

Claim No. HQ16XO1238

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

THE POST OFFICE GROUP LITIGATION

BEFORE SENIOR MASTER FONTAINE

BETWEEN:

ALAN BATES & OTHERS

Claimants

- and -

POST OFFICE LIMITED

Defendant

GROUP LITIGATION ORDER

UPON the Application of the Claimants dated 26 July 2016.

AND UPON HEARING Leading Counsel for the Claimants and Leading Counsel for the Defendant

AND on reading the written evidence filed by the Claimants and the Defendant

AND the PRESIDENT OF THE QUEENS BENCH DIVISION having consented to an Order being made in the following terms.

IT IS ORDERED THAT:-

Scope of the Group Litigation Order

1. This Group Litigation Order ("GLO") applies to all claims (hereinafter "*the Claims*") made against Post Office Limited by:
 - a. Claimants who claim to have suffered losses as a result of Post Office Limited having:
 - (1) Inappropriately attributed to them and/or inappropriately recovered alleged shortfalls in branch accounts from them;

- (2) suspended them, terminated or induced their resignation from their appointments or engagements, for a reason related to inappropriately alleged shortfalls in their branch accounts;
- (3) pursued civil or bankruptcy proceedings, criminal prosecutions and/or restraint applications against them for a reason related to inappropriately alleged shortfalls; and/or
- (4) sought to do any of the foregoing for a reason related to inappropriately alleged shortfalls in their branch's accounts; and

b. a Claimant whose claim gives rise to one or more of the GLO Issues in Schedule 1.

These Claims shall constitute and shall be known as "*The Post Office Group Litigation*" and are to be conducted in accordance with the terms of this GLO and any subsequent orders. The parties to these claims are bound by the orders of the court made in relation to The Post Office Group Litigation.

2. The GLO Issues for the purposes of CPR 19.11(2)(b) are set out in Schedule 1 hereto.
3. A Group Register, on which details of the claims that are subject to this and subsequent orders in The Post Office Group Litigation are to be entered, shall be set up and managed in accordance with this GLO.

Definitions

4. "The Claimants" are those individuals whose details are included on the Group Register in the manner and under the terms set out in paragraph 16 below. Pending the establishment of the Group Register, the Claimants are those listed at Schedule 2 hereto.
5. "The Lead Solicitors" are Freeths LLP, who are responsible for the management and co-ordination of the Claimants' claims and the Group Register, and shall have conduct of all investigations, applications and

proceedings in respect of the GLO issues and preparation for trial of any Lead Cases relating to any of the GLO issues subsequently ordered by the court.

6. "The Defendant" is Post Office Limited.
7. "The GLO Issues" are the common or related issues of fact or law which are identified in Schedule 1 hereto, as may be amended from time to time by order of the Court.
8. "Lead Case" means a case which, if it should be selected as a Lead Case, is fully pleaded and, whether alone or together with other such cases, is intended to dispose, so far as possible, of issues (primarily but not limited to the GLO issues) between the parties to this litigation.
9. "The Management Court" is the Queen's Bench Division of the High Court of Justice, Royal Courts of Justice, Strand, London WC2A 2LL.
10. "The Managing Judge" is the Judge nominated from time to time by the President of the Queen's Bench Division to hear, if possible, all pre-trial applications in this litigation and to conduct the trial.
11. "The Managing Master" is the Master of the Queen's Bench Division nominated from time to time by the Senior Master to hear those pre-trial applications in this litigation that are not suitable to be dealt with by the Managing Judge and are released thereto by the Managing Judge.

Future Claims

12. All future claims to which this Order applies by virtue of paragraph 1 must be issued out of the Management Court and entered on the Group Register, provided that the Standard Minimum Requirements (as set out at paragraph 25 below) are met. All such future claims should be commenced by issuing new Claim Forms (whether individual or in batches).

Documentation

13. All documents (including claim forms, case statements, applications and witness statements) filed with the Management Court in respect of a claim

which is the subject of this Order shall be marked with the short title of the claim and shall be marked in the top left hand corner “The Post Office Group Litigation”.

