

Message

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**From:** Loraine, Paul [GRO]  
**Sent:** 30/12/2014 12:33:43  
**To:** Rodric Williams [GRO]  
**CC:** Parsons, Andrew [/O=BOND PEARCE/OU=First Administrative Group/cn=Recipients/cn=ap6]; Mark Underwood [GRO]  
[GRO]  
**Subject:** FW: Subject to Legal Privilege – Prepared in Connection with Mediations - Letter to SS re Part 2 Questions.DOCX [BD-4A.FID20472253]  
**Attachments:** \_DOC\_29992457(1)\_141230 P2 Questions not being answered - AP comments.DOCX

Rodric

I hope you had a good Christmas.

As you will no doubt be aware, we are currently working through the list of Second Sight's questions to POL in connection with their Part Two report.

As part of this, we are providing reasons to Second Sight in relation to the questions POL is not proposing to answer.

Are you able to assist with Andy's query on question 13.1 of the attached document? Please can you copy Andy and Mark in on your response.

Kind regards

Paul

**Paul Loraine**

Solicitor

for and on behalf of Bond Dickinson LLP

*Bond Dickinson*

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**From:** Parsons, Andrew [mailto:[GRO]]  
**Sent:** 30 December 2014 10:41  
**To:** Mark Underwood [GRO]; Loraine, Paul  
**Cc:** Belinda Crowe  
**Subject:** RE: Subject to Legal Privilege – Prepared in Connection with Mediations - Letter to SS re Part 2 Questions.DOCX [BD-4A.FID20472253]

Mark

Some comments from me attached.

I've tried to flesh out some of the "reasons" so that it doesn't look like we are just stonewalling. I also think there are a few questions we may be able to answer or at least fudge an answer. I think it would be better to try to answer a question than just refuse entirely wherever possible.

I wonder if we should remove the 5 questions we have answered already – rather than record these as a refusal to answer we should perhaps take the benefit of saying already answered?

Paul – see questions 4.6(c) and 4.6(h) and 5.1. Did these questions go to Rob King in POL security – he should know the answer to these. Also – pls can you action 13.1.

A

**Andrew Parsons**  
Managing Associate

*Bond Dickinson*

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**GRO**

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**From:** Mark Underwood [\[mailto:mark.underwood@bond-dickinson.com\]](mailto:mark.underwood@bond-dickinson.com) **GRO**

**Sent:** 30 December 2014 08:59

**To:** Belinda Crowe; Parsons, Andrew; Loraine, Paul ([\[mailto:loraine.p@bond-dickinson.com\]](mailto:loraine.p@bond-dickinson.com) **GRO**); Rodric Williams; Tom Wechsler

**Cc:** Angela Van-Den-Bogerd; Patrick Bourke

**Subject:** RE: Subject to Legal Privilege – Prepared in Connection with Mediations - Letter to SS re Part 2 Questions.DOCX

Hi Belinda,

As requested, please find attached the list of questions we are not providing answers to, and the reasons why.

**Andy** – there is one question I have highlighted. Did we actually ever send out the response with regards to Suspense accounts as I am unsure?

In total we are not providing answers to 41 of the 110 questions posed (37%). Splits by reason in the table below:

Total	Questions	110	%
	Fishing	28	25%
	Out of scope	8	7%
	Already answered	5	5%
		<b>41</b>	<b>37%</b>

Any questions just shout,

Mark

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**From:** Belinda Crowe  
**Sent:** 29 December 2014 11:00  
**To:** Mark Underwood; Parsons, Andrew (GRO); Loraine, Paul (GRO); Rodric Williams; Tom Wechsler  
**Cc:** Angela Van-Den-Bogerd; Patrick Bourke  
**Subject:** Subject to Legal Privilege – Prepared in Connection with Mediations - Letter to SS re Part 2 Questions.DOCX

Please see an attached some amendments to the draft letter for second sight to accompany the answers to their questions.

Mark/Paul/Andy Parsons – would you be able to prepare the schedule of questions to which Post Office is not prepared to respond and the reasons why – it would be that some of the text I have included in the letter is best placed in the Schedule.

Best wishes  
Belinda

**Belinda Crowe**

148 Old Street, LONDON, EC1V 9HQ

GRO Postline: GRO  
GRO

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