

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

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

**Date:** Tue, 12 Mar 2019 14:04:05 -0000

**Importance:** Normal

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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 could 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