

Filed on behalf of the: Defendant
Witness: Andrew Paul Parsons
Statement No.: Thirteenth
Exhibits: AP 13
Date Made: 21 March 2019

Claim No: HQ16X01238, HQ17X02637 and HQ17X04248

**THE POST OFFICE GROUP LITIGATION
IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

B E T W E E N:

ALAN BATES AND OTHERS

Claimants

AND

POST OFFICE LIMITED

Defendant

**THIRTEENTH WITNESS STATEMENT OF
ANDREW PAUL PARSONS**

I, Andrew Paul Parsons of Womble Bond Dickinson (UK) LLP, Oceana House, 39-49
Commercial Road, Southampton, SO15 1GA WILL SAY as follows:

1. I am a partner at Womble Bond Dickinson (UK) LLP (**WBD**), solicitors for the Defendant (**Post Office**) in the above proceedings. I am duly authorised by Post Office to make this statement.
2. I make this statement in response to the order of the Honourable Mr Justice Fraser on 18 March 2019 that by 9:30am on Thursday 21 March 2019 Post Office is to file a witness statement setting out the following:
 - 2.1 the steps taken by Post Office to obtain copies of the pre-2011 Ernst & Young (**E&Y**) audit reports including which specific individuals have instructed or directed those steps;
 - 2.2 if the steps, identified pursuant to paragraph 2.1 above, have led to a conclusion that Post Office does not have the pre-2011 E&Y audit reports in its custody, possession or control, an explanation as to how that can be the case;
 - 2.3 details of what requests, if any, were made prior to 18 March 2019 to obtain copies of the pre-2011 E&Y audit reports from (i) E&Y and (ii) Royal Mail; and

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- 2.4 if and to the extent that no such requests for the pre-2011 E&Y audit reports were made, as set out in paragraph 2.3, an explanation as to why no such requests were made.
3. The facts set out in this statement are within my own knowledge, or if they are outside my knowledge, I have explained the source of my information or belief. References to documents in this statement are to documents within the trial bundle for the Horizon Issues Trial, in the format {Bundle/Tab/Page}. In this statement I also refer to copy documents in Exhibit AP 13.
4. In order to provide the explanation ordered by the Honourable Mr Justice Fraser, it is necessary for me to refer to privileged communications between Post Office and its lawyers at WBD including myself, as well as its lawyers at Linklaters, and other third parties where such communications are subject to legal advice and / or litigation privilege. In so doing, no waiver of privilege is intended or made beyond the express matters set out in this statement.
5. It is relevant background to this statement to explain that on 1 April 2012, Royal Mail Group Ltd (**Royal Mail**) began the process of being privatised whilst Post Office Limited (i.e. the Defendant, Post Office) remained in public ownership. Whilst Post Office was already a separate legal entity before Royal Mail's privatisation, at this point Royal Mail ceased to be Post Office's parent company and the two companies were separated. Post Office Ltd is now wholly owned by the UK government with its shares held by the Secretary of State for Business, Energy and Industrial Strategy. I will refer to this in this statement as "separation".
6. Disclosure in these proceedings has been ordered pursuant to the Disclosure Pilot Scheme (as now set down in PD 51U), pursuant to which the Court *"will be concerned to ensure that disclosure is directed to the issues in the proceedings and that the scope of disclosure is not wider than is reasonable and proportionate"* (Section 1 paragraph 2.4). At a CMC on 2 February 2018 the Court ordered the parties to adopt Model C, which is request-led search-based disclosure, together with disclosure of known adverse documents (see paragraph 5 of the Second CMC order). {C7/11/2}.
7. The scope of disclosure for the Horizon Issues Trial was discussed at the CMC on 5 June 2018 which resulted in the Fourth CMC Order, and was labelled "Stage 3 Disclosure". As recorded at paragraph 4 and Schedule 1 of the Fourth CMC Order {C7/18/2} and {C7/18/6}, Post Office was to disclose the documents in Schedule 1, *"following a reasonable and proportionate search for the said documents in Schedule 1. The Defendant shall, where necessary, use*

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reasonable endeavours to obtain these documents from Fujitsu or ATOS where appropriate". Schedule 1 was substantially negotiated between the parties with the remaining disputed points resolved and ordered by the Court at the CMC. Schedule 1 defined the Post Office custodians relevant to each of the Horizon Issues listed in the schedule, and identified the classes of documents which were required to be disclosed.

