

**IN THE DISTRICT COURT OF NEW ZEALAND
MANUKAU REGISTRY**

CIV: 2012-092-1969

BETWEEN MATTHEW BLOMFIELD
Plaintiff

A N D CAMERON JOHN SLATER
Defendant

**MEMORANDUM OF MATTHEW BLOMFIELD IN RELATION TO THE
“WILL SAY” OF MR MIKE ALEXANDER**

DATED this 25th day of September 2012

Mathew Blomfield

A 7 Rame Road • Greenhithe • Auckland 0632
C 021362462
E matt@blomfield.co.nz

**MEMORANDUM TO CALL CONFERENCE FOR DIRECTIONS
AND APPLY FOR URGENCY**

MAY IT PLEASE THE COURT:

1. Attached is a “Will Say” that was prepared and sent to Mr Mike Alexander for comment and verification.
2. The document was prepared using conversations I have had with Mr Alexander on this matter.
3. Mr Alexander’s business partner Mr John Heimsath has responded with the following. As you can see they are reluctant to get involved.

“Mike would prefer not to be giving evidence at all – as you know despite the awful defamation against you and Mike (and others) our overall analysis of the matter is that the people behind Cameron Slater’s strange ill informed smear campaign may well be previous clients and our view is that those individuals are for whatever reason intent on continuing the fight with you on any front that they happen to choose next. They do not appear to be making reasoned decisions about the validity of what they are saying. In our view, they are the sort of people that will not stop attacking unless you (we) stop fighting back. Accordingly we refuse to fight back and likewise do not want to be seen as being a fellow combatant in your defamation case (however justified the case).

Mike would (for that reason) prefer not to be giving evidence. However, as mentioned he will have to if you subpoena him to do so”.

4. I attach Mr Alexander’s “Will Say” as it was sent to him and without alteration or correction. I have been told that By Mr Heimsath that “Your Will Say statement then his evidence is likely to be broadly in accordance with

what you have written". It is attached on a without prejudice basis for the purpose of this Judicial Settlement Conference.

Thank you

Dated 25th day of September 2012

A handwritten signature in black ink, appearing to read 'Matthew Blomfield', with a long horizontal flourish extending to the right.

Matthew Blomfield
Plaintiff

“WILL SAY” STATEMENT OF MIKE ALEXANDER

I, **MIKE ALEXANDER**, say:

1. I am a lawyer based in Auckland.
2. I have known Matthew Blomfield for 10 years. I have provided him with legal advice over those years.
3. I have read the Story “Operation Kite” that was published on the Whale Oil website on 4 May 2012.
4. The story says “Matt Blomfield in tandem with advice from his faithful lawyers, and a number of emails to Waitakere City Council conspired to steal a cheque from a PO Box, using some private investigators. This statement is untrue. Mr Blomfield was a director and shareholder of the company referred to in the story. He had colour of right to the cheque that was obtained. Mr Blomfield and I have never conspired to steal anything.
5. This was part of a larger dispute that was going on between two shareholders, Mr Claydon and Mr Blomfield. Heimsath Alexander has acted in a long running dispute. See attached letter that provides context.
6. The story says “Matt, on the advice of his lawyer then tried to launder the money but was caught by a vigilant bank.” This statement is untrue, Mr Blomfield endorsed the cheque into his personal account. I advised Mr Blomfield on what is required to endorse a cheque. Mr Blomfield’s error was to endorse a cheque that was marked “non transferable”. The bank later

reversed the cheque. My understanding the cheque was then sent to the company. Neither myself or Mr Blomfield to the best of my knowledge have been involved in “money laundering” of any kind.

7. The story is tagged with the words “Tagged: Corruption • fraud • Hell Pizza • Infrastructure NZ Ltd • Matt Blomfield • Mike Alexander • Paul Claydon • Theft. There was no corruption, no fraud and no theft.

Wednesday, September 19, 2012

Mike Alexander