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**From:** Mark R Davies [GRO]  
**Sent:** Thur 21/03/2019 9:43:04 AM (UTC)  
**To:** Jane MacLeod [GRO]; Alisdair Cameron [GRO]  
**Cc:** Mark Underwood1 [GRO]; Patrick Bourke [GRO]; Melanie Corfield [GRO]  
**Subject:** Statement: legally privileged and strictly confidential

All

As the application for recusal will be made this morning and likely to be public by lunchtime, we have prepared the statement below with input from Portland and legal team.

I would like to send to the Board and BEIS/UKGI for information and we will also prepare [limited] internal and stakeholder comms.

Are all content? Will have to send by 10 I think so apologies for short turnaround.

Mark

“We have reflected in great depth on the proceedings and detailed judgment from the first trial and will continue to consider all options.

“As part of this, we have decided to make an application for the sitting Judge to be recused from the ongoing and upcoming trials. We are acutely aware of the significance of this application, but we have serious reservations about the Judge’s ability to remain impartial in these proceedings.

“We firmly believe that this application is in the best interests of a stable and sustainable Post Office network and the communities who rely on our services every single day.

“We will continue to make operational and other improvements in the interests of our customers and postmasters, including those raised by the judgment. The applications we will be making [have made] reflects, however, our overall confidence in the legal position relating to our defence of this group litigation.”