

**From:** Angela Van-Den-Bogerd [GRO]  
**Sent:** Sun 14/12/2014 12:09:16 PM (UTC)  
**To:** Mark R Davies [GRO]; Belinda Crowe [GRO]  
**Cc:** Rodric Williams [GRO]; Susan.BARTY [GRO]; Patrick Bourke [GRO]; Melanie Corfield [GRO]; Ruth X Barker [GRO]; Stuart.Helmer [GRO]; Belinda Crowe [GRO]  
**Subject:** RE: BBC - One Show [CMCK-UK.FID8673510]

Mark,

I wouldn't be available on Tuesday as the mediation is likely to run into early evening (the recent one myself and Rod were at concluded after 630pm). I could be available from Wednesday onwards and could travel to London immediately after the mediation finishes on Tuesday evening so that I'm London ready for Wednesday morning.

Angela

**Angela Van Den Bogerd | Head of Partnerships**



Ty Brwydran House, Atlantic Close, SWANSEA SA7 9FJ



Mobile [GRO] Mobex [GRO]



[GRO]



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**From:** Mark R Davies  
**Sent:** 14 December 2014 10:39  
**To:** Belinda Crowe  
**Cc:** Rodric Williams; Susan.BARTY [GRO]; Patrick Bourke; Melanie Corfield; Ruth X Barker; Angela Van-Den-Bogerd; Stuart.Helmer [GRO]; Belinda Crowe  
**Subject:** Re: BBC - One Show [CMCK-UK.FID8673510]

Thanks - so all are clear I don't expect the One Show to agree to an interview on Tuesday. Rod's answers to NW questions are v good and I would like us to (once cleared) prepare them at this level of detail to return to Nick Wallis but at the same time copy to the series editor and BBC legal. They are getting into some very dangerous territory here which must start to border on defamation.

To unfairly suggest our legal processes are unsound would surely lower a third party's opinion of us.

Mark

Mark Davies  
Communications and Corporate Affairs Director  
Mobile: [GRO]

Sent from my iPhone  
On 14 Dec 2014, at 10:33, "Belinda Crowe" [GRO] wrote:

I think it highly unlikely that Angela can be around late Tuesday (but she can speak for herself) because of the mediation meeting.

I agree a legal letter tomorrow. I am still of the view that I do not want to be too specific about actually mediating. I really do not want any applicant to be in a position where they think that the fact of their mediation is being made known.

Best wishes

Belinda

[GRO]

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**From:** Mark R Davies  
**Sent:** Sunday, December 14, 2014 10:26 AM  
**To:** Rodric Williams  
**Cc:** Belinda Crowe; BARTY, Susan [GRO]; Patrick Bourke; Melanie Corfield; Ruth X Barker; Angela Van-Den-Bogerd; Helmer, Stuart [GRO]  
**Subject:** Re: BBC - One Show [CMCK-UK.FID8673510]

That works for me. I think we should say Angela could be available on Tuesday late afternoon/evening (assuming she can!) in order to underline our willingness here.

I plan a further round of emails to the BBC today myself so suggest legal letter goes first thing tomorrow? Views?

Mark

Mark Davies  
Communications and Corporate Affairs Director  
Mobile: [GRO]

Sent from my iPhone  
On 14 Dec 2014, at 09:21, "Rodric Williams" [GRO] wrote:

Hi – subject to the timing point Belinda has made, my only comment was we have at least two mediations taking place next week, as well as finishing off all our investigation reports etc.

Could we therefore make this change while staying consistent with Belinda's comment:

Not only is this the busiest time of the year for our client, but our client is still in the process of conducting mediations its work under its Complaint Review and Mediation Scheme, one of which is being conducted at the beginning including conducting mediations during the course of next week.

Rod


Rodric Williams | Litigation Lawyer

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<image002.png> 148 Old Street, LONDON,  
EC1V 9HQ

<image003.png>  Postline:   


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<image005.png> 

<image006.gif> [Post Office stories](#)

<image007.gif> [@postofficenews](#)

<image008.png>

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**From:** Belinda Crowe

**Sent:** 14 December 2014 09:09

**To:** BARTY, Susan

**Cc:** Mark R Davies; Rodric Williams; Patrick Bourke; Melanie Corfield; Ruth X Barker;  
Angela Van-Den-Bogerd; Helmer, Stuart

**Subject:** Re: BBC - One Show [CMCK-UK.FID8673510]

I think the comms guys are still considering as there have been a number of developments over the weekend.

I think we will revert on Monday when we have all the information on where we are now. However, I just wanted to respond on your formulation.

Best wishes

Belinda


**Belinda Crowe**

[148 Old Street, LONDON, EC1V 9HQ](#)

 Postline: 





On 14 Dec 2014, at 08:59, BARTY, Susan  wrote:

Thanks Belinda.

Shall we send it out tomorrow?

