

## Message

**From:** Rodric Williams [GRO]  
**Sent:** 22/06/2016 14:29:32  
**To:** Thomas P Moran [GRO]; Angela Van-Den-Bogerd [GRO]  
 [GRO]; Patrick Bourke [GRO]; Mark R Davies  
 [GRO]; Rob Houghton [GRO]; Tom Wechsler  
 [GRO]; Nick Sambridge [GRO]  
**CC:** Jane MacLeod [GRO]; Parsons, Andrew [GRO]  
**Subject:** RE: Postmaster Litigation Steering Group - Confidential and Subject to Legal Privilege  
**Attachments:** PLSG Agenda 22.06.16.docx; \_DOC\_33198938(1)\_Group Action - Work Plan - 21 June 2016.docx

All – I attach the updated Agenda for today’s meeting, which includes two a resource points (item 6) and the scheduled date for the next meeting (item 8).

I also attach the litigation work plan which focuses on the work being done to respond to Freeths’ Letter of Claim.

See you at 4pm,  
 Rodric

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**From:** Rodric Williams  
**Sent:** 20 June 2016 19:08  
**To:** Thomas P Moran; Angela Van-Den-Bogerd; Patrick Bourke; Mark R Davies; Rob Houghton; Tom Wechsler; Nick Sambridge  
**Cc:** Jane MacLeod; Parsons, Andrew  
**Subject:** Postmaster Litigation Steering Group - Confidential and Subject to Legal Privilege

All,

Thank you all for your engagement in the first Steering Group meeting on 7 June 2016. I now attach the proposed agenda for the next meeting on Wednesday 22 June at 1600. Please let me know if you have any comments or additions.

The follow up actions to the first meeting were:

**1. Circulate Second Sight’s Reports**

Please find attached Second Sight’s:

- a. “Interim Report into alleged problems with the Horizon system” dated 8 July 2013;
- b. “Mediation Briefing Report - Part One” dated 22 May 2014 (this was essentially written by Post Office, and provides non-contentious descriptions of branch operating procedures and related Horizon functions); and
- c. “Briefing Report - Part Two” dated 9 April 2015 (this contains Second Sight’s more contentious statements and allegations).

I also attach the “Reply of Post Office Limited to Second Sight’s Briefing Report – Part Two” dated April 2015, which should be read in conjunction with Second Sight’s Briefing Report - Part Two.

Second Sight also produced individual “case review reports” for cases submitted to the Complaint Review and Mediation Scheme. We therefore have these reports for the 70 Scheme applicants who are now Claimants in the Postmaster Litigation, and can share them with the Steering Group as and when they become relevant.

## 2. Letter of Response - Timetable

The current timetable for Post Office's response to Freeths' Letter of Claim is:

- 28 June 2016: Bond Dickinson to provide draft Letter of Response to Post Office Legal.
- 29 June to 14 July 2016: Refinement of draft with a view to circulating to Steering Group as soon as possible before meeting on 15 July 2016. This is likely to require input from various parts of the business.
- 15 July 2016: Deadline for circulating draft to Steering Group.
- 20 July 2016: Steering Group Meeting to approve draft.
- 28 July 2016: deadline for sending Letter of Response.

## 3. PLSG Terms of Reference

I attach the final Terms of Reference, which reflect Angela's point that the PLSG needs to protect Post Office generally, not just the Network (para. 2.1).

## 4. Communications Protocol

Please remember:

- All documents, including emails, should be marked "**Confidential and Subject to Legal Privilege**".
- Do not forward or circulate documents connected to the Claim beyond the agreed distribution list.
- Be careful when creating new documents which concern the litigation - ideally, you and your teams should only have to reply to / comment on an email or document generated by one of our lawyers.
- Do not destroy any documents that may be relevant.
- If in doubt about any document, consult Legal.

## 5. Internal Stakeholder Communications

I attach the Reactive Lines that Comms prepared in May 2016, shortly after the Freeths Litigation was started. Please consider (and keep under review) whether your teams require anything more (see Agenda item 2.a).

Please let me know if you have any questions on the above or generally.

Kind regards, Rodric



**Rodric Williams**  
Solicitor, Corporate Services  
Post Office Ltd

	GRO	
GRO	<a href="mailto:rodric.williams">rodric.williams</a>	GRO

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