

Case No: G72YJ746

IN THE CENTRAL LONDON COUNTY COURT

Date: 12th February 2024

HASHIM AL HASHIMI
(otherwise known as HASHIM AL HASHIM)

First Claimant

and

ZAINAB MOHAMED

Second Claimant

and

TESCO STORES LIMITED

Defendant/Part 20 Claimant

and

DARRAN TAYLOR

Part 20 Defendant

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

Hearing dates: 8th February 2024

HHJ BAUCHER:

1. The First and Second Claimant (Mr Al Hashimi and Mrs Mohamed) pursued a claim against Tesco Stores Limited (Tesco) in relation to a collision between an Audi A6 Registrations GK62 VTN and an Iveco Daily van registration BT65 CJY driven by Tesco's driver, Mr Taylor, on 21st November 2019. I shall refer to the parties by name for ease of reference.
2. Mr Al Hashimi and Mrs Mohamed served a Claim Form on 16th October 2020, in which Mr Al Hashimi sought to recover damages for pre-accident vehicle damage of £8,544.00, hire of £12,334.32, recovery and storage of £659.00 and general damages for personal injury. Mrs Mohammed sought to recover general damages for personal injury.
3. On 8th December 2020 Tesco served a Defence and Counterclaim challenging the veracity of the claim. On 27th July 2021 Tesco served Mr Al Hashimi, Mrs Mohamed and Mr Taylor with a Part 20 Claim Form and Defence, Counterclaim and Additional Claim for damages arising from the torts of Deceit and Conspiracy.
4. On 27th September 2021 judgment was entered against Mr Taylor. On 23rd September 2022 Mr Al Hashimi and Mrs Mohamed's statements of case were struck out and judgment was entered. The case therefore proceeds for Assessment of Damages in relation to the actions against Mr Al Hashimi, Mrs Mohamed and Mr Taylor.
5. 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) Zhraa Alghafagi (2) Zina Alghafagi (3)
4	Shireen Morgan v Sunil Shah (1) Tesco Stores Ltd (2)
5	Tesco Stores Limited v Shimaa Khattawi (1) Darran Taylor (2)
6	Adel Motlaghi Sayahi (1) Amineh Mohavi (2) v Tesco Stores Limited v Reyhan Safi
7	Shahin Majid Mouradi v Tesco Stores Limited v Manish Parmar (1) Tawfeeq Abdulwahid Tawfeeq (2) Jumana Nusseibeh (3)
8	Grzegorz Collins v Tesco Stores Limited v Darran Taylor
9	Alexander Reed v Tesco Stores Limited v Mubarik Quaje
10	Safaa Jasim v Tesco Stores Limited v Darran Taylor
11	Hashim Al- Hashimi (1) Zainab Mohamed (2) v Tesco Stores Limited v Darran Taylor
12	Mohamed Baktiyar Abdulla v Tesco Stores Limited v Manish Parmar
13	Eda Yaman v Manish Parmar (1) Tesco Stores Limited (2) v Mustafa Zada
	PRE-LITIGATED ACTIONS
14	Bower Lally v Tesco Stores Limited (Tesco Driver – Ramy El-Fayoumi)

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

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

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

Dramatis Personae

7. The following individuals featured in the claim:

Name	Title	State of Proceedings	Role	Position
Hashim Al Hashimi	First Claimant	Assessment of Damages	Defendant	Driver
Zainab Mohamed	Second Claimant	Assessment of Damages	Defendant	Passenger

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
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

8. 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.

9. Tesco's case is that this accident was staged by Mr Al-Hashimi, Mrs Mohamed 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 those torts.
10. I handed down judgment in the cases of Yaman [2023] EW Misc 15 (CC), Mouradi [2023] EW Misc 16 (CC), Morgan [2023] EW Misc 17(CC), Bahceci [2023] EW Misc 18(CC) and Alghafagi [2023] EW Misc 18 (CC) on 17th November 2023. In those actions the torts of conspiracy and deceit were contested by various parties. In those judgments there was an extensive review of the evidence relied upon by Tesco. Tesco succeeded in all actions. I found that those cases and the other linked actions were part of an extensive conspiracy to defraud Tesco. In the light of my detailed findings in those cases in relation to the evidence of Mr Suleman, Mr Palenta, Mr Salazar there is no purpose to be gained from a further review of that evidence in this action.
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. He identified eight areas of damage and concluded:

“I am of the opinion that the full extent of the damage to the Audi has not occurred as a result of contact from the Iveco. The light horizontal scratches on the upper section of the doors, the tearing of the lower section of the offside front wing, the dark coloured contact marks on the lower forward section of the offside front door and the dent in the offside rear quarter panel are not consistent with contact with the Tesco Iveco.

