

Message

**From:** Melanie Corfield [redacted GRO];  
**Sent:** 21/03/2019 11:37:49  
**To:** Jane MacLeod [redacted GRO]; Tom Beezer [/o=Exchange-Org/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=179d9f227294473d81b50e72aacb0623-Tom Beezer]; Amy Prime [/o=Exchange-Org/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ab7222dda3a9453eae5751238a59562-Amy Prime]; Rodric Williams [redacted gro]; Mark Underwood [redacted GRO]; Ben Foat [redacted GRO];  
**CC:** Andrew Parsons [/o=Exchange-Org/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ad9ed344815e47e4aaa3c0e7e1740919-Andrew Pars]; Dave Panaech [/o=Exchange-Org/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0310835f6adc435ab1b160664f370de9-Dave Panaec]; Mark R Davies [mark.r.davies@redacted GRO]; Patrick Bourke [patrick.bourke@redacted GRO];  
**Subject:** RE: Recusal application - filed documents [WBDUK-AC.FID26896945]

cc-ing Mark D and Patrick.  
I agree – no reason to do anything differently.

Mel

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**From:** Jane MacLeod  
**Sent:** 21 March 2019 11:37  
**To:** Tom Beezer <[redacted GRO]>; Amy Prime <[redacted GRO]>; Rodric Williams <[redacted GRO]>; Mark Underwood [redacted GRO]; Melanie Corfield <[redacted GRO]>; Ben Foat <[redacted GRO]>  
**CC:** andrew.parsons <[redacted GRO]>; Dave Panaech <[redacted GRO]>  
**Subject:** RE: Recusal application - filed documents [WBDUK-AC.FID26896945]

Thanks Tom – I agree with that, and its consistent with the approach adopted in the trial which is that documents (eg witness statements) aren't provided until they are discussed in Court (eg witness sworn in).



**Jane MacLeod**  
Group Director of Legal, Risk & Governance  
Ground Floor  
20 Finsbury Street  
LONDON  
EC2Y 9AQ  
Mobile number: [redacted GRO]

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**From:** Tom Beezer [mailto:[redacted GRO]]  
**Sent:** 21 March 2019 11:28  
**To:** Amy Prime [redacted GRO]; Jane MacLeod <[redacted GRO]>; Rodric Williams [redacted GRO]; Mark Underwood [redacted GRO]; Melanie Corfield <[redacted GRO]>; Ben Foat <[redacted GRO]>  
**Cc:** andrew.parsons <[redacted GRO]>; Dave Panaech <[redacted GRO]>  
**Subject:** RE: Recusal application - filed documents [WBDUK-AC.FID26896945]

Mel

I have spoken to Amy. I have a different view here. I don't think you should give out any documents at all, save for the holding statement you have been working on with Jane.

My thinking is as follows:

- Post Office is (put simply) launching an application that criticises this Judge.
- If this judge feels that Post Office does anything that could be seen as publically briefing against him, he may use that as further rationales in his own narrative of "aggressive" etc.
- As to which of these documents is publically available, it is certainly NOT the witness statement or exhibit as that is only public once referred to in open court – and that has yet to happen.
- The letter is private to the court.
- The Application Notice is an odd one. I don't know if the public could eventually get a copy of such a document.

But my rationale remains. In this sensitive scenario err on the side of extreme caution and avoid any possibility of Post Office being seen to launch a briefings campaign against the Judge. And certainly release nothing until we KNOW the public could get in through other channels, and that does not (yet) include the witness statement (and as I have said, I'd need to work on the issue of the Application Notice).

T

**Tom Beezer**

Partner

Womble Bond Dickinson (UK) LLP

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**From:** Amy Prime

**Sent:** 21 March 2019 11:09

**To:** Jane MacLeod; Rodric Williams; Mark Underwood (); Melanie Corfield; Ben Foat

**Cc:** Andrew Parsons; Tom Beezer; Dave Panaech

**Subject:** Recusal application - filed documents [WBDUK-AC.FID26896945]

Dear All

Please find attached a copy of the application documents which will be filed with the Court in the next 10 minutes. A copy of the exhibit to the witness statement is not attached due to its size but can be provided separately.

We have requested that the application be heard on either Thursday 28 March, or Friday 29 March. The next stage of the process is for the Judge to list the hearing date and we will update you further once we have received confirmation of this.

**Mel** – Andy is going to let me know if the application is mentioned by the Judge during Court today. If so, we will let you know. If any of the press in the court room ask for copies of the application documents, Andy is going to direct them towards your team. From a legal perspective, we don't have any objections to the application documents being provided

to the press today, but please feel free to handle this in a way which fits in with your communications strategy – if it is your preference to wait until the day of the hearing, this is fine.

Kind regards  
Amy

**Amy Prime**  
Solicitor  
Womble Bond Dickinson (UK) LLP

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