
From: DURKIN Beth [GRO]
Sent: Wed 10/04/2019 6:27:37 PM (UTC)
To: "Rachel.Roberts" [GRO]
Cc: BARKER David [GRO]
Subject: RE: [EXTERNAL] Tentative: Call - Project Bramble - legally privileged and confidential [PM-AC.FID3854255]

Hi Rachel,

Please find an update below:

Meeting with POL counsel

- Steve, Pete and I met with Tony De Garr Robinson QC and Simon Henderson, counsel for Post Office. Katie from WBD also dialled in.
- Green's tactic is likely to be to try to cast doubt on the validity of Steve's evidence, so counsel wanted to make sure Steve is completely comfortable with everything in his witness statements.
- Various technical points were covered to clarify counsel's understanding and to ensure the accuracy of Steve's statements, in particular where his evidence directly contradicts that of Richard Roll (since Patrick Green, counsel for the claimants, is likely to pick up on these areas).
- Two topics in particular were identified by counsel (relating to specific PEAKS), in relation to which corrections to Steve's witness statements were discussed. Ultimately it was decided that clarifications were not necessary and his evidence remains accurate as it stands.
- WBD are preparing a couple of minor corrections to Steve's witness statements (for example, an incorrectly cited PEAK number).

Meeting with Steve

- Following the meeting with counsel, I met separately with Steve (and Pete) and we discussed how he found the morning useful and interesting.
- We ran through some guidance on giving evidence. This included key points on the approach to be taken generally (for instance: ask for the question to be repeated or clarified if you do not understand it, take time to read the documents you are taken to, direct your answers to the judge, etc).
- We ran through some examples (unrelated to this case) of sticking to the question. Steve is conscious, after Torstein's evidence, of over-answering the question. Steve's tendency is more towards answering 'I don't know for certain' / 'I can't answer that' when the matters in question may in fact be within his knowledge.
- He understands there is no pressure on him to answer in a certain way, and that he is there to assist the court.
- Steve's stutter worsens with nerves, which is something he is conscious of. This was apparent in the meeting with counsel this morning, but it does not impact the ability to understand him so is not a problem.
- Overall Steve comes across as a knowledgeable and honest witness.
- Steve said he feels as prepared as he can be. As well as the formal witness training provided by Bond Solon, he has had a couple of informal sessions with David/me, and today's session with POL counsel.
- He is going to re-read his witness statements this evening for a final time, and I have said he is welcome to call me if he wants to talk anything else through.

Steve is due on at 10.30am tomorrow until around lunchtime. The Judge has been quite clear that Patrick Green will only be allowed 2 hours 15 minutes to cross-examine Steve. In the afternoon, there will be re-examination and then case management issues will be dealt with.

Please let me know if you'd like to discuss any of the above. Would you like me to schedule a call tomorrow evening at say 5.00pm after court?

Kind regards,

Beth

Beth Durkin
Solicitor
for Pinsent Masons LLP

D: [GRO] M: [GRO] I: [GRO]

Winner – 'Law Firm of the Year' at The Legal Business Awards 2019

Winner – 'Law Firm of the Year' at The Lawyer Awards 2018

From: Rachel.Roberts@ [GRO]
Sent: 10 April 2019 18:39
To: DURKIN Beth
Subject: Re: [EXTERNAL] Tentative: Call - Project Bramble - legally privileged and confidential [PM-AC.FID3854255]

Hi Beth,

Thank you. Sorry I have been stuck in meetings. How did the sessions go today? If you could send me a brief update via email I would be grateful.

Regards
Rachel

Sent from my iPhone

On 10 Apr 2019, at 18:35, DURKIN Beth < [GRO] > wrote:

Hi Rachel,

I tried calling but must have missed you. If you'd still like to speak this afternoon, I'm still available. Alternatively, if this is not convenient, happy to schedule a call tomorrow evening after court.

Kind regards,

Beth

Beth Durkin
Solicitor
for Pinsent Masons LLP

D: [GRO] M: [GRO] I: [GRO]

Winner – 'Law Firm of the Year' at The Legal Business Awards 2019

Winner – 'Law Firm of the Year' at The Lawyer Awards 2018

From: DURKIN Beth
Sent: 10 April 2019 14:01
To: Rachel.Roberts@ [GRO]
Subject: RE: [EXTERNAL] Tentative: Call - Project Bramble - legally privileged and confidential

Hi Rachel,

No problem - feel free to call me later at a time that suits you. Best to get me on my mobile (number at the bottom of this email).

Pete is up to speed as he's been with me today - I'll cancel the call at 3.

Kind regards,

Beth

Beth Durkin
Solicitor
for Pinsent Masons LLP

D: [GRO] M: [GRO] I: [GRO]

From: Rachel.Roberts@[GRO]
Date: Wednesday, 10 Apr 2019, 1:28 pm
To: DURKIN Beth [GRO]
Subject: [EXTERNAL] Tentative: Call - Project Bramble - legally privileged and confidential

Hi Beth,

I now have a clash at 3. Can I call you directly later today? Perhaps 530/6?

I suggest if Wendy is not attending or sending a delegate, we cancel as I can update Chris. I assume that Pete is with you today so he has been updated?

Many thanks
Rachel

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