

Case No: G35YJ871

IN THE CENTRAL LONDON COUNTY COURT
BEFORE HHJ BAUCHER

Date: 12th February 2024

BETWEEN:

SAFAA JASIM

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 Claimant pursued a claim against Tesco Stores Limited (Tesco) in relation to a collision between a Mercedes-Benz E220 registration KT16 UOU and an Iveco Daily Van registration BL17 XHW driven by Tesco's driver, Darran Taylor, on 6th November 2019. I shall refer to the parties by name for ease of identity.
2. Mr Jasim served a Claim Form, Particulars of Claim, Schedule of Special Damages and medical report from Dr Lakhani on 29th December 2019, in which he sought to recover damages for vehicle damage, credit hire charges of £10,812.30 and general damages for personal injury in excess of £10,000.
3. Firas Khalil, an alleged passenger in Mr Jasim's vehicle issued proceedings on 25th September 2020 and discontinued his claim on 19th February 2021.
4. On 10th July 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 Jasim and Mr Taylor. On 1st July 2021 Mr Jasim filed a Notice of Discontinuance. On 27th September 2021 judgment was entered against Mr Jasim and Mr Taylor. The outstanding issue is the assessment of damages in respect of both parties.
5. Tesco Stores Limited (Tesco) identified a further 12 litigated 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 Jasim or Mr Taylor. I am grateful for the diligent and careful manner in which Mr Pulford presented his case.

Dramatis Personae

7. The following personnel featured in the claim:

Safaa Jasim	Claimant	Assessment of Damages	Defendant	Driver
Darran Taylor	Part 20 Defendant	Assessment of Damages	Defendant	Tesco Driver
Mohamed Suleman	/	/	Witness	Tesco Driver
Krystof Palenta	/	/	Witness	Tesco Driver

Stalin Salazar	/	/	Witness	Tesco Driver
Jumana Nusseibeh	/	/	/	Witness
Graham Douglas	/	/	Witness	Fraud Analyst
Julie Hawkins	/	/	Witness	Tesco Fleet Legal Manager
Julie Plumb	/	/	Witness	Tesco Insurable Risk Manager
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 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 Jasim 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 against both parties 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 and Ms Nusseibeh there is no purpose to be gained from a further review of that evidence in this action.

11. 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 (this accident) and 21st November 2019 (Case 11).
12. On 6th November 2019 Mr Taylor was scheduled to make a delivery to 149 Wiltshire Close, Draycott Avenue, London SW3 2NY. At 18:10 Mr Taylor drove his Tesco van to Rosemoor Street, Chelsea, London SW3 2GB, immediately adjacent to 149 Wiltshire Close. Mr Taylor remained in his vehicle on Rosemoor Street for 37 minutes as shown by the GPS vehicle tracking log. Mr Taylor did not notify Tesco that his vehicle had been involved in any collision with Mr Jasim's vehicle.
13. On 8th November 2019 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 described in paragraph 15 of Ms Hawkin's witness statement.
14. Mr Taylor subsequently reported the accident on the 10th December 2019 as follows:

Account of Alleged Incident:

Reversed into another car, nearside rear.

Drivers Statement:

i had just done my delivery and got back into my van, i couldn't drive forward as there was a fire engine in front of where i was parked in the centre of the road. i decided to reverse as the fire engine had just arrived and there was no space to drive past. visibility wasn't great as it was dark and the flashing lights from the fire engine wasnt any help, whilst reversing. i heard a bang and immedialy stopped, realising i had reversed into another car, i did accept liability as i was reversing into the main road.

15. In that accident report Mr Taylor blamed the incident on the presence of a fire engine which had blocked his path causing him to reverse. Following a request for information, London Fire Brigade confirmed no fire engine was engaged at that location at the date and time of the incident.
16. 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. Mr Etherington provided a comprehensive report in this matter. He concluded:

“I am of the opinion that the Mercedes has 4 separate damage profiles on the nearside. I am of the opinion that the damage into the outer edge of the roof rail, the impact into the forward section of the nearside front door and the rear section of the nearside front door and the light slanted contact marks on the rear bumper were not caused as a result of this incident. The SRS deployment is consistent with being caused when the unrelated damage occurred to the nearside doors and the B post and therefore it would be related to the possibly compatible glancing damage to the nearside rear door and nearside quarter panel.....