8. Schedule 1 did not include any reference to audit reports, auditors or E&Y. There were express references to types of documents produced by Fujitsu and Post Office, and also to *"ATOS and any other third party IT suppliers"*.
9. My understanding of the Fourth CMC Order, and Schedule 1 in particular, is that audit reports from E&Y did not fall within a class of documents ordered for Stage 3 Disclosure on the basis that they were not a specified third party or an IT supplier, and they were not requested by Freeths in connection with Stage 3 Disclosure when the Fourth CMC Order was made. This meant that Post Office was not required to disclose them unless they were known documents which were considered to be adverse.
10. My colleague Ms Amy Prime is the solicitor at WBD principally responsible for disclosure in this litigation, subject to my supervision. In the course of making this statement, I have discussed the above matter with Ms Prime and her understanding of the Fourth CMC Order at the time of conducting the Stage 3 Disclosure exercise was the same as mine above. I also understand the following from Ms Prime about how Stage 3 Disclosure was conducted:
 - 10.1 WBD liaised with Post Office to obtain names for the custodians whose roles fell within the custodians categories in Schedule 1. Having obtained this information, WBD wrote to Freeths on 22 June 2018 providing the names of the custodians whose email accounts were to be searched pursuant to the Order. {H/70}
 - 10.2 WBD then carried out searches in accordance with Schedule 1. When the E&Y reports and associated documents for 2011 to 2018 were uncovered during the searches for Stage 3 Disclosure, they were disclosed. The E&Y audit reports and associated documents listed below were found in the email accounts of one or more of the following custodians: Andy J. Jones; Rob Bolton; Julie George; Mark R. Pearce; Lesley J. Sewell; Colin Pletts; Sharon Gilkes; Michael Passmore; and Mick Mitchell. These custodians were all identified to Freeths in our letter of 22 June 2018 {H/70}. The E&Y documents that were disclosed as part of Stage 3 Disclosure were:
 - 10.2.1 2011 E&Y Report (POL Management Letter) : {POL-0219218}

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- 10.2.2 2012 E&Y Report (ISAE3402) : {POL-0219219}
- 10.2.3 2013 E&Y Report (ISAE3402) : {POL-0218336}
- 10.2.4 2014 E&Y Report (ISAE3402) : {POL-0218579}
- 10.2.5 2015 E&Y Report (ISAE3402) : {POL-0218708}
- 10.2.6 2016 E&Y Report (ISAE3402) : {POL-0219210}
- 10.2.7 2017 E&Y Report (ISAE3402) : {POL-0220665}
- 10.2.8 2018 E&Y Report (POL Audit Planning Report) : {POL-02190}
- 10.3 These documents were disclosed on 1 August 2018 {H/99}, with the exception of the 2017 E&Y audit report. That report was disclosed on 24 August 2018, having been found in the email account of Mick Mitchell. As explained in paragraph 1.6 of our letter of 1 August 2018 {H/99/4} we had discovered the previous day and on 1 August itself that certain search criteria had not run correctly on the email accounts of 10 custodians including Mick Mitchell. Having corrected this by running the correct searches, additional responsive documents were identified, reviewed and subsequently disclosed on 24 August 2018 {H/106}.
- 10.4 WBD's letter of 1 August 2018 {H/99} explained in detail the searches which had been undertaken to locate the documents required for Stage 3 Disclosure. WBD reviewed 51,893 documents, which led to the following disclosure of documents:
 - 10.4.1 14 documents on 29 June 2018 {H/79};
 - 10.4.2 166 documents on 17 July 2018 {H/92};
 - 10.4.3 3,575 documents on 1 August 2018 {H/99} ; and
 - 10.4.4 2,234 documents on 24 August 2018. {H/106}
- 10.5 Having taken the steps described above, Ms Prime and I believed that Post Office had satisfied its duty to carry out a reasonable and proportionate search for documents for Stage 3 Disclosure and so it did not occur to me to seek documents directly from E&Y. At no stage have Freeths asked us to make any enquiries directly of E&Y.
- 11. Moreover, I am not and have never been aware of any contractual right that Post Office has to obtain or request documents from Royal Mail. I have checked my understanding of this with Ms Prime and she has also confirmed that this is also her understanding. My understanding in relation to this has been formed over

