

**From:** Matthews, Gavin[ ] **GRO**  
**Sent:** Mon 22/07/2013 3:46:31 PM (UTC)  
**To:** Hugh Flemington[ ] **GRO** Susan Crichton[ ]; Rodric Williams[ ] **GRO**  
**Cc:** Parsons, Andrew[ ] **GRO** Richardson, Simon[ ] **GRO**  
**Subject:** RE: Issues for Brian Altman QC to deal with

Dear all

Just to let you know Brian Altman QC is free this Wednesday at 1.30 for a ½ hour tele con. I will get Olivia to send an appointment for your diaries.

Kind regards.

**Gavin Matthews**  
Partner  
for and on behalf of Bond Dickinson LLP

*Bond Dickinson*

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**From:** Hugh Flemington[ ] **GRO**  
**Sent:** 22 July 2013 15:20  
**To:** Matthews, Gavin; Susan Crichton  
**Subject:** Re: Issues for Brian Altman QC to deal with [BD-4A.FID20472253]

Legally privileged and confidential

This was a list i did last friday / saturday if it's of help.

- reply to ccrc
- prep for ag query
- prep for sc query (select committee)
- prep for sra query
- civil stance with fj (including how engaged question - via ck or pol?)
- civil cases
- new cases strategy
- ongoing "in play" cases strategy
- review of past cases and strategy for those (eg qc sitting over ck before writing to people)
- updates strategy to exco, board, shex and rm
- engagement with rm strategy
- weekly meetings w/i pol (being set up)
- ss review and how that finishes to a final report (plus working party)- adjudicator scheme question
- branch users forum
- prepping for any compensation fund

- review of players and their interaction (eg ck, fj, security)

**From:** Matthews, Gavin [REDACTED] **GRO**  
**Sent:** Monday, July 22, 2013 11:59 AM  
**To:** Susan Crichton; Hugh Flemington; Jarnail A Singh; Rodric Williams; Richardson, Simon [REDACTED]  
**Cc:** Parsons, Andrew [REDACTED] **GRO**  
**Subject:** Issues for Brian Altman QC to deal with [BD-4A.FID20472253]

All

Andy Parsons and I have given thought to the general issues we need to discuss with Brian Altman QC if he receives POL's stamp of approval after our 20 minute call with him (probably on Wednesday). Let us know if you agree/want to include other issues.

1. Review and advise on CK's strategy and process for reviewing past/live criminal prosecutions - we propose that he reviews a sample of prosecutions in which (i) CK say there is an issue and (ii) CK say there is no issue
2. Review and advise on POL's response to the CCRC letter
3. Review and advise on what CK say about GJ and his past expert witness statements and advise on the root cause of the problem - how much investigation should POL carry out?
4. Advise on what POL should do re expert witness evidence in the future
5. Advise on what action the AG may take
6. Advise on POLs future prosecution strategy

Regards

Gavin

**Gavin Matthews**

Partner

for and on behalf of Bond Dickinson LLP

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