
From: Cooper, Tom - UKGI[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=97888B27D7034E80AB21DE4583305D52-
[REDACTED] GRO

Sent: Fri 17/05/2019 6:40:55 AM (UTC)

To: Rodric Williams [REDACTED] GRO Watts, Alan [REDACTED] GRO Massey, Kirsten [REDACTED] GRO

Cc: Ben Foat [REDACTED] GRO Watson, Richard - UKGI [REDACTED] GRO

Subject: RE: Post Office Group Litigation - SUBJECT TO LEGAL PRIVILEGE - DO NOT FORWARD

Thanks Rod

If there are items in your first list (1-13) that are generally true, why would we appeal them?

On B, it bothers me that the only fact in the lead cases we can point to where we seem to have concrete evidence that Fraser got it wrong is whether Bates saw the contract. Are there no others?

Take as an example Abdulla where Fraser says there were some errors in the make-up of the outstanding balance at the time he was audited and terminated. If it turns out that (for example) he didn't owe the post office any money at the time he was terminated then he should not have been terminated or prosecuted. The consequences of that are far greater than any issues in the Bates case it seems to me.

So if you're saying we don't need to challenge these findings at this stage, I'd like to understand why we're picking out the Bates contract point as being so special.

In general, I still want to go through the lead cases on a call and I assume the table that Ben outlined in his earlier email is still being prepared so we can go through them?

Tom

From: Rodric Williams [REDACTED] GRO

Sent: 16 May 2019 17:08

To: Cooper, Tom - UKGI [REDACTED] GRO

Cc: Ben Foat [REDACTED] GRO Watson, Richard - UKGI [REDACTED] GRO

Subject: Post Office Group Litigation - SUBJECT TO LEGAL PRIVILEGE - DO NOT FORWARD

Tom,

Further to your telephone conversation with Ben yesterday, please find attached a "one pager" listing the issues of fact being appealed from the Common Issues judgment because an individual claimant's experience has been extrapolated to a finding applicable to the entire postmaster community, and those being appeal because we disagree with them (i.e. because they were not open to the Judge on the evidence and/or are perverse).

Please let us know if you need anything further in this regard.

Separately, we have raised with the external legal team the issue of the costs of the recusal application given its stark dismissal by the Court of Appeal. We will let you know how this progresses.

Kind regards, Rod



Rodric Williams

Head of Legal - Dispute Resolution & Brand
20 Finsbury Street
London EC2Y 9AQ

T:
E:

GRO

This email and any attachments are confidential and intended for the addressee only. If you are not the named recipient, you must not use, disclose, reproduce, copy or distribute the contents of this communication. If you have received this in error, please contact the sender by reply email and then delete this email from your system. Any views or opinions expressed within this email are solely those of the sender, unless otherwise specifically stated.

POST OFFICE LIMITED is registered in England and Wales no 2154540. Registered Office: Finsbury Dials, 20 Finsbury Street, London EC2Y 9AQ.

"Post Office Limited is committed to protecting your privacy. Information about how we do this can be found on our website at www.postoffice.co.uk/privacy"

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>
