

**IN THE COUNTY COURT AT
CENTRAL LONDON**

CLAIM NO. L10CL472

BETWEEN:

**51 DRAYCOTT PLACE
FREEHOLD LIMITED**

Claimant

And

**TARQUIN MANAGEMENT
LIMITED**

Defendant

FIRST WITNESS STATEMENT OF JOHN GALANI

I, John Galani, a director by profession, and occupant of Flat 5, 51 Draycott Place, London SW3 3DB (where I reside) make this statement in support of the Claimant's claim and for use at the hearing on 15 August 2025:

- 1** I am the main point of contact for our solicitors in this matter, and always have been. I confirm that I have read and approved all of Mr Jason Kallis' witness statements (all three filed in these proceedings), and what he said in them and the exhibited correspondence was based on my instruction (any such factual evidence is based on my own experience and sometimes information given to me by others, when I have spoken to other long leaseholders at 51 Draycott Place, London, or the Police).

- 2 All of Mr Kallis's statements are true, and reasonable to my mind. I have spoken to Police on several occasions about the use of Flat 2, and the drug dealing raids that have taken place (including on the day of the 2nd raid when an arrest was made). The Police have told me that are prosecuting someone and as far as I know continue to do so. They told me that the tablets found in large packages given to them were ecstasy tablets worth several thousand pounds. I spoke to the Police on the day of the 2nd raid, and they confirmed that they were looking the tenant at flat 2, Russell McLoughlin, to arrest him.

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.

Signed:

John Galani

A handwritten signature in brown ink, consisting of several overlapping loops and strokes, positioned to the right of the printed name 'John Galani'.

Dated: 13 August 2025

