

From: Owain Draper [GRO]
To: Gideon Cohen [GRO] Andrew Parsons [GRO]
Cc: David Cavender [GRO]
Subject: Re: Statement [WBDUK-AC.FID26896945]
Date: Thu, 23 Aug 2018 16:16:05 +0000
Importance: Normal

I think it got deleted by accident. I agree it should go back in.

From: Gideon Cohen [GRO]
Date: Thursday, 23 August 2018 at 16:57
To: Andrew Parsons [GRO]
Cc: David Cavender [GRO], Owain Draper [GRO]
Subject: Re: Statement [WBDUK-AC.FID26896945]

Ok, in that case happy to retain. If it was my deletion I obviously didn't realise the ramifications!

On 23 Aug 2018, at 18:53, Andrew Parsons [GRO] <mailto:[GRO]> wrote:
Another one...

You've also deleted footnote 23 in para 88, regarding remote access. If we do not cover remote access, then the entire statement needs to be changed, because the statement is premised on the notion that SPMRs have control over their accounts. That point is not 100% true, due to the remote access argument, but is 99.99% true so we need to explain the remote access concept otherwise AVDB won't be telling the truth.

Given the sensitivities on this point, we need to cover it off.

Thoughts please?

A

Andrew Parsons
Partner
Womble Bond Dickinson (UK) LLP

d:
m:
t:
e:

[GRO]
[GRO] <mailto:[GRO]>

Stay informed: sign up to our e-alerts <<https://www.womblebond dickinson.com/uk/preferences>>

<image2d9511.PNG>

womblebonddickinson.com<<http://www.womblebonddickinson.com>>

<image26ad3.PNG><http://www.twitter.com/wbd_uk>

<image5d37f5.PNG><<https://www.linkedin.com/company/womble-bond-dickinson-uk-llp/>>

From: Gideon Cohen [mailto:**GRO**]
Sent: 23 August 2018 16:07
To: Andrew Parsons
Cc: David Cavender; Owain Draper
Subject: Re: Statement

Understood.

On 23 Aug 2018, at 18:06, Andrew Parsons <**GRO**> [mailto:**GRO**]
GRO <mailto:**GRO**> wrote:

Ok – I'm putting these back in but in simplified form. There is nothing secret about any of these – they are all publicly available points of law.

A

Andrew Parsons
Partner
Womble Bond Dickinson (UK) LLP
d:
m:
t:
e: **GRO**

GRO
GRO <mailto:**GRO**> <mailto:**GRO**>
GRO

Stay informed: sign up to our e-alerts<<https://www.womblebonddickinson.com/uk/preferences>>
<image7fad14.PNG>
womblebonddickinson.com<<http://www.womblebonddickinson.com>><<http://www.womblebonddickinson.com>>
<image62fee.PNG><http://www.twitter.com/wbd_uk> <image9edc62.PNG>
<<https://www.linkedin.com/company/womble-bond-dickinson-uk-llp/>>

From: Gideon Cohen [mailto:**GRO**]
Sent: 23 August 2018 16:02
To: David Cavender
Cc: Andrew Parsons; Owain Draper
Subject: Re: Statement

Those were exactly my thoughts.

On 23 Aug 2018, at 17:54, David Cavender <**GRO**> [mailto:**GRO**]

<mailto:[REDACTED]><mailto:[REDACTED]> wrote:

Andy,

Gideon deleted those paragraphs.

I assume he did so on the basis that whilst the earlier paragraphs in that section are generic (and therefore could be said to have been reasonably in the contemplation of the parties at the time of contracting) it would be more difficult to justify the later more granular and specific examples (which have been deleted) on the same basis.

Gideon – is this correct ?

Best,

D.

David Cavender Q.C.

<image001.jpg>

One Essex Court
Temple
London EC4Y 9AR

Direct dial:

[REDACTED]

Switchboard:

[REDACTED]

Fax number:

[REDACTED]

Mobile:

[REDACTED]

www.oelaw.co.uk<<http://www.oelaw.co.uk>><<http://www.oelaw.co.uk>><<http://www.oelaw.co.uk>>

The contents of this email are CONFIDENTIAL and may be PRIVILEGED. If you are not the intended recipient, please telephone [REDACTED] and delete this email.

From: Andrew Parsons [mailto:[REDACTED]]
Sent: 23 August 2018 15:48

To: David Cavender <[REDACTED]> <mailto:[REDACTED]>
<mailto:[REDACTED]> <mailto:[REDACTED]>
Cc: Owain Draper <[REDACTED]> <mailto:[REDACTED]> <mailto:[REDACTED]>
<mailto:[REDACTED]>, Gideon Cohen <[REDACTED]> <mailto:[REDACTED]>
<mailto:[REDACTED]> <mailto:[REDACTED]>
Subject: RE: Statement

David

Quick question... why did you delete the section on regulatory requirements at para 62 onwards?

