent of this conspiracy as set out in the Similar Fact Evidence Mr Taylor should pay £18,000.

26. There will be judgment for Tesco accordingly. I shall ask Counsel to calculate the appropriate interest in respect of the compensatory element and to prepare the final order to reflect the agreement with Mr Collins.

27. 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 set out in relation to the Tesco driver, the Claimants and the individuals to whom they are connected.

##### DARRAN TAYLOR

2. Darran Taylor (the Part 20 Defendant) 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 – the index matter) – 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.

## SHIMAA KHATTAWI

2.1. Darran Taylor reversed into collision with Shimaa Khattawi (Case 5) on 11.09.2019. Shimaa Khattawi has the following connections to this and other cases within the Linked Action:

2.1.1. Shimaa Khattawi's discontinued claim was for personal injury, vehicle damage, credit hire charges and recovery & storage charges.

2.1.2. In her Claim Form and CNF Shimaa Khattawi provided her address as 177 Conway Crescent, Perivale, Greenford, UB6 8JE.

2.1.3. 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 Claimant in Case 29) and at whose house Monika Rogalewicz stored her vehicle registration MG57 KMR.

2.1.4. Shimaa Khattawi's husband, Mr Faisal Dawood is a Sales Manager at JRJ Limited.

2.1.4.1. 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.

2.1.4.2. Jag & Land UK Parts Limited has a previous registered address of 14-16 Wadsworth Road, Perivale, UB6 7LD. Uwe Kirschner the Claimant in Case 32 is the director of Jag & Land UK Parts Limited.

## SAFAA JASIM AND FIRAS KHALIL

2.2. On 06 November 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:

2.2.1. Safaa Jasim brought a claim for personal injury, vehicle damage and credit hire. Firas Khalil brought a claim for personal injury and physiotherapy charges.

2.2.2. On 06 November 2019 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.

2.2.3. Darran Taylor, in the Tesco van, remained on Rosemore Street for 37 minutes as shown by the GPS vehicle tracking log.

2.2.4. 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 as dealt with in the witness statement of Julie Hawkins at paragraph 15.

- 2.2.5. 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.
- 2.2.6. 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

- 2.3. Darran Taylor reversed into collision with Florin Danila in Case 25. Florin Danila has the following connections to this and other cases within the Linked Action:
  - 2.3.1. The Claimant in Case 25, at the scene of the collision, gave his name as Daniel Florin Costel. In a credit hire agreement form the claimant gave his address as Flat 14 Leemark House, Granville Road, Littlehampton BN17 5JS and date of birth as 16/02/1980.
  - 2.3.2. Auto Logistic Solutions acting 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.
  - 2.3.3. Florin Danila in Case 25 brought a claim for vehicle damage, recovery and storage charges and credit hire charges.

2.3.4. 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).

2.3.5. Florin Danila in Case 28 brought a claim for vehicle damage, recovery and storage charges and credit hire charges.

2.3.6. Evans Harding Engineers is the company which inspected the vehicles in both Cases 25 & 28.

2.3.6.1. This same company feature as the engineer for the Claimants in Cases 7, 11, 12, 18, and 32.

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

2.3.7.1. 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.

2.3.7.2. The registered company address for Prime Autocare is 203 The Vale, London, W3 7QS.

2.3.7.3. 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.

2.3.7.4. 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.

2.3.7.5. 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.

2.3.7.6. Uwe Kirschner was involved in a road traffic accident on 09/09/2020. This collision did not involve a Tesco Vehicle. The 'Third Party 3' is detailed as 'Florine Danila'.

2.3.8. In his first Tesco collision (Case 25) Darran Taylor drove into collision with Florin Danila. In his second collision (Case 28), Florin Danila collided with Manish Parmar the Tesco driver.

2.3.8.1. 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.

2.3.9. 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

2.4. 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.

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

2.4.2. 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.

2.4.3. 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 owner of Hano Autos.