I am of the opinion that the unrelated damage that has caused this SRS to deploy and the structural damage to the B post would cause the Mercedes to be unroadworthy but this has not occurred as a result of contact with the Tesco Iveco so the Mercedes would not be unroadworthy as a result of the contact because it would already be unroadworthy as a result of the unrelated damage.”

17. I have considered the entirety of the report and in particular the photographs which Mr Etherington subjected to forensic analysis. I have no hesitation in accepting Mr Etherington's evidence.
18. The index accident also needs to be considered in the context of the Similar Fact Evidence.

Similar Fact Evidence

19. 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.
20. This was not a one-off accident deploying little preparation or planning. The modus operandi follows a distinct pattern; a Greenford Depot driver on a residential road, at night, reversing from a minor road to a major road, crashing into the side of a third-party vehicle. That is the same set of facts as Cases 3, 4, 5, 6, 8, 13, 16, 20, 21, 25 and 30. It also falls into the group of twenty-one cases where the Tesco driver was reversing and the group of twenty-one cases where the damage to the third-party vehicle was side on. The air bag was also said to have deployed in the crash as in Cases 1, 4, 5, 6, 9, 11, 28, 30 and 32. Further, Mr Jasim's vehicle had four areas of damage; only one of which could be consistent with this crash. Inconsistent damage is recorded in Cases 1, 2, 3, 4, 6, 9 and 13. A particular feature was reported; damage to the roof rail of the vehicle. Incompatible damage to the outer edge of the roof rail was similarly reported in Cases 1, 2, 6, 9, 13 and 16.
21. On 19th June 2019 Mr Jasim's vehicle undertook an MOT at a garage in close proximity to Johnson House where in Case 7 the vehicle was MOT assessed. Johnson House is also linked to Cases 10 and 23. The vehicle had another MOT on 24th January 2020 at the same garage JRJ Limited where the Claimant in Case 14 stored his vehicle. JRJ Limited is operated by Mr Dawood the husband of the Claimant in Case 5. The address of that garage is the same registered office address as the Claimant in Case 32's business. The vehicle was finally MOT

assessed on the 21st February 2021 at Johnson House the same business address used by Wish Lounge Ltd directed by Ghaith Al-Waili who is linked to Noel Khuashaba linking this case to Cases 1, 2, 4, 5, 9,13,16, 27 and 30.

22. The relevance of the Similar Fact Evidence is also illustrated by the actions of Mr Taylor and the fact that his other four accidents generated Cases 5, 8, 11 and 25. Mr Taylor reversed into collision with Mrs Khattawi (Claimant in Case 5) on 11th September 2019 which provides links with Cases 14 and 32. The accident on the 21st 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.
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, 6, 8, 15, 16, 19 and 29. Links from Hano Autos extend to Cases 11,12, 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 Mr Jasim and Mr Taylor were a party to a substantial conspiracy.

Damages

25. I am satisfied, from the statement of Mrs Plumb, that Tesco is entitled to recover the cost of the internal work of the investigation in the sum of £2,736.04 for which the parties are jointly and severally liable.
26. 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 £18,000 against each party.

27. 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.”

28. 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.

