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**Cc:** Anthony Grabiner [GRO], Stephanie Wood [GRO]  
**Subject:** Compiling spreadsheet/ feeding into WS  
**Date:** Mon, 18 Mar 2019 10:50:41 +0000  
**Importance:** Normal  
**Attachments:** Notes\_for\_recusal\_application.docx

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All,

Following discussion with AGQC, I have worked up the attached, which seeks to synthesize our arguments on the key bias points.

Any comments/ suggestions gratefully received.

A few important things to note:

- Particularly helpful if people can play devil's advocate and come up with arguments for why some of these findings should have been included. For a number of them I have drawn a complete blank.
- This analysis should also plug into the witness statement being prepared by WBD in support of the application.
- I am conscious that I am not close to the detail of the Horizon trial. Would be good if those who are involved could scrutinize the parts dealing with that overlap especially carefully.
- As I have commented before, this is a 'target-rich' environment. We have to choose the best eggs. Accordingly, I have ditched the couple of glancing references to matters relevant to loss and damage.
- This does not include the 'vitriol' points. I note that some of these are toned down in the final version of the Judgment. We will have to decide precisely what role we want these points to play in the application.

Best

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