Transfer of Existing Proceedings

14. Any existing claim to which this Order applies by virtue of paragraph 1 above, and which is proceeding other than in the Management Court, is to be:
 - a. transferred forthwith to the Management Court. Solicitors for the parties are to co-operate in identifying such claims, including in accordance with paragraph 15 below. On identification of such claims the Lead Solicitors are to send a copy of this Order to each transferring county court. In these premises, Notices of Transfer in accordance with paragraph 4.1 of Practice Direction 30 are hereby dispensed with; and
 - b. entered forthwith on to the Group Register in accordance with the terms of this Order and CPR 19.11(3)(a)(i) and (iii), provided that each such claim or part of a claim meets the Standard Minimum Requirements as set out in paragraph 25 below.
15. If the Defendant is served with or is notified of a claim or counterclaim (whether by service of a Claim Form or a Letter of Claim) falling within paragraph 1 of this Order other than by the Lead Solicitors, then the Defendant shall ensure that the Lead Solicitors are informed of the name of the Claimant, the Claimant’s solicitors (if any) and all available contact details of the Claimant and/or the Claimant’s solicitors (if any), within 14 days of such service or notification.

The Group Register

16. A Group Register shall be established by the Lead Solicitors no later than by 4pm on 23 February 2017. It is a condition of being entered on the Group Register that each Claimant has complied with the Standard Minimum Requirements set out at paragraph 25 below. The following details shall be recorded in respect of each Claimant who is added to the Group Register:

- a. the Claimant's full name and address;
- b. the name and address of the branch(es) in which the Claimant worked and to which the Claimant's claim relates;
- c. the period during which the Claimant worked in such branch(es);
- d. the name and contact details of the Claimant's solicitor;
- e. the date of service of the Claim Form or counterclaim;
- f. the claim number; and
- g. the date of entry onto the Group Register.

17. The Lead Solicitors shall serve an electronic copy of the Group Register in Word or Excel or other agreed format on the Defendant within 7 days of its establishment in accordance with paragraph 16 above.
18. The Lead Solicitors shall review and update the Group Register every month and serve an electronic copy of the updated Group Register on the Defendant within 14 days of such update.
19. The Defendant may give written Notice of Objection to the Lead Solicitors in respect of any individual whose claim has been entered on the Group Register, or as to the accuracy of any other information entered thereon, within 28 days of the service of that individual's Schedule of Information, stating the nature of the objection and the ground(s) for it. In the absence of written confirmation within 21 days that the objection has been accepted by the Lead Solicitors, the Defendant shall apply forthwith to the Management Court for determination of the issue.
20. Such a Notice of Objection shall not affect the individual Claimant's entitlement to remain on the Group Register unless and until the Court directs otherwise.
21. The parties (including the Defendant acting on its own) shall be permitted to apply to the Management Court to remove a claim from the Group Register where there are appropriate grounds for doing so.

22. A Claimant's claim shall remain on the Group Register until such time as he or she serves notice of discontinuance or withdrawal or, if required, obtains permission to discontinue, or if the claim is otherwise disposed of prior to trial. In any such event, the Claimant's claim shall be removed from the Group Register on the expiration of the last day of the period of account during which notice of discontinuance or withdrawal or permission to discontinue is given or the effective date of disposal occurred. For these purposes, the period of account shall be each period of 2 months commencing with the date on which the Group Register is established.
23. For the purposes of CPR 38.2(2)(c), consent to discontinuance by any Claimant on behalf of the other Claimants may be given by the Lead Solicitors.
24. The Lead Solicitors shall, as part of the Group Register, maintain a list called the "Discontinued Claims Register" detailing:
 - a. the name of any party discontinuing or withdrawing; and
 - b. the date of the filing of the notice of discontinuance, withdrawal, or other form of disposal.

Standard Minimum Requirements

25. The Standard Minimum Requirements for entry of a claim onto the Group Register in accordance with paragraph 16 above are as follows:
 - a. a Claim Form (in respect of which the issue fee has been paid) has been issued, on which the individual Claimant is named;
 - b. the Claim Form must be or have already been served with (if appropriate) a Notice of Funding, Form N251. The requirement to serve Particulars of Claim in any separate document is hereby dispensed with, subject to further order; and
 - c. the Claimant's claim must fall within the scope of this GLO as set out at paragraph 1 above.