The damage to the bumper, the upper section of the offside front wing and the light contact on the lower profile of the doors could be consistent with contact with the Iveco but all three areas of damage would not occur in one single incident.”
13. I have no hesitation in accepting that evidence.

14. Mr Taylor whilst employed by Tesco was involved in five accidents within three months on the 11th September 2019 (Case 5), 2nd October 2019 (Case 25), 23rd October 2019 (Case 8), 6th November 2019 (Case 10) and the index accident 21st November 2019.
15. Mr Taylor provided a detailed report of the index accident as set out below:

Please describe in the driver's own words, how the incident happened. Please provide a detailed description of the incident for the Review Board to consider.

(If this is alleged incident – please summarise the details of the alleged incident and include the name of the Tesco.com driver it relates to).

I was driving to my delivery and when i arrived i parked on the right hand side of the road which was the same side as the customers house, which was just around the bend of the road which turned to the left. after doing my delivery i got back in the van and turned it on, made the necessary checks and as soon as i pulled out whilst looking in my side mirrors i saw a car approaching and immediately pressed the brake by the time i had done this the car ended up hitting the passenger side bumper & indicator light. there was a big bush on the corner of the bend so ~~there~~ in sure visibility for the other driver wasn't the clearest.

Sketch of Scene.

16. Mr Taylor also provided the same description in his telephone report of the incident. However, he also stated that he had completed the “bump card.” The bump cards were subjected to forensic handwriting analysis by Ms Caramiello. 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. The bump card was not completed by Mr Taylor.
17. The index accident also needs to be considered in the context of the Similar Fact Evidence.

Similar Fact Evidence

18. Graham Douglas provided two witness statements setting out details of the linked cases and the links relating to this claim. Those links were summarised by Mr Pulford and are attached as Appendices 1 and 2 of this judgment.
19. This was not a one-off accident deploying little preparation or planning. The manner of the crash shares features with other Tesco Greenford depot crashes. This was a Greenford Tesco driver, on a residential road, at night, who drove from a parking place into the side of a prestige vehicle. That set of facts is replicated in Cases 28 and 32. It was a side impact as occurred in twenty-one other crashes. Airbags were alleged to have been deployed as in Cases 1, 4, 5, 6, 9, 28, 30 and 32. Mr Al Hashimi's vehicle also had incompatible damage. Inconsistent damage also occurs in Cases 1, 2, 3, 4, 6, 9, 13 and 16. The vehicle was also taken to ROJ Motors on the Abbey Industrial Estate for storage as in Cases 12 and 18. Eight other cars also went to the Abbey Industrial Estate; Cases 3, 12, 17, 18, 19, 20, 21 and 31. Cases 3, 19, 20 and 21 were all crashes involving Mr Rose. The Abbey Industrial Estate is where one of the Claimants in Case 3, Ms Z Alghafagi, operates her garage. Cases 29 and 12 are also linked to the Estate.
20. Mr Al Hashimi took his vehicle for an MOT on 13th October 2019 to the same test centre as used by the Claimant in Case 5. This is in close proximity to another garage where MOT tests were undertaken in Cases 3, 7, and 12. Mr Al Hashimi is also a director of a company in the motor trade; Cars77 Limited. There are another eleven cases where the claimants are also directors in the motor trade industry: Cases 3, 8, 12, 13, 14, 15, 16, 17, 23, 24, 31 and 32. Cars 77 Limited registered address is 150 Coles Green Road the same address for Inter Car Solutions Limited which is directed by Hayder Sharif who is also the director of HS Motors Limited. HS Motors Limited is registered at the Abbey Industrial Estate and was used for storage in Cases 3 and 20.
21. Mr Al Hashimi is also Facebook friends with Omar Al Hasimi and he is linked with Nadeem Jawaheri, Rinas Ahmed, Biar Hawizi and Awara Mario and

thereby Cases 6, 16 and 30. Awara Mario is the owner of Hano Autos which was the alleged inspection venue in Cases 1, 2, 4, 5, 6, 13, 15, 16, 19 and 29.