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years of working with Post Office – I have acted for them on various matters since 2008 – and because, as far as I was and am aware, there is no separation agreement between Royal Mail and Post Office of the type that you would sometimes see in some de-mergers. I am not however able to point to a specific email or conversation from which this understanding was formed. Because of this, and because we believed that we had already conducted a reasonable and proportionate search, no request was made of Royal Mail for disclosure of documents for the purposes of Stage 3 Disclosure.

12. On 19 September 2018, the Claimants' solicitors, Freeths LLP (**Freeths**) wrote to my firm in relation to Stage 3 Disclosure and noted, amongst various other matters, that Post Office had disclosed a number of audit reports produced by E&Y, in particular from 2011, 2012 and 2016. Freeths requested that Post Office disclose the audit reports, produced by E&Y (or other firm) annually, from the introduction of Horizon to date. {H/115/2}
13. On 3 October 2018 WBD responded to Freeths in relation to the various matters they had raised, in a 15 page letter {H/124/4}. We stated that Post Office would take steps to locate the third party reports and provide disclosure of them. We said that we anticipated that locating and reviewing these documents would take a couple of weeks and we would provide an update shortly.
14. Mr Coyne filed his first report on 16 October 2018, and within this report he had made various comments about the disclosed E&Y reports. In October and November 2018, my firm investigated these comments at the same time as preparing for the Common Issues Trial which commenced on 7 November 2018. Ms Lucy Bremner, a solicitor at WBD, was tasked to investigate Mr Coyne's comments which arose from the 2011 E&Y management letter {POL-0219218}.
15. The explanation below of the steps taken has been provided to me by Ms Bremner, taken from my own knowledge and from reviewing emails around this time (over which privilege is not waived):
 - 15.1 In late October 2018, Ms Bremner contacted various people at Post Office to locate someone at Post Office who could assist with responding to Mr Coyne's points and to provide relevant documents which went beyond just pre-2011 audit reports. This chain of enquiry led to Ms Bremner being put in contact with Mr Johann Appel, Head of Internal Audit at Post Office.
 - 15.2 On 2 November 2018, in response to WBD's request for information and documents Mr Appel confirmed to Ms Bremner (by email, copied to me and others) that Post Office was *"unable to locate the relevant documents prior to*

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2011 at Post Office. We have requested RMG to search for the relevant documents in their archives and we are chasing daily". I understood from this email that the audit reports and any related documents (eg. Audit and Risk Committee minutes) had been requested from Royal Mail. This email chain is subject to legal privilege and contains confidential information about my client's investigations into matters raised by Mr Coyne. I am anxious to protect my client's privileged information so this email is not being included in my exhibit and privilege over it is not being waived. I confirm however that there is nothing else in Mr Appel's email or the rest of the email chain that contradicts my understanding.

