

From: Cooper, Tom - UKGI
Sent: Thu, 5 Apr 2018 15:07:15 +0000
To: O'Neill, Elizabeth - UKGI; Lambert, Helen - UKGI
Cc: Callard, Richard - UKGI
Subject: RE: Litigation and Appointment - next steps - STRICTLY CONFIDENTIAL

Helen

How is this being progressed – have we commented?

Tom

Tom Cooper

Director

UK Government Investments

1 Victoria Street | London | SW1H 0ET

T: [REDACTED] **GRO**
M: [REDACTED]
E: tom.cooper@ukgi.gov.uk [REDACTED] **GRO**
PA: marcus.mcalister@ukgi.gov.uk [REDACTED] **GRO**

Please note that with immediate effect, my email address has changed to

[REDACTED] **GRO**

I will still receive emails sent to my old address until 30 April 2018. Thereafter you will only be able to contact me on my new address and emails sent to my ukgi.gov.uk address will not be forwarded.

I would be grateful if you could note this and change my contact details accordingly.

From: Rodric Williams [REDACTED] **GRO**
Sent: 27 March 2018 18:44
To: O'Neill, Elizabeth - UKGI <[REDACTED] **GRO**>; Patrick Bourke <[REDACTED] **GRO**>
Cc: Jane MacLeod <[REDACTED] **GRO**>; Callard, Richard - UKGI <[REDACTED] **GRO**>; Cooper, Tom - UKGI <[REDACTED] **GRO**>; Lambert, Helen - UKGI <[REDACTED] **GRO**>
Subject: RE: Litigation and Appointment - next steps - STRICTLY CONFIDENTIAL

Elizabeth,

Thank you for sending through your draft protocol identifying the touchpoints in the Post Office Group Litigation on which you would like visibility.

Your touchpoints overlap substantially the matters on which we will be reporting to our Board of Directors as part of our governance for managing the litigation and its risks. That governance includes the establishment of a Board Subcommittee to receive legal advice on Post Office's

defence as the litigation proceeds. Tom Cooper, BEIS/UKGI's shareholder representative on the Board, is a member of the Litigation Subcommittee, which will meet shortly before full Board meetings so as to provide the full Board with contemporaneous, focussed updates.

In addition to the updates BEIS/UKGI will receive through its Board and Litigation Subcommittee representation, we are also happy to provide updates on the litigation to BEIS/UKGI's legal advisors. These should be done in-person or via telephone conference call, immediately following the full Board meetings to ensure continuity and consistency of reporting.

The above approach is reflected in the attached revised protocol, which is designed to protect Post Office's claims to legal professional privilege and attaches as appendices:

- a reporting timetable prepared around key stages in the litigation and our Board's calendar; and
- the obligations which will accompany the disclosure of confidential information.

Please note that the litigation timetable is very likely to change in response to the proactive case management being applied by the Managing Judge Sir Peter Fraser. It is also likely to change as the parties respond to developments in the litigation itself. We do not however propose to make any changes to scheduled update meetings unless they require Post Office to consider materially changing its approach to the litigation.

We look forward to receiving your comments on our draft. I am very happy to discuss those in person or over the telephone if you would find that easiest.

With kind regards, Rodric



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Postal Award for Customer
Experience

Rodric Williams
Head of Legal - Dispute Resolution & Brand
20 Finsbury Street
London EC2Y 9AQ
T: [REDACTED] GRO
E: rodric.williams@postoffice.co.uk [REDACTED] GRO

From: O'Neill, Elizabeth - UKGI [REDACTED] GRO
Sent: 01 March 2018 15:51
To: Patrick Bourke <[REDACTED] GRO >
Cc: Jane MacLeod <[REDACTED] GRO >; Rodric Williams
 <[REDACTED] GRO >; Callard, Richard - UKGI <[REDACTED] GRO >;
 Cooper, Tom - UKGI <[REDACTED] GRO >; Lambert, Helen - UKGI
 <[REDACTED] GRO >
Subject: Litigation and Appointment - next steps

Patrick, Helen,

Thank you for your time last week.

As discussed, I attach a standard form litigation protocol along the lines of what we would propose to submit to the Permanent Secretary. As you will see, this sets out various touchpoints

in the litigation process, and the steps we intend to take to ensure the Permanent Secretary remains fully informed at each salient point.

If you are able to provide more detail on the litigation timetable, or indeed if you have any comments or suggestions, we would be happy to amend the protocol bespoke to the current litigation.

Separately I'd be grateful, as I indicated in my email to Helen on Monday, if in anticipation of Tom Cooper's appointment, you could let me know if you intend to agree an NDA similar to the one you have with Richard, and if so, forward me the proposed text so that Tom and I may consider.

Kind regards,

Elizabeth

From: Patrick Bourke <[REDACTED] GRO>
Sent: 23 February 2018 15:10
To: O'Neill, Elizabeth - UKGI <[REDACTED] GRO>
Cc: Jane MacLeod <[REDACTED] GRO>; Rodric Williams <[REDACTED] GRO>; Callard, Richard - UKGI <[REDACTED] GRO>
Subject: Litigation Meeting

Dear Elizabeth

It was a pleasure to meet with you this morning.

I just wanted to confirm that we have understood the need for an appropriately structured information flow in relation to the matters we discussed earlier, and agree that some form of protocol to govern those arrangements makes very good sense.

While recognising that there is no set format in this regard, it would nonetheless be helpful for us to draw inspiration from similar arrangements you have put in place with other ALBs. You kindly offered to share something with us for that purpose.

We will come back to you with our take on how this might work best in our case, having regard to the particularities of our governance arrangements and the litigation itself.

In the meantime, do please feel free to get in touch if there is anything you'd like to discuss.

Kind regards

Patrick



**2017 Winner of the
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for Customer
Experience**

Patrick Bourke
Corporate Affairs Director
1st Floor

20 Finsbury Street

London EC2Y 9AQ

GRO

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