

From: Andrew Parsons <[REDACTED]>
To: Gideon Cohen <[REDACTED]>, Amy Prime <[REDACTED]>, Owain Draper <[REDACTED]>, Anthony Grabiner <[REDACTED]>
Cc: Stephanie Wood <[REDACTED]>, Tom Beezer <[REDACTED]>, Dave Panaech <[REDACTED]>, David Cavender <[REDACTED]>

Subject: RE: Witness Statement

Date: Tue, 26 Mar 2019 11:00:31 +0000

Importance: Normal

Inline-Images: image001.png; image002.png; image003.png; image6bf32e.PNG; image5b780.PNG; imagef44196.PNG

Fair enough. We'll take it out.

But 32 is wrong in relation to TCs – for TC disputes the SPMs contact FSC not the helpline (as per the contact details stated on the TC).

A

Andrew Parsons

Partner
Womble Bond Dickinson (UK) LLP

d: [REDACTED]
m: [REDACTED]
t: [REDACTED]
e: [REDACTED]

[Stay informed: sign up to our e-alerts](#)



womblebond Dickinson.com



From: Gideon Cohen [mailto:[REDACTED]]
Sent: 26 March 2019 10:45
To: Amy Prime; Owain Draper; Andrew Parsons; Anthony Grabiner
Cc: Stephanie Wood; Tom Beezer; Dave Panaech; David Cavender
Subject: RE: Witness Statement [WBDUK-AC.FID26896945]

Sorry, one final point on this. Not sure we want to include Factual Matrix Point 32. We accept that this was true. So even though it is being used illegitimately by the Judge (to determine the status of the BTS), I do not think it falls within 23-24 of Parson 14, which is focused on findings which we say he has made too early, and in the absence of full evidence and disclosure. Further evidence and disclosure will not make any difference to this point, because we accept that it is true.

From: Amy Prime [mailto:[GRO](#)]
Sent: 26 March 2019 10:05
To: Gideon Cohen; Owain Draper; Andrew Parsons; Anthony Grabiner
Cc: Stephanie Wood; Tom Beezer; Dave Panaech; David Cavender
Subject: RE: Witness Statement [WBDUK-AC.FID26896945]

Thanks Gideon

Amendment made.

Many thanks

Amy

Amy Prime
Solicitor
Womble Bond Dickinson (UK) LLP

d: [GRO](#)
m: [GRO](#)
t: [GRO](#)
e: [GRO](#)

[Stay informed: sign up to our e-alerts](#)



womblebonddickinson.com



From: Gideon Cohen [mailto:[GRO](#)]
Sent: 26 March 2019 09:59
To: Amy Prime; Owain Draper; Andrew Parsons; Anthony Grabiner
Cc: Stephanie Wood; Tom Beezer; Dave Panaech; David Cavender
Subject: RE: Witness Statement [WBDUK-AC.FID26896945]

Amy,

On more thought re the factual matrix section: we should remove point 67. It is too close to the matrix we contend for at Point 67 of the Factual Matrix document.

Thanks

Gideon

From: Amy Prime [mailto:[GRO](#)]
Sent: 26 March 2019 09:47
To: Owain Draper; Andrew Parsons; Anthony Grabiner; Gideon Cohen
Cc: Stephanie Wood; Tom Beezer; Dave Panaech; David Cavender
Subject: RE: Witness Statement [WBDUK-AC.FID26896945]

Owain

Thank you, these have been fed into the witness statement.

Kind regards

Amy

Amy Prime
Solicitor
Womble Bond Dickinson (UK) LLP

d: [GRO](#)
m: [GRO](#)
t: [GRO](#)
e: [GRO](#)

[Stay informed: sign up to our e-alerts](#)



womblebond dickinson.com



From: Owain Draper [mailto:[GRO](#)]
Sent: 26 March 2019 09:09
To: Andrew Parsons; Anthony Grabiner; Gideon Cohen
Cc: Amy Prime; Stephanie Wood; Tom Beezer; Dave Panaech; David Cavender
Subject: Re: Witness Statement [WBDUK-AC.FID26896945]

Dear All,

Please find attached with some proposed changes. Many are simply agreement with Gideon's suggestion that paras be removed.

Kind Regards,

Owain

Owain Draper

One Essex Court, Temple

EC4Y 9AR

Switchboard: **GRO**

www.oeclaw.co.uk <<http://www.oeclaw.co.uk>>

The content of this email is confidential and may subject to legal professional privilege. If you are not the intended recipient, please delete it permanently and inform the sender.

From: Andrew Parsons <**GRO**>
Date: Tuesday, 26 March 2019 at 07:49
To: Anthony Grabiner <**GRO**>, Gideon Cohen <**GRO**>
Cc: Owain Draper <**GRO**>, Amy Prime <**GRO**>, Stephanie Wood <**GRO**>, Tom Beezer <**GRO**>, Dave Panaech <**GRO**>, David Cavender <dcavender@oeclaw.co.uk>
Subject: RE: Witness Statement [WBDUK-AC.FID26896945]

Thanks all.