- 15.3 It was at this point that I formed the belief (that I now know to be mistaken) that the pre-2011 E&Y audit reports had been requested from Royal Mail.
- 15.4 Post Office (Mr Appel) has, during the preparation of this statement, provided me with a copy of an email chain from its company secretarial team to Royal Mail (at pages 1 to 5 of Exhibit AP13) of which I was not aware at the time. This email chain was subject to legal privilege but Post Office is prepared to provide a limited waiver over the privilege in this chain because it does not contain any sensitive information. These emails show that the request actually made of Royal Mail on 31 October 2018 was much narrower than I had believed and was only for "*Audit, Risk & Compliance Committee meetings from before the split, namely 2010 & 2011*".
- 15.5 I recall subsequently having a conversation with Mr Rodric Williams, in-house lawyer at Post Office, who had spoken with Mr Luke Ryan, in-house lawyer at Royal Mail. This was during the early part of the Common Issues trial but I do not recall the exact date, but believe that it must have been between 7 November 2018 (start of that trial) and 12 November 2018 (being the date of Mr Williams' email referred to below). My understanding was that Royal Mail, having received Post Office's request, were unwilling to disclose audit documents without a Court Order (privilege over these conversations is not waived save for the matters confirmed in this paragraph). At this time, I was still of the belief that we were seeking a wide request for audit reports and related documents from before separation.
- 15.6 After speaking to Ms Bremner about the documents needed to respond to Mr Coyne's report and other aspects under investigation in this litigation, Mr Williams then sought to explain the request in an email sent to Mr Ryan on 12 November 2018 seeking:

"a 2010 Ernst & Young management letter; and/or

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Royal Mail Group Audit Committee or Audit, Risk & Compliance Committee (ARC) minutes for 2010/2011."

The balance of this email contains sensitive material relating to this litigation and the request for the documents over which my client maintains its right to privilege.

- 15.7 This email was forwarded to me later that day but I did not understand this to mean that the general request for audit reports before separation had been withdrawn, merely that there were two specific documents being targeted as a priority in order to address Mr Coyne's report. I note that Post Office was due to file its responsive evidence to Mr Coyne's report four days later, on 16 November 2018.
- 15.8 A day or so later I recall receiving a call one evening from Mr Williams in which he said that Mr Ryan had informed him that Royal Mail had located some documents but that it was still unwilling to provide these without a Court Order.
- 15.9 At the end of this sequence of events, as far as I was concerned this matter was closed, Post Office having made due enquiry of Royal Mail about audit documents and Royal Mail having said they were not prepared to give disclosure without a Court Order. I realise now my mistake in that the request actually made was narrower than I had thought at the time.
16. On 21 December 2018 Freeths wrote to WBD, in relation to a number of subjects, including the audit reports. {H/154/3} In their letter Freeths asked Post Office to disclose the reports as soon as possible.
17. On 17 January 2019 my firm responded to Freeths' letter, as part of a lengthy letter in relation to a number of subjects in relation to the Horizon Issues Trial. {H/169/2} In our letter we explained that certain E&Y audit reports and associated documents had already been provided and we set out the relevant disclosure references. These are the same eight documents referenced in paragraph 10.2 above. Freeths' request however was for audit reports by E&Y "or otherwise". We indicated that whilst Post Office had already provided the disclosure ordered by the Court, Post Office was prepared to provide the documents requested on a voluntary basis. We stated that Post Office had requested relevant documents from Fujitsu for any other audits, and that they would be reviewed for privilege and disclosed as soon as possible. I understand from my colleague Mr Jonathan Gribben that in a telephone conversation with Matthew Lenton of Fujitsu on 24 September 2018 that he requested that Mr Lenton provide copies of all of the audit reports which Fujitsu held. These documents were provided by Mr Lenton

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in an email (over which privilege is not waived) on 24 September 2018 but had at that stage mistakenly not been considered for disclosure.

