

**From:** David Cavender [REDACTED] [GRO]  
**To:** 'Amy Prime' [REDACTED] [GRO]  
**Cc:** Andrew Parsons [REDACTED] [GRO], Owain Draper [REDACTED]  
[GRO], Gideon Cohen [REDACTED] [GRO]  
**Subject:** RE: Trial Bundle [WBDUK-AC.FID27103678]  
**Date:** Fri, 21 Sep 2018 16:42:46 +0000  
**Importance:** Normal  
**Inline-Images:** image001.jpg; image002.png; image003.png; image004.png

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Amy,

Many thanks for this.

Whilst I can see the logic of this – I think there are some documents which are post contractual that we might want to put to witnesses for reasons of prejudice.

By way of example: cases such as Sabir and Abdula : the documents such as audit reports revealing their deficits – how they were caused – what they said at the time etc: these will be useful in asking questions which will assist on the optics of the case and go to the credibility of the witness.

I will try and identify as I go through the cases those documents in this category that it might be useful to include to assist you in this process.

Best,

D.

**David Cavender Q.C.**

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Temple  
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**From:** Amy Prime [mailto: **[GRO]**]  
**Sent:** 21 September 2018 17:36  
**To:** David Cavender   
**Cc:** Andrew Parsons  **[GRO]**  Owain Draper  **[GRO]**  Gideon Cohen  **[GRO]**  
**Subject:** RE: Trial Bundle [WBDUK-AC.FID27103678]

David

Please find attached a first draft of the trial bundle index which we sent to Freeths on 12 September. The bundle naming does not exactly reflect the outline in Schedule 1 of 6<sup>th</sup> CMC Order as this index was produced beforehand, but Bundle E is Section D in the attached index.

Your understanding is correct. This bundle is intended to contain a chronological run of the documents which relate to the Lead Claimants (mix of exhibits and other documents in disclosure). So far we have inserted the documents which have been disclosed and are dated prior to the contract being entered / the C entering into the branch. We have asked the Cs to confirm any other documents which they wish to include in this section and to add the documents which they disclosed late after we had already produced the index.

We have chased Freeths for a response to this, but no comments have been received yet. We will chase again on Monday.

Kind regards  
Amy

**Amy Prime**  
Solicitor  
Womble Bond Dickinson (UK) LLP

d:   
m:   
t:   
e:

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**From:** David Cavender [mailto:[\[GRO\]](#)]  
**Sent:** 21 September 2018 13:32  
**To:** Amy Prime  
**Cc:** Andrew Parsons; Owain Draper; Gideon Cohen  
**Subject:** Trial Bundle

Hi Amy,

I have been thinking about Bundle E of the proposed trial bundle “Lead Claimants Documents Bundle”. I am right in thinking that this will be a mix of the documents in their exhibits and relevant (additional parts) of the disclosure in chrono order ??

When might that part of the bundle be ready ? It is obviously particularly important for my cross examination prep to get that part as soon as possible.

Best,

D.

**David Cavender Q.C.**

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**From:** Amy Prime [mailto:[\[GRO\]](#)]  
**Sent:** 17 September 2018 15:33  
**To:** David Cavender <[\[GRO\]](#)>  
**Subject:** FW: Post Office Group Litigation: Strike Out Application

David

Please find attached the strike out application as served.

Thanks

Amy

**Amy Prime**

Solicitor

Womble Bond Dickinson (UK) LLP



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