

From: Rodric Williams [GRO]
Sent: Mon 29/10/2018 6:36:49 PM (UTC)
To: Ben Foat [GRO]
Subject: FW: Confidential: Subject to Litigation Privilege - Postmaster Group Litigation Board Briefing Note.
Attachment: Postmaster Group Litigation Board Meeting Briefing Note - Confidential - Subject to Litigation Privilege FINAL.docx

Ben – by way of “heads up”, please see the attached Briefing Paper prepared for Paula on the Group Litigation ahead of tomorrow’s Board meeting.

Based on the call that Paula had this afternoon with David Cavender QC, the issues likely to be discussed are:

1. The recent judgment on the Strike Out Application, which David says does not change the substance of our legal case, but has increased the “risk” of managing a judge who can be unpredictable.
2. The “tone” of Post Office’s case, where David will be respectful but needs to put untruths to some of the witnesses, e.g. where they produced false accounts, or say they didn’t receive contracts when other documents suggest they did.
3. Overall merits, where David says the Claimants’ Opening doesn’t add much clarity to their case despite its length, and which doesn’t address key planks of our case (it is also almost completely silent on the evidence the Claimants said was essential to their case when we sought to strike it out as irrelevant and/or inadmissible).

Please let me know if you need anything further or would like to discuss any issue.
Rod

From: Mark Underwood1
Sent: 28 October 2018 13:51

To: Paula Vennells <

[GRO]

Cc: Rodric Williams

>; Angela Van-Den-Bogerd

[GRO]

[GRO]

Jane MacLeod

[GRO]

Melanie Corfield

[GRO]

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Dear Paula,

Further to our call on Friday morning and ahead of your call with David Cavender QC tomorrow (which I working with Avene to arrange) and the Board on Tuesday, please find attached a short paper which includes:

- A suggested agenda for the Postmaster Litigation update at the Board, noting we only have 20 minutes; and
- Further information on each of the points discussed on our call on Friday.

Please do let me know if you require any further information and thanks to everyone on the copy list for helping pull together the attached.

Kind Regards

Mark



Mark Underwood

Head of Portfolio: Legal, Risk &
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