22. The relevance of the Similar Fact Evidence is further illustrated by the actions of Mr Taylor and the fact that his other four accidents generated Cases 5, 8, 10, and 25. The incident in Case 5 connects with Cases 14 and 32. The index accident connects 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.
23. 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 8, 12, 18 and 29.
24. I have no doubt given the nature of the accident and the multiplicity of links established by the Similar Fact Evidence this accident was one of a series of stage-managed accidents and that Mr Al Hashimi, Mrs Mohamed and Mr Taylor were a party to a substantial conspiracy. Mr Pulford submitted that Mr Al Hashimi was central to the conspiracy. I concur with that submission. I consider that Mr Al Hashimi's centrality is demonstrated by the operation of his own garage and the multiplicity of the links to a number of the key players in this extensive conspiracy.

Damages

25. In this matter Tesco had to pay repair costs for the damage to its own vehicle in the sum of £1,030.03. I am satisfied that Tesco is entitled to recover that sum for which the parties are jointly and severally liable.
26. I am also satisfied from the statement of Mrs Plumb that Tesco is entitled to recover £2,883.27 for the internal work engaged in this investigation for which

the parties are jointly and severally liable. 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.

27. 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 in his Skeleton argument asked me to make an award of £18,000 against Mr Al Hashimi, Mrs Mohamed and Mr Taylor. In his oral submissions Mr Pulford asked me to make a distinction in respect of Mr Al Hashimi given his central role in the conspiracy.
28. 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.”

29. 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.

30. 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 Al Hashimi and Mrs Mohamed also paid for this “service” in the same manner as witnessed by Ms Nusseibeh (see findings in Mouradi). They did so for financial gain. Mr Al Hashimi claimed for damage which had not been sustained in this sham crash. He further enjoyed the fruits of his fraud by using a prestige hire vehicle and incurring hire charges of £12,334.32. Had his claim succeeded he would also have recovered general damages. Similarly Mrs Mohamed would also have recovered general damages..
31. Mr Al Hashimi and Mrs Mohamed submitted a Claim Notification Form, Claim Form, Particulars of Claim and Reply and Defence to Counter Claim all supported with a statement of truth. The Reply positively asserted the accident was genuine. Those false representations were bolstered with claims for fictitious injury. They both claimed in their medical reports that the air bag had been activated. Tesco was entitled to rely on those representations, all of which were untrue. Thus, Mr Al Hashimi and Mrs Mohamed lied in court documents thereby damaging the integrity of the justice system.
32. Mr Al Hashimi, Mrs Mohamed, and others unknown, induced a trusted employee, Mr Taylor, 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 four earlier successful sham crashes committed a further gross breach of trust in the index accident. I find Mr Taylor deliberately crashed his Tesco van into Mr Al Hashimi and Mrs Mohamed. Mr Taylor then lied to Tesco in his extensive description of the incident in his accident report. He also lied

about completing the “bump card.” The crash also required Tesco to repair its Iveco Daily van. 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.

33. 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.
34. Mr Al Hashimi, Mrs Mohamed and Mr Taylor have not furnished this court with any information as to their income and assets. I have taken into account Mr Pulford’s representations. I am satisfied that given the extent of the outrageous conduct and the size of this conspiracy as set out in the Similar Fact Evidence Mr Al Hashimi’s position elevates the extent of his egregious conduct. He will therefore be ordered to pay £20,000 exemplary damages. I am satisfied Mrs Mohamed’s and Mr Taylor’s roles were such that the award of exemplary damages in respect of their cases should be £18,000.
35. 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.
36. 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

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) – 23/10/2019.
 - Jasim & Khalil (Case 10) – 06/11/2019.
 - Florin Danila (Case 25) – 02/10/2019.
 - Al Hashimi & Mohammed (Case 11– Index Matter) – 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. In her Claim Form and CNF the First Defendant provided her address as 177 Conway Crescent, Perivale, Greenford, UB6 8JE.

2.1.2. 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.

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

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

2.1.3.2. 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 this company.

GREGORZ COLLINS

2.2. Darran Taylor reversed into collision with Gregorz Collins (Case 8). Grzegorz Collins has the following connections to this and other cases within the Linked Action:

2.2.1. Grzegorz Collins brought a claim for personal injury, vehicle damage and credit hire charges.

- 2.2.2. Gregorz Collins is a director of the following companies:
- PWC London Ltd with a registered address of 16a Badminton Close – appointed 14/08/2019.
 - Collins Brothers Group Limited with a registered address of 16a Badminton Close – appointed 14/08/2019. This company operates as ‘Collins Brothers Customs.’
- 2.2.3. A Facebook profile was identified for Collins Brothers Customs which linked to Prestige Wrap & Customs.
- 2.2.4. The Instagram account for Grzegorz Collins confirms on his biography he is the owner of Prestige Wrap.
- 2.2.5. 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.
- 2.2.6. Prestige Wrap Unit 5 Belvue Business Centre, London 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.