29. In this case Mr Jasim submitted a Claim Notification Form, Claim Form, Particulars of Claim all supported with a statement of truth. He also bolstered that

claim with a fictitious claim for personal injury and told his medical expert the impact was at medium speed and the airbags were deployed. The tracking data demonstrates that whilst in situ in the location the vehicle reached a maximum speed of 4.8mph. Mr Etherington is unequivocal the air bag was not deployed in any accident. Tesco was entitled to rely on the representations made in the pleadings and documents, all of which are untrue. I am satisfied Mr Jasim made false representations with the intention of recovering substantial compensation from Tesco. It is clear he was struggling to meet the financial repayments on his vehicle. Direct debits for the finance on his vehicle were returned due to insufficient funds on eight occasions prior to the accident. It is also apparent from Mr Etherington's report his vehicle had sustained multiple points of damage in other accidents. Mr Jasim further enjoyed the fruits of his fraud as he gained the use of a prestige hire vehicle and incurred hire charges of £10,812.30. Had his claim succeeded Mr Jasim would also have recovered damages for his personal injury.

30. The accident was a sham. I am satisfied that as in similar accidents Mr Taylor waited for Mr Jasim to arrive and then deliberately reversed his vehicle into Mr Jasim's car. I have no doubt he did so because he had been paid "cash for crash" as is clearly set out in the evidence of Mr Suleman, Mr Palenta and Mr Salazar. I also find that Mr Jasim paid for this "service" in the same manner as witnessed by Ms Nusseibeh (see findings in Mouradi). Thus, Mr Jasim lied in court documents therefore damaging the integrity of the justice system. He, and others unknown, also induced Mr Taylor, a trusted employee, in a position of responsibility to breach that trust. Mr Taylor motivated by avarice committed a gross breach of trust. He deliberately drove his vehicle into Mr Jasim's car. He then lied about the initial accident and the extent of the damage. He further lied when interviewed. He admitted it was the second time he had forgotten to report an incident. He maintained his account the incident was affected by the presence of a fire engine despite being told there was no fire engine in the vicinity at the material time. 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.

31. 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.
32. Mr Jasim and Mr Taylor have not furnished this court with any information as to their income and assets. I am satisfied given the extent of the egregious conduct and the extent of this conspiracy as set out in the Similar Fact Evidence there should be an award of exemplary damages against each party in the sum of £18,000. I consider that is sufficient to deter Mr Jasim and Mr Taylor and others, from engaging in “cash for crash” fraud.
33. There will be judgment for Tesco accordingly. I shall ask Counsel to calculate the appropriate interest and to prepare the final order.
34. 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

35. 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

36. 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 (Case 10 Index Matter) – 06/11/2019.
- Florin Danila (Case 25) – 02/10/2019.
- Al Hashimi & Mohammed (Case 11) – 21/11/2019.

THE COLLISION

37. On 06 November 2019 Darran Taylor reversed into collision with Safaa Jasim and Firas Khalil:

37.1.1. 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.

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

37.1.3. Darran Taylor did not notify Tesco of the collision with Safaa Jasim's vehicle.

- 37.1.4. On 08 November 2019 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.
- 37.1.5. 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.
- 37.1.6. 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.

SHIMAA KHATTAWI

- 37.2. 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:
- 37.2.1. Shimaa Khattawi's discontinued claim was for personal injury, vehicle damage, credit hire charges and recovery & storage charges.
- 37.2.2. In her Claim Form and CNF Shimaa Khattawi provided her address as 177 Conway Crescent, Perivale, Greenford, UB6 8JE.
- 37.2.3. 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.

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

37.2.4.1. 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.

37.2.4.2. 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.

FLORIN DANILA

37.3. 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:

37.3.1. 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.

37.3.2. 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.

37.3.3. Florin Danila in Case 25 brought a claim for vehicle damage, recovery and storage charges and credit hire charges.

37.3.4. 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).

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

37.3.6. Evans Harding Engineers is the company which inspected the vehicles in both Cases 25.

37.3.7. This same company feature as the engineer for the Claimants in

- Case 7 (Mouradi),
- Case 11 (Hashimi),
- Case 12 (Abdulla),
- Case 18 (Waleed Mohammed) and
- Case 32 (Kirschner).

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

37.3.8.1. Prime Autocare is the storage, recovery and repair garage used in:

- Case 25 Danila,
- Case 26 Al Shamar,

- Case 28 Danila,
- Case 32 Uwe Kirschner.

