

From: Amy Prime <[REDACTED]>
To: Michael Wharton <[REDACTED]>
Subject: FW: Privileged – Group Action – Documents to be disclosed [BD-4A.FID26896945]
Date: Thu, 17 May 2018 08:38:48 +0000
Importance: Normal
Attachments: 20120315 - _POL_BOARD.PDF; 2012040418 - _POL_BOARD.PDF; 20120523 - _POL_BOARD.PDF; 2013_07_16_Board_papers_single_pdf_v.2.pdf; BoardPDFpack.pdf
Inline-Images: image001.png; image002.png; image003.png; image7443a1.PNG; imagefa3252.PNG; image4c0dcf.PNG

Michael

Andy has agreed with the below – please could we get these documents into R, tagged as necessary and the redactions applied.

Thanks

A

Amy Prime
Solicitor
Womble Bond Dickinson (UK) LLP

d: [REDACTED]
m: [REDACTED]
t: [REDACTED]
e: [REDACTED]



womblebond Dickinson.com



From: Amy Prime
Sent: 14 May 2018 22:57
To: Andrew Parsons
Cc: Michael Wharton
Subject: RE: Privileged – Group Action – Documents to be disclosed [BD-4A.FID26896945]

Andy

I think both Michael and I agree that the following documents / pages fall within Stage 2 Disclosure (**Michael** - say if you disagree / think there are other pages to be disclosed).

20120315 - POL BOARD.pdf	Pages 122 to 124 and 173
2012040418 - POL BOARD.pdf	Pages 132 to 140 (however these are all privileged)

20120523 - POL BOARD.pdf	Pages 38 and 141 to 143
2013 07 16 Board papers single.pdf v.2.pdf	Pages 32 to 34 and 44 to 45 (these might be out of scope)
BoardPDFpack.pdf	Pages 81 to 89

I didn't really see anything which relate to bullet (2) below, but got the impression that between 2011 and 2013 POL had bigger issues with NT then worrying about the policy for managing shortfalls. Also, it feels that the board papers are just too high level for this sort of detail. **Michael** – did you find anything?

Michael – please can we not put all of the board papers into Relativity, once we have worked out which ones to disclose we will put them somewhere safe.

Thanks

Amy

From: Amy Prime
Sent: 14 May 2018 20:46
To: Andrew Parsons
Cc: Michael Wharton
Subject: RE: Privileged – Group Action – Documents to be disclosed [BD-4A.FID26896945]

Andy

Michael has (annoyingly) exceeded himself and located POL's board papers for Sept 11 to July 13. POL don't have access to any earlier than Sept 11 and disclosure is cut off at July 13.

We need to disclose:

*"Minutes of meetings of Post Office's Board of Directors (or historic equivalent) (a) between 1999 and 2001 at which the **roll-out of Horizon, its operation and any associated operational risks were considered or discussed**, and (b) between 2010 and 2011 **at which the same was considered or discussed with respect to Horizon Online, limited in each case to matters associated with financial reconciliations, shortfalls, discrepancies or losses.**"*

*Reports to Post Office's Board of Directors (or historic equivalent) between (i) 1 January 1999 to 31 December 2000, (ii) 1 January 2005 to 30 April 2006 and (iii) 1 January 2010 to 31 July 2013 **relating to Post Office's network-wide approach to identifying, tracking or managing discrepancies, shortfalls or losses, or to Postmasters' ability to dispute shortfalls.***

Michael has been through the board papers and located a number of papers which fall within the above categories and should be disclosed (ie. see pages 121 to 124 of the attached). The issue is that these documents are packs of papers – can we redact the non-disclosable pages – they are littered with privilege and commercially sensitive?

I am going to review these documents as well just to double check we actually have to disclose them but I also think we are going to need to brief at least Rod / Mark on the contents of these. [Do you need something for the SG tomorrow?](#)

Thanks
A

From: Michael Wharton
Sent: 14 May 2018 20:08
To: Amy Prime
Subject: RE: Privileged – Group Action – Documents to be disclosed [BD-4A.FID26896945]

Amy

I've been through the board papers uploaded to the FTP site and believe the following are relevant:

See [20120315 - POL BOARD.pdf](#) referring to major incidents on Horizon (eg p121 onwards).

