
From: Cooper, Tom - UKGI[/O=HMT/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8D968D43E33749AE9E59F9C9350E69D5-COOPER, THOMAS (TCOO)

Sent: Mon 26/11/2018 10:32:39 AM (UTC)

To: Rodric Williams [REDACTED] GRO [REDACTED]

Cc: Watson, Richard - UKGI [REDACTED] GRO [REDACTED]; Fox, Joshua - UKGI [REDACTED] GRO [REDACTED]; Jane MacLeod [REDACTED] GRO [REDACTED]

Subject: Re: Post Office Group Litigation - SUBJECT TO LEGAL PRIVILEGE - DO NOT FORWARD

Rod

Has the judge made any comment about the late submission of emails? I'd be interested to understand the background

Tom

Sent from my iPhone

On 25 Nov 2018, at 21:53, Rodric Williams [REDACTED] GRO [REDACTED] wrote:

Richard,

Thank you for your email. Given the way the trial timetable has been structured, rather than send an email on Friday I intended to send you one following the conclusion of Post Office's evidence tomorrow, Monday 26 November 2018 (i.e. along the lines of the report I sent on 15 November 2018 following the conclusion of the Claimants' evidence). I trust that is ok.

I then propose to send you the parties' closing submissions, which will be filed later this week on Thursday 29 or Friday 30 November 2018, and then an update following the conclusion of each parties' oral submissions. Again, I trust that is ok.

Kind regards, Rodric

From: Watson, Richard - UKGI [REDACTED] GRO [REDACTED]

Sent: 21 November 2018 12:00

To: Rodric Williams [REDACTED] GRO [REDACTED]; Fox, Joshua - UKGI [REDACTED] GRO [REDACTED]

Cc: Jane MacLeod [REDACTED] GRO [REDACTED]; Cooper, Tom - UKGI [REDACTED] GRO [REDACTED]

Subject: RE: Post Office Group Litigation - SUBJECT TO LEGAL PRIVILEGE - DO NOT FORWARD

Rodric

We have found your updates helpful and would be grateful if we could have them on a weekly basis while this trial and future trials are ongoing.

I trust that will be OK

Kind regards

Richard

Richard Watson | General Counsel

UK Government Investments

1 Victoria Street | London | SW1H 0ET

T: [REDACTED] GRO

E: [REDACTED] GRO

W: <https://www.ukgi.org.uk/>

From: Rodric Williams [REDACTED] GRO

Sent: 15 November 2018 00:03

To: Watson, Richard - UKGI [REDACTED] GRO Fox, Joshua - UKGI

[REDACTED] GRO

Cc: Jane MacLeod [REDACTED] GRO

Cooper, Tom - UKGI [REDACTED] GRO

Subject: Post Office Group Litigation - SUBJECT TO LEGAL PRIVILEGE - DO NOT FORWARD

Post Office Group Litigation - SUBJECT TO LEGAL PRIVILEGE - DO NOT FORWARD

Richard, Josh,

In accordance with the Information Sharing Protocol agreed on 11 June 2018, I set out below a summary of the Claimants' evidence following the conclusion today of our cross-examination of the six Lead Claimants.

Overall, our cross-examination:

- was effective in establishing that the Lead Claimants:
 - o understood and accepted core agency duties to Post Office when they entered into their contracts with us, which included accounting to us for our cash and stock and branch losses;
 - o received their written contracts, and had ample opportunity to request the contract if (as some maintained) they had not;
 - o received good training when they took over their branch.
- revealed very little to support claims that Horizon may have been responsible for their branch losses, with plausible alternative operational reasons for the losses being advanced.
- demonstrated that several Lead Claimants had engaged in false accounting, corrupting those accounts.
- also demonstrated the difficulty in taking to trial very old cases which would typically be statute-barred from a Court hearing.
- less favourably, highlighted the Lead Claimants' confusion with:
 - o the "settle centrally" process for disputing Transaction Corrections and branch accounts at the end of a Trading Period (a matter we aim to address in our evidence);
 - o the suite of documents received through the appointment process on the day they take over branch operations (although this was better with the more recent Network Transformation documents and processes).
- also highlighted that Post Office's investigations into disputed branch losses were not always visible to the Lead Claimants.

Tomorrow, the first two Post Office witnesses (Nick Beal and Paul Williams) will give their evidence. This marks a turning point in the trial, as over the next six days the majority of court time will be spent with the Claimants' counsel Patrick Green QC cross-examining our witnesses, putting to them questions designed to advance the Claimants' case and harm ours. We therefore expect significant criticism to be levelled at Post Office and our practices and procedures during this period, the scope of which will become clearer tomorrow.

Kind regards, Rodric

Rodric Williams

<image003.png>

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T:

E:

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