

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

Subject: Re: Letter from Freeths - Recusal [WBDUK-AC.FID26896945]

Date: Tue, 26 Mar 2019 15:17:17 +0000

Importance: Normal

Inline-Images: image001.png; image002.png; image003.png

Agreed.

How about this?

“We do not agree that the witness statement fails to comply with the Order. If your client wishes to contend at the hearing that any argument made by Post Office goes beyond the witness statement and/or amounts to an “ambush”, that submission can be made. We do not propose to provide a further statement.”

Owain Draper

One Essex Court, Temple

EC4Y 9AR

Switchboard: [GRO]

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From: Gideon Cohen [GRO]
Date: Tuesday, 26 March 2019 at 15:05
To: 'Amy Prime' [GRO]
Cc: Stephanie Wood [GRO], Tom Beezer [GRO], Owain Draper [GRO]
[GRO], Dave Panaech [GRO], David Cavender [GRO]
[GRO], Andrew Parsons [GRO], Anthony Grabiner [GRO]
Subject: RE: Letter from Freeths - Recusal [WBDUK-AC.FID26896945]

Yes. If they think our submissions go beyond the scope of the WS, that is something they can complain about at the appropriate time. They have more than enough information.

From: Amy Prime [mailto:[GRO]]
Sent: 26 March 2019 15:02
To: Gideon Cohen
Cc: Stephanie Wood; Tom Beezer; Owain Draper; Dave Panaech; David Cavender; Andrew Parsons
Subject: Letter from Freeths - Recusal [WBDUK-AC.FID26896945]

Gideon

Please find attached a letter from Freeths complaining that Post Office have not complied with the Order since the list provided in Parsons 15 is non-exhaustive and did not identify all matters, and that we have simultaneously gone further than permitted by the Order by seeking to rely on the "structure, tenor and subject-matter of the judgment as a whole".

The Cs have requested that we confirm whether we intend to rely on other parts of the Judgment and to identify them in a further witness statement by 6pm today. If we do not do so the Claimants are considering to seek an unless order / tell Fraser.

I assume the approach when responding will be that the information required to understand the basis for POL's application and to enable the Cs to respond has been provided, but we would welcome your thoughts and comments.

In particular, POL may ask what is the risk of the Managing Judge forcing POL to provide further information and thereby delaying the recusal hearing.

Kind regards
Amy

Amy Prime
Solicitor
Womble Bond Dickinson (UK) LLP

d:
m:
t:
e:

GRO

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