Happy with Gideon's changes. We'll finalise, get client approval and file at 12noon.

A

Andrew Parsons
Partner
Womble Bond Dickinson (UK) LLP

d:
m:
t:
e:

GRO

GRO

<mailto:

GRO>

Stay informed: sign up to our e-alerts <<https://www.womblebond Dickinson.com/uk/preferences>>

Join us for Disrupting Disputes 2.0
20 March 2019 at the British Library

Book your place here<<https://www.womblebond dickinson.com/uk/insights/events/disrupting-disputes-20>>

[Womble Bond Dickinson (UK) LLP]<<http://>>

womblebond dickinson.com<<https://www.womblebond dickinson.com>>

[Womble Bond Dickinson (UK) LLP Twiter]<https://www.twitter.com/wbd_uk>

[Womble Bond Dickinson (UK) LLP LinkedIn]<<https://www.linkedin.com/company/womble-bond-dickinson-uk-llp/>>

From: Anthony Grabiner [mailto:**GRO**]

Sent: 25 March 2019 22:15

To: Gideon Cohen

Cc: Andrew Parsons; Owain Draper; Amy Prime; Stephanie Wood; Tom Beezer; Dave Panaech; David Cavender

Subject: Re: Witness Statement [WBDUK-AC.FID26896945]

If Gideon thinks they're problematic please leave them out. We've got a lot of good material and I don't want it undermined by taking points that don't really work. What time tomorrow is this due to be served? I'm in an arbitration hearing all day but I could look at any disputed bits over lunch (1pm to 2pm) if that would help.

Tony

Lord Grabiner QC
One Essex Court
Temple
London, EC4Y 9AR

GRO

On 25 Mar 2019, at 22:08, Gideon Cohen <**GRO**> [mailto:**GRO**] wrote:

Thanks Andy. Agree with the approach. Nonetheless, I have highlighted a few of these which I think we should not include - some of them seem a bit problematic to me. But subject to that, from my perspective this is good to go.

All best

Gideon

Gideon Cohen
Barrister

One Essex Court
Temple
London EC4Y 9AR

Switchboard:

GRO

Fax number:

GRO

www.oeclaw.co.uk<<http://www.oeclaw.co.uk>><<http://www.oeclaw.co.uk>>

The contents of this email are CONFIDENTIAL and may be PRIVILEGED. If you are not the intended recipient, please telephone GRO and delete this email.

From: Andrew Parsons GRO <mailto:GRO>
Sent: 25 March 2019 19:01
To: Owain Draper; Gideon Cohen; Amy Prime; Stephanie Wood; Tom Beezer; Dave Panaech
Cc: Anthony Grabiner; David Cavender
Subject: RE: Witness Statement [WBDUK-AC.FID26896945]

All

As per my discussion earlier today with Gideon, we have added more sections of the Judgment to the attached statement. Our approach has been to include anything that we might rely on, unless plainly not relevant to the application. The objective being to avoid any challenge on appeal that a point in the Judgment was not put to Fraser on the application.

All comments welcomed.

Kind regards
Andy

Andrew Parsons
Partner
Womble Bond Dickinson (UK) LLP

d:

m:

t:

e: GRO

GRO

GRO

<mailto:GRO>

Stay informed: sign up to our e-alerts<<https://www.womblebond dickinson.com/uk/preferences>>

Join us for Disrupting Disputes 2.0
20 March 2019 at the British Library

Book your place here<<https://www.womblebond dickinson.com/uk/insights/events/disrupting-disputes-20>>

[Womble Bond Dickinson (UK) LLP]<UrlBlockedError.aspx>

womblebond dickinson.com<<https://www.womblebond dickinson.com>>

[Womble Bond Dickinson (UK) LLP Twitter]<https://www.twitter.com/wbd_uk> [Womble Bond Dickinson (UK) LLP LinkedIn] <<https://www.linkedin.com/company/womble-bond-dickinson-uk-llp/>>

From: Andrew Parsons
Sent: 25 March 2019 10:37

To: 'Owain Draper'; Gideon Cohen; Amy Prime; Stephanie Wood; Tom Beezer; Dave Panaech
Cc: Anthony Grabiner; David Cavender
Subject: RE: Witness Statement [WBDUK-AC.FID26896945]

Thanks – I've got carriage of this now and will respond in the next couple of hours.

Andy

From: Owain Draper [mailto:**GRO**]
Sent: 25 March 2019 09:05
To: Gideon Cohen; Amy Prime; Stephanie Wood; Andrew Parsons; Tom Beezer; Dave Panaech
Cc: Anthony Grabiner; David Cavender
Subject: Re: Witness Statement [WBDUK-AC.FID26896945]

Dear All,

Attached with some minor changes from me.

