

**From:** Anthony Grabiner <[GRO]>  
**To:** Tom Beezer <[GRO]>  
**Cc:** Gideon Cohen <[GRO]>, Andrew Parsons <[GRO]>, Dave Panaech <[GRO]>, "Amy Prime" <[GRO]>, David Cavender <[GRO]> Owain Draper <[GRO]>, Stephanie Wood <[GRO]>  
**Subject:** Re: Application docs [WBDUK-AC.FID26896945]  
**Date:** Wed, 20 Mar 2019 14:22:29 +0000  
**Importance:** Normal  
**Inline-Images:** image306b08.PNG; image1c37a2.PNG; imagea860f7.PNG

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Thanks Tom. I really don't think the clients had any choice. I'm not one for adjectives and adverbs anyway so it should be firm but polite.

Regards,

Tony

Lord Grabiner QC  
One Essex Court  
Temple  
London, EC4Y 9AR

[GRO]

On 20 Mar 2019, at 14:17, Tom Beezer <[GRO]>mailto:[GRO]> wrote:

All

Just spoken to Jane M from Post Office.

Instructions from Post Office Board are "do it". Make the application.

One point – Post Office Board did not enjoy what it read about Post Office in CIT Judgment (the "vitriol" points from the Judge). Jane asks that we collectively bear that in mind and when drafting letters, witness statements etc we err on the reasoned side of life – in other words fewer adjectives than normal – to try and demonstrate that we are very reasonable.

But main point – instructed to do it.

I have predicted, to Jane, but not promised, that we would be likely to issue and serve at some point tomorrow ?

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Tom Beezer  
Partner  
Womble Bond Dickinson (UK) LLP  
d:  
m:

t:  
e: **GRO**  
**GRO**  
**GRO** <mailto:**GRO**>

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<<https://www.linkedin.com/company/womble-bond-dickinson-uk-llp/>>

From: Gideon Cohen [mailto:**GRO**]  
Sent: 20 March 2019 13:22  
To: Tom Beezer; Andrew Parsons; Dave Panaech; Amy Prime  
Cc: David Cavender; Anthony Grabiner; Owain Draper; Stephanie Wood  
Subject: Application docs

In anticipation of (hopefully) getting the green light for this application from PO, please see attached the application documents. There are various bits to be filled in (particularly references in the WS).

Grateful if everyone could take a careful look at all of these though.

I have gone for a time estimate for the hearing of 4 hrs. Thoughts on that appreciated too.

Thanks

Gideon

Gideon Cohen  
Barrister

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