

Witness Statement of Alexander Baron, Claimant

In The Civic National Business Centre

Claim Number K8QZ9Q1A

Between

Alexander Baron

Claimant

and

George Kakala

Defendant

Witness Statement of Alexander Baron

1) I, ALEXANDER BARON, retired, Claimant (in person), of 93c Venner Road, Sydenham, London SE26 5HU will say as follows:

2) In 2019 and 2020, I acted as a process server for George Kakala, then a solicitor of Gans & Co. I also did some work for another solicitor with the same firm, Mr Odunlami, for which I was paid, but I have received no payment at all for the work I did for Mr Kakala, in spite of chasing him for it. I gave him some space to pay because I know the civil law works at a snail's pace, and also because like almost every other firm in the country, his was affected by the Covid lockdowns.

- 3) Mr Kakala has admitted in his Defence that I undertook this work but has claimed I failed to produce the Statement of Service in the correct format. He claims further that I was contacted by a Partner in the firm named Anthony Finn in connection with this. Both these claims are untrue.**
- 4) I have never heard of Anthony Finn nor corresponded with any other party about this work, and I still have the relevant e-mails to prove it, e-mails in which Mr Kakala expresses his satisfaction with the work undertaken. I exhibit 4 of these e-mails as Exhibits “AB 1” to “AB 4”. I have many more.**
- 5) Over the years I have visited the Peckham office of Gans & Co perhaps 15 or 20 times. The only males I have ever spoken to there were Mr Goodman (see next paragraph), the aforementioned Mr Odunlami, and Mr Kakala.**
- 6) I was recommended to Mr Kakala by another solicitor with the firm, Edward Goodman, who has now retired. Mr Goodman told me I should ask for cash up front for performing these services. I thought this unnecessary because I believed I could trust a lawyer to honour a verbal contract. I will not make that mistake again.**
- 7) When I undertook this work, I was acting as an agent for Mr Kakala, not for any third party, be it the Legal Aid Board or any other agency. If the Legal Aid Board has failed to pay Mr Kakala for the work I invoiced, that is his problem, not mine. These invoices were submitted to Mr Kakala, who checked them in my presence because I handed them to him personally.**
- 8) The first invoice was indeed not set out properly. Mr Kakala told me that at the time and told me how it should be formatted, so I redrafted it and gave it to him again. He checked it and signified it was correctly set out. All subsequent invoices were set out correctly, presented to Mr Kakala in person, and verified by him as correct.**

9) Earlier this year, I spoke to Mr Kakala and he asked me to send him the invoices again, see Exhibit “AB 2”. I did so because I was informed by the Gans receptionist over the telephone that he was by then working entirely or principally for another firm so may not have had access to them.

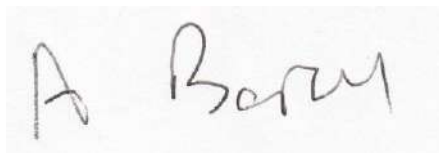
10) Again, I must stress that Mr Kakala expressed satisfaction with my work and invoices. If this were not the case, he would not have employed my services again and again and again.

Statement of truth:

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

dated this 18th day of November 2023

signed Alexander Baron

A handwritten signature in black ink, appearing to read "A Baron", on a light-colored background.