- 2.2.7. Prestige Wrap previously operated from Unit 4/8 Logic House, Belvue Road, Northolt, UB5 5QJ prior to moving to the Belvue Business Centre (adjacent road).
- 2.2.8. Unit 4/8 Logic House, Belvue Road, Northolt, UB5 5QJ is also the address of Larini Car Sales Limited.
- 2.2.8.1. In Case 6 Adel Sayahi, the Claimant's vehicle was acquired by Larini Car Sales Limited.
- 2.2.8.2. Larini Car Sales Limited is a company directed by Mousa Issa.
- 2.2.8.3. Mousa Mohamad Issa is also the company director for W3 Car Repairs Limited at the registered address of Sabichi House, 5 Wadsworth Road, Perivale, Greenford, UB6 7JD.
- 2.2.8.4. W3 Car Repairs Limited was formerly registered at 7 Essex Park Mews W3 7RJ.
- 2.2.8.5. W3 Car Repairs Limited was the garage in Case 30 Faris, where the Claimant's vehicle was reported to be stored at W3 Car Repairs Limited 7B Essex Park Mews W3 7RJ as asserted in the Claimant's engineers (Blakes Assessors) report.
- 2.2.8.6. In Case 27 Nour, the Claimant's vehicle was reported to be stored at W3 Car Repairs Limited 7B Essex Park Mews W3 7RJ as was confirmed in the Claimant's engineers (Blakes Assessors) report.
- 2.2.9. Logic House, Belvue Road, Northolt, UB5 5QJ is the address given for Wish Lounge.
- 2.2.10. Blake Assessors is the engineering company which inspected the Gregorz Collin's vehicle in Case 8. Blake Assessors is also the company which has provided expert engineer's reports in 15 other cases throughout the Linked Action.
- 2.2.11. Gregorz Collin is Facebook friends with Noel Khuashaba.

SAFAA JASIM AND FIRAS KHALIL

- 2.3. 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:
- 2.3.1. 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.
- 2.3.2. Darran Taylor in the Tesco van remained on Rosemore Street for 37 minutes. A copy of the GPS vehicle tracking log is appended to this Defence.
- 2.3.3. Safaa Jasim brought a claim for personal injury, vehicle damage and credit hire. Firas Khalil brought a claim for personal injury and physiotherapy charges.
- 2.3.4. 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.
- 2.3.5. 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.

- 2.3.6. 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

- 2.4. 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:

- 2.4.1. The Claimant in Case 25, at the scene of the collision, gave his name as Daniel Florin Costel. In a credit hire agreement form he gave his address as Flat 14 Leemark House, Granville Road, Littlehampton BN17 5JS and date of birth as 16/02/1980.
- 2.4.2. 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.
- 2.4.3. Florin Danila in Case 25 brought a claim for vehicle damage, recovery and storage charges and credit hire charges.
- 2.4.4. 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).
- 2.4.5. Florin Danila in Case 28 brought a claim for vehicle damage, recovery and storage charges and credit hire charges.
- 2.4.6. Evans Harding Engineers is the company which inspected the vehicles in both Cases 25 and 28.

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

2.4.7.1. 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.

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

2.4.7.3. 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.

2.4.7.4. 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.

2.4.7.5. 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.

2.4.7.6. 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.'

2.4.8. 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.

2.4.8.1. 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.

2.4.9. 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).

PRESENT CASE

3. Darran Taylor drove into collision with the First Claimant's Vehicle in which the First and Second Claimants were occupants, while Darran Taylor was emerging from a parked position, at 7.05pm.

ZAINAB MOHAMMED

4. The Second Claimant in her CNF and in her Claim Form reported this collision occurred on 21 November 2019.
5. Second Claimant brought a claim for Personal injury.

HASHIM AL HASHIM

6. The First Claimant in his CNF and in her Claim Form reported this collision occurred on 21 November 2019.

THE CLAIMANT'S VEHICLE

7. The First Claimant's Vehicle underwent the following relevant MOTs:
 - 7.1. 13/09/2019 – Autobike MOT Unit at 7A Abbey Industrial Estate, Wembley, HA0 1UD – this same test centre carried out an MOT test on the Claimants vehicle in Case 5.
 - 7.1.1. This address is in close proximity to Safe Autos 7C Abbey Industrial Estate, Wembley, HA0 1UD which carried out MOT Tests on the Claimants' vehicles in Case 3 and Case 7.

