

**From:** Rodric Williams [GRO]  
**Sent:** Fri 08/07/2016 3:27:07 PM (UTC)  
**To:** Thomas P Moran [GRO]; Angela Van-Den-Bogerd [GRO];  
Patrick Bourke [GRO]; Mark R  
Davies [GRO]; Rob Houghton [GRO]; Tom  
Wechsler [GRO]; Nick  
Sambridge [GRO]  
**Cc:** Jane MacLeod [GRO]; Parsons,  
Andrew [GRO]; Mark  
Underwood [GRO]  
**Subject:** Postmaster Litigation Steering Group - Confidential and Subject to Legal Privilege - Do Not Forward  
**Attachment:** PLSG Action List.docx  
**Attachment:** PLSG Agenda 14.07.16.docx  
**Attachment:** \_DOC\_33332371(1)\_Group Action - Work Plan - Meeting on 14 July 2016.docx

All,

Please find attached a draft agenda for the next Steering Group meeting on 14 July 2016 at 1600, along with the Action List and updated Bond Dickinson litigation work plan.

Bond Dickinson are near to having a draft Letter of Response (**LOR**) ready for review by the Steering Group. The current plan is to circulate this on 15 July 2016 with a table directing each of you to the parts most relevant to your sections of the business.

As noted in the agenda, to complete the LOR for circulation we need to make the tactical decisions set out below and in the attached "one-page" paper covering each issue:

1. Do we address in detail the "bugs" in Horizon identified by Second Sight?
2. Do we attack Second Sight's credibility / expertise in order to undermine their reports?
3. Do we let Second Sight speak to Freeths?
4. Do we lodge counterclaims against Claimants who have outstanding debts?
5. Do we agree not to assert any Official Secrets Act obligations against claimants?
6. Do we engage in further mediation?
7. Do we explain whether part of Post Office's motivation for bringing prosecutions is a desire to recover money?

Unfortunately, I am out of the office next week and cannot attend the meeting, for which I apologise. I have however been through the questions with Andy Parsons from Bond Dickinson, who will be at the meeting to provide my legal input on these issues.

If you have any other items to add to the agenda, or any questions generally, please let me know (copying Mark Underwood, cc'ed, who will help coordinate as necessary).

Kind regards, Rodric



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