

From: Watson, Richard - UKGI
Sent: Sat, 30 Nov 2019 11:53:03 +0000
To: Ben Foat; Cooper, Tom - UKGI
Cc: Alan Watts
Subject: Re: Mediation

Ben

Thanks for this update. Sounds very encouraging.

Kind regards

Richard

Sent from my BlackBerry — the most secure mobile device — via the EE Network

From: Ben.Foat [GRO]
Sent: 30 November 2019 11:25 am
To: Tom.Cooper [GRO]
Cc: Alan.Watts [GRO]; Richard.Watson [GRO]
Subject: RE: Mediation

Morning Tom

- Overall, the parties made significant progress. [REDACTED] which POL was liable for in respect of the Common Issues Judgment. My sense is that we will be able to get them even lower. [REDACTED]
- We are proposing to go back to the mediators over the weekend through Herbert Smith Freehills (HSF) where we instruct them that a 4th day of mediation on Monday would be helpful.
- Tactically I don't want your (or Tim's) formal approval yet but to contact Tim, yourself and Nick on Monday to [REDACTED] (which POL is already liable for – we can't argue these as they are already court ordered). The legal view is that settlement at that point would be an excellent result in respect of these proceedings. Our next offer on Monday is likely to be [REDACTED]
- Settlement will be made by the parties signing a "Settlement, release and discharge" which will cover:
 -
 - Financial settlement (as a global amount – not assigning individually – particularly because of the convicted claimants)
 - Release and discharge of these [civil] proceedings (which will cover the convicted claimants, but as discussed, will be difficult to cover malicious prosecutions).
 - Agreed statement by the parties (which we will review from both a legal and comms perspective)
 - [REDACTED]

- [REDACTED]
- POL would assist those claimants who wish to exit the business post settlement.
 - POL would waive or withdraw the proof of debt for those insolvent claimants.
 - Freeths and the litigation funder to give an undertaking not solicit or act for any further claimants against Post Office.

We are working on this draft document over the weekend. There is likely to be legal debate to ensure we are protected on the above points though there is likely to some degree of residual risk with the above points.

- [REDACTED]

I will email you separately to update you on other GLO matters shortly.

I'm available this weekend if you want to discuss.

Have a great weekend in the meantime.

Kind regards
Ben



Ben Foat

Group General Counsel
Ground Floor
20 Finsbury Street
LONDON
EC2Y 9AQ

Mobile : [REDACTED] GRO

From: Cooper, Tom - UKGI [REDACTED] GRO
Sent: Saturday, November 30, 2019 9:18:09 AM
To: Ben Foat [REDACTED] GRO
Cc: Alan Watts [REDACTED] GRO; Watson, Richard - UKGI [REDACTED] GRO
Subject: Re: Mediation

Great. Thanks

Sent from my iPhone

On 30 Nov 2019, at 09:10, Ben Foat <[REDACTED] GRO> wrote:

Hi tom

I'm drafting an email to you now. You should have it in about 5 minutes.

Kind regards
Ben

Ben Foat
General Counsel
Post Office Limited

[Ben.foat@\[REDACTED\] GRO](mailto:Ben.foat@[REDACTED] GRO)

From: Cooper, Tom - UKGI <[REDACTED] GRO>
Sent: Saturday, November 30, 2019 9:08:55 AM
To: Ben Foat <[REDACTED] GRO> Alan Watts <[REDACTED] GRO>
Cc: Watson, Richard - UKGI <[REDACTED] GRO>
Subject: Mediation

Ben, Alan

Grateful if you could let us know where things stand currently.

Tom

Sent from my iPhone

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