Schedules of Information

26. All of the Claimants who, as of the date of this Order, have issued proceedings to which this GLO applies by virtue of paragraph 1 above, shall serve on the Defendant as soon as reasonably possible and in any event by no later than 4pm on 20 June 2017, a completed Schedule of Information in the form set out in Schedule 3 hereto, such information to be provided to the best of each Claimant's knowledge and belief and be verified by a statement of truth signed by or on behalf of each Claimant.
27. Any Claimant who subsequently issues a claim to which this GLO applies by virtue of paragraph 1 above shall serve on the Defendant as soon as reasonably possible thereafter and in any event no later than 42 days after service of the claim form a completed Schedule of Information (as under paragraph 26), without prejudice to the Claimant seeking, and the Defendant agreeing (such consent not to be unreasonably refused) any extension of time pursuant to paragraph 38 below.
28. Upon service of the documents set out in paragraphs 26 or 27 above, each claim to which this GLO applies shall be stayed until further order.

Statements of Case

29. The Claimants shall serve a letter setting out and explaining the claims of Crown Office employees and branch Assistants/Managers by 4pm on 28 February 2017.
30. The Claimants shall file and serve Generic Particulars of Claim by 4pm on 23 March 2017.
31. The Defendant shall file and serve a Generic Defence by 4pm on 18 July 2017.
32. The Claimants shall file and serve a Reply to the Generic Defence if so advised by 4pm on 20 September 2017.

Costs Sharing

33. Save as otherwise may be ordered or agreed between the parties, the liabilities for costs in connection with any claim recorded on the Group Register shall be determined in accordance with CPR 46.6.
34. No further work in relation to the GLO Issues shall be undertaken by any legal representative other than the Lead Solicitors, their servants or agents unless authorised by the Lead Solicitors; and no liability for common costs in relation to such work, in the absence of such authorisation shall arise between the Claimants or between the parties. For the avoidance of doubt, this Order does not prejudice the Defendant's right to seek recovery from any further potential claimant who is advancing any claim or potential claim through a law firm other than the Lead Solicitors its reasonable costs of or in relation to (1) initially informing them that a GLO has been made and sending them a copy and (2) should they thereafter persist in further correspondence, responding to the same and taking any necessary steps as a result.
35. 14 days before the CMC referred to in paragraph 40 below, the parties shall:
 - a. serve and file a statement which sets out the costs incurred to date and the projected estimate of costs to the conclusion of the CMC;
 - b. inform the other parties in writing if they wish there to be further directions in relation to costs and shall have liberty to seek further directions on costs (and if necessary to amend this Order) at that CMC.

Publicity

36. The making of this GLO, and an invitation to prospective Claimants to consider joining The Post Office Group Litigation, shall be advertised by the Lead Solicitors in the form set out at Schedule 4 to this Order. The Lead Solicitors shall place appropriate notices on their own website or micro site, in the Law Society Gazette, on social media to include but not limited to Twitter, LinkedIn and Facebook, and national and regional newspapers as agreed between the parties or otherwise determined by the Court, the costs of which shall be reserved.

Cut-off Date

37. In order to be entitled to enter on to the Group Register, a Claimant whose claim falls within the scope of this GLO must have issued and served a Claim Form by 4pm on 26 July 2017. The final date on which such claims must be entered on to the Group Register will be 4pm on 6 September 2017, although the cut-off date shall be subject to review at the first Case Management Conference (see paragraph 40 below).

Extensions of Time

38. The parties may, by prior agreement in writing, extend the time for directions, in any Order relating to The Post Office Group Litigation, by up to 28 days and without the need to apply to Court. Beyond that 28 day period, any agreed extension of time must be submitted to the Court by email including a brief explanation of the reasons, confirmation that it will not prejudice any hearing date and with a draft Consent Order in word format. The Court will then consider whether a formal Application and Hearing is necessary.

