

Message

**From:** Andrew Parsons [GRO]  
**Sent:** 26/03/2019 11:25:42  
**To:** Rodric Williams [GRO]; Amy Prime [GRO]; Jane MacLeod [GRO]  
**CC:** Tom Beezer [GRO]; Mark Underwood [GRO]; Ben Foat [GRO]  
**Subject:** RE: Recusal Application - 15th Witness Statement [WBDUK-AC.FID26896945]

Rod

Understood – Counsel has confirmed that the draft skeleton will be ready by close on Thursday.

A

**Andrew Parsons**

Partner  
Womble Bond Dickinson (UK) LLP

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**From:** Rodric Williams [mailto:[GRO]]  
**Sent:** 26 March 2019 11:22  
**To:** Amy Prime; Jane MacLeod  
**Cc:** Tom Beezer; Andrew Parsons; Mark Underwood [GRO]; Ben Foat  
**Subject:** RE: Recusal Application - 15th Witness Statement [WBDUK-AC.FID26896945]

Thanks Amy.

I have discussed this with Jane. Please file and serve the Statement.

Going forward, can you please give us more time to consider these documents. We appreciate that everyone is working flat out but we need more than 4 hours to consider and give instructions on draft documents.

This is especially important with the Skeleton for the Recusal Application. Can you please therefore make sure we have early sight of the draft Skeleton, say by close of play on Thursday, so that we can feed our comments in as it is refined ahead of filing at 5pm on Monday 1 April 2019.

Thanks, Rod

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**From:** Amy Prime [mailto:[GRO]]  
**Sent:** 26 March 2019 08:07  
**To:** Jane MacLeod <[GRO]>; Rodric Williams [GRO]  
**Cc:** Tom Beezer <[GRO]>; andrew.parsons <[GRO]>; Mark Underwood [GRO]

[GRO] >; Ben Foat <[GRO]  
**Subject:** Recusal Application - 15th Witness Statement [WBDUK-AC.FID26896945]

Jane, Rodric

Please find attached the witness statement which is due to be filed at **12pm today**. A copy of the 14<sup>th</sup> witness statement and the order by which the 15<sup>th</sup> witness statement is pursuant to are also attached for reference.

The witness statement contains 7 paragraphs, with the remainder being extracts from the Judgment. We have sought to include in the statement as much as possible from the Judgment so as no points are missed, which has been weighed against the risk of including such a large volume of material that we are accused of being unhelpful.

In relation to matters which have arisen in the Horizon Issues Trial that could be useful examples of the Judge's apparent bias, the scope of the witness statement is only focussed on the Common Issues Trial however, there is ongoing consideration as to whether this material could be used in the skeleton argument / oral submissions. Owain Draper has been re-tasked from the HIT to the recusal application for a couple of days so as to consider this and the HIT transcripts have been added to the application bundles so as to enable Counsel to do so.

Any thoughts or comments on the witness statement would be welcomed.

Kind regards  
Amy

**Amy Prime**  
Solicitor  
Womble Bond Dickinson (UK) LLP  
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