

## Message

**From:** Amy Prime [GRO]  
**Sent:** 26/03/2019 08:07:28  
**To:** Jane MacLeod [GRO]; Rodric Williams [GRO]  
**CC:** Tom Beezer [GRO]; Andrew Parsons [GRO]; Mark Underwood [GRO]; Ben Foat [GRO]  
**Subject:** Recusal Application - 15th Witness Statement [WBDUK-AC.FID26896945]  
**Attachments:** \_DOC\_154958621(2)\_15th Witness Statement of Parsons - Recusal.DOCX; Bates v Post Office.draft directions order v2.docx; 2019.03.21 Fourteenth Witness Statement of Andrew Paul Parsons.pdf

Jane, Rodric

Please find attached the witness statement which is due to be filed at **12pm today**. A copy of the 14<sup>th</sup> witness statement and the order by which the 15<sup>th</sup> witness statement is pursuant to are also attached for reference.

The witness statement contains 7 paragraphs, with the remainder being extracts from the Judgment. We have sought to include in the statement as much as possible from the Judgment so as no points are missed, which has been weighed against the risk of including such a large volume of material that we are accused of being unhelpful.

In relation to matters which have arisen in the Horizon Issues Trial that could be useful examples of the Judge's apparent bias, the scope of the witness statement is only focussed on the Common Issues Trial however, there is ongoing consideration as to whether this material could be used in the skeleton argument / oral submissions. Owain Draper has been re-tasked from the HIT to the recusal application for a couple of days so as to consider this and the HIT transcripts have been added to the application bundles so as to enable Counsel to do so.

Any thoughts or comments on the witness statement would be welcomed.

Kind regards  
Amy

**Amy Prime**  
Solicitor  
Womble Bond Dickinson (UK) LLP

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m:  
t:  
e:

**GRO**

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