

**From:** Owain Draper <[REDACTED] GRO>  
**To:** Andrew Parsons <[REDACTED] GRO> Amy Prime <[REDACTED] GRO>  
[REDACTED] GRO Gideon Cohen <[REDACTED] GRO> David Cavender  
[REDACTED] GRO  
**Cc:** Tom Beezer <[REDACTED] GRO> Dave Panaech <[REDACTED] GRO>  
Anthony Grabiner <[REDACTED] GRO>  
**Subject:** Re: Post Office Group Litigation - Recusal Application  
**Date:** Wed, 27 Mar 2019 10:34:48 +0000  
**Importance:** Normal  
**Inline-Images:** image001.png; image002.png; image003.png

---

The main alternative is to confirm that, subject to our point about the Judgment being read as a whole, we have identified all the passages on which we intend to rely. We would, in effect, be deleting the words “in particular” from the sentences that introduce each category of point.

Whether or not we want to do that depends on whether the rest of the counsel team thinks that amounts to tying our hands too much.

One further option would be to say practically the same thing as below but with slightly more words. For example:

“We have responded fully to your letter of yesterday. There are no further paragraphs that we wish to identify in accordance with the Order.

Your clients now have the benefit of a 44-page witness statement filed in accordance with the Order and have notice of the parts of the Judgment to which Post Office objects. We offered to provide a Skeleton Argument, which would have given you early sight of the arguments on the application as well as the relevant passages, but you preferred to seek a witness statement.

Your clients can, on the basis of the witness statement, form a view as to whether or not they wish to oppose the application. We invite you to inform us of your clients’ position in accordance with the deadline in the Order.”

Kind Regards,

Owain

Owain Draper

One Essex Court, Temple

EC4Y 9AR

Switchboard: [REDACTED] GRO

[www.oeclaw.co.uk](http://www.oeclaw.co.uk)<<http://www.oeclaw.co.uk>>

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: Andrew Parsons <[REDACTED] GRO>  
Date: Wednesday, 27 March 2019 at 10:21

To: Owain Draper [GRO], Amy Prime [GRO] Gideon Cohen  
[GRO], David Cavender [GRO]  
Cc: Tom Beezer [GRO], Dave Panaech [GRO], Anthony  
Grabiner [GRO]  
Subject: RE: Post Office Group Litigation - Recusal Application

I would normally agree, but given historic allegations of PO being dismissive, do we want to write something more substantive?

A

Andrew Parsons  
Partner  
Womble Bond Dickinson (UK) LLP

d:  
m:  
t:  
e:

**GRO**

Stay informed: sign up to our e-alerts<<https://www.womblebond dickinson.com/uk/preferences>>

[Womble Bond Dickinson (UK) LLP]<<http://>>

womblebond dickinson.com<<https://www.womblebond dickinson.com>>

[Womble Bond Dickinson (UK) LLP Twitter]<[https://www.twitter.com/wbd\\_uk](https://www.twitter.com/wbd_uk)>

[Womble Bond Dickinson (UK) LLP LinkedIn]<<https://www.linkedin.com/company/womble-bond-dickinson-uk-llp/>>

From: Owain Draper [mailto:[GRO]]

Sent: 27 March 2019 10:17

To: Amy Prime; Gideon Cohen; David Cavender

Cc: Andrew Parsons; Tom Beezer; Dave Panaech; Anthony Grabiner

Subject: Re: Post Office Group Litigation - Recusal Application [WBUDK-AC.FID26896945]

We could, however, respond with something like this (just so Cs cannot say we ignored their letter):

“We have responded fully to your letter of yesterday. We have nothing to add.”

Owain Draper

One Essex Court, Temple

EC4Y 9AR

Switchboard: **GRO**

[www.oeclaw.co.uk](http://www.oeclaw.co.uk)<<http://www.oeclaw.co.uk>><<http://www.oeclaw.co.uk>>

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: Amy Prime **GRO**  
Date: Wednesday, 27 March 2019 at 09:54  
To: Gideon Cohen **GRO**, Owain Draper **GRO**, David Cavender **GRO**, Anthony Grabiner **GRO**  
Cc: Andrew Parsons **GRO**, Tom Beezer **GRO**, Dave Panaech **GRO**  
Subject: FW: Post Office Group Litigation - Recusal Application [WBDUK-AC.FID26896945]

Dear All

Please find attached Freeths' response to our letter of last night. The back correspondence is also attached.

They are planning to "proceed on the basis that you will not be relying on any parts of the Judgment to which you have not expressly referred in Parsons 15" unless we tell them otherwise by 11am and may seek a hearing with the Judge to discuss this matter and delay the recusal hearing.

Thoughts and comments welcomed.

