

Message

From: Amy Prime [/O=EXCHANGE-ORG/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=AB7222DDA3A9453EAED5751238A59562-AMY PRIME]
Sent: 29/09/2017 13:19:05
To: Jane MacLeod [GRO]
CC: Rodric Williams [GRO]; Gavin Matthews [/o=Exchange-Org/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=24fec6fc4253431abbbf6ce6acbbf5be7-Gavin Matth]
Subject: RE: Tony tomorrow [BD-4A.FID26896945]

Jane

That is fine, thank you for picking this up.

Kind regards
Amy

Amy Prime
Solicitor
Bond Dickinson LLP

Bond Dickinson

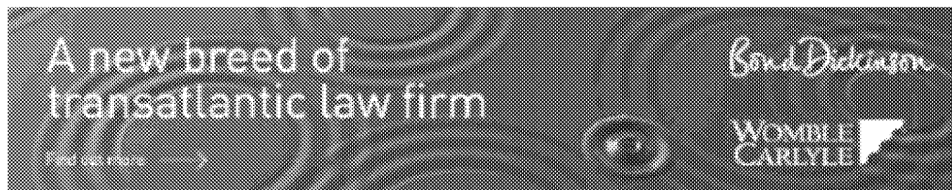
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From: Jane MacLeod [GRO]
Sent: 29 September 2017 13:47
To: Amy Prime
Cc: Rodric Williams; Gavin Matthews
Subject: Re: Tony tomorrow [BD-4A.FID26896945]

Amy

This may be difficult - I'm attending so I can pick these up, but I'm not really expecting any 'actions' as such.

Jane

Jane MacLeod
Group Director Legal, Risk & Governance
Post Office

GRO

From: Amy Prime [GRO]
Sent: Friday, September 29, 2017 11:36:39 AM
To: Jane MacLeod
Cc: Rodric Williams; Gavin Matthews
Subject: RE: Tony tomorrow [BD-4A.FID26896945]

Jane

For your information, Tony has asked if I can dial-in into the meeting with Paula and Al today just to sit in the background and make a note of the meeting and any actions which may arise from this.

I hope that this is ok, but please let me know if you have any concerns or would like to discuss this.

Kind regards
Amy

Amy Prime
Solicitor
Bond Dickinson LLP

Bond Dickinson

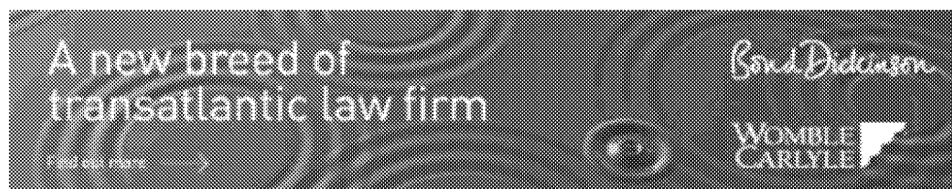
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From: Andrew Parsons
Sent: 28 September 2017 18:44
To: Jane MacLeod
Cc: Amy Prime; Rodric Williams
Subject: Tony tomorrow [BD-4A.FID26896945]

Jane

I've spoken to Tony this evening. Below is a rough outline of what he plans to cover tomorrow with Paula / Al. This might change before tomorrow – he's a barrister – last minute changes are what they do!

1. Why have we recommended focussing on the contractual points?
 - a. This will be the obvious starting point for the judge. Going against this makes POL look difficult in a case where the Claimants are saying POL is an oppressive organisation.

- b. Not engaging on the contractual points, gives Freeths the chance to select which contractual issues to promote and makes it difficult for POL to influence how those issues are framed. This may weaken POL's case.
 - c. It is difficult to see how we could address another issue first eg. to deal with Horizon you first need to understand the contractual basis in relation to Horizon.
2. Claim advanced by Freeths
- a. It is ambitious for them to imply numerous terms.
 - b. That doesn't mean that their case is hopeless, they may well win on some issues (ie. Post Office might have an implied duty to offer adequate training).
 - c. We have a credible argument on the burden of proof issue but it is a complicated point.
3. Mood music
- a. We need to weave into the story that losing on the "burden of proof" issue would be disastrous for POL, but this needs to be done with great care and not over-exaggerated.

I've also prepped Tony on Paula and Al's respective styles.

I'm [GRO] from 7:30am tomorrow so if you'd like to discuss, please do feel free to call this evening (any time – I'm on the mobile).

Kind regards
Andy

Andrew Parsons
Partner
Bond Dickinson LLP

Bond Dickinson

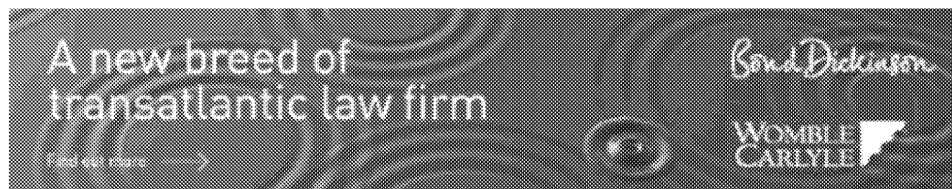
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