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

37.3.8.3. 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.

37.3.8.4. 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.

37.3.8.5. 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.

37.3.8.6. 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'.

37.3.9. 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.

- 37.3.9.1. 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.

37.3.10. 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).

HASHIM AL HASHIMI AND ZAINAB MOHAMMED

37.4. 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.

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

37.4.2. 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.

37.4.3. 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, the owner of Hano Autos.

SAFAA JASIM

THE VEHICLE

38. Blake Assessors Engineers inspected the Claimant's vehicle in this claim.

38.1. Blake Assessors feature as the Claimant engineer on 15 other cases in The Linked Action:

- Case 1 Bahceci,
- Case 2 Namdar,
- Case 4 Morgan,
- Case 5 Khattawi,
- Case 6 Sayahi,
- Case 8 Collins,

- Case 9 Reed,
- Case 10 Jasim (index),
- Case 13 Yaman,
- Case 15 Lally,
- Case 16 Ahmed,
- Case 19 Hussain,
- Case 27 Nour,
- Case 29 Rogalewicz,
- Case 30 Faris,
- Case 31 Said.

38.2. It is important to note that with the report of Phillippos Constantinou an image of the Claimant's Vehicle's roof sill is provided, titled 076.jpeg. This image reveals a dent to the sill on the upper rim of the roof of the Claimant's Vehicle.

38.3. Incompatible damage to the outer edge of the roof rail is reported in the following additional cases:

- i. Case 1 Bahceci,
- ii. Case 2 Namdar,
- iii. Case 6 Sayahi,
- iv. Case 9 Reed,
- v. Case 13 Yaman,
- vi. Case 16 Ahmed.

39. The Claimant's Vehicle, KT15 UOU was subject to a finance agreement with Black Horse Finance. In response to a DPA request on 02/03/2022 Black Horse Finance gave the following information:

39.1. The finance agreement in the sum of £16,000 began on 12/06/2018.

39.2. The Claimant's direct debit payments were returned due to lack of funds on the following dates:

- 12/07/2018.
- 11/01/2019.
- 12/03/2019.
- 10/05/2019.
- 12/06/2019.
- 12/07/2019.
- 12/09/2019.
- 19/09/2019.

39.3. Full repayment of the finance for the Claimant's Vehicle was made on 16/01/2020 in the sum of £11,863.05.

MOT GARAGES

40. The Claimant's Vehicle underwent the following MOT Assessments:

40.1. On 19/06/2019 the Claimant's Vehicle was MOT assessed at Shine Motors Limited of 7a Coronation Road, Park Royal, London, NW10 7PQ. This is in close proximity to Johnson House, Johnsons Way, London, NW10 7PF.

40.1.1. Johnson House, Johnsons Way, London, NW10 7PF is also the address at which Shahin Mouradi (Claimant in case 7)'s vehicle underwent MOT assessment.

40.1.2. Johnson House, Johnsons Way, London, NW10 7PF is also the address of Logistic Solutions 613 Ltd.

JOHNSON HOUSE / MARTAZA AL HAMADI

40.2. 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.

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

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

40.3.2. 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

40.3.3. 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.

40.3.3.1. 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.

40.3.3.2. 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.

40.4. On 24/01/2020 the Claimant's Vehicle was MOT assessed at Simba Autos Unit 7 Fleetway West Business Park 14-16 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD. This is the same address from which the following companies operate or previously operated from:

40.4.1. JRJ Limited is the garage 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.

40.4.1.1. Shimaa Khattawi (the Claimant in Case 4) is married to Mr Faisal Dawood, who is the Sales Manager at JRJ Limited.

40.4.2. Jag & Land UK Parts Limited has a previous registered address of 14-16 Wadsworth Road, Perivale, UB6 7LD.

40.4.2.1. Uwe Kirschner the Claimant in Case 32 is the director of Jag & Land UK Parts Limited.

40.5. On 21/01/2021 the Claimant's Vehicle was MOT assessed at MKAutostone Vehicle Repairs & Training Centre Limited of Unit 2 Johnson House, Johnson's Way, London, NW10 7PF.

