

Message

From: Parsons, Andrew [Andrew.Parsons@bond-dickinson.com] **GRO**
Sent: 12/03/2014 10:00:00
To: David Oliver [david.oliver@bond-dickinson.com] **GRO** Chris Aujard
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CC: Matthews, Gavin [Gavin.Matthews@bond-dickinson.com] **GRO**
Subject: Advice for Linklaters [BD-4A.FID20472253]
Attachments: Advice for Linklaters.zip

David, Chris

Please find attached the key pieces of formal advice that have been prepared by BD. There are obviously 1000s of other emails which provide further ad hoc advice.

A few documents to note in particular:

1. Note of meeting with Richard Morgan QC.

Back in 2012, before SS were engaged, the primary concern was that SPMRs would bring something akin to a class action against POL. This was being driven by Shoosmiths and the 100+ SPMRs they had gathered together. Off the back of Shoosmiths' attempts to get a test case off the ground (which was ultimately unsuccessful), we instructed Richard Morgan QC to advise on whether POL should instruct an expert to produce a pre-emptory report giving Horizon a clean bill of health. (I think at this time the intention was to use Deloitte - apologies I was not directly involved in these events). Attached is a summary of the key points from the con with RMCQ in which he advises against instructing an expert.

2. Settlement presentation.

This presentation is for a talk I gave to what was at that time the Sparrow Steering Group. (Chris - you may recall that this was the lead decision making body for Sparrow before the Programme Board was constituted and was attended by a number of ExCo members). This presentation was the starting point for the settlement policy.

3. Insurances risks note

This note had the dual purpose of advising the board (its contents were later reflected in a board paper) and acting as notification to POL's insurers - hence why this doesn't look like a traditional piece of legal advice.

Kind regards
Andy

Andrew Parsons

Senior Associate

for and on behalf of Bond Dickinson LLP

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