From:	Cooper, Tom - UKGI[/O=HMT/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8D968D43E33749AE9E59F9C9350E69D5-COOPER, THOMAS (TCOO]	-
Sent:	Fri 08/06/2018 3:21:12 PM (UTC)	
То:	Callard, Richard - UKGI GRO]	
Cc:	Callard, Richard - UKGI[GRO] Lambert, Helen - UKGI[GRO]; Aldred, Tom - UKGI[GRO]; O'Neill, Elizabeth - UKGI[GRO] Clarke, Stephen - UKGI[GRO]	;
Subject:	Re: Post Office Group Litigation - SUBJECT TO LEGAL PRIVILEGE	
Yeah. Doesn't feel li	ke the last time	
Tom Cooper		
Director		
UK Government I	investments	
1 Victoria Street I I	London I SW1H 0ET	
T: CDO		
M: GRO		
* L	GRO	
PA: marcus.mcalist	er GRO	
Please note that wi	ith immediate effect, my email address has changed to tom.cooper GRO	
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Director
UK Government Investments
1 Victoria Street London SW1H 0ET
T: GRO E: tom.cooper GRO PA: marcus.mcalister GRO
Please note that with immediate effect, my email address has changed to tom.cooper GRO
I will still receive emails sent to my old address <u>until 30 April 2018</u> . Thereafter you will only be able to contact me on my new address and emails sent to my <u>GRO</u> address will not be forwarded.
I would be grateful if you could note this and change my contact details accordingly.
On 7 Jun 2018, at 13:58, Lambert, Helen - UKGI < GRO > wrote:
Hi all
The requirement for this particular update is set out in the protocol (i.e. an update after the board meeting of 24 May). Rod acknowledges this in the first of the emails attached, in response to my email of 16 May, but also actually indicates that he will try to get this to us before the Board meeting. I then subsequently asked him for the update on 31 May (also attached) and then yesterday.
Obviously the sub went up in the meantime and potential dates for POL's GC to brief Alex/Andrew Griffiths directly have been discussed, but the idea that this could be considered a substitute for the reporting requirements we have agreed in the protocol is not one which would have occurred to me, particularly considering that meeting may not happen until late September. We certainly can't wait that long for an update on the Merits.
Thanks Helen
Helen Lambert I Legal Secondee UK Government Investments 1 Victoria Street I London I SW1H 0ET
T: GRO M: E: helen.lambert(GRO
From: Callard, Richard - UKGI
Sent: 07 June 2018 13:07 To: Cooper, Tom - UKGI ← CDO >
Cc: Aldred, Tom - UKGI < GRU ; Lambert, Helen - UKGI
< <u>GRO</u> >; O'Neill, Elizabeth - UKGI ₹ GRO >

Tom

Think it's time to escalate to Paula again. Might be worth Helen digging out the emails that showed what we asked for etc.

It's constant defer defer. And it will keep happening.

Subject: FW: Post Office Group Litigation - SUBJECT TO LEGAL PRIVILEGE

From: Rodric Williams [mailto]	GRO	<u> </u>	
Sent: 07 June 2018 13:00			
To: Lambert, Helen - UKGI <	GRO	 >	
Cc: O'Neill, Elizabeth - UKGI	GRO	>; Cooper, Tom - UK	GI
<; Cal	lard, Richard - UK	Ĝl ⊲ GRO	> ;
Clarke, Stephen - UKGI 4	GRO	>; Jane MacLeod	
< GRO	>		
Subject: RE: Post Office Group Li	tigation - SUBJECT	TO LEGAL PRIVILEGE	

Helen,

I had understood that the report I sent on 14 May 2018 had been shared with Alex following the Board and Subcommittee meetings held in May, the outcome of which is that a further meeting on the Postmaster Litigation will be held between Alex, Tom and our senior management later in the summer, once the practical implications of counsels' opinion (which is essentially lengthy and complex legal analysis) had been assessed by Post Office.

In light of that development, I had no longer anticipated the need to provide a formal briefing on the merits opinion. We have however provided you with five separate updates on developments with the Postmaster Complaints in the intervening period.

In addition to the CCMC held on Tuesday, we are also this week finalising Defences to the Individual Particulars of Claim filed by five of the Lead Claimants in the Common Issues trial, each of which is c.50 pages long. These must be filed with the Court tomorrow. I trust you will appreciate that hitting this critical court deadline needs to take priority over any additional reporting.

Kind regards, Rodric

From: Lambert, Helen - U	JKGI [mailto GRO) <u> </u>	
Sent: 06 June 2018 11:14			
To: Rodric Williams ∢	GRO	·· · >	
Cc: O'Neill, Elizabeth - Ul	⟨GI ╡ GRO	; Cooper, Tom - UI	KGI
d GRO	>; Callard, Richard - UKGI <	₫ GRO	⊳ ;
Clarke, Stephen - UKGI <	GRO	>	
Subject: RF: Post Office (Group Litigation - SUBJECT TO	OLEGAL PRIVILEGE	

Hi Rodric

I hope all is well.

I am sure you have been busy with the CMC yesterday, but was hoping you might be able to give me an update on the below. The urgency in getting an update on the case to Alex is in increasing significantly and we would appreciate if you could provide the update, in particular on the merits opinion, so that we are able to do so as soon as possible.

Many thanks Helen

Helen Lambert I Legal Secondee UK Government Investments

1 Victoria Street I London I SW1H 0ET



From: Lambert, Helen - UKGI Sent: 31 May 2018 09:29

To: 'Rodric Williams'

GRO
Cc: O'Neill, Elizabeth - UKGI

GRO

GRO

GRO

GRO

Subject: RE: Post Office Group Litigation - SUBJECT TO LEGAL PRIVILEGE

Rodric

Please find attached the protocol with minor amendments. We hope this can now be considered agreed.

I was also wondering whether you might be able to give me an expected timescale for receipt of the written update following last week's board meeting.

Many thanks

Helen

Helen Lambert I Legal Secondee UK Government Investments

1 Victoria Street I London I SW1H 0ET



Sent: 22 May 2018 13:32

To: Lambert, Helen - UKGI ← GRO >; O'Neill, Elizabeth - UKGI

GRO

Subject: Post Office Group Litigation - SUBJECT TO LEGAL PRIVILEGE

Elizabeth, Helen,

<u>Information Sharing Protocol</u>

Please find attached the draft Protocol, the amendments to which seek to reflect the discussion we held last week. I hope these are acceptable, but please let me know if not.

Case Management Conference

By way of an update, a Costs & Case Management Conference has been listed for a half-day hearing on <u>5 June 2018</u>, which (time permitting) will deal with the parties' respective costs budgets and the progress the parties' experts have made in preparing for the Horizon issues trial to held in March 2019.

Kind regards, Rodric

Head of Legal - Dispu	ite Resolution & Brand
20 Finsbury Street	
London EC2Y 9AQ	
T: GRO	
E: rodric.williams	GRO

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