

Message

From: Jane MacLeod [GRO]
Sent: 05/12/2017 09:11:51
To: Andrew Parsons [GRO]; Rodric Williams [GRO]
Subject: Fwd: Postmaster Litigation - CONFIDENTIAL AND SUBJECT TO LEGAL PRIVILEGE - DO NOT FORWARD

See question below. I assume the answer is technically yes, however in practice, must be considered unlikely and in any event would be subject to the outcome of the main action?

Jane MacLeod
Group Director Legal, Risk & Governance
Post Office
[GRO]

From: Alisdair Cameron
Sent: Tuesday, December 5, 2017 8:52:27 AM
To: Paula Vennells; Jane MacLeod
Cc: Thomas P Moran; Mark Underwood [GRO]
Subject: Re: Postmaster Litigation - CONFIDENTIAL AND SUBJECT TO LEGAL PRIVILEGE - DO NOT FORWARD

Thanks. Could the settlement with existing postmasters create an incentive for a separate class action from every other postmaster who has had to pay for a loss? Thanks Al

Alisdair Cameron
Chief Finance & Operating Officer

20 Finsbury Street
London
EC2Y 9AQ
[GRO]

From: Paula Vennells
Sent: Tuesday, December 5, 2017 8:05:07 AM
To: Jane MacLeod; Alisdair Cameron
Cc: Thomas P Moran; Mark Underwood [GRO]
Subject: Re: Postmaster Litigation - CONFIDENTIAL AND SUBJECT TO LEGAL PRIVILEGE - DO NOT FORWARD

Jane,
Thanks this seems sensible. But I would appreciate the chance to discuss - what time is your meeting tomorrow? I may have time before 1pm today, or early tomorrow am.
How much are we are likely to need to consider?
Cheers,
Paula

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From: Jane MacLeod
Sent: Tuesday, December 5, 2017 7:54:47 AM
To: Paula Vennells; Alisdair Cameron
Cc: Thomas P Moran; Mark Underwood [GRO]
Subject: Postmaster Litigation - CONFIDENTIAL AND SUBJECT TO LEGAL PRIVILEGE - DO NOT FORWARD

Paula, AI

I wanted to let you know that at the Litigation Steering Group tomorrow we will be asked to consider the following:

- The proposal that we initiate settlement discussions with Freeths as regards 2 defined groups of claimants:
 - Serving postmasters of whom there are approximately 45 and each of whose claims are less than £5000, and
 - Settled cases where approximately 120 claimants have previously signed settlement agreements with Post Office – for example under NT. We have counter-claimed against this group for return of settlement monies previously paid, on the basis that those settlements were expressed to be binding and final, so that if the claimants wish to re-open the matters as part of the litigation, then we have argued that they should not have the benefit of the monies paid under those settlement arrangements. Generally the amounts of those settlements exceed the amounts now claimed in the litigation.

In each of these categories we believe that there is value (both financial and tactical) in seeking to settle and that because of the specific facts of these cases, any settlement will not impact the wider issues. It will also help to demonstrate to the Court that we are seeking to resolve issues, rather than being obstructionist.

The approval sought from the Steering Committee is to authorise the lawyers to reach out to Freeths to initiate settlement discussions. No amounts will be discussed at this stage, and indeed it is likely that any settlements would be determined on a case by case basis. Clearly there will need to be further agreed governance processes in relation to any such settlements.

- Proposals regarding the extent of e-disclosure to be given in the litigation – this is procedural but will set in train significant work to recover relevant files that will be required to be disclosed during the litigation.

Please let me know if you would like further information, or if you would like to discuss these proposals.

Kind regards,

Jane



Jane MacLeod

Group Director of Legal, Risk & Governance
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