GREGORZ COLLINS

#### THE CLAIMANT'S VEHICLE

3. The Claimant's vehicle, GGZ 6086 was subject to a finance agreement. Motonovo Finance responded to a DPA request on 29/12/2021. Of relevance is the following:

- 3.1. The Finance was in the name of Miss Aneta Anna Klimowicz (formerly Aneta Pawenska) (17/05/1993) of 16 Arragon Gardens, London, SW16 5LX (albeit the driving licence provided gave an address of 29 Northcote Avenue, Southall, UB1 2AY).
- 3.2. The finance commenced on 03/07/2017 in respect of the vehicle YD60GOK. A deposit of £6,000 was paid for the vehicle followed by 59 monthly payments, the first repayment of £448.87 (2 month after the execution of the documents) and a final payment of £607.87 (falling due around August 2022).
- 3.3. Documentation provided by Motonovo shows that there were issues with the direct debit payments, the first rejected payment was on 18/04/2018 and additional missed payments occurred on
  - i. 18/09/2018,
  - ii. 20/11/2018,
  - iii. 18/01/2019
  - iv. 25/01/2019,
  - v. 19/03/2019,
  - vi. 26/03/2019,
  - vii. 18/04/2019,
  - viii. 29/04/2019,

- ix. 20/05/2019,
- x. 18/09/2019,
- xi. 26/09/2019,
- xii. 18/10/2019,
- xiii. 19/11/2019 (post-accident),
- xiv. 18/12/2019,
- xv. 20/01/2020,
- xvi. 18/02/2020,
- xvii. 25/02/2020,
- xviii. 18/03/2020,
- xix. 20/04/2020,
- xx. 19/05/2020.

- 3.4. A telephone call from the finance agreement holder on 05/11/2019 addressed the arrears on the account and set up an authorised third-party, said to be a cousin, who would ensure that the account would be paid up to date as the account holder was unable to do so. In a second call, placed one hour later, Motonovo were advised that the vehicle had been written off in an incident on 22/10/2019 (the actual date of the incident is 23/10/2019) in which a Tesco delivery vehicle had collided with the Claimant's vehicle.
- 3.5. A telephone call on 18/12/2019 was made by the finance company to chase settlement details. The customer advised that it had been her cousin who had been involved in the incident. It therefore appears that Grzegorz Collins is the cousin of Aneta Klimowicz,
- 3.6. A telephone call on 17/06/2020 notes that the V5c was in the account holder's cousin's name. She was advised that this was in breach of the terms and conditions of the agreement.
- 3.7. Final settlement of the agreement was made on 04/07/2020 by a Gregorz Collins in the sum of £10,968.15.

4. 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 the following 12 cases throughout the Linked Action:

- Case 1 Bahceci,
- Case 2 Namdar,
- Case 4 Morgan,
- Case 5 Khattawi,
- Case 6 Sayahi,
- Case 9 Reed,
- Case 13 Yaman,
- Case 15 Lally,
- Case 16 Ahmed,
- Case 19 Hussain,
- Case 27 Nour,
- Case 30 Faris.

#### CLAIMANT'S COMPANY

5. 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'.

5.1. The Claimant has a Facebook account under the name 'Greg Daniel Collins', this is confirmed by comparison of the photographs on the Facebook profile and his driver's license image.

5.2. The Claimant's Facebook account is 'friends' with an account in the name of NoeLY Noel.

- 5.3. A Facebook profile was identified for Collins Brothers Customs which is connected via web results to Prestige Wrap & Customs.
- 5.4. The Instagram account for Grzegorz Collins confirms on his biography he is the owner of Prestige Wrap under the name @prestigewrap.
- 5.5. 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.
- 5.6. Prestige Wrap previously operated from Unit 4/8 Logic House, Belvue Road, Northolt, UB5 5QJ prior to moving to the Belvue Business Centre.
- 5.6.1. 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.

- 5.6.1.1. 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.

GHAITH AL WAILI

- 5.7. Ghaith Al Waili and Alexander Reed, the Claimant in Case 9, were both Directors of Wish Lounge Limited's.
- 5.8. 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. Ghaith Al-Waili is friends on Facebook with Samatar Jama (Tesco driver in Case 1).
- 5.10. Ghaith Al Waili is the project manager at Petrichor Designs Limited.
- 5.10.1. 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> confirms that he is a project manager for Petrichor Designs Ltd.
- 5.10.2. The followers of Petrichor Designs Limited shows that 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.
- 5.11. 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.
- 5.12. 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

- 5.13. 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.
- 5.14. Martaza Al Hamadi was Director of Logistic Solutions 613 Ltd.
- 5.14.1. Martaza Al Hamadi is also listed as the Director of Perivale Motor Group.
  - 5.14.2. 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.
  - 5.14.3. 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.

5.14.3.1. 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.