Further Case Management

39. A copy of this order shall be lodged with:
 - a. the Senior Master of the Queen's Bench Division in Room E115 at the Royal Courts of Justice, Strand, London, WC2A 2LL; and
 - b. the Law Society at 113 Chancery Lane, London, WC2A 1PL.
40. There be a Case Management Conference before the Managing [Judge/Master] on the first open date after 18 October 2017, with a time estimate of 1 day, for which purpose the parties are to apply jointly to Queen's Bench Listing.

Costs of this Application

41. Costs of this application be costs in the case.

Permission to Restore

42. The parties have permission to restore.

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THE POST OFFICE GROUP LITIGATION

BEFORE SENIOR MASTER FONTAINE

BETWEEN:

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Claimants

- and -

POST OFFICE LIMITED

Defendant

SCHEDULE 1

LIST OF GLO ISSUES – CPR 19.11(2)(b)

Introduction

1. The GLO identifies claims which fall within the scope of the GLO by paragraph 1.
2. The matters set out below are intended to identify the high level GLO issues to assist in the management of the GLO, and not as a substitute for particularised pleadings.
3. These GLO issues will be likely to require revision and review as the matter progresses, including when pleadings are finalised.
4. No party makes or is deemed to make any admission by reason of the matters set out below.

GLO Issues

In this schedule:

"Horizon" means the IT system known as Horizon operated by the Defendant and made available in Post Office's branches for the purpose of conducting Post Office's business.

"Postmaster Contract" means the Subpostmasters Contract 1994 edition (as amended) between Post Office and a Subpostmaster, or other similar contract between Post Office and Subpostmaster.

- (1) On a proper construction of the Postmaster Contract (including both express and implied terms), what was the true agreement between Claimants and the Defendant in relation to:
 - (a) the provision of Horizon;
 - (b) the operation of Horizon;
 - (c) the provision of training in relation to Horizon;
 - (d) the provision of support in relation to Horizon;
 - (e) effecting, recording and accounting for transactions;
 - (f) liability for Claimants to pay alleged shortfalls of cash or stock;
 - (g) identifying and investigating alleged shortfalls of cash or stock;
 - (h) seeking recovery of alleged shortfalls of cash or stock;
 - (i) termination;
 - (j) limitation of liability for termination; and
 - (k) good faith, fair dealing, transparency, co-operation and trust and confidence.
- (2) Did the Defendant owe a fiduciary duty to Claimants in relation to the effecting of, recording and accounting for transactions, and if so what was its scope and effect?

- (3) Did the Defendant owe duties in tort to Claimants in relation to the matters set out at 1(a) – (i) above, and if so what was their scope and effect?
- (4) In relation to Claimants signing off accounts which were not correct and/or offering resignations from their positions:
 - (a) did the Claimants do so under duress and, if so, what is the effect (if any) of such duress on the legal significance of the accounts and/or resignations;
 - (b) did the Defendant deal unconscionably with the Claimants and, if so, what is the effect (if any) of such dealing in the legal significance of the accounts and/or resignations?
- (5) The effect of Horizon.
- (6) Did the Defendant conceal or misrepresent the true position in relation to the extent of any problems with Horizon?
- (7) What training did the Defendant provide or make available to postmasters from time to time in relation to Horizon?
- (8) In relation to support:
 - (a) What support did the Defendant provide or make available to postmasters from time to time in relation to Horizon?
 - (b) What instructions were given by or on behalf of the Defendant to relevant staff providing such support in relation to problems with or potential errors in, or generated by, Horizon?
- (9) In relation to the investigations:
 - (a) What investigations (if any) did the Defendant conduct when an alleged shortfall of cash or stock was shown in a branch's accounts?
 - (b) What instructions were given by or on behalf of the Defendant to investigators in relation to potential errors in or generated by Horizon?
- (10) Did the Defendant harass any of the Claimants (within the meaning of section 3 of the Protection from Harassment Act 1997).

As a matter of law, can the Defendant be liable for damages for stigma, loss of reputation and distress as a result of breaching its contractual duties identified at paragraph (1)?

