

Message

From: Rodric Williams [GRO]
Sent: 21/11/2018 23:55:41
To: Andrew Parsons [GRO]
Subject: FW: Post Office Group Litigation Update - SUBJECT TO LEGAL PRIVILEGE - DO NOT FORWARD

FYI – what I sent to Paula et al this evening....

From: Rodric Williams
Sent: 21 November 2018 23:55
To: Paula Vennells [GRO]; Jane MacLeod [GRO]; Mark R Davies [GRO]; Alisdair Cameron [GRO]
Cc: Mark Underwood1 [GRO]; Melanie Corfield [GRO]
Ben Foat [GRO]; Angela Van-Den-Bogerd [GRO]
Subject: Post Office Group Litigation Update - SUBJECT TO LEGAL PRIVILEGE - DO NOT FORWARD

Post Office Group Litigation - SUBJECT TO LEGAL PRIVILEGE - DO NOT FORWARD

All,

Angela (back on copy) concluded her evidence today, with her cross-examination covering:

- her branch support work following Second Sight's July 2013 Report (with the suggestion being that it recognised something inherently wrong with the previous position);
- Horizon issues, including remote access and communications to postmasters about bugs affecting branch accounts (specifically the 2010 "Receipts and Payments mismatch" issue); and
- whether postmasters acquire goodwill when taking over a branch (a matter which appears to relate to lost investment if their contract is terminated).

The Court also heard evidence from:

- Tim Dance, Retail Transformation Integration Manager, whose cross-examination suggested that our business plan templates are designed for a commercially naïve audience, and fail to identify for applicants the possibility of having to pay for branch losses; and
- Helen Dickinson, Security Team Leader, where it was put that corporations, as well as individuals, can engage in fraud which they systemically rationalise, e.g. as per Enron (it was not however expressly suggested that Post Office has done this), and that postmasters could be forced to falsify their accounts, either on instructions from the helpline or because there was no specific function in Horizon to dispute a Transaction Correction or Trading Period balance (there has however been substantial evidence to the effect that these can be challenged through the "settle-centrally" process).

Michael Shields, Temporary Postmaster Advisor, began giving his evidence on temporary postmasters shortly before the close of today's proceedings. He will continue with his evidence tomorrow, when the court is also scheduled to hear evidence from:

- Elaine Ridge, a former Network Contract Advisor, on the appointment interview held with the Lead Claimant Naushad Abdulla;
- David Longbottom, Training and Audit Advisor, on transfer audits when new postmasters takes on a branch generally, and the transfer audit for the Lead Claimant Elizabeth Stockdale specifically; and
- Michael Webb, Training and Audit Advisor, on a transfer audit for the Lead Claimant Mohammad Sabir.

Towards the end of Angela's evidence, the Judge indicated that he wanted to comment on the evidence generally. He did not elaborate on what aspect of the evidence he wanted to raise, and in the end did not make any comment. However, we anticipate it could be one of two things, depending on which side's approach to the evidence he may be preferring:

- the Claimants have spent a long time dealing with matters which are straightforward and/or ultimately for the judge to decide (e.g. as per the Judge's comment today to Patrick Green QC that he "seem[s] to want to get so overly complicated on what are quite simple points"); or
- our witnesses have not been helpful, in that they did not always respond to questions about certain policies and documents, or about specific aspects of the Lead Claimants' cases. We would say this is due to the extensive time period being covered and because some of those aspects are irrelevant to the issues being tried, but it could equally be characterised as our witnesses being defensive (a trait the Claimants are keen to ascribe to Post Office).

We are continuing to monitor and discuss this with the counsel team as they shape the written Closing Submissions which will be filed next week after all the evidence has been heard.

Kind regards, Rod



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