

To: Watson, Richard - UKGI [GRO]
From: Cooper, Tom - UKGI
Sent: 2020-05-07T08:46:42Z
Importance: Normal
Subject: FW: Thursday's CCRC Board Call
Received: 2020-05-07T08:46:00Z
[2020.05.06 - Project Brisbane - Summary of Board and Subcommittee Consideration of Key Issues.pdf](#)
[2020.05.06 - Project Brisbane - Appendix 1 - Phase 1 Chronology.pdf](#)
[CCRC dashboard 2020.07.05\(5147554_1\).DOCX](#)

I'm quite concerned about the minutes. The fact that I recused myself from the recusal decision doesn't seem to be recorded.

I also remember at the end of 2018 the GLO committee made a strong request for the legal team to change approach after the judge slated the company in the hearing before the Common Issues Trial.

I also remember using the term defending the indefensible a few times with Cavender. None of the flavour that the Board was pretty concerned (or at least some of us were) comes across.

Tom

From: Thomas Cooper [GRO]
Sent: 06 May 2020 09:22
To: Cooper, Tom - UKGI [GRO]
Subject: Fwd: Thursday's CCRC Board Call

Get [Outlook for iOS](#)

From: Watts, Alan <Alan.Watts [GRO]>
Sent: Wednesday, May 6, 2020 8:20:32 AM
To: Richard.Watson@ [GRO]; Thomas Cooper <tom.cooper1@ [GRO]>; Alisdair Cameron <alisdair.cameron@ [GRO]>; Ken McCall1 <Ken.McCall1@ [GRO]>; Tim Parker <Tim.Parker@ [GRO]>; Nick Read <Nick.Read1@ [GRO]>; Lisa Harrington (1) <lisa.harrington1@ [GRO]>; Carla Stent1 <Carla.Stent1@ [GRO]>; Zarin Patel <Zarin.Patel1@ [GRO]>
Cc: Ben Foat <Ben.Foat@ [GRO]>; Rodric Williams <rodric.williams [GRO]>; Lord, William <William.Lord@ [GRO]>; Emanuel, Catherine <Catherine.Emanuel@ [GRO]>; Richard Taylor <richard.taylor@ [GRO]>; Veronica Branton <Veronica.Branton@ [GRO]>; nvamos@ [GRO]; nvamos@ [GRO]; Brian Altman <BAltman@ [GRO]>; 'Zoe.Johnson@ [GRO]'; 'Zoe.Johnson@ [GRO]'; David.Calvert-Smith@ [GRO]; David.Calvert-Smith@ [GRO]; Diane Blanchard <diane.blanchard@ [GRO]>
Subject: Thursday's CCRC Board Call

All

The purpose of this email is to provide updates in respect of the following:

1. **CCRC** – New developments and Updates
2. **Historical management of the GLO (Project Brisbane)** – Provision of our Phase 1 work and an update as to scope and indicative costings of Phase 2

CCRC Updates

1. **New developments**

REDACTION

2. **Updates**

CCRC/appeal timetable

REDACTION

PCDE

REDACTION

Historical Management of the GLO

1. **Phase 1**

I attach our phase 1 executive summary and accompanying detailed chronology which sets out our findings following a review of the minutes and papers for the following governance committees:

- Board
- The Sparrow Subcommittee (established in the context of the initial complaint and mediation scheme) (in place 2014-15)
- GLO Subcommittee (in place 2018-2019).

We are working with the Post Office Secretariat team to upload the underlying minutes and papers referred to in the chronology to a Sharepoint site. We expect that the Board will be able to access this Sharepoint within the next few days but if you would like a copy of any of the documents in the meantime please contact Hanvit Jang ([Hanvit.Jang@GRO](#)), a paralegal in our team.

2. Phase 2

Scope

As noted in my email dated 28 April 2020,

REDACTION

REDACTION

REDACTION

Please could you let me know whether this list will suffice for your purposes or whether there are any other topics we should consider.

Data Collection

REDACTION

REDACTION

Cost Estimate for Phase 2

REDACTION

REDACTION

It will not be possible to know how exactly many documents will need to be reviewed to respond to the questions raised by the Board until the documents have been collected from Post Office's systems and HSF has processed those documents onto its review platform.

Alternatively, we have prepared the following indicative costs estimates for HSF's work based upon three different assumed review volumes. If the Board would like to agree upon a particular document review volume, we can then engineer our searches to return approximately the agreed number of documents (but we note, conversely to the approach set out in the previous paragraph, the possibility that otherwise relevant documents could be excluded from the scope of the HSF Belfast team's review):

- a. On the basis of a review of 10,000 documents – approx. **£150,000**
- b. On the basis of a review of 20,000 documents – approx. **£215,000**
- c. On the basis of a review of 30,000 documents – approx. **£275,000**

We would be grateful to receive your views in this regard.

3. **CCRC Board Call on 7 May 2020**

Apart from the question of costs and scope, there are no decisions that the Board needs to make this Thursday. If you would like to use the CCRC Board call on Thursday as a forum to ask any questions or discuss the above more generally, we would be happy to assist. Conversely, if you would prefer to await the completion of Phase 2, all we need from you in the immediate term is confirmation as to whether, from a costs perspective, we adopt option (a), (b) or (c) above and the call can be taken out of the diary. Do let me know.

Regards

Alan

Your health and safety and the health and safety of our people, clients and other visitors to our offices is important to us. As part of our response to COVID-19, we ask that you please read and act on the information at this [link](#) before attending any events or meetings at our offices or that we host elsewhere.

Herbert Smith Freehills LLP and its subsidiaries and Herbert Smith Freehills, an Australian Partnership, are separate member firms of the international legal practice known as Herbert Smith Freehills.

This message is confidential and may be covered by legal professional privilege. If you are not the intended recipient you must not disclose or use the information contained in it. If you have received this email in error please notify us immediately

by return email or by calling our main switchboard on GRO and delete the email.

Further information is available from www.herbertsmithfreehills.com, including our Privacy Policy which describes how we handle personal information.

Herbert Smith Freehills LLP is a Limited Liability Partnership registered in England and Wales with registered number OC310989. It is authorised and regulated by the Solicitors Regulation Authority of England and Wales (<https://www.sra.org.uk>), authorisation number 419682. A list of the members and their professional qualifications is open to inspection at the registered office, Exchange House, Primrose Street, London EC2A 2EG. We use the word partner of Herbert Smith Freehills LLP to refer to a member of Herbert Smith Freehills LLP, or an employee or consultant with equivalent standing and qualifications. Herbert Smith Freehills LLP's registration number for Value Added Tax in the United Kingdom is GB 927 1996 83.

This email and any attachments are confidential and intended for the addressee only. If you are not the named recipient, you must not use, disclose, reproduce, copy or distribute the contents of this communication. If you have received this in error, please contact the sender by reply email and then delete this email from your system. Any views or opinions expressed within this email are solely those of the sender, unless otherwise specifically stated.

POST OFFICE LIMITED is registered in England and Wales no 2154540. Registered Office: Finsbury Dials, 20 Finsbury Street, London EC2Y 9AQ.

"Post Office Limited is committed to protecting your privacy. Information about how we do this can be found on our website at www.postoffice.co.uk/privacy"