

From: Stephanie Wood <[REDACTED]>
To: Gideon Cohen <[REDACTED]>, Tom Beezer <[REDACTED]>
Cc: Amy Prime <[REDACTED]>, David Cavender <[REDACTED]>, Andrew Parsons <[REDACTED]>
Subject: RE: timing of readiness for recusal [WBDUK-AC.FID26896945]
Date: Tue, 19 Mar 2019 22:29:31 +0000
Importance: Normal
Attachments: Draft_application_notice_19.03.2019_v2.doc

Dear all,

I attach the draft application notice.

Kind regards,

Stephanie

From: Gideon Cohen
Sent: Tuesday, March 19, 2019 9:21 PM
To: Tom Beezer
Cc: Amy Prime; David Cavender; Andrew Parsons; Stephanie Wood
Subject: Re: timing of readiness for recusal [WBDUK-AC.FID26896945]

On 19 Mar 2019, at 20:28, Tom Beezer <[REDACTED]> wrote:

All

Jane at POL is wanting an update on timing of readiness for recusal if the button is pressed tomorrow.

Could each of you comment on what I set out below (and what I do set out below is just my understanding of where we are, so do correct at will...):

- Letter to Freeths – Amy is doing that. Yet to be done, but is only short.

- Application Notice. Gideon. Done I believe?

Stephanie has done a draft, on which I have commented. Stephanie, once you are happy with it, could you please circulate?

- Draft Order. Done I believe. I think I have seen a copy.

Yes, circulated on Sunday. Please let me know if any comments.

- Draft witness statement. Work in progress. Amy P is collating the back story (quotes from hearings etc) and then Amy and Gideon to bully that into a first draft. Realistic for tomorrow ?

Difficult to comment on timings until I've seen a draft. More fundamentally, spoke about this to Tony today. His view was that we might want to hold this back for the hearing, and not put in a WS at all. That would involve beefing up the App Notice slightly.

- Skeleton Arg'. David, Gideon – where is that sitting and how far off a draft to AGQC are we ?

I spent much of today drafting it with AGQC. We are well advanced - and anyway we will obviously not be putting this in with the application notice.

Are there any other bits I have missed ?

If POL said "yes" tomorrow when would we serve Freeths and Judge ? When do we think we will try an engineer the hearing to be ? Friday ? Next week ?

Won't be Friday, because it will be contested and the other side will want to put in a skeleton argument. I think back end of next week would be the very earliest.

Also, we need to think REALLY carefully about ensuring that Lord Grabiner is available to do the hearing. Andy P says this Judge is very much of the "do it when I say" camp and not when Counsel is free.

David, Gideon – how can we ensure that lord Grabiner will be free for the hearing ? Is that a note from him to the Judge ? Is that something the Clerks sort out ?

Have you spoken to the clerks?

All thought gratefully received.

Jane wants me to send her a timing update early tomorrow morning.

T

Tom Beezer
Partner
Womble Bond Dickinson (UK) LLP

d:

m:

t:

e:

GRO

GRO

GRO

GRO

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