

Message

**From:** Tom Beezer [GRO]  
**Sent:** 14/03/2019 13:32:35  
**To:** Jane MacLeod [GRO] [GRO]  
**CC:** Andrew Parsons [GRO]; Amy Prime [GRO]  
**Subject:** RE: QCs [WBDUK-AC.FID26896945]  
**Attachments:** PO - Recusal.docx

And now attaching the 'note' that DCQC prepared for Lord Neuberger, which is referred to in the 'recusal note'. This attachment is for completeness only and it is not urgent that you digest it right now.

T

**Tom Beezer**  
Partner  
Womble Bond Dickinson (UK) LLP

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

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**From:** Tom Beezer  
**Sent:** 14 March 2019 13:08  
**To:** Jane MacLeod [GRO]  
**Cc:** Andrew Parsons; Amy Prime  
**Subject:** RE: QCs [WBDUK-AC.FID26896945]

Jane

Please see attached "recusal note" from Lord Neuberger.

This has just been received. I am reading it now.

T

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**From:** Tom Beezer  
**Sent:** 14 March 2019 11:53  
**To:** Jane MacLeod ([GRO])  
**Cc:** Andrew Parsons; Amy Prime  
**Subject:** QCs

Jane

A short e mail to check we are "at one" on forward facing actions. As I see it the running order is as follows:

- We get Neuberger QC recusal comment/advice this eve'
- If 'a runner' we need to decide between Grabiner QC & Mark Howard QC. That decision could be made tomorrow or early next week. From e mails I sense that you are leaning towards MHQC
- We then instruct the QC who would "do" the recusal advocacy (assuming they too concur with the Neuberger view of the world)
- Alongside the above work stream we will also get input from Neuberger QC over Common Issues appeal at some point next week (I hope. That is the timeframe I'll push for)
- We then take decisions next week (post Neuberger QC advice) over steps in Common Issues appeal (as to who/when etc).

No reply needed to this unless you have a different view.

T