7.2. 14/12/2020 – GBR Motors Unit 18 Abbey Industrial Estate, HA0 1NR.
This same test centre carried out MOT Tests on Case 3 and Case 12.

7.3. The First Claimants Vehicle, GK62 VTN was identified as having being subject to a finance agreement.

7.3.1. Blue Motion Finance responded to a DPA request on 29/12/2021.
The following is of relevance:

- The First Claimant notified Blue Motion Finance that his vehicle was a write off on 20/12/2019.
- The First Claimant was unable to meet his vehicle payments between May 2020 and October 2020 due to the First Claimant being on furlough.
- The finance was settled in full on 16/04/2021.

FIRST CLAIMANT'S COMPANY

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

8.1.1. Cars77 Limited's registered address is 150 Coles Green Road, NW2 7JL.

8.1.2. 150 Coles Green Road, NW2 7JL is also the address for Inter Car Solutions Limited which is directed by Hayder Sharif.

8.1.2.1. Hayder Sharif is also the director of HS Motors Limited.

8.1.2.2. HS Motors Limited is registered at Unit 9B Abbey Industrial Estate and is the storage and inspection location for the Claimant's vehicle in Case 3 and Case 20.

NADEEM JAWAHERI

9. Hashim Al Hashimi's has a Facebook account, on which he 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.

9.1. Nadeem Jawaheri is also associated 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.

ADEL MOTLAGHI SAYAHI

9.2. Adel Sayahi (Facebook associate of Nadeem Jawaheri).

9.3. 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.

9.4.

9.4.1. 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.

9.4.2. 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.

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

9.4.2.2. 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.

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

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

9.4.2.3.2. Ghaith Al Waili is the current Director.

9.4.3. 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

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

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

9.5.2. 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.

9.5.3. 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 22/02/2019 and 14/05/2019.

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

9.5.4. 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

9.6. Awara Mario has a Facebook account in which he is associated with Nadim Jawaheri and on which he 'loved' a post made by Nadim Jawaheri (ندیم جواهری).

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

9.8. 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 (the index matter).
- 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.

9.8.1. Hano Autos Ltd registered address is 7 Westmoreland House, Cumberland Park, Scrubs Lane, London, NW10 6RE.

- 9.8.2. There are two further companies bearing the name ‘Hano’:
- 9.8.2.1. Hano Autos UK Limited’s registered address is also 7 Westmoreland House, Cumberland Park, Scrubs Lane, London, NW10 6RE and is directed by Niaz Saleh who filed a CH01 with Companies House having changed his name from Awara Saleh to Niaz Saleh on 19.02.2015.
 - 9.8.2.2. Hano UK Limited’s registered address is also 7 Westmoreland House, Cumberland Park, Scrubs Lane, London, NW10 6RE.
- 9.8.3. 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:
- 9.8.3.1. Unit 4-6 Abbey Industrial Estate, Mount Pleasant, Wembley, Middlesex, HA0 1QT.
 - 9.8.3.1.1. 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.

- 9.8.3.2. 7 Westmoreland House, Cumberland Park, Scrubs Lane, London, NW10 6RE the current registered address (as set out above).
- 9.8.3.3. 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.
- 9.8.4. 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.
- 9.8.5. 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:
- 9.8.5.1. 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.

9.8.5.2. 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.

ABBEY INDUSTRIAL ESTATE, MOUNT PLEASANT, WEMBLEY HA0 1RE

10. In the present claim Evans Harding Engineers report that the First Claimant's Vehicle was allegedly stored and inspected at ROJ Motors at 20b Abbey Industrial Estate, Mount Pleasant, Wembley HA0 1RE.

10.1. Evans Harding Engineers are the engineer on:

- Case 3 (Alghafagi).
- Case 7 (Mouradi).
- Case 11 (Present).
- Case 12 (Abdulla).
- Case 18 (Hayder Mohammed).
- Case 25 (Danilla).
- Case 28 (Danilla) and
- Case 32 (Kirschner).

ROJ MOTORS

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

10.2.1. 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.

