Message

**Subject**: FW: FW: Paula's talking points [BD-4A.FID26896945]

Attachments: imagee30d04.JPG; image57445f.PNG; imagebbc21c.PNG; image18fb71.PNG; imagec68542.PNG; Compare Result

1.docx; \_DOC\_36874511(1)\_Steering Group Paper - Litigation Strategy Options.DOCX

From: Andrew Parsons GRO

Sent: 28 September 2017 18:31

To: arobinson GRO

Cc: Amy.Prime GRO

Subject: FW: Paula's talking points [BD-4A.FID26896945]

Tony

Below are the talking points we got from Jane for tomorrow's meeting.

I've attached the two papers I mentioned.

Amy will send you the pleadings and RFIs in the morning.

A

## **Andrew Parsons**

Partner

Bond Dickinson LLP

Bond Dickinson

Mobile: Office:

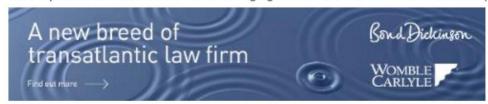


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From: Amy Prime

Sent: 28 September 2017 16:58

To: Andrew Parsons

**Subject:** Paula's talking points

Paula's talking points:

- 1. Why have we recommend this strategy for the CMC?
  - a. There are risks to this strategy so why to bring to the front / deal with now?
  - b. Why is it worth dealing with now? What is the harm in dealing with it later?
- 2. Claim advanced by Freeths
  - a. Is it an ambitious claim?
  - b. Why are they seeking to imply numerous implied terms
  - c. Our approach is better because....
- 3. Doomsday scenario
  - a. Would the court consider the impact of the doomsday decision in particular, the impact on public funds and POL business, when making a decision?

## **Amy Prime**

Solicitor

Bond Dickinson LLP



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