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THE POST OFFICE GROUP LITIGATION

BEFORE SENIOR MASTER FONTAINE

BETWEEN:

ALAN BATES & OTHERS

Claimants

- and -

POST OFFICE LIMITED

Defendant

SCHEDULE 2

CLAIMANTS' DETAILS

No.	Title	First Name	Initial	Surname	Address
1.	Mr	Haji	H N	Abbas Choudry	
2.	Ms	Lesley	L	Abbot	
3.	Mr	Naushad	N	Abdulla	
4.	Mrs	Oyetju Omotara	O O	Adedayo	
5.	Mrs	Tabasam	T	Ahmed	
6.	Mr	Mohammed Zubair	M Z	Amir	
7.	Miss	Dionne	D	Andre	
8.	Ms	Nichola	N	Arch	

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9.	Mrs	Isabella	I	Armstrong-Wall	
10.	<u>Mr</u>	Kamran	K	<u>Ashraf</u>	
11.	Ms	Shazia	S	Azam	
12.	Mr	Lawrence	L G	Bailey	
13.	<u>Ms</u>	<u>Carol</u>	<u>C</u>	<u>Bains</u>	
14.	Mr	Virendra Kumar	V K	Bajaj	
15.	<u>Mrs</u>	<u>Cynthia</u>	<u>C</u>	<u>Balakumar</u>	
16.	Ms	Tracy	T	Banks	
17.	Mrs	Jasvinder	J	Barang	
18.	<u>Ms</u>	<u>Margaret</u>	<u>M</u>	<u>Bateman</u>	
19.	Mr	Alan	A	Bates (named on Claim Form)	
20.	Mr	Arun	A	Bhanote	
21.	Mr	Reviti Raman	R R	Bhanote	
22.	<u>Ms</u>	<u>Neha</u>	<u>N</u>	<u>Bhardwaj</u>	

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23.	<u>Ms</u>	<u>Ram Pratap</u>	<u>R P</u>	<u>Bhardwaj</u>
24.	<u>Mr</u>	<u>Harpeet Singh</u>	<u>H S</u>	<u>Bhondi</u>
25.	<u>Mr</u>	Rajinder	<u>R S</u>	Bilkhu
26.	<u>Ms</u>	<u>Amanda Julie</u>	<u>A J</u>	<u>Bissett</u>
27.	<u>Mrs</u>	Margaret	<u>M W</u>	Boston
28.	<u>Mr</u>	<u>Evon</u>	<u>E</u>	<u>Botoros</u>
29.	<u>Ms</u>	<u>Janet</u>	<u>J</u>	<u>Bradbury</u>
30.	<u>Mr</u>	Timothy	<u>T</u>	Brentnall
31.	<u>Ms</u>	Sharon	<u>S P</u>	Brown
32.	<u>Mr</u>	Thomas	<u>T G</u>	Brown
33.	<u>Mr</u>	Gary	<u>G</u>	Brown
34.	<u>Mrs</u>	Wendy	<u>W</u>	Buffrey
35.	<u>Mr</u>	<u>Nathan Vincent</u>	<u>NV</u>	<u>Bulch</u>

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36.	Mr	Timothy	T	Burgess	
37.	Ms	Sarah	S	Burgess-Boyde	
38.	Mr	Alan	A	Campbell	
39.	Mr	David	D	Carney	
40.	Ms	Julie	J L	Carter	
41.	Mr	Conrad	C	Chau	
42.	Mr	Ghazala	G	Chishty	
43.	Mr	Bashir	B	Choglay	
44.	Ms	Jillia Marian	J M	Climo	
45.	Ms	Deirdre	D	Connolly	
46.	Mr	Adrian	A	Corner	
47.	Ms	Wendy	W	Cousins	
48.	Mr	Philip	P	Cowan	
49.	Ms	Pauline	P	Coyle	

