FREETHS

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27 March 2019

Our Ref: JXH/1684/2113618/1/MB Your Ref AP6/364065.1369

Dear Sirs

POST OFFICE GROUP LITIGATION RECUSAL APPLICATION – PARTICULARS

We refer to your letter of yesterday evening, 26 March 2019. It does not provide the clarity that we requested.

We note that in your letter you say that you "do not agree that the witness statement fails to comply with the Order". That amounts to an assertion that you have complied with the Order, which required you to identify the specific findings relied upon for the purposes of paragraphs 24 and 25 of Parsons 14.

Accordingly, we will 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.

If, notwithstanding your letter of yesterday and the clear terms of the Order, our understanding is not correct please state so expressly by 11am today so that we can consider whether any extension is necessary to paragraph 3.2 of the Order and make that or any other applications to the Court in the course of this afternoon, if the Judge is able to accommodate a short hearing for that purpose.

Yours faithfully

Freeths LLP

Please respond by e-mail where possible

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