18. We wrote further to Freeths on 30 January 2019 and provided a disclosure list for the 102 additional documents from Fujitsu, which by this time had been reviewed, and arranged for them to be made available to Freeths. These 102 additional documents did not include any further E&Y reports, other than an E&Y audit report from 2013 {POL-0511047} which appears to be very similar to the E&Y audit report from 2013 disclosed on 1 August 2018 {POL-0218336} but was not classified by Post Office's e-disclosure platform as a 100% duplicate to the version disclosed on 1 August 2018. The information in this paragraph has been provided to me by Ms Prime.
19. WBD continued to take steps to locate audit reports within Post Office's e-disclosure platform in which there was by this time over 10,000,000 documents. On 4 February 2019, Mr Michael Wharton, a solicitor within WBD working on the Horizon Issues Trial, carried out the following extracted text searches: "management letter for the year ended"; "audit planning report"; "report to the audit and risk committee"; "audit results report"; "audit results update report"; "control themes and observations" which were based on wording within the E&Y reports which had already been located. The documents responsive to these searches were reviewed and where relevant disclosed, as referred to in our letters of 11 and 12 February 2019 referred to in paragraphs 21 and 23 below. My understanding in this paragraph was provided to me by Mr Wharton as I was not directly involved in these searches.
20. On 8 February 2019 WBD received a letter from Freeths in which they asked us to confirm that *"Fujitsu was the appointed auditor of Horizon prior to the instruction of"* E&Y; and that all audit reports had now been disclosed. {H/192/1}
21. We responded to Freeths on 11 February 2019 as part of another lengthy letter in relation to disclosure. {H/196/7} We explained that we had carried out a further search for audit reports in our e-disclosure platform, which contained all of the custodians' documents for Stage 3 Disclosure, and that the resulting documents would be disclosed. We indicated our position, in line with the principles of the Disclosure Pilot, that Post Office did not have an obligation to provide disclosure of all audit reports on Horizon since 2000. We confirmed in our letter that Post Office had conducted a reasonable and proportionate search for such documents. Finally, we also stated that we were looking into the position regarding the identity of the auditor of Horizon prior to 2011.

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22. Also, on 11 February 2019, Ms Bremner sought confirmation from Mr Appel as to who was the auditor of Horizon prior to E&Y. Mr Appel confirmed that *"Ernst & Young were the external auditors for Post Office and RMG"*. Privilege is not waived in this email.
23. On 12 February 2019 WBD wrote to Freeths to provide formal disclosure of the further documents which had been identified from the search on the e-disclosure platform as referred to in our letter of the previous day. {H/202/1}
24. On 13 February 2019, Ms Bremner contacted Mr Appel at Post Office, and copied me into her email (over which privilege is not waived). Ms Bremner asked Mr Appel to confirm: *"is it correct that all audit reports pre-2011 are in Royal Mail's possession and not yours?"*. Mr Appel confirmed that this was the case, copying me into his reply.
25. On 18 February 2019 Freeths wrote to us seeking confirmation of who was appointed as auditor of Horizon prior to 2011. {H/205/1}
26. WBD responded to this letter on 27 February 2019. {H/227/1} In this letter, amongst other points, we stated as follows: *"Post Office understands that E&Y were the auditors of Horizon prior to 2011. Copies of the audit reports are held by Royal Mail Group. Post Office has made a request for these documents however Royal Mail Group are concerned about providing these documents without a formal order from the Court for third party disclosure. Please could you confirm if you wish to continue to pursue disclosure of these documents, in which case assistance from the Court on this disclosure request may be required"*. I did not at this time consider making a request to E&Y for the audit reports because I believed that the post-2011 E&Y audit reports had already been disclosed and that any earlier reports were held by Royal Mail.
27. Whilst this letter accurately reflected my understanding of the position at that time, I now know this was incorrect in that Royal Mail had at that time only asserted their position in response to the narrower documents referred to in Mr Williams' 12 November 2018 email. I directed the drafting of the 27 February 2019 letter by Ms Prime and approved its content so this was my mistake.
28. The following day, 28 February 2019, Freeths replied to our letter, stating that they did require disclosure of the pre-2011 audit reports and indicating their belief that these documents fell within Post Office's power and control as *"there must have been provisions [as part of separation] to allow Post Office to have access to documents relating to its own business"*. {H/230/1} Freeths also objected to

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having to apply for an order against Royal Mail, and asked Post Office and Royal Mail to reconsider.