This is a major pressure on POL's business and drives lots of its pressures. Indeed, Post Office is probably the most highly regulated business in the country.

A

Andrew Parsons
Partner
Womble Bond Dickinson (UK) LLP

d:
m:
t:
e:

GRO

[REDACTED] <mailto:[REDACTED]> <mailto:[REDACTED]>
[REDACTED] <mailto:[REDACTED]> [REDACTED] <mailto:[REDACTED]>

Stay informed: sign up to our e-alerts <<https://www.womblebond dickinson.com/uk/preferences>>

<image002.png>

womblebond dickinson.com <<http://womblebond dickinson.com>> <<http://womblebond dickinson.com>>
<<http://www.womblebond dickinson.com>>

<image003.png> <http://www.twitter.com/wbd_uk>

<image004.png> <<https://www.linkedin.com/company/womble-bond-dickinson-uk-llp/>>

From: David Cavender [mailto:[REDACTED]]
Sent: 23 August 2018 10:30
To: Andrew Parsons
Cc: Owain Draper; Gideon Cohen
Subject: RE: Statement [WBDUK-AC.FID26896945]

Dear Andrew,

I attach a tracked version of Angela's statement which includes comments from Gideon and from me. These

(relatively few) comments have been made upon the clean version provided. My comments on admissibility have also been discussed with Owain.

Best,

D.

David Cavender Q.C.

<image001.jpg>

One Essex Court
Temple
London EC4Y 9AR

Direct dial:

GRO

Switchboard:

GRO

Fax number:

GRO

Mobile:

GRO

www.oelaw.co.uk<<http://www.oelaw.co.uk>><<http://www.oelaw.co.uk>><<http://www.oelaw.co.uk>>

The contents of this email are CONFIDENTIAL and may be PRIVILEGED. If you are not the intended recipient, please telephone GRO and delete this email.

From: Andrew Parsons [mailto:GRO]

Sent: 20 August 2018 17:53

To: David Cavender <mailto:GRO>

<mailto:GRO> <mailto:GRO>

Cc: Owain Draper <mailto:GRO> <mailto:GRO> <mailto:GRO>

<mailto:GRO> <mailto:GRO> <mailto:GRO>

<mailto:GRO> <mailto:GRO>

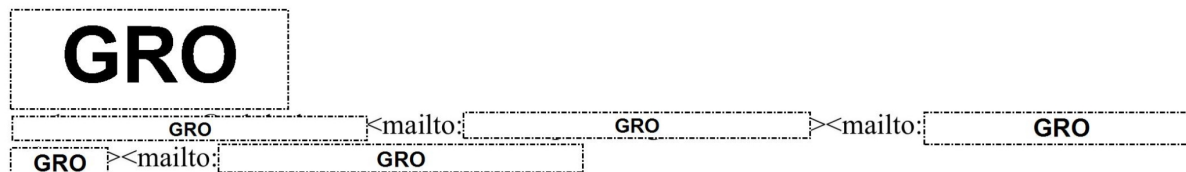
Subject: FW: Statement [WBDUK-AC.FID26896945]

David

As discussed earlier – any comments appreciated on Angela's statement.

Andrew Parsons
Partner
Womble Bond Dickinson (UK) LLP

d:
m:
t:
e:



Stay informed: sign up to our e-alerts<<https://www.womblebonddickinson.com/uk/preferences>>

womblebonddickinson.com<<http://womblebonddickinson.com>><<http://womblebonddickinson.com>>
<<http://www.womblebonddickinson.com>>

<image003.png><http://www.twitter.com/wbd_uk>

<image004.png><<https://www.linkedin.com/company/womble-bond-dickinson-uk-llp/>>

From: Andrew Parsons
Sent: 20 August 2018 16:32
To: 'Angela Van-Den-Bogerd'; Rodric Williams
Cc: Victoria Brooks; Ivan Roots
Subject: RE: Statement [WBDUK-AC.FID26896945]

Angela

Please find attached your updated statement (+ a comparison showing the changes from the original version sent to you). This includes your comments, further amendments from Counsel and some comments from me.

Once you've had a chance to review, it might be easiest for us to setup a call to go through the remaining points.

Thanks
Andy

From: Angela Van-Den-Bogerd [mailto:angela.van-den-bogerd@gro.nl]
Sent: 17 August 2018 16:59
To: Andrew Parsons; Rodric Williams
Cc: Victoria Brooks
Subject: RE: Statement

Importance: High

Andy

Please find attached the latest version of my statement. This is still work in progress as I have some queries out with the business. I will pick this up again on Monday when I should have the information I've requested. In the meantime I'm returning to you as I have some comments for you/WBD that I've tracked – could you review and let me have a response/update please. Where we've referenced other witness statements it would be helpful if I could see them. Is this possible?

