

**From:** Andrew Parsons [GRO]  
**To:** Gideon Cohen [GRO], Dave Panaech [GRO], Mandy Robertson [GRO], Amy Prime [GRO], Victoria Brooks [GRO]  
**Cc:** David Cavender [GRO], Owain Draper [GRO]  
**Subject:** RE: Examination in chief  
**Date:** Tue, 13 Nov 2018 21:22:46 +0000  
**Importance:** Normal  
**Inline-Images:** image2a7db1.PNG; image7d3da8.PNG; imaged0ce00.PNG

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Gideon - These are fine.

Dave / Victoria – between you, please can you let the witnesses know the general nature of the questions they will get.

Gideon - two other points.

What are we doing about the Stubbs defence that refers to docs from Paul Williams that Paul did not send? This is not a problem with Paul's evidence but a mistake by the legal team in preparing the Defence so I think we need to own up to this.

I'm really not comfortable that the Judge has a clear understanding of how SPMRs can dispute either transactions corrections or end of trading period shortfalls. We could pick this up with Angela?

Thoughts?

A

**Andrew Parsons**  
Partner  
Womble Bond Dickinson (UK) LLP



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**From:** Gideon Cohen [mailto:[GRO]]  
**Sent:** 13 November 2018 18:35

**To:** Dave Panaech; Mandy Robertson; Amy Prime  
**Cc:** Andrew Parsons; David Cavender; Owain Draper  
**Subject:** Examination in chief

All,

Please see attached the 2 documents we are currently intending to present as typo-corrections for our witnesses.

There are a number of other points which will be canvassed in examination in chief rather than by written correction, because they are (a) new evidence and/or (b) more involved than a typo correction. Currently, we have questions for Beal (clarifying which hotline was 24 hr); Haworth (clarifying which checklist he used, and mentioning the CoA for the Crossflatts branch); Trotter (explaining why he didn't go through the contract in his first interview with Dar); and Van Den Bogerd (giving figures on how many branches, both generally and of the Cs in this case, are run by (a) companies and/or (b) multiples).

The additional points for examination in chief which arose today were for Longbottom (explaining the nature of the 2 page balancing guide, and that it was not a replacement for the manuals) and Ridge (explaining that there were 2 different Christines with different jobs).

Please let me know if there are any queries, internally or from the witnesses, on what will be covered.

Thanks

Gideon

Gideon Cohen

Barrister

One Essex Court

Temple

London EC4Y 9AR

Switchboard:

**GRO**

Fax number:

**GRO**

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