40.5.1. Wish Lounge Limited is a business which operates from Johnson House, Johnson's Way, London, NW10 7PF.

40.5.1.1. Wish Lounge Limited is directed by Ghaith Al-Waili.

GHAITH AL WAILI

40.6. Ghaith Al Waili was the director of Wish Lounge Lounge before handing the role to and Alexander Reed (the Claimant in Case 9).

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

40.6.2. 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.

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

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

40.7.1. The Instagram account for Petrichor Designs Limited is @p.designsltd It can also be seen from document 0.198 that the Facebook profile, <https://www.facebook.com/ghaith.alwaili.1> confirms that he is a project manager for Petrichor Designs Ltd.

40.7.2. 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 page 16 the account of Samatar Jama,
 - iii. Mr_b1arx – the account of Biar Hawaizi,
- 40.8. 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.
- 40.9. Ghaith Al-Waili and Noel Khuashaba are both directors of Expert Rock Limited.
- 40.10. Ghaith Al-Waili and Noel Khuashaba are also ‘friends’ on Facebook.

NOEL KHUASHABA

- 40.11. Noel Khuashaba has a Facebook account under the name NoelYNoel as explained at paragraph 67 of the statement of Graham Douglas.
- 40.12. Noel Khuashaba is Facebook friends with Gregorz Collin (the Claimant in Case 8).
- 40.13. 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).

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

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

40.15. Fast Ten Limited carried out repairs and provided the invoice in Case 29 [29.19]. The contact number on that invoice “07551511515” is registered to Mousa Mohamad Issa.

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

MOUSA MOHAMAD ISSA

40.16. Mousa Mohamad Issa is the company director of W3 Car Repairs Limited at the registered address Sabichi House, 5 Wadsworth Road, Perivale, Greenford, UB6 7JD.

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

40.16.2. 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 (Blakes Assessors) report.

40.16.3. W3 Car Repairs has an Instagram account under the name @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.

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

40.17.1. 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.

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

BIAR HAWAIZI

- 40.18. Biar Hawaizi is or has been the director of the following companies:
- aa. B1AR X Logistics Limited (Company Number 11309385) which is registered at Unit 4 Sabre House, 1 Belvue Road, Northolt, UB5 5QJ.
 - bb. Berkeley Motors Limited (Company Number 10472101) which is now registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD.
 - cc. B1 Capital Cars Limited (Company Number 09739859) which is now registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD.
 - dd. Antonella Wine Bars Limited (Company Number 07002654).
 - ee. A1 Performance Solutions Ltd (Company Number 07002654) which previously had a registered address of 44 Bideford Avenue, UB6 7PP.
 - ff. BH Cars Limited (Company Number 09127857) which is now registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD.
 - gg. BH Car Repairs Limited (Company Number 09128288) which previously had a registered address of 44 Bideford Avenue, UB6 7PP.

- hh. Fast Ten Performance Limited (Company Number 09410193) which is registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD.
- ii. Auto Empire Limited (Company Number 09961022) which is registered at Sabichi House 5 Wadsworth Road, Perivale, Greenford, Middlesex, UB6 7JD.
- jj. Eagle Coachcrafts 007 Limited (Company Number 06597739) which previously had the registered address of 42 Bideford Avenue, UB6 7PP.

40.18.1. 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.

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

40.18.1.2. Logistic Solutions 613 Limited is dealt with above.

40.18.2. 44 Bideford Avenue, Perivale, Greenford, UB6 7PP is the address for the following companies controlled by Biar Hawaizi, Noel Khuashaba and Bower Lally as follows:

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

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

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

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

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

40.18.4.2. KT15 USG is the vehicle Alexander Reed (Claimant in Case 9) was driving in his collision with the Tesco Driver Mubarik Quaaaje.