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50.	Ms	<u>Zoe</u>	Z	<u>Dan</u>	
51.	Mr	Scott	S	Darlington	
52.	Mr	<u>Phillip</u>	P	<u>Dauncey</u>	
53.	Mr	John	J	Dickson	
54.	Mr	<u>Sukhwant</u>	S	<u>Dosanjh</u>	
55.	Ms	Marion	M	Drydale	
56.	Mr	<u>Sathiaseelan</u>	S	<u>Eswarakumar</u>	
57.	Mr	Thomas	T E	English	
58.	Mrs	Nirmala	N	Fatania	
59.	Mr	Stanley	S	Fell	
60.	Ms	Joanne	J	Foulger	
61.	Mr	<u>Richard Fairfax</u>	R F	<u>Gates</u>	
62.	Mr	<u>Harkamel</u>	H S	<u>Ghag</u>	

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63.	Mr	<u>David John</u>	D J	<u>Gilbert</u>	
64.	Ms	<u>Paula</u>	P	<u>Gorman</u>	
65.	Ms	Donna Lynn	D L	Gosney	
66.	Mr	<u>Samsudin</u>	S	<u>Govani</u>	
67.	Ms	<u>Sally</u>	S	<u>Graham</u>	
68.	Ms	Alison	A	Hall	
69.	Ms	Josephine	J	Hamilton	
70.	Mr	<u>Muhammad</u>	M	<u>Haneef</u>	
71.	Mrs	Susan	S	Hazzleton	
72.	Mr	David	D T	Hedges	
73.	Ms	Allison	A	Henderson	
74.	Mr	Peter	P	Holloway	
75.	Mrs	Marion	M	Holmes (the personal representative of Peter Holmes (deceased))	

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76.	Mr	Frank	F	Holt		
77.	Mrs	Gillian	G M	Howard		
78.	Mr	Graham	G	Howard		
79.	<u>Mrs</u>	<u>Elaine</u>	<u>E</u>	<u>Hughes</u>		
80.	<u>Mrs</u>	<u>Lynette Jane</u>	<u>L J</u>	<u>Hutchings</u>		
81.	<u>Mrs</u>	<u>Elaine</u>	<u>E</u>	<u>Illidge</u>		
82.	<u>Ms</u>	<u>Colleen</u>	<u>C</u>	<u>Ingham</u>		
83.	<u>Mrs</u>	<u>Veronica Dorothy</u>	<u>V D</u>	<u>Irvine</u>		
84.	<u>Ms</u>	<u>Karen</u>	<u>K</u>	<u>James</u>		
85.	<u>Ms</u>	Anonymity Order				
86.	<u>Ms</u>	<u>Sarah</u>	<u>S</u>	<u>Javed</u>		
87.	Mr	Cledwyn Pierce	C P	Jones		

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88.	Mr	Keith	K	Jones	
89.	Mr	Michael Ernest	M E	Jones	
90.	Mr	Harish	H	Joshi	
91.	Mrs	Karen	K	Judd	
92.	Mr	Parmod Kumar	P K	Kalia	
93.	Mrs	Siema	S	Kamran	
94.	Mr	Anish	A	Kavi	
95.	Mr	Mohammed	M	Khalil	
96.	Mr	Antony Afzal	A A	Khan	
97.	Mr	Amir	A H	Khan	
98.	Mrs	Mamonah	M	Khan	
99.	Mr	Darren	D	King	
100.	Ms	Lorraine	L S	Kirkman	
101.	Mr	Usman	U D	Kiyani	

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102.	Ms	Susan	S	Knight	
103.	Mr	Kamaljit	K	Kooner	
104.	Mr	<u>Hitesh</u>	H	<u>Korat</u>	
105.	Mr	<u>Kamaleswaran</u>	K	<u>Kunabalasingam</u>	
106.	Mr	<u>Seifudin Nazarali</u>	S N	<u>Kutianawala</u>	
107.	Mr	<u>Adrees</u>	A	<u>Latif</u>	
108.	Ms	<u>Denise</u>	D	<u>Latreille</u>	
109.	Mr	<u>Mario</u>	M	<u>Lummi</u>	
110.	Mr	<u>Dermot</u>	D	<u>Lynch</u>	
111.	Ms	<u>Susan Elizabeth</u>	S E	<u>Mansfield</u>	
112.	Ms	Wendy	W	Martin	
113.	Mr	<u>Gary</u>	G	<u>Massey</u>	
114.	Mr	Francis Joseph	F J	Maye	
115.	Ms	Katherine	K	McAlerney	