29. On 14 March 2019, I understand from Mr Anthony de Garr Robinson QC that the E&Y reports were raised by Mr Patrick Green QC in discussion before Court began that day. Consequently, in the early afternoon, WBD sent a letter to Royal Mail of the same date {H/242.3.1} which we copied to Freeths requesting copies of the pre-2011 E&Y reports.
30. Following receipt of that letter, Mr Ryan of Royal Mail telephoned me on the morning of 15 March 2019. In that conversation Mr Ryan confirmed that Post Office had not requested the pre-2011 E&Y audit reports previously.
31. I discussed this further with Mr Williams of Post Office and I also spoke to Mr Appel and it came to light that my understanding as set out in our letter of 27 February 2019 {H/227/1} was wrong. I spoke to Mr James Hartley at Freeths by telephone as soon as possible following discovery of this mistake, on that same morning of 15 March 2019. I promised to confirm in writing what had happened, and my firm did so in its letter on the same date. {H/242} In my letter I stated: *"It was incorrect for us to say in our letter of 27 February 2019 that (i) a request had been made for the E&Y audit reports prior to 2011, (ii) that these documents were definitely held by Royal Mail and (iii) that Royal Mail was concerned about providing the pre-2011 Audit reports without a Court order... The error was ours and we sincerely apologise for it".*
32. After the Order was made for the production of this statement, so to double check my understanding of Post Office's rights to access documents:
 - 32.1 Mr Mark Underwood, Head of Portfolio: Legal, Risk & Governance at Post Office instructed Linklaters, who acted for Post Office in the separation from Royal Mail, to identify and review any agreements between Post Office and Royal Mail in connection with the separation that Linklaters believed may contain a contractual right to access documents. Linklaters advised Mr Underwood that they had carried out an initial review of the agreements they were aware of and advised that they did not appear to include any provisions which would enable Post Office to access Royal Mail's records for audits reports in connection with the Horizon system for the period prior to separation. They further advised that they would only expect to see such a provision in a separation agreement and that they were not aware that a separation agreement existed.

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- 32.2 Mr Appel of Post Office confirmed (by email copied to me, over which privilege is not waived) that he is not aware that Post Office has any contractual right against E&Y to get copies of pre-2011 audit reports.
33. As ordered by the Court, on 18 March 2019, my firm wrote to both Royal Mail {H/248} and E&Y {H/249} to request copies of the E&Y audit reports produced prior to 2011.

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true.

Signed:

GRO

Date:

21 March 2019

Filed on behalf of the: Defendant
Witness: Andrew Parsons
Statement No: Thirteen
Date Made: 21 March 2019

Claim Nos: HQ16X01238, HQ17X02637 and HQ17X04248

THE POST OFFICE GROUP LITIGATION

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

BEFORE THE HONOURABLE MR. JUSTICE FRASER

B E T W E E N:

ALAN BATES AND OTHERS

Claimants

AND

POST OFFICE LIMITED

Defendant

EXHIBIT AP13

This is the Exhibit marked AP13 referred to in the Thirteenth Witness Statement of Andrew Parsons

Charlie Temperley

From: Rebecca Whibley <[GRO]>
Sent: 06 November 2018 08:20
To: Johann Appel; Lisa Toye
Cc: Michelle Darbyshire
Subject: RE: Urgent: Documents required: RMG ARC Minutes from 2010 & 2011

Hi Johann & Lisa

Please can you advise Michelle on the absolute deadline? I am aware it is very urgent but not sure I have been told a date.

Thank you,

Rebecca



Rebecca Reay
Company Secretarial Administrator

First Floor, Finsbury Dials
20 Finsbury Street
London
EC2Y 9AQ

[GRO]

From: Michelle Darbyshire [mailto:[GRO]]
Sent: 06 November 2018 07:40
To: Rebecca Reay <[GRO]>
Cc: Lisa Toye <[GRO]> Johann Appel <[GRO]>
Subject: RE: Urgent: Documents required: RMG ARC Minutes from 2010 & 2011

Hi Rebecca,

We are currently working on this but we are struggling for time. When is the absolute deadline for receiving anything we may find?

