

From: Rodric Williams [GRO]
Sent: Wed 20/04/2016 6:10:48 PM (UTC)
To: Parsons, Andrew [GRO]
Subject: RE: Group Action - action list

Thanks – can you pls give me a quick call – I'd like to run something past you quickly.

My number is [GRO]

From: Parsons, Andrew [mailto:[GRO]]
Sent: 20 April 2016 19:07
To: Rodric Williams
Cc: Matthews, Gavin; Mark Underwood [GRO]; Lukas, Elisa
Subject: Group Action - action list

Rodric

Action list from our meeting. I've also added in some other actions that we have discussed previously so we have everything in one place. Your actions are in **yellow**.

Group Action

Strategy

1. Mark to send round "time bar" letter.
2. BD to draft notice for D&O insurer / broker
3. BD to prepare timeline of events / process map for litigation
4. Rod to raise with Jane the issue of a standstill agreement on claims against FJ
5. BD to advise on costs recovery (including in-house legal time) in context of group action.
6. BD to prepare short briefing note on Group Litigation procedure.
7. BD to do bullets for Rod on Chairman / Minister meeting.
8. Rod to set up meeting with Mark Davies to test the litigation strategy from a comms perspective (if Jane agrees)

Team

9. Rod to pitch "steering group" idea to Jane
10. BD to refine list of Counsel into a recommendation

Documents

11. BD to prepare letter to FJ re document preservation
12. BD to speak to Kath / Shirley re getting full story on past document gathering exercises

Short-term steps

13. BD to prepare protocol on "What to do on receipt of Letter of Claim"
14. BD to prepare response to Freeths last letter.

CCRC

15. BD to circulate updated CCRC tracker
16. BD to check whether "payments mismatch" document is in CCRC data room
17. Rod to circulate CK email re the effect of the "payments mismatch" issue on Misra / ask BAQC for advice on this

Chairman report

18. Rod to revert to BD on Deloitte privilege question.
19. BD to liaise with BAQC re reviewing criminal files

Kind regards
Andy

Andrew Parsons

Managing Associate

Bond Dickinson

Direct: GRO
Mobile:

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