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116.	Mr	<u>Donald</u>	D	<u>Mclean</u>	
117.	Ms	<u>Tracey</u>	I	<u>Merritt</u>	
118.	Mr	<u>Asif</u>	A	<u>Mirza</u>	
119.	Mrs	Seema	S	Misra	
120.	Mr	<u>John Robert</u>	JR	<u>Moir</u>	
121.	Mr	<u>Arthur</u>	A	<u>Modd</u>	
122.	Ms	<u>Enid</u>	E	<u>Mummery</u>	
123.	Mr	<u>Nahman</u>	N	<u>Nisar</u>	
124.	Mrs	Jenny	J	O'Dell	
125.	Ms	<u>Mojisola</u>	M	<u>Okuwoga</u>	
126.	Mr	Ralph	R	Oliver (a Protected Party by Terri Packwood, his Litigation Friend)	
127.	Mrs	Sarah	S	Osolinski	
128.	Mr	<u>Damian</u>	D	<u>Owen</u>	
129.	Ms	<u>Sandra</u>	S	<u>Owen</u>	

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130.	<u>Mrs</u>	<u>Wendy Ann</u>	<u>W A</u>	<u>Owen (the personal representative of Mr John Owen (deceased))</u>	
131.	<u>Mr</u>	<u>Sivanesarajah</u>	<u>S</u>	<u>Pakeerathan</u>	
132.	Mr	Vijay	V	Parekh	
133.	<u>Mrs</u>	<u>Jotika</u>	<u>J</u>	<u>Patel</u>	
134.	<u>Mr</u>	<u>Upendra Kumar</u>	<u>U K</u>	<u>Patel</u>	
135.	<u>Mr</u>	<u>Vipinchandra</u>	<u>V</u>	<u>Patel</u>	
136.	<u>Mr</u>	<u>Yogesh</u>	<u>Y</u>	<u>Patel</u>	
137.	<u>Mr</u>	<u>George</u>	<u>G</u>	<u>Patterson</u>	
138.	<u>Ms</u>	<u>Tracy Ann</u>	<u>T A</u>	<u>Paynter</u>	
139.	Ms	Anonymity Order			
140.	<u>Mr</u>	<u>Lee</u>	<u>L</u>	<u>Phelps</u>	
141.	Mr	Steve Bryan	S B	Phillips	
142.	Mr	Paul	P	Popov	
143.	Mr	Kanagasundaram	K	Prince	

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144.	Mr	<u>Aslam</u>	A	<u>Ramtoola</u>	
145.	Mrs	Shahnaz	S	Rashid	
146.	Ms	Shirley	S	Rayner	
147.	Mr	<u>Thomas</u>	T	<u>Reed Morris</u>	
148.	Mr	Mansel Kevin	M K	Rees	
149.	Mr	<u>Karl Thomas Anthony</u>	K T A	<u>Reid</u>	
150.	Mr	<u>Brian</u>	B	<u>Richardson</u>	
151.	Mr	<u>James</u>	J	<u>Richardson</u>	
152.	Mr	Alan	A	Riddell	
153.	Mrs	Carol	C	Riddell	
154.	Ms	Della	D	Robinson	
155.	Ms	Megan	M	Robinson	
156.	Mr	Michael	M	Rudkin	
157.	Mr	Mohammad	M	Sabir	

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158.	Mr	Mohammed	M A	Saleem	
159.	Mr	<u>Kamal Deep</u>	<u>K D</u>	<u>Sandhu</u>	
160.	Mr	<u>Ennosel Joseph</u> <u>Dominic</u>	<u>E J D</u>	<u>Savio</u>	
161.	Ms	Siobhan	S	Sayer	
162.	Mr	<u>Vinod Kumar</u>	<u>V K</u>	<u>Sharma</u>	
163.	Mr	<u>Christopher</u> <u>Michael</u>	<u>C M</u>	<u>Sharples</u>	
164.	Mr	<u>Jarnail</u>	J	<u>Singh</u>	
165.	Mr	<u>Kuldip</u>	K	<u>Singh</u>	
166.	Mr	<u>Setpal</u>	S	<u>Singh</u>	
167.	Mr	<u>Gurmit</u>	G	<u>Singh-Gill</u>	
168.	Mr	<u>Ravinder Pal</u>	R P	<u>Singh-Gill</u>	
169.	Miss	Janet	J	Skinner	
170.	Mr	<u>Brian</u>	B	<u>Skirrow</u>	
171.	Ms	<u>Julie</u>	J	<u>Steward</u>	

