

From: Rob Smith [GRO]
To: 'Amy Prime' [GRO]
Cc: Andrew Parsons [GRO], Tom Beezer [GRO]
[GRO]

Subject: RE: Post Office Group Litigation - Appeal [WBDUK-AC.FID26896945]

Date: Thu, 14 Mar 2019 12:42:30 +0000

Importance: Normal

Attachments: 4852_001.pdf; Documents_for_recusal_application.zip; PO_-_Recusal.docx

Inline-Images: image001.png; image002.png; image003.png

Dear Amy,

Please find the advice from Lord Neuberger attached. Also attached is the documents David was given and a note that was prepared by David and Gideon. David did go over the £12,000 budget but he is happy to stick to this.

The advice for the appeal will depend on the timescale that he is given by you. He will need 40 to 50 hours to prepare this and his preference is for this to be at the beginning on April. I do understand that this may be too far off for you.

I am happy to discuss.

Thanks

Rob

Robert Smith
www.oeclaw.co.uk

Direct dial:
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Mobile:

GRO

From: Amy Prime [GRO]
Sent: 13 March 2019 22:52
To: Rob Smith [GRO]
Cc: Andrew Parsons [GRO], Tom Beezer [GRO]
Subject: RE: Post Office Group Litigation - Appeal [WBDUK-AC.FID26896945]

Rob

Just so as I can manage expectations, would you be able to let me know an estimated timeframe for the appeal opinion (work stream 3 below)?

Many thanks

Amy

Amy Prime

Solicitor
Womble Bond Dickinson (UK) LLP

d:
m:
t:
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GRO

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From: Rob Smith

GRO

Sent: 12 March 2019 15:51
To: Amy Prime
Cc: Andrew Parsons; Tom Beezer
Subject: RE: Post Office Group Litigation - Appeal [WBDUK-AC.FID26896945]

Sorry. You are correct. It should read 1&2

Thanks

Rob

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GRO

From: Amy Prime [GRO]
Sent: 12 March 2019 15:50
To: Rob Smith [GRO]
Cc: Andrew Parsons [GRO]; Tom Beezer [GRO]
Subject: RE: Post Office Group Litigation - Appeal [WBDUK-AC.FID26896945]

Rob

Please could I clarify whether that is "1 & 2 - £10,000 to £12,000".

Many thanks

Amy

Amy Prime
Solicitor
Womble Bond Dickinson (UK) LLP

d: [GRO]
m:
t:
e:

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From: Rob Smith [GRO]
Sent: 12 March 2019 15:48
To: Amy Prime
Cc: Andrew Parsons; Tom Beezer
Subject: RE: Post Office Group Litigation - Appeal [WBDUK-AC.FID26896945]

Amy,

I have spoken to Lord Neuberger and he estimates between 10-12 hours for him to advise on 1 & 3 - £10,000 to £12,000. This will be with you by close of play on Thursday latest.

At this moment in time he does not have a view on 3. I will be back to you on that as soon as I can.

Thanks

Rob

Robert Smith

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Direct dial:
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GRO

From: Amy Prime [GRO]
Sent: 12 March 2019 14:04
To: Rob Smith [GRO]
Cc: Andrew Parsons [GRO]; Tom Beezer [GRO]
Subject: Post Office Group Litigation - Appeal [WBDUK-AC.FID26896945]

Hi Rob

Further to our discussion, Post Office would like to instruct Lord Neuberger to:

Provide advice on the merits of a recusal application and whether such an application should be made.

If the answer to (1) is that Post Office should make a recusal application, then please could Post Office be advised on the process and procedure for making a recusal application, and the approach that the Court would take in determining such a matter.

Provide an opinion on the appeal of contractual issues and the implication of terms.

Questions (1) and (2) are more urgent and we would appreciate if this advice could be provided before (3). Once Lord Neuberger has had an opportunity to consider the papers, it would be appreciated if he could provide estimated timings for the advice being produced and confirm fee estimates.

Electronic reading bundles will follow shortly, with hard copies to be couriered to One Essex Court. In the meantime, please could you discuss with David Cavender QC providing a verbal briefing to Lord Neuberger.

In relation to Lord Grabiner QC, as discussed please could Lord Grabiner QC be placed onto a first right of refusal for the potential to attend on behalf of Post Office at a recusal hearing. Please could this arrangement be put in place up until his trial which begin on 30 April 2019. If availability does become an issue, please could you let either Andy, Tom or me know. It would be appreciated if this arrangement could be confirmed by email?

If there are any questions on the above, please let me know.

Kind regards

Amy

Amy Prime
Solicitor
Womble Bond Dickinson (UK) LLP

d:
m:
t:
e:

GRO

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