Kind regards  
Amy

Amy Prime  
Solicitor  
Womble Bond Dickinson (UK) LLP

d:  
m:  
t:  
e:

**GRO**

Stay informed: sign up to our e-alerts<<https://www.womblebond Dickinson.com/uk/preferences>>

[Womble Bond Dickinson (UK) LLP]<<http://>>

womblebond Dickinson.com<<https://www.womblebond Dickinson.com>>

[Womble Bond Dickinson (UK) LLP Twitter]<[https://www.twitter.com/wbd\\_uk](https://www.twitter.com/wbd_uk)>

[Womble Bond Dickinson (UK) LLP LinkedIn]<<https://www.linkedin.com/company/womble-bond-dickinson-uk-llp/>>

From: Miranda Bond [mailto:GRO]

Sent: 27 March 2019 09:42

To: Dave Panaech; Charlie Temperley; Andrew Parsons; Amy Prime; Emma Campbell-Danesh; Victoria Brooks; Jonathan Gribben; Michael Wharton; Anna Martin; Lucy Bremner; Beth Hooper; Katie Simmonds; Sushma MacGeoch; Rachel Lawrie; Jane Atkinson; Mandy Robertson

Cc: James Hartley; Imogen Randall; Dean Hill; Stephanie Jameson; Chloe Oram; Nicola Pettit; Angélique Richardson; Sarah Bogues; Francesca See

Subject: Post Office Group Litigation - Recusal Application

Dear Sirs,

Please see attached our firm's letter of today's date.

Yours faithfully,  
Freeths LLP

Miranda Bond

Legal Assistant

T: GRO

[Freeths Website]<<https://www.freeths.co.uk/>>

Freeths LLP

Floor 3, 100 Wellington Street

Leeds LS1 4LT

[@freeths]<<https://twitter.com/freeths>>

[Freeths LLP]<<https://www.linkedin.com/company/freeths-llp/>>

[RSS Feed]<<http://www.freeths.co.uk/rssfeed>>

Legal 500 Guide 2018: 'Top Tier' in 22 categories | 144 'Recommended' Lawyers | 24 'Elite Leading Lawyers'

Chambers UK Guide 2018: 'Ranked' in 37 categories | 66 Lawyers 'Leaders in the field'

To see our additional awards, please click here<<http://www.freeths.co.uk/Working-here-awards>>

Please read our Data Protection Notice at [www.freeths.co.uk](http://www.freeths.co.uk)<<http://www.freeths.co.uk>>  
<<http://www.freeths.co.uk>>

Please be aware of the increasing risk of cybercrime and online fraud. If you ever receive an email stating a change in bank account details purporting to be from Freeths LLP, do not send any funds to the account and contact us immediately. We will never send you an email telling you that we have changed our bank account details.

Freeths LLP is a limited liability partnership, registered in England and Wales, Partnership number OC304688. Registered Office, 80 Mount Street, Nottingham NG1 6HH. We are authorised and regulated by the Solicitors Regulation Authority. You can find a copy of the SRA Handbook, which includes the SRA Code of Conduct at [www.sra.org.uk/handbook](http://www.sra.org.uk/handbook)<<http://www.sra.org.uk/handbook>>  
<<http://www.sra.org.uk/handbook>> You can inspect a list of the names of the members of Freeths LLP at our registered office during normal business hours. This message is confidential and may contain legally



privileged information. If you have received this in error, please delete this message and let us know by emailing Postmaster: [GRO] telephoning us on [GRO]. Freeths LLP does not accept the service of legal proceedings by email unless by prior agreement.

Please consider the environment! Do you need to print this email?

---

The information in this e-mail and any attachments is confidential and may be legally privileged and protected by law. odraper [GRO] only is authorised to access this e-mail and any attachments. If you are not odraper [GRO] please notify amy.prime [GRO] as soon as possible and delete any copies. Unauthorised use, dissemination, distribution, publication or copying of this communication or attachments is prohibited and may be unlawful. Information about how we use personal data is in our Privacy Policy<<https://www.womblebonddickinson.com/uk/privacy-policy>> on our website.

Any files attached to this e-mail will have been checked by us with virus detection software before transmission. Womble Bond Dickinson (UK) LLP accepts no liability for any loss or damage which may be caused by software viruses and you should carry out your own virus checks before opening any attachment.

Content of this email which does not relate to the official business of Womble Bond Dickinson (UK) LLP, is neither given nor endorsed by it.

This email is sent by Womble Bond Dickinson (UK) LLP which is a limited liability partnership registered in England and Wales under number OC317661. Our registered office is 4 More London Riverside, London, SE1 2AU, where a list of members' names is open to inspection. We use the term partner to refer to a member of the LLP, or an employee or consultant who is of equivalent standing. Our VAT registration number is GB123393627.

Womble Bond Dickinson (UK) LLP is a member of Womble Bond Dickinson (International) Limited, which consists of independent and autonomous law firms providing services in the US, the UK, and elsewhere around the world. Each Womble Bond Dickinson entity is a separate legal entity and is not responsible for the acts or omissions of, nor can bind or obligate, another Womble Bond Dickinson entity. Womble Bond Dickinson (International) Limited does not practice law. Please see [www.womblebonddickinson.com/legal](http://www.womblebonddickinson.com/legal)<<http://www.womblebonddickinson.com/legal>> notices for further details.

Womble Bond Dickinson (UK) LLP is authorised and regulated by the Solicitors Regulation Authority.

---

This email has been scanned by the Symantec Email Security.cloud service.  
For more information please visit <http://www.symanteccloud.com>

---

---

This email has been scanned by the Symantec Email Security.cloud service.  
For more information please visit <http://www.symanteccloud.com>

---

---

This email has been scanned by the Symantec Email Security.cloud service.  
For more information please visit <http://www.symanteccloud.com>

---

---

This email has been scanned by the Symantec Email Security.cloud service.  
For more information please visit <http://www.symanteccloud.com>

---

