

## Message

**From:** Jane MacLeod  
**on behalf of** Jane MacLeod  
**Sent:** 29/04/2016 14:05:48  
**To:** Tim Parker  
**Subject:** Post Office - Chairman's review and potential litigation

Dear Tim

Just a brief update following our conversation on Wednesday. I gather the meeting with the Minister went well, in that it provided an opportunity to give the Minister a clearer understanding as to where matters stand.

As expected, we have now formally received the Letter of Claim from Freeths on behalf of 91 applicants (it arrived yesterday afternoon). The document is 53 pages long and will require careful review. On a very quick scan it appears that, not unexpectedly, there are a number of allegations made, however, there does not appear to be any new material raised. At this stage, there is no quantification of the claim for damages.

We have referred the Letter to Bond Dickinson and the team will make the necessary procedural responses (eg acknowledging receipt) and will then prepare the litigation strategy. I have asked for a briefing paper to be prepared for the Board meeting on 21 May which will include at a high level, a summary of the claim and the likely timeline.

We are notifying BIS this afternoon of the fact of receipt and our Communications team has prepared a standard response to any media query confirming that we have received a claim and will therefore be responding through legal processes.

In terms of your review:

- On the legal and prosecutions policy questions, including those relating to dual (theft/false accounting) charges and the allegation that Post Office exercised undue pressure to secure guilty pleas to false accounting, , Brian Altman QC has now started the process of reviewing the prosecution files for the 19 cases in the Scheme in which dual charges were considered.
- On the technical/IT questions being considered by Deloitte, they have now completed the discovery and scoping stage, the first in what is a two phase process. We met with Deloitte last night at which they reported back on the different approaches they could take to the substantive, or hard testing, phase of the process – each approach potentially capable of providing us with higher levels of assurance but, naturally, at increasingly higher cost. In addition, and not least in the context of the litigation, our choices over the degree of assurance we seek, will need to be tested against wider tactical and commercial considerations. We will consider, internally at first and then with Deloitte and Jonathan Swift, which combination of the different permutations of the testing which could in theory be performed, will achieve the best overall result in light of the various strands of work. Deloitte remain confident that this substantive phase, dependant on the choices we make, should be capable of delivery and reporting within our preferred timescales – ie. by end May/early June.

As ever, should you have any questions, do please give me a call.

Kind regards

Jane

**Jane MacLeod**  
General Counsel  
Ground Floor



20 Finsbury Street  
LONDON  
EC2Y 9AQ

Mobile number: