

From: Andrew Parsons <[GRO]>

To: "sarah.rimmer" <[GRO]>, "helen.dickinson" <[GRO]>, "david.longbottom" <[GRO]>, "angela.vanden-bogerd" <[GRO]>, "michael.shields" <[GRO]>, "brian.trotter" <[GRO]>, "nick.beal" <[GRO]>, "tim.dance" <[GRO]>, "paul.f.williams" <[GRO]>, "mike.x.webb" <[GRO]>, "michael.r.haworth" <[GRO]>, "john.breeden" <[GRO]>, "andrew.carpenter" <[GRO]>

Cc: Victoria Brooks <[GRO]>, Dave Panaech <[GRO]>, Beth Hooper <[GRO]>, "Mandy Robertson" <[GRO]>

Subject: Post Office Group Litigation Trial - privileged [WBDUK-AC.FID26896945]

Date: Wed, 5 Sep 2018 13:31:38 +0000

Importance: Normal

All

Thanks for supporting Post Office's defence in the Group Litigation and for all your hard work over the last few weeks on your witness statements.

We appreciate that being a witness in Court will be a new and unusual experience for most of you, and one that comes with a mix of nerves and excitement. To help you plan ahead and get ready I've set out below an overview of the steps that will take place between now and the trial. If you have any questions about any of this, please feel free to contact me or Victoria Brooks (copied).

- **Trial.** The Trial starts on 5 November 2018 and runs for 4 weeks. It will be at the High Court in London (<https://courtribunalfinder.service.gov.uk/courts/rolls-building>).
 - In the week or so before the trial starts, we will agree a running order for witnesses with the Claimants. This allows us to estimate the approximate days on which you will be needed in Court. You should only be needed for the day on which you are giving evidence but we sometimes ask that you are there on other days to hear some of the evidence being given by the Claimants. This is so that you understand what has been said earlier in the trial in case similar questions are asked of you.
 - Court days start at 10:30 and finish at 4:30, so you may need to travel to London the day before or arrange to stay overnight to the following day. We can advise you on the best plan closer to the time.
- **Training.** Before trial, we will be arranging witness familiarisation training. This is run by Bond Solon (<https://www.bondsolon.com/witness-familiarisation/>). This training is usually in the form of a group workshop and takes a full day, during which Bond Solon will explain the Court process, how cross-examination works and how to assist the Court when giving your evidence. For those of you giving longer evidence, we may also arrange some 1-2-1 training sessions.

We'll be in touch shortly to arrange convenient dates, but it is best if this training is done 1-2 weeks before the trial starts

- **Pre-reading.** It is important that you understand the wider background to this litigation and are familiar with the Claimants' evidence and relevant documents. We will be producing folders of relevant documents for each of you, tailored to your specific areas of evidence. The case is very document heavy, so it may take you 2 - 3 days of reading to go through them.
- **Meetings with the legal team.** We may need some of you to attend meetings or conference calls with the legal team to discuss specific issues. Trying to organise this with 14 witnesses can be challenging, so we are going to send out placeholder appointments to try to reserve some time now.

Actions for you:

- Please can you block out your diaries for the whole of November 2018. We should be able to release this time back to you once we have agreed the running order for witnesses.
- Please can you let us know if you have any holidays or other unavoidable appointments between now and November so that we can make arrangements for training and meetings.
- Please let your line manager know that the trial is coming up and what will be required of you (feel free to forward this email to them). Your respective GE members have already been informed. If they have any questions about this, they should speak to Rodric Williams or Mark Underwood in the first instance. You should think about making plans to cover your day to day work so that adequate time can be given to trial preparation.
- This case is likely to attract media interest. Please can you be careful about what you post on social media as journalists may pick this up. Also, I would recommend that you change your privacy settings to "private" on all social media accounts that you use for personal matters until the trial is over. This is so your posts are not publicly visible to journalists.

Many thanks again.
Andy