

From: Andrew Parsons [REDACTED] GRO
To: Owain Draper [REDACTED] GRO, Amy Prime [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 10:44:30 +0000

Importance: Normal

Inline-Images: imagec08577.PNG; image43c5a2.PNG; imagee6195f.PNG

I prefer option 2 (with one change below).

I would welcome thoughts from the rest of the Counsel team?

A

Andrew Parsons

Partner

Womble Bond Dickinson (UK) LLP

d: [REDACTED]
m: GRO
t:
e:

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From: Owain Draper [mailto:[REDACTED] GRO]
Sent: 27 March 2019 10:35
To: Andrew Parsons; Amy Prime; Gideon Cohen; David Cavender
Cc: Tom Beezer; Dave Panaech; Anthony Grabiner
Subject: Re: Post Office Group Litigation - Recusal Application

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. *If your clients require more time to decide on whether to oppose the application, our client has no objection to the deadline for this being extended from 12noon today to 5pm today. 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: **GRO**

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From: Andrew Parsons **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

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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 [WBDUK-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

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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

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From: Miranda Bond [mailto:[GRO](mailto:)]

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

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