

From: Andrew Parsons [REDACTED] **GRO**
Sent: Thur 30/08/2018 6:33:31 PM (UTC)
To: Rodric Williams [REDACTED] **GRO**; Mark Underwood [REDACTED] **GRO**; Jane MacLeod [REDACTED] **GRO**
Cc: Amy Prime [REDACTED] **GRO**; Dave Panaech [REDACTED] **GRO**; Victoria Brooks [REDACTED] **GRO**
Subject: Strike out of the Claimant's evidence [WBDUK-AC.FID26896945]
Attachment: PLSG Paper - Strike out of the Claimants' evidence.pdf
Attachment: Witness Statement of Andrew Parsons.docx
Attachment: _DOC_151613218(1)_Draft Order - strike out.DOCX
Attachment: Marked Up Statements.zip

Jane, Rodric, Mark

We have reviewed the Cs evidence served on Friday and the recommendation from the legal team is to apply to have some of it struck out on the grounds that it is inadmissible.

I've attached to this email:

- A PLSG Decision Paper setting out our advice (and which includes a note from Counsel on admissibility of evidence)
- A draft witness statement setting out the grounds for the application + a draft Order.
- A pack of marked up statements showing those bits we recommend be struck out (please ignore the formatting issues – we have had to convert these from pdfs and will fix the problems before filing any application)

How would you like to proceed to make a decision on this?

This is an important application / decision so it does, in my view, warrant going through proper governance. However, time is against us. There is a CMC on Wednesday 19 September and so we would like to file the application (if approved) as soon as possible to avoid any complaint that the Cs have had insufficient notice. Ideally, we would like this filed by Tuesday next week so that we have given two clear weeks' notice before the CMC.

If that is not possible, we have a PLSG meeting scheduled for next Wednesday at 12noon.

Kind regards
Andy
Andrew Parsons
Partner
Womble Bond Dickinson (UK) LLP

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