

Message

**From:** Emanuel, Catherine [REDACTED] **GRO**  
**Sent:** 09/12/2019 18:20:01  
**To:** ben.foat [REDACTED] **GRO**; Rodric Williams [REDACTED] **GRO**; Andrew Parsons [REDACTED]  
**Subject:** FW: CONFIDENTIAL SETTLEMENT DEED - Undertakings conditional on settlement  
**Attachments:** Letter to Post Office Ltd.pdf; Signed undertaking.pdf

Undertakings offered from JH and Therium, attached. Held to my order for the time being.

**From:** James Hartley [REDACTED] **GRO**  
**Sent:** 09 December 2019 17:40  
**To:** Emanuel, Catherine [REDACTED] **GRO**  
**Cc:** Watts, Alan [REDACTED] **GRO**; Henry Warwick [REDACTED] **GRO**; Imogen Randall [REDACTED]  
[REDACTED] **GRO**; Charles Flint QC [REDACTED] **GRO**  
stephen.ruttle [REDACTED] **GRO**; Ognjen Miletic [REDACTED] **GRO**; Patrick Green QC [REDACTED]  
[REDACTED] **GRO**; James Hartley [REDACTED] **GRO**  
**Subject:** RE: CONFIDENTIAL SETTLEMENT DEED - Undertakings conditional on settlement

Kate

Please find attached signed undertakings, worded as agreed in our previous email exchanges. These are sent strictly on the basis that the undertakings only become effective, and are only given, if and when a settlement agreement is executed to settle the Post Office Group Action. These undertakings are therefore to be held by you to our order and in the event that no settlement is concluded you will return the undertakings, which will have no effect and will not be binding.

Please confirm your agreement that the attached undertakings are received and held on the basis set out above. If you are not able to give that confirmation then please return the undertakings by return of email.

Regards

James

**From:** Emanuel, Catherine [REDACTED] **GRO**  
**Sent:** 09 December 2019 16:45  
**To:** Patrick Green QC [REDACTED] **GRO**; Ognjen Miletic [REDACTED] **GRO**  
**Cc:** James Hartley [REDACTED] **GRO**; Watts, Alan [REDACTED] **GRO**; Henry Warwick [REDACTED] **GRO**  
[REDACTED] **GRO**; Imogen Randall [REDACTED] **GRO**; Charles Flint QC [REDACTED]  
[REDACTED] **GRO**; stephen.ruttle [REDACTED] **GRO**  
**Subject:** RE: CONFIDENTIAL SETTLEMENT DEED - Updated Master Version

All,

When can I expect the drafting on the 2 outstanding points (related parties and press coverage) as well as the proposed undertakings?

Kate

**From:** Patrick Green QC [REDACTED] **GRO**  
**Sent:** 09 December 2019 15:43  
**To:** Ognjen Miletic [REDACTED] **GRO**  
**Cc:** Emanuel, Catherine [REDACTED] **GRO**; James Hartley [REDACTED] **GRO**; Watts, Alan [REDACTED]  
[REDACTED] **GRO**; Henry Warwick [REDACTED] **GRO**; Imogen Randall [REDACTED]  
[REDACTED] **GRO**; Charles Flint QC [REDACTED] **GRO**

stephen.ruttle **GRO**

**Subject:** Re: CONFIDENTIAL SETTLEMENT DEED - Updated Master Version

Kate

Just working on the [AAA] points on Related etc — haven't forgotten them

Best, Patrick

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**James Hartley**

Partner - Dispute Resolution

T: **GRO**  
F: \_\_\_\_\_  
M: \_\_\_\_\_



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Patrick Green QC

T: **GRO**  
M: \_\_\_\_\_

On 9 Dec 2019, at 15:25, Ognjen Miletic **GRO** > wrote:

Dear Kate,

As promised, please find attached the compare document showing changes from the version you circulated at the weekend.

Best,  
Ognjen

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**From:** Ognjen Miletic  
**Sent:** 09 December 2019 15:20:40  
**To:** Emanuel, Catherine; James Hartley  
**Cc:** Watts, Alan; Patrick Green QC; Henry Warwick; Imogen Randall; Charles Flint QC; stephen.ruttle **GRO**  
**Subject:** CONFIDENTIAL SETTLEMENT DEED - Updated Master Version

Dear Kate,

Please find attached a revised version of the Settlement Agreement. It is a clean document but a compare document will be sent shortly to show changes made from the last version which you circulated at the weekend.

Also attached is a compare document showing the minor changes in the Joint Press Statement. The new statement from Alan Bates is contained within the body of the attached Settlement Agreement.

There a couple of minor matters still to come which will follow as soon as possible.

Many thanks,  
Ognjen

<Compare Document (9 December 2019 at 3.24pm).docx>

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