

Message

From: Parsons, Andrew [GRO]
Sent: 29/07/2016 08:29:45
To: Thomas P Moran [GRO]; Jane MacLeod [GRO]
CC: Melanie Corfield [GRO]; Rodric Williams [GRO]; Patrick Bourke [GRO]; Mark R Davies [GRO]; Tom Wechsler [GRO]
Subject: RE: Postmaster Litigation Briefing Plan - CONFIDENTIAL AND SUBJECT TO LEGAL PRIVILEGE [BD-4A.FID26859284]

Jane

I'm fine with this too.

Andy

Andrew Parsons
Partner

Bond Dickinson

Direct: [GRO]
Mobile: [GRO]

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From: Thomas P Moran [GRO]
Sent: 29 July 2016 09:26
To: Jane MacLeod
Cc: Melanie Corfield; Rodric Williams; Patrick Bourke; Mark R Davies; Tom Wechsler; Parsons, Andrew
Subject: Re: Postmaster Litigation Briefing Plan - CONFIDENTIAL AND SUBJECT TO LEGAL PRIVILEGE

Jane

Thanks. I am fine with the note to the board. Any elaboration on our media line should not include a phrase such as 'conspiracy theories' as this sounds emotive. Could we change 'considered and resolved' to 'considered and disproved'?

On way up to Bradford to day so limited access - call me if urgent.

Cheers

Tom

On Jul 29, 2016, at 8:57 AM, Jane MacLeod <[GRO]> wrote:

Mel

Given the conversation at GE on Monday (which Mike G was at), I wonder whether we should have an additional line which we could consider using if the remote access issue comes up? This would be along the line of:

"We are aware of a claim and we are defending our position through the legal processes. **We welcome the opportunity for these allegations to be considered and resolved through the Court process.**" (Al's suggestion went further and referred to conspiracy theories ...)

In relation to the Board (and GE), I would like to send a note out today along the lines set out below – any thoughts ?

Many thanks,

Jane

Draft note for the Board

Subject: Postmaster Litigation

As you will recall from the briefing provided at the May board, although formal proceedings have still not been served on Post Office (although we expect these by 11 August), we have been in discussion with Freeths (the solicitors acting for the claimants) on a range of issues and we were advised yesterday that the number of claimants has now increased to 198; again this was not unexpected.

As mentioned in my May briefing, on 28 April Freeths had sent to us a lengthy Letter of Claim. Bond Dickinson (on our behalf) responded to this last night. The response letter (which runs to 99 pages) provides a detailed rebuttal to each and every issue raised in the Letter of Claim, and was discussed at length within Post Office and has been reviewed by our QC Tony Robinson.

While none of the allegations set out in the Letter of Claim are new, and we are not relying on any new information in our rebuttal, the tone of our response is more assertive than we have used previously, given that our rebuttal arguments will help to shape the issues that will form the basis of any litigation. Although the rebuttal is a legal letter between the two firms of solicitors, we fully expect that it will be made available to the claimants and therefore we should assume that its contents will become public, and it has been written with this risk in mind.

Should we become aware of any planned media coverage, we will let you know, however our communications approach will continue to be the Postmasters have sought to resolve the matter through litigation and that is the appropriate forum through which the issues in the case should be resolved. Therefore we do not plan to make any external comment beyond "we are aware of a claim and are defending our position through the legal processes". To do otherwise will only serve to provoke further coverage.

In addition we have a range of reactive messaging ready to go to staff and postmasters; we have briefings ready to use for relevant managers, and will direct postmasters and staff to our established support procedures in the event of any concerns. We are also updating BIS on the risk of adverse coverage.

Please call me if you would like any further information.

Etc"

<image002.png>

Jane MacLeod

General Counsel
Ground Floor
20 Finsbury Street
LONDON
EC2Y 9AQ

Mobile number: GRO

From: Melanie Corfield
Sent: 28 July 2016 17:32
To: Thomas P Moran [GRO]
Cc: Jane MacLeod [GRO]
Subject: RE: Horizon Briefing Plan - CONFIDENTIAL AND SUBJECT TO LEGAL PRIVILEGE

Hello Tom

I attach a short document with comms approach and draft materials (to be kept under review of course).

If you are content then I can circulate to the steering group?

Best wishes,
Mel

From: Thomas P Moran
Sent: 26 July 2016 13:43
To: Melanie Corfield
Cc: Jane MacLeod
Subject: Horizon Briefing Plan - CONFIDENTIAL AND SUBJECT TO LEGAL PRIVILEGE

Mel

Please can you share the broader Comms plan we have for the Horizon response? We would like to have the following ready (even if we chose not to use them):

- Press line
- Briefing for the Board
- L300 briefing note
- Broader business briefing note

Thanks

Tom

<image003.png>

Tom Moran
General Manager, Network

Finsbury Dials
20 Finsbury Street
London, EC2Y 9AQ

T: [GRO]

E: [GRO]

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