Kind Regards,

Owain

Owain Draper

One Essex Court, Temple

EC4Y 9AR

Switchboard: **GRO**

www.oeclaw.co.uk<<http://www.oeclaw.co.uk>><<http://www.oeclaw.co.uk>><<http://www.oeclaw.co.uk>>

The content of this email is confidential and may subject to legal professional privilege. If you are not the intended recipient, please delete it permanently and inform the sender.

From: Gideon Cohen <**GRO** [mailto:**GRO**]>
Date: Sunday, 24 March 2019 at 22:25
To: Amy Prime <**GRO** [mailto:**GRO**]>, Stephanie Wood <**GRO** [mailto:**GRO**]>, Andrew Parsons <**GRO** [mailto:**GRO**]>, Tom Beezer <**GRO** [mailto:**GRO**]>, Dave Panaech <**GRO** [mailto:**GRO**]>
Cc: Anthony Grabiner <**GRO** [mailto:**GRO**]>, David Cavender <**GRO** [mailto:**GRO**]>, Owain Draper <**GRO** [mailto:**GRO**]>
Subject: RE: Witness Statement [WBDUK-AC.FID26896945]

All,

First draft of the WS attached. All comments gratefully received.

Thanks

Gideon

Gideon Cohen

Barrister

One Essex Court
Temple
London EC4Y 9AR

Switchboard:

GRO

Fax number:

GRO

www.oeclaw.co.uk<<http://www.oeclaw.co.uk>><<http://www.oeclaw.co.uk>>

The contents of this email are CONFIDENTIAL and may be PRIVILEGED. If you are not the intended recipient, please telephone **GRO** and delete this email.

From: Amy Prime **GRO** <mailto:**GRO**>

Sent: 22 March 2019 18:11

To: Gideon Cohen; Stephanie Wood

Subject: Witness Statement [WBDUK-AC.FID26896945]

Hi Gideon, Stephanie

Please could you let me know an ETA for the witness statement being circulated – not chasing, just planning diaries.

Many thanks
Amy

Amy Prime
Solicitor
Womble Bond Dickinson (UK) LLP

d:
m:
t:
e:

GRO

GRO

<mailto:

GRO

><mailto:

GRO

>

Stay informed: sign up to our e-alerts<<https://www.womblebond Dickinson.com/uk/preferences>>

Join us for Disrupting Disputes 2.0
20 March 2019 at the British Library

Book your place here<<https://www.womblebond Dickinson.com/uk/insights/events/disrupting-disputes-20>>

[Womble Bond Dickinson (UK) LLP]<UrlBlockedError.aspx>

womblebond Dickinson.com<<http://womblebond Dickinson.com>><<https://www.womblebond Dickinson.com>>

[Womble Bond Dickinson (UK) LLP Twiter]<https://www.twitter.com/wbd_uk>

[Womble Bond Dickinson (UK) LLP LinkedIn]<<https://www.linkedin.com/company/womble-bond-dickinson-uk-llp/>>

Please consider the environment! Do you need to print this email?

The information in this e-mail and any attachments is confidential and may be legally privileged and protected by law. gcohen@GRO <mailto:GRO> only is authorised to access this e-mail and any attachments. If you are not gcohen@GRO <mailto:GRO>, please notify amy.prime@GRO <mailto:GRO> as soon as possible and delete any copies. Unauthorised use, dissemination, distribution, publication or copying of this communication or attachments is prohibited and may be unlawful. Information about how we use personal data is in our Privacy Policy<<https://www.womblebond Dickinson.com/uk/privacy-policy>> on our website.

Any files attached to this e-mail will have been checked by us with virus detection software before transmission. Womble Bond Dickinson (UK) LLP accepts no liability for any loss or damage which may be caused by software viruses and you should carry out your own virus checks before opening any attachment.

Content of this email which does not relate to the official business of Womble Bond Dickinson (UK) LLP, is neither given nor endorsed by it.

This email is sent by Womble Bond Dickinson (UK) LLP which is a limited liability partnership registered in England and Wales under number OC317661. Our registered office is 4 More London Riverside, London, SE1 2AU, where a list of members' names is open to inspection. We use the term partner to refer to a member of the LLP, or an employee or consultant who is of equivalent standing. Our VAT registration number is GB123393627.

Womble Bond Dickinson (UK) LLP is a member of Womble Bond Dickinson (International) Limited, which consists of independent and autonomous law firms providing services in the US, the UK, and elsewhere around the world. Each Womble Bond Dickinson entity is a separate legal entity and is not responsible for the acts or omissions of, nor can bind or obligate, another Womble Bond Dickinson entity. Womble Bond Dickinson (International) Limited does not practice law. Please see www.womblebond Dickinson.com/legal<<http://www.womblebond Dickinson.com/legal>><<http://www.womblebond Dickinson.com/legal>> notices for further details.

Womble Bond Dickinson (UK) LLP is authorised and regulated by the Solicitors Regulation Authority.

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

<_DOC_154958621(1)_15th Witness Statement of Parsons - Recusal.DOCX>

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>
