

**From:** Anthony de Garr Robinson [GRO]  
**To:** 'Amy Prime' [GRO] Owain Draper [GRO]  
**Cc:** Andrew Parsons [GRO]  
**Subject:** RE: Defence and Compare [BD-4A.FID26896945]  
**Date:** Fri, 14 Jul 2017 14:36:39 +0000  
**Importance:** Normal  
**Attachments:** 115\_Bates\_draft\_Defence.docx  
**Inline-Images:** image001.jpg; image002.png; image003.png; image004.png

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Thanks for the clarification, Amy.

I have whizzed through the draft and here are my suggestions. Like you, I have generally steered clear of trying to correct and complete the innumerable internal para refs in the pleading – I presume that will come later, after the text has all been finalised.

As you will see, there are a few points where I have tried to explain the changes I've made because I'm concerned I might have got the wrong end of the stick, for example para 57(3). I've also highlighted some points that I feel uneasy about and which it might be a good idea to talk about, for example paragraphs 46(4) and 56(1).

Best wishes,

Tony

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**From:** Amy Prime [GRO]  
**Sent:** 14 July 2017 14:34  
**To:** Anthony de Garr Robinson [GRO] Owain Draper [GRO]  
**Cc:** Andrew Parsons [GRO]  
**Subject:** RE: Defence and Compare [BD-4A.FID26896945]

Tony

None in particular, there aren't that many amendments so please feel free to review all of those highlighted in the compare.

There are comments in the world version of the defence which explain some of the amendments.

Amy

**Amy Prime**  
Solicitor  
Bond Dickinson LLP

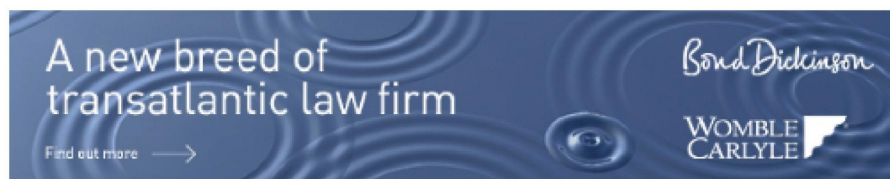
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**From:** Anthony de Garr Robinson [GRO]  
**Sent:** 14 July 2017 14:24  
**To:** Amy Prime; Owain Draper  
**Cc:** Andrew Parsons  
**Subject:** RE: Defence and Compare [BD-4A.FID26896945]

Thanks, Amy.

I've promised Andy not to read the whole pleading, but I will look at the changes to see if I have difficulties with any of them. Is there anything you would like me particularly to look at?

Tony

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**From:** Amy Prime [GRO]  
**Sent:** 14 July 2017 13:55  
**To:** Owain Draper [GRO]; Anthony de Garr Robinson [GRO]  
**Cc:** Andrew Parsons [GRO]  
**Subject:** Defence and Compare [BD-4A.FID26896945]

Tony

Please see attached the current version of the Defence (with the exception of the changes to the Suspense Account rider which Andy has just sent). Also attached is a comparison to version 112 of the Defence which you circulated on Wednesday.

Many thanks

Amy

**Amy Prime**  
Solicitor  
Bond Dickinson LLP

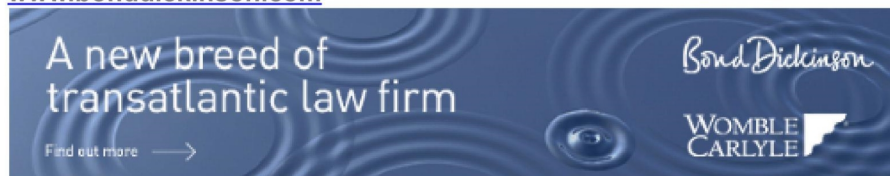
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