Message	2			
From:	Victoria Brooks GRO			.00000000000000000000000000000000000000
Sent:	05/07/2018 07:23:20	··		
To:	Angela Van-Den-Bogerd	GRO		
CC:	Nick Beal GRO	; Mark Underwood	<b>GRO</b> ; Rodric	Williams
	GRO	; Andrew Parsons	GRO	
Subject:	Re: Timings for witness statemen	ts [WBDUK-AC.FID26896945]		
Thanks	Angela.			
Noted a	and will do.			
Kind re	gards			
Victoria	1			
Victor	ia Brooks			
Managi	ng Associate e Bond Dickinson (UK) LLP			
	E BOILD DICKINSON (OK) LLF			
	GRO			
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Sent fro	om my iPhone			
On 5 Ju	l 2018, at 07:39, Angela Van-Den-Bog	erd GRO	) wrote:	
	Hi Nick	l		
	THE PRICE			
	Lagree on Chris.			
	<b>Victoria</b> – I spoke with Alison Bolsoveher.	er yesterday. She will happily	y be a witness so please reach out to	
	My leave is from 11 <sup>th</sup> July, returning	on 23 <sup>rd</sup> July.		
	Thanks			
	Angela			
	<image003.png></image003.png>	Angela Van Den Boge	erd	

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<b>From:</b> Nick Beal <b>Sent:</b> 04 July 2018 12:18			
To: Victoria Brooks <	GRO	; Angela Van-Den-Bogerd	GRO
·	Mark Underwood	GRO	
Cc: Rodric Williams	GRO	; Andrew Parsons	GRO
GRO	_	\	
Subject: RE: Timings for witn	ess statements [WB	DUK-AC.FID26896945]	
Thx Victoria.			
estes y the wars that			
luts to confirm that my lave	is 21 <sup>st</sup> July to 3 <sup>rd</sup> Au	gust – so definitely need to bea	r this in mind.
•			
	•	ward to the list also – whilst th	
contracts than remuneratior	n, he does have a gro	eat working knowledge of this s	stuff too.
Andy — can vou confirm Lear	share the Paul Inwr	ood witness attachment with hi	m
ning can you commit i car	s situs e cise i das ilitim	ou with a acacini, cit with in	3114
l am about to send over Stev	vart's review of Paul	's statement – straight to you V	/ictoria marked legal
privileged?			
Rgds			
<image008.png></image008.png>			
	Nick Beal		
<image009.png> 2017 Winner of the Global</image009.png>	11	s' Development & Remuneration	
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	20 Finsbury Stre London	et,	
Experience	ECZY 9AQ		
	GRO		

From: Victoria Brooks	GRO			
<b>Sent:</b> 03 July 2018 16:23		. <del></del>		
To: Angela Van-Den-Bogerd <	GR	<b>o</b>	Nick Beal	
GRO	; Mark Underwood	GRO		•
Cc: Rodric Williams <	GRO	; Andrew Parsons	GRO	

GRO

Subject: Timings for witness statements [WBDUK-AC.FID26896945]

Dear Angela, Nick and Mark

Thanks for your time on the call earlier.

I've prepared an indication of the timings for the phases of witness statements below. This isn't intended to be set in stone since we will need to fit around witness availability if they are doing something they cannot change. However, your help (in particular I was thinking Mark and Rodric) in clearing their desks and getting us priority access to them would be much appreciated.

I will also work into the below some time to deal with witness evidence on specific issues raised in relation to specific Lead Claimants, but have focused on the evidence on generic issues for now.

Dates	Task	Who?
W\c 2 July 2018	Finalising issues to raise with witnesses on generic issues	WBD and POL
	Arranging priority access for witnesses	POL
	Contact witnesses on generic issues to introduce lawyers working on statements and set up calls	WBD
W\c 9 July 2018	Calls and meetings with witnesses on generic issues	WBD and POL witnesses
	Working on witness statements	WBD
W\c 16 July 2018	Calls and meetings with witnesses on generic issues	WBD and POL witnesses
	Working on witness statements on	WBD
W/c 23 July 2018	Reviewing draft witness statements	POL witnesses assisted by WBD
W/c 30 July 2018	Final drafts / signing off	WBD and POL witnesses
W/c 6 August 2018	Slippage	WBD and POL witnesses
10 August 2018	Witness statement deadline	All

For your information, I will be assisted with the preparation of the statements by a team consisting of Dave Panaech, Ivan Roots, Helen Creech, Ed Duffield and Mandy Robertson. Depending on the complexity of the evidence allocated to each team member, they may be able to work more quickly than the above for certain of the witnesses.

Please let me know if you have any comments or queries on the above.

Kind regards

Victoria

## Victoria Brooks

Managing Associate
Womble Bond Dickinson (UK) LLP



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