I had intended to be on leave next week but in light of this being unfinished I am now in work on Monday and will pick up for the rest of the week to finalise this statement ahead of submission deadline.

Thanks,
Angela

<image005.png>

Angela Van Den Bogerd
People Services Director

1st Floor, Ty Brwydran,
Atlantic Close, Llansamlet
Swansea SA7 9FJ

GRO

Confidential Information:

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorised review, use, disclosure or distribution is prohibited. If you are not the intended recipient please contact me by reply email and destroy all copies of the original message.

From: Andrew Parsons [mailto:GRO]

Sent: 08 August 2018 21:15

To: Angela Van-Den-Bogerd <mailto:GRO> <mailto:GRO>
GRO <mailto:GRO> <mailto:GRO>
>>; Rodric Williams

<mailto:GRO> <mailto:GRO>
<mailto:GRO> <mailto:GRO>
Cc: Victoria Brooks <mailto:GRO> <mailto:GRO>
<mailto:GRO> <mailto:GRO>

Subject: Statement

Angela

Please find attached the latest draft of your statement. All comments welcomed. This has been restructured from the last version you saw, added a number of new sections and have cut out some material to make it shorter / where we have considered material to be to far over the line of admissibility.

Rod – your comments also welcomed. In particular, there are some comments marked in green for your attention.

Kind regards
Andy

Andrew Parsons
Partner
Womble Bond Dickinson (UK) LLP

d:
m:
t:
e:

GRO

Diagram illustrating the structure of a message header, showing fields like GRO and mailto: separated by delimiters.

Stay informed: sign up to our e-alerts<<https://www.womblebonddickinson.com/uk/preferences>>



womblebonddickinson.com<<http://womblebonddickinson.com>><<http://womblebonddickinson.com>>
<<http://www.womblebonddickinson.com>>

<image003.png><http://www.twitter.com/wbd_uk>

<image004.png><<https://www.linkedin.com/company/womble-bond-dickinson-uk-llp/>>

Please consider the environment! Do you need to print this email?

The information in this e-mail and any attachments is confidential and may be legally privileged and protected by law. angela.van-den-bogerd@GRO <mailto:GRO>

GRO <mailto:[REDACTED]>
only is authorised to access this e-mail and any attachments. If you are not
angela.van-den-bogerd [REDACTED] <mailto:[REDACTED]>
<mailto:[REDACTED]>, please notify andrew.parsons [REDACTED],
<mailto:[REDACTED]> as soon as possible and
delete any copies. Unauthorised use, dissemination, distribution, publication or copying of this
communication or attachments is prohibited and may be unlawful. Information about how we use personal
data is in our Privacy Policy<<https://www.womblebond dickinson.com/uk/privacy-policy>> on our website.

Any files attached to this e-mail will have been checked by us with virus detection software before transmission. Womble Bond Dickinson (UK) LLP accepts no liability for any loss or damage which may be caused by software viruses and you should carry out your own virus checks before opening any attachment.

Content of this email which does not relate to the official business of Womble Bond Dickinson (UK) LLP, is

neither given nor endorsed by it.

This email is sent by Womble Bond Dickinson (UK) LLP which is a limited liability partnership registered in England and Wales under number OC317661. Our registered office is 4 More London Riverside, London, SE1 2AU, where a list of members' names is open to inspection. We use the term partner to refer to a member of the LLP, or an employee or consultant who is of equivalent standing. Our VAT registration number is GB123393627.

Womble Bond Dickinson (UK) LLP is a member of Womble Bond Dickinson (International) Limited, which consists of independent and autonomous law firms providing services in the US, the UK, and elsewhere around the world. Each Womble Bond Dickinson entity is a separate legal entity and is not responsible for the acts or omissions of, nor can bind or obligate, another Womble Bond Dickinson entity. Womble Bond Dickinson (International) Limited does not practice law. Please see www.womblebond Dickinson.com/legal<<http://www.womblebond Dickinson.com/legal>> <<http://www.womblebond Dickinson.com/legal>><<http://www.womblebond Dickinson.com/legal>> notices for further details.

Womble Bond Dickinson (UK) LLP is authorised and regulated by the Solicitors Regulation Authority.

This email and any attachments are confidential and intended for the addressee only. If you are not the named recipient, you must not use, disclose, reproduce, copy or distribute the contents of this communication. If you have received this in error, please contact the sender by reply email and then delete this email from your system. Any views or opinions expressed within this email are solely those of the sender, unless otherwise specifically stated.

POST OFFICE LIMITED is registered in England and Wales no 2154540. Registered Office: Finsbury Dials, 20 Finsbury Street, London EC2Y 9AQ.

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>
