GRO From: Amy Prime To: Gideon Cohen GRO **GRO** Owain Draper Andrew Parsons **GRO** Anthony Grabiner **GRO** Cc: Stephanie Wood Tom Beezer 4 GRO GRO **GRO** Dave Panaech David Cavender **GRO**

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

Date: Tue, 26 Mar 2019 10:05:04 +0000

Importance: Normal

Inline-Images: image001.png; image002.png; image103.png; image1abf1b.PNG; image2af17e.PNG;

image226c33.PNG

Thanks Gideon

Amendment made.

Many thanks

Amy

Amy Prime

Solicitor Womble Bond Dickinson (UK) LLP



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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

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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=""></http:>
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From: Andrew Parsons GRO Date: Tuesday, 26 March 2019 at 07:49 To: Anthony Grabiner GRO GRO Cc: Owain Draper GRO Amy Prime GRO GRO Amy Prime GRO GRO Dave Panaech GRO 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

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Barrister
One Essex Court Temple London EC4Y 9AR
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From: Andrew Parsons 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

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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 **GRO** Switchboard: www.oeclaw.co.uk><a href="http://www 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** Date: Sunday, 24 March 2019 at 22:25 To: Amy Prime Stephanie Wood **Andrew Parsons** GRO **GRO** , Tom Beezer GRO **GRO** GRO Dave Panaech GRO GRO Cc: Anthony Grabiner **GRO** David Cavender **GRO** Owain Draper

All,

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

GRO Subject: RE: Witness Statement [WBDUK-AC.FID26896945]

Thanks
Gideon
Gideon Cohen Barrister
One Essex Court Temple London EC4Y 9AR
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From: Amy Prime 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

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