Best wishes

Susan

Sent from my Windows Phone

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**From:** Belinda Crowe  
**Sent:** 14/12/2014 08:36  
**To:** BARTY, Susan; Mark R Davies; Rodric Williams  
**Cc:** Patrick Bourke; Melanie Corfield; Ruth X Barker; Angela Van-Den-Bogerd;  
Helmer, Stuart; Belinda Crowe  
**Subject:** RE: BBC - One Show [CMCK-UK.FID8673510]

Many thanks Susan.  
That works.  
Best wishes  
Belinda

**Belinda Crowe**  
148 Old Street, LONDON, EC1V 9HQ

Postline:

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**From:** BARTY, Susan   
**Sent:** 12 December 2014 18:53  
**To:** Mark R Davies; Belinda Crowe; Rodric Williams  
**Cc:** Patrick Bourke; Melanie Corfield; Ruth X Barker; Angela Van-Den-Bogerd;  
Belinda Crowe; Helmer, Stuart  
**Subject:** RE: BBC - One Show [CMCK-UK.FID8673510]

I agree.

I will be out of the office on Monday, but should be on email. In any event I am copying in a colleague, Stuart Helmer.

Belinda – I sent my draft before seeing your letter – we can say “The most appropriate spokesperson is engaged in the mediation scheme work at the start of next week, so would not be able to contribute before Wednesday next week.”

Kind regards

Susan

**Susan Barty**  
**Partner**

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M  
F  
E

<image001.jpg>

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United Kingdom

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**From:** Mark R Davies [GRO]  
**Sent:** 12 December 2014 18:43  
**To:** Belinda Crowe  
**Cc:** BARTY, Susan; Rodric Williams; Patrick Bourke; Melanie Corfield; Ruth X Barker; Angela Van-Den-Bogerd; Belinda Crowe  
**Subject:** Re: BBC - One Show [CMCK-UK.FID8673510]

Can I suggest that we hold off on legal letter till we hear back to my email? Starting to build line of comms above nick wallis and it could irritate

Mark Davies  
Communications and Corporate Affairs Director  
Mobile: [GRO]

Sent from my iPhone  
On 12 Dec 2014, at 18:40, "Belinda Crowe"  
[GRO] wrote:

Thanks Susan. My only comment is that I prefer not to indicate specifically that we are actually mediating at the beginning of next week. I would not want the applicant concerned to in any way be exposed or feel exposed should anything we say become public. My concern is even if no-one else knows who she is, she might pick this up if the one show were to say that there is a case being mediated on Tuesday. It is a particularly sensitive case.

Best wishes  
Belinda

[GRO]

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**From:** BARTY, Susan [GRO]  
**Sent:** Friday, December 12, 2014 06:30 PM  
**To:** Rodric Williams; Patrick Bourke; Melanie Corfield; Ruth X Barker; Angela Van-Den-Bogerd; Belinda Crowe; Mark R Davies  
**Subject:** BBC - One Show [CMCK-UK.FID8673510]

Dear all

I attach a draft letter to the BBC and set it out below, for ease of reference.

Best wishes

Susan

**Susan Barty**  
**Partner**

T  
M  
F  
E [GRO]  
[GRO]

<image001.jpg>

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Dear Sirs

**Post Office Limited - The One Show**

As you will recall, we act for Post Office Limited.

We understand that our client has been contacted by you in relation to a further piece you are proposing to broadcast next week, again on the One Show. Our client was first informed by email shortly before midday that the story was to run "at around the same time next week". Our client was also asked for a substantive response to the extensive issues raised by noon on Monday 15 December 2014. From this our client understood the broadcast was to run not before Tuesday next week. However, our client now understands that it is likely to be broadcast on Monday.

In any event, the email raises a number of new and serious allegations, and refers to further contributors including Geoffrey Sturgess and Sandip Patel QC. We consider that you must have known that you were proposing to run a further story on these issues and, in the circumstances, should have given our client proper notice before any intended broadcast. Not only is this the busiest time of the year for our client, but our client is still in the process of conducting mediations under its Complaint Review and Mediation Scheme, one of which is being conducted at the beginning of next week. You have asked for a spokesperson to appear on the programme. The most appropriate spokesperson is engaged in the mediation process at the start of next week, so would not be able to contribute before Wednesday next week.

There is no urgency in reporting on this matter such that the broadcast needs to take place on Monday or, indeed, Tuesday next week. To go ahead with the broadcast without our client having a proper opportunity to respond, in the light of the serious allegations raised in the email sent to our client, would run a serious risk of significant inaccuracies and damaging statements, which would be likely to misrepresent the facts and cause serious harm to our client.

We would also remind you that any reference to the Horizon system needs to be seen in the context of the approximately 6 million different transactions conducted through the system every day and the tens of thousands of people in the different subpostoffices who carry on their business using the system with no difficulty. As we have made clear, a tiny percentage of Post Offices have reported problems and there is no evidence of any negative impact on consumers.



All of our client's rights remain reserved.

Yours faithfully

**CMS Cameron McKenna LLP**

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