

**From:** Amy Prime <[GRO]>  
**To:** Tom Beezer <[GRO]>, Andrew Parsons <[GRO]>  
[GRO]  
**Cc:** Dave Panaech <[GRO]>

**Subject:** RE: Super Silk Ideas [WBDUK-AC.FID26896945]

**Date:** Mon, 11 Mar 2019 18:26:51 +0000

**Importance:** Normal

**Inline-Images:** image001.png; image002.png; image003.png; imagee63f45.PNG; imagee5fe66.PNG;  
image37940e.PNG

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That sounds sensible.

Draft email below to Jane / Rod / Mark – I have purely guessed at the costs estimate (which is 40 hours at [GRO]) but have no feeling if this is in the right area. If anything it might be a little low depending on how much he would like to read.

Thoughts / comments welcome.

Thanks

A

[DRAFT]

Dear All

We have discussed with Counsel in more detail the appointment of a senior QC to review the judgment, grounds of appeal and provide advice on the merits of an appeal. There are two options:

- The Rt. Hon. Lord Neuberger – retired as the President of the United Kingdom Supreme Court in 2017. Lord Neuberger would be able to provide strategic and merits advice on the appeal. He would however not be able to represent Post Office in Court (due to a general restriction on his work). If we wish to instruct Lord Neuberger then it would be necessary to do so asap (ideally tomorrow). Hourly rate of [GRO]
- Lord Grabiner QC – a very senior QC who would be well placed to provide strategic advice and merits on the appeal, but would also be able to represent Post Office in the Court of Appeal if it was decided that a senior QC would assist with the presentation of Post Office's case. Lord Grabiner is currently under brief for a different matter but has some availability. Hourly rate of [GRO]

With either option we would also be looking to appoint a couple of junior Counsel to assist with the production of the advice.

Since Lord Neuberger would not be able to represent Post Office in Court, we would recommend that Post Office instruct Lord Grabiner QC to review the judgment (and surrounding documents such as the opening and closing submissions, witness statements and pleadings) and provide advice on the strategy to be adopted for the appeal and the merits of an appeal. We would roughly estimate the costs of obtaining this advice to be c. **GRO** but would be able to firm this estimate once we have provided Lord Grabiner QC with the papers.

If you have any questions on the scope of the review to be undertaken, please let me know. Otherwise, please could you confirm that we can begin with instructing Lord Grabiner QC?

Kind regards

**Amy Prime**

Solicitor

Womble Bond Dickinson (UK) LLP

d: **GRO**  
m: **GRO**  
t: **GRO**  
e: **GRO**

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**From:** Tom Beezer

**Sent:** 11 March 2019 18:06

**To:** Amy Prime; Andrew Parsons

**Cc:** Dave Panaech

**Subject:** RE: Super Silk Ideas [WBDUK-AC.FID26896945]

My initial inclination is to go with the QC that would actually be able to be in an appeal process...

Just a view.

Could go some way to answering the AI C point about "you lost" as my guess is he will at least want new blood in any appeal team – so super silk will be needed.....

**Tom Beezer**  
Partner  
Womble Bond Dickinson (UK) LLP

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**From:** Amy Prime  
**Sent:** 11 March 2019 18:04  
**To:** Andrew Parsons; Tom Beezer  
**Cc:** Dave Panaech  
**Subject:** Super Silk Ideas [WBDUK-AC.FID26896945]

Hi Andy, Tom

Have spoken with OEC and the possibilities on super silks are:

We can instruct Lord Neuberger to review the matter and provide advice on the merits of an appeal / recusal. He would however not be able to represent POL in court at an appeal. **If we want to instruct him we would need to instruct him this week and get documents to him tomorrow as he is travelling to South Africa.** He is £ 

Lord Grabiner is currently under brief but would be able to review the matter and provide merits / advice on the appeal. If we would like to instruct him we will also need to instruct a couple of juniors (his working style). He is



I will put together an email to go to Jane, Rod, Mark with the two options. My thoughts are that we should get an initial view from Lord Neuberger and if we decide that we want an super silk at the appeal then we could consider using Lord Grabiner, but would welcome your thoughts.

Thanks

Amy

**Amy Prime**

Solicitor

Womble Bond Dickinson (UK) LLP

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