

Message

From: Mark Underwood1 [GRO]
Sent: 31/10/2014 16:50:24
To: Parsons, Andrew [GRO]
CC: Belinda Crowe [GRO]; Patrick Bourke [GRO]; Angela Van-Den-Bogerd [GRO]; Jessica Barker [GRO]; Fawcett, Daniel [GRO]; Ward, Alexandra [GRO]
Subject: RE: M032 - POL Response to CRR [BD-4A.FID25887227]
Attachments: _DOC_29579895(3)_M078 - Draft response to CRR.DOCX; M053 - Response to CRR.DOCX; image009.png; image010.png; image001.jpg; image002.jpg; image003.jpg; image004.jpg; image005.png; image006.png; image007.png; image008.png

Hi Andy,

Patrick, Belinda & I have been taking a look at the CRR responses to M053 & M078 today. Attached are the revised versions which reflect our position on the references made to 'remote access' in each.

With regards to your below note:

M078: Completely agree and I think this is reflected in the attached.

M053: I think we are ok. SS have taken the Applicants comments made in her CQR out of context. Her concerns relate to the Transaction Correction process rather than 'remote access' per se.

Let me know if you have any reservations. Otherwise I will send these back to their respective owners at BD for finalisation.

Thanks

Mark

From: Parsons, Andrew [GRO]
Sent: Friday, October 31, 2014 04:24 PM
To: Belinda Crowe; Patrick Bourke
Cc: Angela Van-Den-Bogerd; Jessica Barker; Fawcett, Daniel <[GRO]>; Ward, Alexandra [GRO]
Subject: RE: M032 - POL Response to CRR [BD-4A.FID25887227]

Belinda, Patrick

I've considered how to address the remote access issues in both the CRRs on M053 and M078, in particular whether there is a way to avoid or distance ourselves from the "remote access" question whilst we investigate this further.

M078 - the remote access issue in this case is a minor point. SS agree that there were significant errors by the branch staff which were the key cause of the losses. My suggestion therefore is to simply not comment at all on the remote access point but rather focus on the fact that SS accept that there were staff errors. This is Dan's case (not Alva's as I wrongly said below) and therefore we can get this one re-drafted if you agree with this approach.

M053 - this one is more difficult. The remote access point is a key part of the CRR and therefore there is no obvious way to avoid addressing it. To my mind, we have two options:

1. Go with the defensive language attached. This does not deny the existence of remote access but simply states that the Applicant has not put forward any evidence to support her allegation.
2. Delay responding until we have a definitive answer.

My preference is option 1 as I think delaying sends the wrong message to SS.

I'd be grateful for your thoughts.

Kind regards
Andy

Andrew Parsons
Managing Associate
for and on behalf of Bond Dickinson LLP

Bond Dickinson

Direct: **GRO**
Mobile:
Fax:

Follow Bond Dickinson:



www.bonddickinson.com

From: Parsons, Andrew
Sent: 29 October 2014 17:39
To: 'Jessica Barker'
Cc: Angela Van-Den-Bogerd; Belinda Crowe
Subject: RE: M032 - POL Response to CRR [BD-4A.FID20472253]

Jess

We're going to struggle with this because the lawyers (Lex and Alva) for these two cases are out or in meetings most of today / tomorrow so the earliest will be able to turn this around will be close Friday, may be Monday.

A

Andrew Parsons
Managing Associate
for and on behalf of Bond Dickinson LLP

Bond Dickinson

Direct: **GRO**
Mobile:
Fax:

Follow Bond Dickinson:



www.bonddickinson.com

From: Jessica Barker **GRO**
Sent: 29 October 2014 17:32
To: Parsons, Andrew
Cc: Angela Van-Den-Bogerd; Belinda Crowe

Subject: FW: M032 - POL Response to CRR
Importance: High

Hi Andy

Please see below from Chris Holyoak to Angela regarding M053 and M078. Could the re-drafts of the PO responses (as discussed this morning) be circulated around the PO panel tomorrow?

Many thanks and best wishes

Jess

From: Chris Holyoak [GRO]
Sent: 29 October 2014 17:23
To: Angela Van-Den-Bogerd; 'Ron Warmington - 2nd Sight'; 'Ian Henderson'
Cc: [mediation@GRO](#); Belinda Crowe; Jessica Barker
Subject: RE: M032 - POL Response to CRR

Angela,
Thanks for this and also for the comments from Post Office on M067 and M132.
Any news on the comments on M053 and M078, which were due on 21 and 23 October respectively?
Thanks
Chris

From: Angela Van-Den-Bogerd [GRO]
Sent: 28 October 2014 22:40
To: Ron Warmington - 2nd Sight [GRO]; Ian Henderson [GRO]
Cc: [mediation@GRO](#); Belinda Crowe; Jessica Barker
Subject: M032 - POL Response to CRR

Dear Ron,

Please find attached POL's response to the draft CRR in respect of M032.

With regards,
Angela

Angela Van Den Bogerd | Head of Partnerships



148 Old Street, LONDON, EC1V 9HQ

[GRO]

Mobex: [GRO]

[GRO]

[Post Office stories](#)

[GRO]

POST
OFFICE

Confidential Information:

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorised review, use, disclosure or distribution is prohibited. If you are not the intended recipient please contact me by reply email and destroy all copies of the original message.

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: 148 OLD STREET, LONDON EC1V 9HQ.

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: 148 OLD STREET, LONDON EC1V 9HQ.

Please consider the environment! Do you need to print this email?

The information in this e-mail and any attachments is confidential and may be legally privileged and protected by law. belinda.crowe GRO only is authorised to access this e-mail and any attachments. If you are not belinda.crowe GRO, please notify andrew.parsons GRO as soon as possible and delete any copies. Unauthorised use, dissemination, distribution, publication or copying of this communication or attachments is prohibited and may be unlawful.

Any files attached to this e-mail will have been checked by us with virus detection software before transmission. Bond Dickinson LLP accepts no liability for any loss or damage which may be caused by software viruses and you should carry out your own virus checks before opening any attachment.

Content of this email which does not relate to the official business of Bond Dickinson LLP, is neither given nor endorsed by it.

This email is sent for and on behalf of Bond Dickinson LLP which is a limited liability partnership registered in England and Wales under number OC317661. Our registered office is St Ann's Wharf, 112 Quayside, Newcastle Upon Tyne, NE1 3DX, where a list of members' names is open to inspection. We use the term partner to refer to a member of the LLP, or an employee or consultant who is of equivalent standing. Our VAT registration number is GB123393627.

Bond Dickinson LLP is authorised and regulated by the Solicitors Regulation Authority.