

**From:** Jane MacLeod <[GRO]>  
**To:** Andrew Parsons <[GRO]>, Rodric Williams  
    <[GRO]>  
**Cc:** Amy Prime <[GRO]>, Charlie Temperley <[GRO]>  
    <[GRO]>  
**Subject:** RE: Meeting with AI - draft paper  
**Date:** Thu, 11 Apr 2019 07:15:02 +0000  
**Importance:** Normal  
**Inline-Images:** image001.png; image002.png; image003.png

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Thanks Andy

I would like to circulate the paper ahead of the meeting (this morning if possible) so as to give as much opportunity as possible for people to think about this issues (although I don't think AI will have much time, but it would be helpful for NRF and Richard Watson of UKGI).

I had originally said that the briefing would address both appeal strategy and early views on the approach to settlement options. However if the appeal discussion runs on, then I think it will be more important to allow that discussion to run its course, and then have the settlement discussion at another time.

Does that work for you and DCQC?

Jane MacLeod

<[GRO]>

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**From:** Andrew Parsons <[GRO]>  
**Sent:** 11 April 2019 08:11  
**To:** Rodric Williams <[GRO]>; Jane MacLeod <[GRO]>  
**Cc:** Amy Prime <[GRO]>; Charlie Temperley <[GRO]>  
**Subject:** RE: Meeting with AI - draft paper

Thanks both. We will work in these changes and circulate a final version this morning.

Jane – do you intend to provide this to AI and others before / at the meeting or shall we just use this as a speaking note? Knowing this will help David plan what to say.

Also, we were going to brief AI on settlement after the appeal discussion. Is that still the plan?

A

## Andrew Parsons

Partner  
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**From:** Rodric Williams <[REDACTED] GRO >  
**Sent:** 11 April 2019 00:45  
**To:** Jane MacLeod <[REDACTED] GRO >; Andrew Parsons <[REDACTED] GRO >  
**Cc:** Amy Prime <[REDACTED] GRO >; Charlie Temperley <[REDACTED] GRO >  
**Subject:** RE: Meeting with AI - draft paper [WBDUK-AC.FID26896945]

All – my comments now added to Jane's....

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**From:** Jane MacLeod  
**Sent:** 10 April 2019 20:39  
**To:** andrew.parsons <[REDACTED] GRO >; Rodric Williams <[REDACTED] GRO >  
**Cc:** Amy Prime <[REDACTED] GRO >; Charlie Temperley <[REDACTED] GRO >  
**Subject:** RE: Meeting with AI - draft paper [WBDUK-AC.FID26896945]

All

Please find attached the draft paper – no material typos (!) however I have inserted a couple of comments in mark-up for consideration.

I will read the grounds of appeal at a more leisurely pace ....

Many thanks,

Jane

Jane MacLeod

GRO

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**From:** Andrew Parsons <[REDACTED]>  
**Sent:** 10 April 2019 18:09  
**To:** Jane MacLeod <[REDACTED]>; Rodric Williams <[REDACTED]>  
**Cc:** Amy Prime <[REDACTED]>; Charlie Temperley <[REDACTED]>  
**Subject:** Meeting with AI - draft paper [WBODUK-AC.FID26896945]

Jane, Rodric

As promised, please find attached a draft paper from WBD and DCQC on the main appeal for the meeting with AI tomorrow. We are happy for this paper to be circulated in advance of the meeting or kept to this group and used as a speaking note, whichever you think best.

All comments on the attached welcomed, particularly as to tone and the overall approach.

If the paper is to be circulated, please can you let Charlie (cc'd) know and he will proof read (I'm useless at spotting typos!) and pdf before it is sent out.

I've also attached an email from DCQC earlier today with the current draft of the Grounds of Appeal. This is just for your information; I doubt those at the meeting tomorrow will care for this much detail and these grounds are only draft anyway.

Kind regards

Andy

**Andrew Parsons**

Partner  
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