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**From:** Patrick Bourke [REDACTED] **GRO**  
**Sent:** Wed 12/07/2017 7:56:11 AM (UTC)  
**To:** Mark R Davies [REDACTED] **GRO**, Andrew Parsons [REDACTED] **GRO**, Mark Underwood [REDACTED] **GRO**, Jane MacLeod [REDACTED] **GRO**, Angela Van-Den-Bogerd [REDACTED] **GRO**, Stuart Nesbit [REDACTED] **GRO**, Rob Houghton [REDACTED] **GRO**, Rodric Williams [REDACTED] **GRO**, Tom Thomas P Moran [REDACTED] **GRO**, Mark Ellis [REDACTED] **GRO**, Melanie Corfield [REDACTED] **GRO**  
**Cc:** Kevin Morgan [REDACTED] **GRO**  
**Subject:** RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

Hi Andy  
I'm happy to take on the reading as well.  
Patrick

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**From:** Mark R Davies  
**Sent:** 12 July 2017 08:55  
**To:** Andrew Parsons; Mark Underwood [REDACTED] Jane MacLeod; Angela Van-Den-Bogerd; Stuart Nesbit; Patrick Bourke; Rob Houghton; Rodric Williams; Thomas P Moran; Tom Wechsler; Mark Ellis; Melanie Corfield  
**Cc:** Kevin Morgan  
**Subject:** Re: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

Hi Andy  
I can answer that up front - I would like to read it all, and would like Mel to do so as well if she has time.  
Speak later.  
Mark

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**From:** Andrew Parsons [REDACTED] **GRO**  
**Sent:** 12 July 2017 08:47  
**To:** Mark Underwood [REDACTED] Jane MacLeod; Angela Van-Den-Bogerd; Mark R Davies; Stuart Nesbit; Patrick Bourke; Rob Houghton; Rodric Williams; Thomas P Moran; Tom Wechsler; Mark Ellis; Melanie Corfield  
**Cc:** Kevin Morgan  
**Subject:** RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

All

Please find attached an extract from the full Defence. This is the summary section – it provides a good overview of the Defence that we will be discussing later today.

One point that would also be good to discuss is whether anyone would like to review the Defence (its 80 pages) or sections of it. To help with this, I've set out below a brief index to the Defence.

Section A: This is the fact heavy section of the defence; the rest of the defence is more legal.

1. Overview of postmaster contracts
2. Branch accounting
3. Fujitsu, Horizon and remote access
4. Helplines
5. Post Office investigations

6. Termination of postmaster contracts
7. Termination of postmaster contracts
8. Suspense accounts

Section B: Contract terms and legal duties re postmasters  
Section C: Contract terms and legal duties re assistants and employees  
Section D: Duties in tort  
Section E: Agency duties  
Section F: Fiduciary duties  
Section G: Breaches by Post Office  
Section H: Claims for deceit  
Section I: Harassment claims  
Section J: Duress and unconscionable dealing  
Section K: Malicious prosecution  
Section L: Unjust enrichment  
Section M: Loss and damage  
Section N: Generic defences raised by Post Office

Post Office's counterclaim

Kind regards  
Andy

**Andrew Parsons**  
Partner

Bond Dickinson LLP

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**From:** Mark Underwood  
**Sent:** 11 July 2017 13:46

**GRO**

**To:** Jane MacLeod; Angela Van-Den-Bogerd; Mark R Davies; Stuart Nesbit; Patrick Bourke; Rob Houghton; Rodric Williams; Thomas P Moran; Tom Wechsler; Andrew Parsons; Mark Ellis; Melanie Corfield  
**Cc:** Kevin Morgan  
**Subject:** RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

Dear all, further to my note earlier today, please find attached the final Decision Paper.

Mark



**Mark Underwood**

Head of Portfolio: Legal, Risk &  
Governance

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**From:** Mark Underwood1

**Sent:** 11 July 2017 09:30

**To:** Jane MacLeod; Angela Van-Den-Bogerd; Mark R Davies; Stuart Nesbit; Patrick Bourke; Rob Houghton; Rodric Williams; Thomas P Moran; Tom Wechsler; 'Parsons, Andrew'; Mark Ellis; Melanie Corfield

**Cc:** Kevin Morgan

**Subject:** PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

Dear all,

We have a PLSG meeting on Wednesday 12 July @12 in Tonbridge (1.11). Ahead of that meeting please find attached:

1. The Agenda
2. Decision Paper: Access to Second Sight
3. Decision Paper: Standstill Agreement with Fujitsu
4. Decision Paper: Communications Strategy
5. Decision Paper: Wider Risks to POL **[To follow later today]**
6. Open actions list as at 11 July 2017

Please let me know if you are intending to dial in.

Many thanks, and apologies for the delay in circulating these papers.

Mark

**GRO**

**Dial-in numbers:**

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**GRO**

United Kingdom International direct:

**GRO**

Chairperson passcode: 85009207 then #

Participant passcode: 82368934 then #



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