NADEEM JAWAHERI

40.19. Biar Hawaizi is ‘friends’ via Facebook Nadeem Jawaheri.

40.20. 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

40.21. 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.

40.21.1. 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,

40.21.2. 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.

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

40.21.2.2. 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.

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

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

40.21.2.3.2. Ghaith Al Waili is the current Director.

40.21.3. 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

40.22. Rinas Ahmed (also goes by the name Rinas Osman) (Facebook friend of Nadeem Jawaheri), is the Claimant in Case 16.

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

40.22.2. Aviva in a DPA response set out their policy holder in the collisions with Mohammed Namdar (Claimant in Case 2) was R & A Repairs Limited of 100 Welley Road, Wraysbury, Staines-upon-Thames, TW19 5HF.

40.22.3. Mohammed Namdar (Claimant in Case 2) issued previous claims against Aviva for collisions on 20/04/2019 and 11/08/2013.

40.22.3.1. In the Aviva DPA response, a schedule of vehicles insured under the policy for R & A Repairs Limited was provided, which included the following vehicle registrations: M88 BWR, W8 BWR.

- M88 BWR is the vehicle with which Namdar (Claimant in Case 2) 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.
- M88 BWR is a BMW 120 which 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.

- W8 BWR is a Mercedes C220 AMG which 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.
- A Mercedes C220 AMG with a registration number W8 BWR was also insured on the 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.

40.22.4. 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 (see paragraph 89 (ii) above).

AWARA MARIO/ HANO AUTOS

- 40.23. 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).
- 40.24. Awara Mario in his LinkedIn profile reports he is the director of Hano Autos Limited.
- 40.25. 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.

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

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

40.25.2.1. 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.

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

40.25.3. 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:

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

40.25.3.1.1. 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.

40.25.3.2. 7 Westmoreland House, Cumberland Park, Scrubs Lane, London, NW10 6RE the current registered address (as set out above).

40.25.3.3. 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.

40.25.4. 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.

40.26. 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:

40.26.1. 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.

40.26.2. 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

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

40.27.1. 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.

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

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

40.27.4. 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.

40.27.4.1. 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.

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

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

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

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

40.30. 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.

40.31. 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.

40.31.1. 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

40.32. 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.

40.32.1. “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.

40.32.2. 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.

40.32.3. 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.

40.32.3.1. 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).

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

BOWER LALLY

40.33. 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.

40.34. Bower Lally is registered as the director of the following companies:

aa. BL Motors Limited registered address is Sabre House, Unit 1, Belvue Road, Northolt, UB5 5QJ. The company has previously had registered office address as follows:

- 100c Welley Road, Staines, TW19 5HQ between 13/11/2018 and 14/01/2019,
 - Sabichi House, 5 Wadsworth Road, Perivale, Greenford, UB6 7JD between 14/01/2019 and 05/06/2019,
 - 7 Essex Park Mews W3 7RJ between 05/06/2019 and 29/09/2020.
- bb. HR Smith Limited registered at the address of Unit 1 Sabre House, Belvue Road, UB5 5QJ. Bower Lally was the sole director.
- cc. B & L Bodywork Limited registered at the address of 44d Bideside Avenue, Perivale, Uxbridge, UB6 7PP which does not appear to exist.
- However, upon searching the postcode it appears that the address is in fact ‘Bideford Avenue UB6 7PP’.
 - 42 & 44 Bideford Avenue, UB6 7PP are registered office addresses for companies run by Noel Khuashaba and Biar Hawaizi as detailed above.
- dd. OK Valeting London Limited at the address of 36-39 The Green, Southall, UB2 4AN [0.068]. The company remains active. Bower Lally is the sole director from the incorporation date until present.
- OK Valeting London Limited featured in the recent claim by Bower Lally against Tesco, accident dated 21/02/2022.
 - Carter Motors Limited.
- 40.35. Bower Lally is the Claimant in Cases 14 and 15. Bower Lally brought a further claim against Tesco in February 2022.

40.36. 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.

40.36.1. 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.

40.37. 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.

Appendix 2

