

## Message

**From:** Jane MacLeod [GRO]  
**Sent:** 14/07/2017 07:18:37  
**To:** Andrew Parsons [GRO]  
**Subject:** RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

Hi Andy

I have read the Defence all the way through on a stand alone basis (not yet side by side against the GPOC!) and have no comments. I'm convinced – but I guess it's not my judgement that counts!!!

You and Mark were locked away when I came back to my desk. Mark said that you thought the discussion had gone well, although I was kicking myself for talking about the 'black hat' work, as that took us down an unnecessary rabbit hole. Still we got it back .....

So, in terms of minutes of the discussion yesterday, my suggestion – subject to your thoughts, would be:

"JM and Andrew Parsons, Partner from Bond Dickinson briefed GE on the proposed Defence that would be filed on behalf of Post Office on 18 July in the Postmaster litigation. The following points were made:

- Mr Parsons described the role of the Defence document in the proceedings, and noted that the document would be signed by the General Counsel on behalf of Post Office.
- The accuracy of the factual statements included in the Defence had been reviewed internally by those Post Office staff with knowledge of the relevant facts.
- Mr Parsons summarised the key themes arising in the litigation and the approach to those themes in the defence.
- Freeths were still advertising for additional claimants however the window for applicants to apply to join the litigation would close on 26 July and Post Office would receive details of the total number and names of applicants shortly thereafter. Present indications suggested that the total number of claimants in the proceedings would be 400-500.
- The Claimants have the opportunity to respond to Post Office's Defence in a formal document called a Reply. This is due to be served on Post Office and filed with the Court on 20 September 2017. It is not mandatory for the Claimants to serve a Reply but given the complexity and importance of this case it is expected that they would do so.
- A Court hearing, called a Case Management Conference, will take place on 19 October 2017. This hearing, and the preparation for it, will provide an opportunity for Post Office and the Claimants to agree further steps leading up to trial, including the selection of those postmasters' cases which the parties wish to put forward as Lead Cases; disclosure of documents; witness evidence and expert evidence. Once selected, the Lead Cases will be examined in greater detail by the Court at mini-trials with the aim of using those cases to determine points of principle or fact that apply broadly to many cases. To be able to do this, the parties will need to set out their positions in relation to these Lead Cases in further, case-specific Particulars of Claim, Defences and Replies.

GE noted the briefing and requested that a further update be provided to GE and the Board following the Case Management Conference. This update should include an assessment of the potential impact on Post Office and its business and operations of the range of possible outcomes, based on the issues to be considered through the Lead Cases."

Many thanks,

Jane

**Jane MacLeod**

Group Director of Legal, Risk & Governance



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20 Finsbury Street  
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Mobile number: GRO

**From:** Andrew Parsons GRO  
**Sent:** 12 July 2017 14:49  
**To:** Mark Underwood GRO; Jane MacLeod GRO; Angela Van-Den-Bogerd GRO; Mark R Davies GRO; Stuart Nesbit GRO; Patrick Bourke GRO; Rob Houghton GRO; Rodric Williams GRO; Thomas P Moran GRO; Tom Wechsler GRO; Mark Ellis GRO; Melanie Corfield GRO  
**Cc:** Kevin Morgan GRO; Amy Prime GRO  
**Subject:** RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

All

Please find attached the draft Defence for your review and comment. As discussed earlier, if possible please provide comments rather than amendments to the actual text. I've also attached the Claimants' Generic Particulars of Claim for reference.

You'll see a few points where input from Deloitte and Fujitsu is needed – we expect to get this today.

Please send any comments to me and Amy Prime (copied).

Thanks  
Andy

**Andrew Parsons**  
Partner  
Bond Dickinson LLP

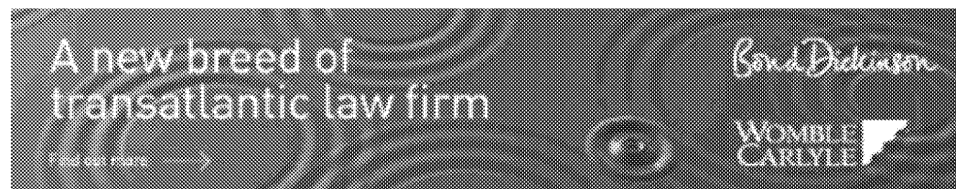
**GRO**

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**From:** Mark Underwood GRO  
**Sent:** 12 July 2017 14:40  
**To:** Jane MacLeod; Angela Van-Den-Bogerd; Mark R Davies; Stuart Nesbit; Patrick Bourke; Rob Houghton; Rodric

Williams; Thomas P Moran; Tom Wechsler; Andrew Parsons; Mark Ellis; Melanie Corfield  
**Cc:** Kevin Morgan  
**Subject:** RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

Dear all, please find attached the open action list, which includes those taken today.

I have highlighted in yellow those that require people's imminent attention.

Many thanks

Mark



**2017 Winner of the Global Postal Award  
for Customer Experience**


**Mark Underwood**

Head of Portfolio: Legal, Risk & Governance

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**From:** Mark Underwood 

**Sent:** 11 July 2017 13:46

**To:** Jane MacLeod; Angela Van-Den-Bogerd; Mark R Davies; Stuart Nesbit; Patrick Bourke; Rob Houghton; Rodric Williams; Thomas P Moran; Tom Wechsler; 'Parsons, Andrew'; Mark Ellis; Melanie Corfield

**Cc:** Kevin Morgan

**Subject:** RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

Dear all, further to my note earlier today, please find attached the final Decision Paper.

Mark



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**From:** Mark Underwood 

**Sent:** 11 July 2017 09:30

**To:** Jane MacLeod; Angela Van-Den-Bogerd; Mark R Davies; Stuart Nesbit; Patrick Bourke; Rob Houghton; Rodric Williams; Thomas P Moran; Tom Wechsler; 'Parsons, Andrew'; Mark Ellis; Melanie Corfield

**Cc:** Kevin Morgan

**Subject:** PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

Dear all,

We have a PLSG meeting on Wednesday 12 July @12 in Tonbridge (1.11). Ahead of that meeting please find attached:

1. The Agenda
2. Decision Paper: Access to Second Sight
3. Decision Paper: Standstill Agreement with Fujitsu
4. Decision Paper: Communications Strategy
5. Decision Paper: Wider Risks to POL **[To follow later today]**
6. Open actions list as at 11 July 2017

Please let me know if you are intending to dial in.

Many thanks, and apologies for the delay in circulating these papers.

Mark

**GRO**

**Dial-in numbers:**

United Kingdom Freephone

**GRO**

United Kingdom International direct:

**GRO**

Chairperson passcode: 85009207 then #

Participant passcode: 82368934 then #



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