

From: Gideon Cohen <[GRO]>
To: 'Amy Prime' <[GRO]>, Tom Beezer <[GRO]>, Andrew Parsons <[GRO]>, Dave Panaech <[GRO]>
Cc: David Cavender <[GRO]>, Anthony Grabiner <[GRO]>, Owain Draper <[GRO]>, Stephanie Wood <[GRO]>
Subject: RE: Application docs [WBDUK-AC.FID26896945]
Date: Wed, 20 Mar 2019 15:06:38 +0000
Importance: Normal
Inline-Images: image001.png; image002.png; image003.png

Thanks Amy. I am happy with those changes.

From: Amy Prime [mailto:[GRO]]
Sent: 20 March 2019 14:38
To: Gideon Cohen; Tom Beezer; Andrew Parsons; Dave Panaech
Cc: David Cavender; Anthony Grabiner; Owain Draper; Stephanie Wood
Subject: RE: Application docs [WBDUK-AC.FID26896945]

Gideon

Please find attached marked-up copies of the order and application notice.

Witness statement to follow as soon as possible.

Kind regards

Amy

Amy Prime
Solicitor
Womble Bond Dickinson (UK) LLP

d: [GRO]
m:
t:
e:

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From: Gideon Cohen [mailto:[GRO](#)]
Sent: 20 March 2019 14:23
To: Tom Beezer; Andrew Parsons; Dave Panaech; Amy Prime
Cc: David Cavender; Anthony Grabiner; Owain Draper; Stephanie Wood
Subject: RE: Application docs [WBDUK-AC.FID26896945]

Thanks Tom.

On timing, I have sent over the 3 draft documents, so it is really a question (a) of how quickly everyone can review, and (b) how quickly the refs and other bits can be filled in. Potentially it could all be done very quickly – just depends on what people's availability/ how much tweaking there is to be done. Obviously we want to be careful and thorough, but I would not have thought it should take too long.

Best

Gideon

From: Tom Beezer [mailto:[GRO](#)]
Sent: 20 March 2019 14:17
To: Gideon Cohen; Andrew Parsons; Dave Panaech; Amy Prime
Cc: David Cavender; Anthony Grabiner; Owain Draper; Stephanie Wood
Subject: RE: Application docs [WBDUK-AC.FID26896945]

All

Just spoken to Jane M from Post Office.

Instructions from Post Office Board are "do it". Make the application.

One point – Post Office Board did not enjoy what it read about Post Office in CIT Judgment (the "*vitriol*" points from the Judge). Jane asks that we collectively bear that in mind and when drafting letters, witness statements etc we err on the

reasoned side of life – in other words fewer adjectives than normal – to try and demonstrate that we are very reasonable.

But main point – instructed to do it.

I have predicted, to Jane, but not promised, that we would be likely to issue and serve at some point tomorrow ?

t

Tom Beezer

Partner

Womble Bond Dickinson (UK) LLP

d: 
m:
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e:

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From: Gideon Cohen [mailto:
Sent: 20 March 2019 13:22
To: Tom Beezer; Andrew Parsons; Dave Panaech; Amy Prime
Cc: David Cavender; Anthony Grabiner; Owain Draper; Stephanie Wood
Subject: Application docs

In anticipation of (hopefully) getting the green light for this application from PO, please see attached the application documents. There are various bits to be filled in (particularly references in the WS).

Grateful if everyone could take a careful look at all of these though.

I have gone for a time estimate for the hearing of 4 hrs. Thoughts on that appreciated too.

Thanks

Gideon

Gideon Cohen

Barrister

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