See [2012040418 - POL BOARD.pdf](#) (eg p132 onwards).

See [20120523 - POL BOARD.pdf](#) (eg p141 onwards).

See [2013 07 16 Board papers single pdf v.2.pdf](#) (eg p 32 onwards).

See [BoardPDFpack.pdf](#) (eg p 81 onwards).

Most (if not all) of these documents contain some privileged material and so will need to be redacted.

Let me know what you think.

Thanks

Michael

Michael Wharton
Solicitor
Womble Bond Dickinson (UK) LLP

d:
m:
t:
e:

GRO



womblebond dickinson.com



From: Michael Wharton
Sent: 14 May 2018 15:17
To: Amy Prime
Subject: FW: Privileged – Group Action – Documents to be disclosed [BD-4A.FID26896945]

Amy

See below – Kim has uploaded the board papers they have to the FTP site.

Thanks

Michael

From: Kim Pretorius [mailto:GRO]
Sent: 14 May 2018 14:45
To: Michael Wharton
Cc: Veronica Branton
Subject: RE: Privileged – Group Action – Documents to be disclosed [BD-4A.FID26896945]

Hi Michael

I have uploaded all our board papers between September 2011 (the earliest we have access to) to July 2013. You will notice I have also added individual agendas for 2011 up to September 2012 as the pdf documents are not in order and the agenda will hopefully help you find what you need.

Kind regards

Kim

From: Michael Wharton [mailto:GRO]
Sent: 14 May 2018 09:55
To: Kim Pretorius [GRO]
Cc: Veronica Branton [GRO]
Subject: RE: Privileged – Group Action – Documents to be disclosed [BD-4A.FID26896945]

Kim

Please could you upload only the first set of papers (Post Office Limited Board) for the date range January 2011 to July 2013 (inclusive).

Thank you for your help.

Kind regards

Michael

Michael Wharton

Solicitor
Womble Bond Dickinson (UK) LLP

d:
m:
t:
e:

GRO



womblebonddickinson.com



From: Kim Pretorius [<mailto:>

GRO

]
Sent: 14 May 2018 09:26
To: Michael Wharton
Cc: Veronica Branton
Subject: RE: Privileged – Group Action – Documents to be disclosed [BD-4A.FID26896945]
Importance: High

Hi Michael

We have got papers for the following:

Post Office Limited Board – 2011 – Present

Post Office Limited Audit, Risk and Compliance Committee – 2012 – present

Post Office Limited Nominations Committee – 2011- present

Post Office Limited Remuneration Committee – 2012 – present

Post Office Management Services Board – 2014 – Present

Post Office Management Service Audit, Risk and Compliance Committee – 2015 – present

Please can you confirm which papers you need and what date range.

I will get them loaded to the portal today.

Kind regards

Kim

From: Michael Wharton [mailto:GRO]
Sent: 11 May 2018 15:28
To: Veronica Branton <GRO> Kim Pretorius
GRO
Subject: RE: Privileged – Group Action – Documents to be disclosed [BD-4A.FID26896945]

Veronica

Thank you for your quick response and apologies for the tight turnaround time.

If you could upload the documents to our secure FTP site please (details below). If you sign in using the username and password, click on the 'Board and Committee Papers (post-2011)' folder, click 'Upload Files' and then upload the relevant documents, we will be able to access them that way. If you could let me know once this is done please.

Please let me know if you have any questions and thank you for your help.

Kind regards

Michael

FTP site details:

Site address: <https://sftp.advanceddiscovery.co.uk>

Username: 917090@lss

Password: ELdc\$1010

Michael Wharton

Solicitor
Womble Bond Dickinson (UK) LLP

d: [redacted]
m: [redacted]
t: [redacted]
e: [redacted]



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From: Veronica Branton [[mailto:\[redacted\]](mailto:[redacted])] **GRO**
Sent: 11 May 2018 15:12
To: Michael Wharton; Kim Pretorius
Subject: RE: Privileged – Group Action – Documents to be disclosed [BD-4A.FID26896945]

Michael

What arrangements do we have in place for sharing documents securely? This amounts to hundreds of documents. We are extremely busy and really need proper notice of these requests.

