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**From:** Jane MacLeod [GRO]  
**Sent:** Fri 22/09/2017 3:00:27 PM (UTC)  
**To:** Avene Regan [GRO]  
**Cc:** Paula Vennells [GRO]; Alisdair Cameron [GRO]  
**Subject:** Re: Litigation- meeting with Tony Robinson  
**Attachment:** image001.png  
**Attachment:** image002.png

Thanks Avene- we'll liaise with BD to sort this out.

Jane MacLeod  
Group Director of Legal, Risk & Governance  
The Post Office  
[GRO]

Sent from my iPad

On 22 Sep 2017, at 15:53, Avene Regan [GRO] wrote:

Hi Jane,

Yes Paula would like to meet with Tony. Happy to liaise directly if helpful.

Best,

Avene

**<image001.png> Avene Regan**

**2017 Winner of the** Executive Assistant  
**Global Postal Award for** to the Group Chief Executive,  
**Customer Experience** Paula Vennells

Post Office Customer Support Centre  
Finsbury Dials  
20 Finsbury Street  
London, EC2Y 9AQ

Tel: [GRO]

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**From:** Jane MacLeod  
**Sent:** 22 September 2017 15:02  
**To:** Paula Vennells [GRO]; Alisdair Cameron [GRO]  
**Cc:** Avene Regan [GRO]  
**Subject:** Litigation- meeting with Tony Robinson

Paula, Al

Unfortunately Tony Robinson (QC) is not available on Monday. Would it make sense for us to arrange for you to meet a him ahead of the CMC in any event?

Jane

**<image002.png> Jane MacLeod**

Group Director of Legal, Risk & Governance  
Ground Floor

20 Finsbury Street  
LONDON

EC2Y 9AQ

Mobile number: **GRO**

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**From:** Avene Regan

**Sent:** 22 September 2017 12:06

**To:** Jane MacLeod <**GRO**>

**Cc:** Rodric Williams <**GRO**> Kevin Morgan

**GRO**

**Subject:** RE: Call with Richard Callard

Hi Jane,

Regarding the call, between 8:30-10 or 12-1pm would be ideal. Obviously will be flexible though.

Thanks,

Avene

**<image001.png> Avene Regan**

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**From:** Jane MacLeod

**Sent:** 22 September 2017 11:55

To: Avene Regan [GRO]  
Cc: Paula Vennells [GRO]; Alisdair Cameron  
[GRO]; Rodric Williams [GRO]  
Subject: RE: Call with Richard Callard

Avene,

Following discussion with Paula & Al this morning I suggest the following as speaking notes re the Postmaster Litigation:

#### Postmaster Litigation

- Jane will give a briefing as part of my CEO's report on the Case Management Conference which is being heard on 19 October
- This will set out the procedural steps to be followed by both parties over the next 12-24 months
- Broadly 2 key questions to be decided:
  - Whether Horizon is robust
  - Whether the postmaster contract is fair and supports our operating practices
- Freeths are pressing for the contractual question to be heard first, and our QC supports this approach as it gives us the best opportunity to influence the way the legal questions are framed.
- There are strategic risks with this approach. If we go to trial and lose, then it will undermine the nature of the relationship between Post Office and the agency networks, and we would potentially be at risk of substantial financial losses.
- However this option would also support us if we were considering a settlement ahead of any such hearing, as it would ensure that we had the best possible visibility of Freeths' case, so as to be able to better assess what a successful settlement could look like.
- We don't expect that the hearings on these issues will happen before late 2018, and at this stage we still don't know if the CRC will have opined at that point.
- Our QC (Tony Robinson\*\*\*) is briefing us in November on the outcome of the CMC, and that will enable us to monitor progress (both ours and Freeths') and we will keep under consideration whether a settlement should be considered.
- Rod Williams has been keeping the BEIS legal team informed on key developemnts

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**Avene** - We're looking to see if we can get a short meeting/call in between Tony and Paula/Al on Monday ahead of the Board discussion

Paula/Al – does this work for you based on our discussions this morning?

Jane

<image002.png> **Jane MacLeod**

Group Director of Legal, Risk & Governance  
Ground Floor

20 Finsbury Street

LONDON

EC2Y 9AQ

Mobile number: [GRO]

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**From:** Avene Regan

**Sent:** 22 September 2017 09:05

**To:** Rob Houghton <[REDACTED]>; Kevin Gilliland <[REDACTED]>; Nicholas Kennett <[REDACTED]>; Martin Kirke <[REDACTED]>; Jane MacLeod <[REDACTED]>; Mark R Davies <[REDACTED]>; Martin Edwards <[REDACTED]>

**Subject:** Call with Richard Callard

Morning all,

Apologies for short notice, Paula has a regular pre-board call with Richard **today at 2pm**. She's asked for your input on any issues you think she should either raise or be aware of.

In particular anything relating to IT, Peregrine and on ARC, Nom&Rem that would be useful to call out or mention ahead of the meetings next week.

Mark – Patrick has provided some helpful input on our banking framework. Copying you in case there is anything else to mention.

Al – I suspect there will be some steers following your call with Carla this morning, which you can update during your 1:1 later.

Any steers or input appreciated by 1pm if possible.

Thanks,

Avene