
From: Jane MacLeod[**GRO**]
Sent: Sat 21/05/2016 3:35:53 PM (UTC)
To: Paula Vennells[**GRO**]; Mark R Davies[**GRO**]; Tom Wechsler[**GRO**]; Patrick Bourke[**GRO**]
Cc: Alisdair Cameron[**GRO**]; Alwen Lyons[**GRO**]; Rodric Williams[**GRO**]; Thomas P Moran[**GRO**]
Subject: RE: Sparrow Board paper

Paula

I will coordinate the advice you have requested.

ALL - please note that all Board papers, minutes, emails and other correspondence are now potentially disclosable in the litigation, as well as being subject to FOIA disclosure.

Accordingly any correspondence in any form (whether letters, memos, email or text - and whether on PO or personal accounts) relating to Sparrow and the matters subject to the litigation - **must** be addressed to either Rod Williams or myself and others should only be cc'd and those must be kept to a minimum, in order to ensure that to the extent possible, the correspondence is protected by privilege, and **must** have in the Subject line of the email - REQUEST FOR ADVICE.

Equally, all relevant emails from Rod & myself will state that they are ADVICE - SUBJECT TO LEGAL PROFESSIONAL PRIVILEGE. Such emails **must not** be forwarded to any third person - whether in or out of PO.

Jane

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-----Original Message-----

From: Paula Vennells
Sent: 21 May 2016 11:32
To: Jane MacLeod; Mark R Davies; Tom Wechsler; Patrick Bourke
Cc: Alisdair Cameron; Alwen Lyons
Subject: Sparrow Board paper

Hi Jane/Patrick,

Thanks for the above. A couple of questions (some building on the GE discussion so I have the answers documented):

- 1) who have we engaged as our primary legal advisers alongside BD? If BD alone, are they equipped - experienced enough and street wise enough? And do they have specialism/experience in point 3 below? (You may have mentioned Linklaters in this context?)
- 2) who/what is our internal resource/governance?
- 3) I won't describe this correctly but you will follow my point (it relates to Sir Tony Hooper's concern and one of the issues at the heart of the Hillsborough case): can we (Al, Neil, Kevin and myself) have a deep dive on the issues related to the (im)balance of power of the institution vs the individual. We need to understand this irrespective of Sparrow.
- 4) the paper is well written, balanced and reassures me we will handle it well. Thank you. Notwithstanding... could

you/Mark put on your blackest hats and think through the worst outcomes: I would like a downside horizon scan. Eg., are there any judicial review or (mis)use of public funds angles at all - costs expended to date, failure of our own mediation mediation scheme.

5) Horizon expert - the board note doesn't cover this: we need to brief the new NEDs and remind the others - could you/Tom give me a speaking note.

6) Stakeholders section: paras 22 and 23 - needs to include more on political, Government and IR stakeholders. Eg.. keeping ministers and MPs briefed and calm in the run up to the next GE; managing the CWU/NFSP; specific journalists and media interest; etc. Could Mark/Tom provide a speaking note.

I want to be sure we share all angles with the NEDs so they are fully appraised as to how noisy/difficult it could become. (At what point might it be sensible to give the board a deep dive, if the timetable plays out as you indicate?) I believe we will manage this well with our new board.

Thanks for a good and clear paper.

Paula

Sent from my iPhone