

Message

**From:** Rodric Williams [REDACTED] **GRO** [REDACTED]  
**Sent:** 19/11/2018 22:16:37  
**To:** Jane MacLeod [REDACTED] **GRO** [REDACTED]; Andrew Parsons [REDACTED] **GRO** [REDACTED] Mark Underwood1 [REDACTED] **GRO** [REDACTED]  
**Subject:** RE: Litigation

Thanks Jane.

Andy – let's pick this up tomorrow morning....

---

**From:** Jane MacLeod  
**Sent:** 19 November 2018 22:09  
**To:** Andrew Parsons <[REDACTED] **GRO** [REDACTED] Mark Underwood1 [REDACTED] **GRO** [REDACTED]>;  
Rodric Williams [REDACTED] **GRO** [REDACTED]  
**Subject:** Fwd: Litigation

Over to you ....

Jane MacLeod  
Group Director Legal, Risk & Governance  
Post Office

[REDACTED] **GRO** [REDACTED]

---

**From:** Jane MacLeod <[REDACTED] **GRO** [REDACTED]>  
**Sent:** Monday, November 19, 2018 10:03 pm  
**To:** Rob Houghton  
**Subject:** Re: Litigation

Thanks Rob.

FJ will be asked to review relevant sections of the report - the legal team are in the process of doing this at the moment.

FJ have filed witness statements already, but probably can't comment on the matters that we are concerned about. At this stage, I wanted to give you a heads up on the challenge. The legal team will be in touch about solutions.

Jane

Jane MacLeod  
Group Director Legal, Risk & Governance  
Post Office

[REDACTED] **GRO** [REDACTED]

---

**From:** Rob Houghton <[REDACTED] **GRO** [REDACTED]>  
**Sent:** Monday, November 19, 2018 9:15 pm  
**To:** Jane MacLeod  
**Subject:** RE: Litigation

Jane – see below...

**From:** Jane MacLeod

**Sent:** 19 November 2018 20:37

**To:** Rob Houghton < GRO>

**Subject:** Litigation

Rob,

Two things to discuss/ get your views on:

1. Our experts opinion is due to be submitted to the court on Friday week. It's 300 pages long ..... WBD received a draft today and have requested that someone from the POL IT team should review it. Presumably this will be you and Catherine?

>> Yep definitely and FJ??

2. Our witness statements for the Horizon trial were submitted on Friday. We had hoped that Catherine would be able to provide the POL commercial context, however understandably given that she is (relatively) new to POL and the witness statement would need to cover matters from before her appointment, she was reluctant to give a witness statement and be subject to potential cross-examination on matters before before her time. As a result we now have no witness statement from POL and nothing to provide any context about how commercial decisions are made in relation to IT matters - particularly relevant will be the issue as to whether/how we prioritise operational simplifications etc that affect postmasters and customers.

>> I helped her on the witness statement and I thought it did cover how commercial decisions are made. The problem is none of us can give evidence prior to 2.5 years ago other than probably FJ – have you thought about getting a witness statement from FJ Pete (?) who has been within POL account since day 1 and can give a fair assessment that POL has never acted on defects from a commercial angle due to the contractual type with FJ? It seems a much stronger line of enquiry than internally. Is there an option to get a witness statement from people prior to our time here – ie my predecessors?

The team will consider options around this, but I wanted to flag that this could become an issue and no doubt most of your team will have similar concerns to Catherine given that most of them are also 'new'.

>> Yep

Jane

Jane MacLeod

Group Director Legal, Risk & Governance

Post Office

 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](http://www.postoffice.co.uk/privacy)”