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

## BIAR HAWAIZI

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

5.15.1. Eagle Coachcrafts 007 Limited (Company Number 06597739) previously had a registered address of 42 Bideford Avenue, UB6 7PP and now has the registered address of The Pavilion, Rosslyn Crescent, Harrow, HA1 2SZ. Biar Hawaizi was the Company Secretary for this company.

aa. Antonella Wine Bars Limited (Company Number 07002654),

bb. A1 Performance Solutions Ltd (Company Number 07002654) previously had a registered address of 44 Bideford Avenue, UB6 7PP,

cc. BH Cars Limited (Company Number 09127857) is now registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD,



- dd. BH Car Repairs Limited (Company Number 09128288) 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. B1 Capital Cars Limited (Company Number 09739859) is now registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD,
- gg. Auto Empire Limited (Company Number 09961022) is registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD,
- hh. Berkeley Motors Limited (Company Number 10472101) is now registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD,
- ii. B1AR X Logistics Limited (Company Number 11309385) is registered at Unit 4 Sabre House, 1 Belvue Road, Northolt, UB5 5QJ,

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

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

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

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

## BOWER LALLY

- 5.16. 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.
- 5.17. 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.

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

5.19. 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.

5.19.1. 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.

5.20. 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.

#### NOEL KHUASHABA

5.21. 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.

5.22. 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),

5.22.1. 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.

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

5.23.1. 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).

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

#### MOUSA MOHAMAD ISSA

5.25. 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.

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

5.25.2. 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.

5.25.3. 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.

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

5.26.1. 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.

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

#### NADEEM JAWAHERI

6. Biar Hawaizi is 'friends' via Facebook with Nadeem Jawaheri.

7. Nadeem Jawaheri (ندیم جواهری) 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,
- Awara Mario.

#### ADEL MOTLAGHI SAYAHI

7.1. Adel Sayahi (Facebook friend of Nadeem Jawheri).

7.2. On 03/09/2019 Adel Sayahi (Claimant in Case 6), thirteen days before the collision with the Tesco Driver, reported to his insurer, Sabre, a hit and run incident when the Adel Sayahi's Vehicle LM18XVU was parked and unattended. No claim was made against the policy: no third party details were provided.

7.2.1. Adel Sayahi's Vehicle was acquired by a new keeper on 10/02/2020. That new keeper was W3 Car Repairs Limited,

directed by Mousa Mohamad Issa address given as Rear of 5 Sabichi House, Wadsworth Road, Perivale, Greenford, UB6 7JD.

7.2.2. On 22/11/2021 Sayahi's vehicle was acquired by Larini Car Sales Ltd of Unit 4/8 Logic House, Belvue Road, Northolt, UB5 5QJ.

7.2.2.1. Larini Car Sales Ltd is a company also directed by Mousa Issa,

7.2.2.2. Prestige Wrap a company run by Collins (the Claimant in Case 8) – has previously operated from Unit 4/8 Logic House, Belvue Road, Northolt, UB5 5QJ,

7.2.2.3. Wish Lounge has been identified as operating from Logic House, Belvue Road, Northolt, UB5 5QJ.

7.2.2.3.1. Reed (the Claimant in Case 9) was a Director of Wish Lounge.

7.2.2.3.2. Ghaith Al Waili is the current Director.

7.2.3. Adel Sayahi and Amineh Mohavi appear to be aliases. On 30/12/2009 a DPA response from KGM confirmed claims were intimated by Kamal Taei and Emina Taei for a road traffic collision which occurred on 30 December 2009. In that claim the National Insurance numbers provided by Kamal Taei and Emina Taei are the same numbers as used by Adel Sayahi and Amineh Mohavi.

RINAS AHMED

7.3. Rinas Ahmed (also goes by the name Rinas Osman) (Facebook friend of Nadeem Jawaheri) is the Claimant in Case 16, having collided with Tesco Driver Rakesh Lakhman.

7.3.1. Rinas Ahmed is the director of R & A Repairs Limited.

7.3.2. 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.

7.3.3. In respect of the vehicles insured by R&A Repairs Limited it is worthy of note that:

- i. 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.
- ii. M88 BWR is the vehicle with which Namdar collided in the Aviva incident on 20/04/2019. This was added to the policy on 12/03/2019 and was removed on 08/07/2019.
- iii. 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.
- iv. 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.



- v. 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.

7.3.3.1. Rinas Ahmed and Bower Lally have therefore owned and insured the same vehicles M88BWR and W8BWR on policies of insurance.

7.3.4. The address of 100 Welley Road, Wraysbury, Staines-upon-Thames, TW19 5HF, was a previous registered office address of BL Motors Limited, run by Bower Lally.

#### 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 has the registered address of 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 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.

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.

7.6.3.4. 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.

- 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.

7.11.1.1. 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 Motors 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.

## Appendix 2