Best wishes

Veronica

From: Michael Wharton [[mailto:\[redacted\]](mailto:[redacted])] **GRO**
Sent: 11 May 2018 15:06
To: Veronica Branton [[mailto:\[redacted\]](mailto:[redacted])] **GRO**
Subject: RE: Privileged – Group Action – Documents to be disclosed [BD-4A.FID26896945]

Veronica

We would like to get hold of copies of these Board and Committee papers if possible please. Would you be able to send these across to me? I assume they are saved in electronic form?

If it's possible to get those across to me this afternoon or as early as possible on Monday that would be ideal, but appreciate there may be a lot of documents so if you could let me know if this is achievable please.

Kind regards

Michael

Michael Wharton

Solicitor
Womble Bond Dickinson (UK) LLP

d:
m:
t:
e:

GRO



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From: Veronica Branton [<mailto:>

GRO

]
Sent: 28 March 2018 17:16
To: Michael Wharton
Subject: Re: Privileged – Group Action – Documents to be disclosed [BD-4A.FID26896945]

Michael

We have Board and Committee papers from 2011.

Best wishes

Veronica

Sent from my iPhone

On 28 Mar 2018, at 16:57, Michael Wharton <

GRO

> wrote:

Veronica

In relation to the reports to the board of directors (item 2 in my original email), we are looking to get hold of these reports from a number of date ranges, one of which is between January 2010 and July 2013 – do you have access to the reports from 2011 onwards or are these held by the Postal Museum too?

Kind regards

Michael

Michael Wharton

Solicitor

Womble Bond Dickinson (UK) LLP

d:
m:
t:
e:

GRO

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<image0956b7.PNG>

<image0a7dd6.PNG> <imageef5908.PNG>

From: Veronica Branton [<mailto:>

GRO

]
Sent: 21 March 2018 12:23
To: Michael Wharton
Cc: Mark Underwood1; Amy Prime
Subject: RE: Privileged – Group Action – Documents to be disclosed [BD-4A.FID26896945]

Michael

I spoken with my team and I understand that it is likely to be the Postal Museum that holds these records. The contact name we have at the Postal Museum is: - [Jenny Willis](#)

GRO

 though our dealings with Jenny have been to do with data retention. The CoSec files here only go back to 2011.

Best wishes

Veronica

From: Michael Wharton [<mailto:>

GRO

]
Sent: 19 March 2018 18:02
To: Veronica Branton

GRO

Cc: Mark Underwood1

GRO

; Amy Prime

GRO

Subject: Privileged – Group Action – Documents to be disclosed [BD-4A.FID26896945]

Veronica

A group of former and current postmasters, branch assistants and Crown employees have brought a legal claim against Post Office. Their claim is very broad alleging failings from inadequate training and support, to inadequate consideration of the reliability of Horizon. As part of this, Post Office has been ordered to disclose a range of documents which are relevant to the claim.

We are speaking to a number of people across a variety of teams within Post Office so as to understand where these documents are located, the overall volume of documents and any issues we might encounter in accessing them.

Specifically, we would like to speak to you regarding the following types of document. If your team does not have access to these documents then we would like to know which team it would be best for us to contact:

Minutes of meetings of Post Office's Board of Directors (or historic equivalent) (a) between 1999 and 2001 at which the roll-out of Horizon, its operation and any associated operational risks were considered or discussed, and (b) between 2010 and 2011 at which the same was considered or discussed with respect to Horizon Online, limited in each case to matters associated with financial reconciliations, shortfalls, discrepancies or losses.

Reports to Post Office's Board of Directors (or historic equivalent) between [date range to be agreed] relating to Post Office's network-wide approach to identifying, tracking or managing discrepancies, shortfalls or losses, or to Postmasters' ability to dispute shortfalls.

Please note we do not need you to send us any documents.

Please could you let me know when you would be available for a call during the course of this week.

If you have any queries about the documents or the call, please feel free to contact either Mark Underwood or me.

Kind regards

Michael

Michael Wharton
Solicitor
Womble Bond Dickinson (UK) LLP



<image001.png>

womblebond Dickinson.com

<image002.png> <image003.png>

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