

Message

From: Henderson, Tom [REDACTED] **GRO**
Sent: 17/06/2019 10:09:26
To: Andrew Parsons [/o=Exchange-Org/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ad9ed344815e47e4aaa3c0e7e1740919-Andrew Pars]; Ben Foad [REDACTED] **GRO**; Rodric Williams [REDACTED] **GRO**; Watts, Alan [REDACTED] **GRO**; Massey, Kirsten [REDACTED] **GRO**
CC: Tom Beezer [/o=Exchange-Org/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=179d9f227294473d81b50e72aacb0623-Tom Beezer]; Sushma MacGeoch [/o=Exchange-Org/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c2c7479fef646f3b1ee3fddd17a3f25-Sushma MacG]; Amy Prime [/o=Exchange-Org/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ab7222dda3a9453eaed5751238a59562-Amy Prime]
Subject: RE: Post Office Group Litigation - Settlement - legally privileged [WBDUK-AC.FID26896945]

Andy,

Thank you for your email. Alan and I spoke about the same point on Friday and agree that we should send something to Freeths this week to get the ball rolling. I think it will be as simple as trying to fix a mediation date in light of the Judge's recent comments. We should also pick this up on the call today.

Kind regards,

Tom

Tom Henderson
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From: Andrew Parsons <**GRO**>
Sent: 17 June 2019 10:32
To: Ben Foat <**GRO**>; Rodric Williams <**GRO**>; Watts, Alan <**GRO**>; Massey, Kirsten <**GRO**>; Henderson, Tom <**GRO**>; Amy Prime <**GRO**>
Cc: Tom Beezer <**GRO**>; Sushma MacGeoch <**GRO**>
Subject: Post Office Group Litigation - Settlement - legally privileged [WBDUK-AC.FID26896945]

All

We spoke a couple of weeks ago about a plan for moving forward settlement in the Group Litigation. In simple terms, this was to ask Freeths to provide better claim valuation information either alongside or as a pre-condition to mediation. Has that plan changed following the board sub-committee last week?

Another shift in the dynamic is that the Judge has asked for a conversation about the future of the litigation after closing submissions in the Horizon trial (i.e. on 2 July). This gives rise to the question of whether the litigation should be stayed pending the CI appeal or not. A stay may be more attractive if the parties can show the Judge that the time will nevertheless be used productively to advance settlement. Or, we might have an opportunity here to seek an Order for the Cs to provide better claim information. Either way, we may wish to write to Freeths sooner rather than later about settlement.

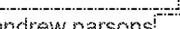
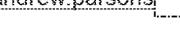
If we're still following the same path, I think that HSF were preparing a first draft of a letter to Freeths? In the meantime, we have now received advice from Brian Altman QC on settling with convicted claimants – attached. His conclusion is:

"In my opinion, there is some risk to including convicted Claimants in any settlement agreement or package. At this stage, and in the abstract, I am unable exactly to define or to quantify the risk. While it has to be a matter for others to advise and decide how far Post Office should go in progressing a differential approach among the convicted Claimants and the rest, my advice must be that reaching any settlement agreement with the convicted Claimants should be a red line for all the reasons given above."

I'd be grateful for an update just so we have clarity on who is doing what.

Kind regards
Andy

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Partner
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