

Message

From: Mark R Davies [GRO]
Sent: 26/06/2018 18:34:15
To: Jane MacLeod [GRO]; Mark Underwood1 [GRO]; Andrew Parsons [GRO]; Rodric Williams [GRO]; Melanie Corfield [GRO]
Subject: Re: Postmaster Litigation - Disclosure in the 2017-18 ARA. Subject to privilege

Hi

I'm sorry I missed your call Jane.

I'm broadly happy with this but there is one line I'd like to think about and discuss. As well as Mel view i would also appreciate Patrick view - may we forward this to him?

Mark

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From: Jane MacLeod
Sent: Tuesday, June 26, 2018 9:56:53 AM
To: Mark Underwood1; Andrew Parsons; Rodric Williams; Mark R Davies; Melanie Corfield
Subject: RE: Postmaster Litigation - Disclosure in the 2017-18 ARA. Subject to privilege

Thanks everyone.

I attach a further draft which I've tidied up grammatically in the last paragraph.

Mark/Mel - are you ok with this?

Thanks,

Jane

**Jane MacLeod**

Group Director of Legal, Risk & Governance
Ground Floor
20 Finsbury Street
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Mobile number:

[GRO]

From: Mark Underwood1
Sent: 26 June 2018 08:35
To: Andrew Parsons <a [GRO]>; Jane MacLeod [GRO]; Rodric Williams [GRO]; Mark R Davies [GRO]
Subject: RE: Postmaster Litigation - Disclosure in the 2017-18 ARA. Subject to privilege [WBDUK-AC.FID26896945]

Hi Jane,

Although I cannot comment on whether there are any legal risks associated with the inclusion of this statement, I wonder whether we could remove the following wording:

"Post Office does not believe that that this claim valuation is credible or accurate".

I think we make this point anyway and by including it we run the risk of irritating the other side, a flurry of letters having to be exchanged and the lawyers being distracted from the core legal work?

For ease, I have attached a version which reflects this change and swapping "accept" for "stated", for your consideration.
Mark



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for Customer Experience**

Mark Underwood

Head of Portfolio: Legal, Risk & Governance

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Mobile number: **GRO**

From: Andrew Parsons **GRO**
Sent: 26 June 2018 08:25
To: Jane MacLeod <**GRO**>; Mark Underwood1 <**GRO**>; Rodric Williams <**GRO**>; Mark R Davies <**GRO**>
Subject: RE: Postmaster Litigation - Disclosure in the 2017-18 ARA. Subject to privilege [WBDUK-AC.FID26896945]

Jane

I cannot see any further risks that need to be flagged.

I agree with swapping "accept" for "they have stated".

Kind regards
Andy

Andrew Parsons

Partner
Womble Bond Dickinson (UK) LLP

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e: Andrew.Parsons@wbd.com **GRO**

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From: Jane MacLeod **GRO**
Sent: 25 June 2018 22:50
To: Andrew Parsons; Mark Underwood1; Rodric Williams; Mark R Davies
Subject: Postmaster Litigation - Disclosure in the 2017-18 ARA. Subject to privilege

All

As flagged last week, we have a meeting of the Board Audit, Risk & Compliance Committee on Thursday afternoon, at which we will ask the ARC for their views on disclosure.

To that end, I attach a word document showing the draft wording as proposed following the May ARC meeting, and alternate wording which could be used instead if EY/ the ARC believe that we need to reference the fact that Freeths flagged numbers in their Skeleton Argument for the costs hearing held on 5 June. This is based on Andy's draft at the

end of last week, and shows the changes from the May wording highlighted in yellow, with a couple of suggested comments from me (in italics).

If there are any views as to the legal and reputational risks of including this statement, we should also present these to the ARC. One of the key risks is that by putting this number in the ARA, it will give credence to the number notwithstanding the qualifications. Please let me know asap of any others.

Many thanks,

Jane



Jane MacLeod

Group Director of Legal, Risk & Governance
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