

**From:** Andrew Parsons [GRO]  
**To:** Anthony de Garr Robinson [GRO]  
**Cc:** Tom Beezer [GRO], Amy Prime [GRO]  
Gideon Cohen [GRO], "Owain Draper" [GRO]  
[GRO], "David Cavender" [GRO]  
[GRO]

**Subject:** RE: Recusal

**Date:** Wed, 20 Mar 2019 20:54:01 +0000

**Importance:** Normal

**Inline-Images:** imaged33ee8.PNG; imageeae657.PNG; image8fda3a.PNG

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Tony – I've copied the rest of the team so we're all of the same mind.

The application won't be ready by 10:30am. It will go in during the course of the day tomorrow – probably in the afternoon.

The plan is to ask for the application to be heard during Brexit week in the covering letter. The application will be filed by email to the Judge's clerk, so he may not even know that it has been filed by the end of the Court day. We are not looking to embarrass him (yet) so unless he raises it, I think our plan is to say nothing in Court.

My feeling is that we keep you ring-fenced from it, so that you can plead ignorance. If asked, you can say that you are not aware of the details of the application, PO is being advised by Lord Grabiner and that you can relay any message as required. But just so you know, the draft Order includes an immediate stay of the HIT.

Owain – can you make sure you have LGQC and Gideon's diaries for next week in case we get drawn into a listing discussion.

Thoughts from anyone else? Feel free to disagree.

A

**Andrew Parsons**  
Partner  
Womble Bond Dickinson (UK) LLP

d: [GRO]  
m:

t: GRO  
e:

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**From:** Anthony de Garr Robinson [mailto:GRO]  
**Sent:** 20 March 2019 20:45  
**To:** Andrew Parsons  
**Subject:** Recusal

Dear Andy,

Am I right in thinking that the recusal application will be issued and will be in with the judge by the time court starts at 10:30 tomorrow morning? If so, I have a strange feeling that he might want to discuss it with me and that I will need to know what to tell him. When have we made the applic returnable, for example, and what proposals are we making regarding its resolution? And do we have any suggestions to make about the Horizon trial proceeding in the meantime?

Tony

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