Kind Regards
Michelle

Michelle Darbyshire
Senior Records & Information Governance Manager
Royal Mail Group

Pond Street, Sheffield, S98 6HR

[GRO] [GRO] [GRO] Mobex: [GRO]
e-mail: [GRO]



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From: Rebecca Reay [mailto:] GRO
Sent: 02 November 2018 12:44
To: Michelle Darbyshire
Cc: Lisa Teye; Johann Appel
Subject: RE: Urgent: Documents required: RMG ARC Minutes from 2010 & 2011

Hi Michelle,

Just wanted to check you had received this and whether there was any update?

Best wishes,

Rebecca



Rebecca Reay
Company Secretarial Administrator

First Floor, Finsbury Dials
20 Finsbury Street
London
EC2Y 9AQ

GRO

From: Rebecca Reay
Sent: 01 November 2018 08:44
To: 'Michelle Darbyshire' < > GRO
Cc: Lisa Teye < GRO > Johann Appel < GRO >
Subject: RE: Urgent: Documents required: RMG ARC Minutes from 2010 & 2011

Dear Michelle,

As discussed yesterday, we are looking for Royal Mail Group Audit Committee or Audit, Risk & Compliance Committee (ARC) minutes for meetings that took place during 2010 & 2011. It appears the Post Office Limited Audit, Risk & Compliance Committee was not formed until 2012 so we believe the relevant information must be in the Royal Mail Group meeting minutes.

Within these minutes the relevant search terms will be:

- Credence
- Credence IT Controls
- Credence change controls
- IT Controls update

Many thanks in advance.

Best wishes,

Rebecca



Rebecca Reay
Company Secretarial Administrator

First Floor, Finsbury Dials
20 Finsbury Street
London
EC2Y 9AQ

GRO

From: Michelle Darbyshire [mailto:[GRO](#)]
Sent: 31 October 2018 13:41
To: Rebecca Reay [mailto:[GRO](#)]
Subject: Re: Urgent: Documents required: RMG ARC Minutes from 2010 & 2011

I will call you later.

Sent from my iPhone

On 31 Oct 2018, at 13:39, Rebecca Reay [mailto:[GRO](#)] wrote:

Hi Michelle,

Ah, maybe I was given the wrong number.

Thank you for agreeing to look into this. I am sorry to be a pain but it is very urgent (it relates to ongoing litigation which is currently before the High Court – you might have seen it in the news). Are you able to look into it sooner or ask someone who might be able to do this sooner in your team? Again I apologise for the late notice – we are working to strict deadlines set as part of the trial process and we have been struggling to track down these documents as we believed they were at the Postal Museum, but it appears not.

Thank you in advance.

Best wishes,

Rebecca

<image001.png>

Rebecca Reay
Company Secretarial Administrator

First Floor, Finsbury Dials
20 Finsbury Street
London
EC2Y 9AQ

GRO

From: Michelle Darbyshire [mailto:] GRO
Sent: 31 October 2018 13:13
To: Rebecca Reay GRO
Cc: Lisa Toye GRO
Subject: Re: Urgent: Documents required: RMG ARC Minutes from 2010 & 2011

Hi Rebecca,

I haven't received a voicemail from you but I will need time to look into this and locate the records. I am travelling between sites so will contact you in the next couple of days.

Kind Regards
Michelle

Sent from my iPhone

On 31 Oct 2018, at 13:02, Rebecca Reay [] wrote:

Dear Michelle,

Further to my voicemail, I work at Post Office Limited and we are looking to access the minutes from the Royal Mail Group Audit, Risk & Compliance Committee meetings from before the split, namely 2010 & 2011. I was given your details by Jamie Ellul from the Postal Museum who advised you might be able to help.

Are you able to send me these documents?

Many thanks,

Rebecca

<image001.png>

Rebecca Reay
Company Secretarial Administrator

First Floor, Finsbury Dials
20 Finsbury Street
London
EC2Y 9AQ

GRO

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