- 10.2.2. ROJ Motors is not a limited company, therefore there is no information available on the Companies House database.
- 10.2.3. Online searches for ROJ Motors have produced no results whatsoever.
- 10.2.4. 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.
 - 10.2.4.1. 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.
- 10.2.5. Further matches also confirm an address of Unit 17 Abbey Industrial Estate Mount Pleasant, Wembley of JJ Motor Body Repairs.
- 10.3. A further Google search was carried out for ‘20b Abbey Industrial Estate’ and a copy of the results are available.
- 10.4. A Google images show the address ‘20b’ on the Abbey Industrial Estate.
 - 10.4.1. There is no signage to confirm that Roj Motors operates from this location.
- 10.5. 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.

10.6. 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.

10.6.1. 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

10.7. 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.

10.7.1. "HS Motorss Limited" is directed by Hayder Sharif (D.O.B. June 1989) and has a registered address of Unit 9b, Abbey Industrial Estate, Mount Pleasant, Wembley, HA0 1NR.

10.7.2. 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.

10.7.3. 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.

10.7.3.1. 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).

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

NOEL KHUASHABA

10.8. 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.

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

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).

10.9.1. 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.

10.10. Noel Khuashaba has a Facebook account under the name NoelYNoel.

10.10.1. 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).

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

GHAITH AL WAILI

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

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

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

10.14. Wish Lounge Limited has an Instagram account under the name @wishlounge.

10.15. 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.Document.

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

10.16.1. 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.

10.16.2. 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.

10.17. 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.

10.18. 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

10.19. 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.

10.20. Martaza Al Hamadi was Director of Logistic Solutions 613 Ltd.

10.20.1. Martaza Al Hamadi is also listed as the Director of Perivale Motor Group.

10.20.2. 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.

10.20.3. 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.

10.20.3.1. 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.

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

BIAR HAWAIZI

- 10.21. Biar Hawaizi is or has been the director of the following companies:
- aa. Eagle Coachcrafts 007 Limited (Company Number 06597739) previously had a registered address of 42 Bideford Avenue, UB6 7PP.
 - bb. Antonella Wine Bars Limited (Company Number 07002654).
 - cc. A1 Performance Solutions Ltd (Company Number 07002654) previously had a registered address of 44 Bideford Avenue, UB6 7PP.
 - dd. BH Cars Limited (Company Number 09127857) is now registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD.
 - ee. BH Car Repairs Limited (Company Number 09128288) previously had a registered address of 44 Bideford Avenue, UB6 7PP.
 - ff. Fast Performance Limited (Company Number 09410193) is registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD.
 - gg. B1 Capital Cars Limited (Company Number 09739859) is now registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD.
 - hh. Auto Empire Limited (Company Number 09961022) is registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD.
 - ii. Berkeley Motors Limited (Company Number 10472101) is now registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD.

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

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

10.21.1.1. The Companies House record for Logistic Solutions 613 Ltd gave a previous registered address of The Pavilion, Rosslyn Crescent, Harrow, HA1 2SZ.

10.21.1.2. Logistic Solutions 613 Limited is dealt with at [40.20.3.1 above].

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

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

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

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

BOWER LALLY

10.22. 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.

10.23. 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.

- 10.24. Bower Lally is the Claimant in Cases 14 and 15. Bower Lally brought a further claim against Tesco in February 2022.
- 10.25. 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.
- 10.25.1. 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.
- 10.26. 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.

MOUSA MOHAMAD ISSA

- 10.27. Mousa Mohamad Issa is the director of Larini Car Sales Ltd of Unit 4/8 Logic House, Belvue Road, Northolt, UB5 5QJ.
- 10.27.1. 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.
- 10.28. Mousa Mohamad Issa therefore purchased the Claimant in Case 6's vehicle following the collision with a Tesco Driver.
- 10.29. 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.

- 10.29.1. W3 Car Repairs Limited was formerly registered at 7 Essex Park Mews W3 7RJ.
- 10.29.2. 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 (Blakes Assessors) report.
 - ii. Nour (Case 27) where the Claimant's vehicle was reported to be stored at W3 Car Repairs Limited 7B Essex Park Mews W3 7RJ as was confirmed in the Claimant's engineers (Blakes Assessors) report.
- 10.29.3. W3 Car Repairs has an Instagram account and was located under the @w3carrepairs with an account name W3 Car Repairs Ltd. The account is 'followed' by an account under the name @berkeleymotorslimited with an account name of 'Berkeley Motors Limited'. This is a company run by Biar Hawaizi.

Appendix 2