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172.	Ms	Elizabeth	E	Stockdale	
173.	Ms	<u>Sally Mary</u> <u>Kathleen</u>	<u>S M K</u>	<u>Stringer</u>	
174.	Ms	Pamela	P J	Stubbs	
175.	Mr	Greg	G	Suszczenia	
176.	Ms	Joy	J	Taylor	
177.	Mr	<u>Hughie Noel</u>	<u>H</u>	<u>Thomas</u>	
178.	Ms	<u>Pauline</u>	<u>P</u>	<u>Thomson</u>	
179.	Mr	<u>Hardia Singh</u>	<u>H S</u>	<u>Tiyur</u>	
180.	Ms	<u>Sandra</u>	<u>S</u>	<u>Tizzard</u>	
181.	Mr	Christopher	C	Trousdale	
182.	Ms	Jasvinder	J K	Uppal	
183.	Ms	<u>Lynne</u>	<u>L</u>	<u>Veen</u>	

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184.	Mr	Guy	G	Vinall	
185.	Mr	Terry	T	Walters	
186.	Mr	Graham	G	Ward	
187.	Mr	Ian	I	Warren	
188.	<u>Mrs</u>	<u>Susan</u>	<u>S</u>	<u>Watson</u>	
189.	<u>Mr</u>	<u>Paul Thomas</u> <u>James</u>	<u>P T J</u>	<u>Wavish</u>	
190.	<u>Mr</u>	<u>Alan</u>	<u>A</u>	<u>White</u>	
191.	<u>Mr</u>	<u>Leslie Stephen</u>	<u>L S</u>	<u>Whitehead</u>	
192.	<u>Ms</u>	<u>Fiona</u>	<u>F</u>	<u>Whybro</u>	
193.	Ms	Rachel Anne	R A	Williams	
194.	Ms	Margery	M L	Williams	
195.	Mr	Julian	J	Wilson	
196.	<u>Mr</u>	<u>Peter</u>	<u>P</u>	<u>Worsfold</u>	

GRO

197.	<u>Ms</u>	<u>Kym</u>	<u>K</u>	<u>Wyllie</u>	GRO
198.	Mr	David	D	Yates	

Those entries that are underlined are those included in the Schedule of Claimants as amended by Freeths LLP (Solicitors for the Claimants) on 26 July 2016 pursuant to CPR 17.1(1).

IN THE HIGH COURT OF JUSTICE

Claim No. HQ16XO1238

QUEEN'S BENCH DIVISION

THE POST OFFICE GROUP LITIGATION

BEFORE SENIOR MASTER FONTAINE

BETWEEN:

ALAN BATES & OTHERS

Claimants

- and -

POST OFFICE LIMITED

Defendant

SCHEDULE 3
SCHEDULE OF INFORMATION

1.	Claimant & Branch Details	
1.1.	Name	
1.2.	Home address	
1.3.	Branch address	
1.4.	Subpostmaster (Yes / No, if No give details, e.g. Crown Office Employee, guarantor of Franchisee)	
1.5.	Date and form of any contract entered into with Post Office	
1.6.	Start date of appointment/engagement	

1.7.	End date of appointment/engagement	
1.8.	Currently employed / engaged? (Yes/No)	
1.9.	Lived in linked residential premises? (Yes/No)	
1.10.	Employed assistants? (Yes/No, and if yes identify number as at date of termination of appointment)	
1.11.	Operated a retail business from same premises (Yes/No)	
2.	Training and Support	
2.1.	Received initial training from Defendant re: Horizon when introduced in 1999/2000 (Yes/No)	
2.2.	Received initial training from Defendant re: Horizon when took up position? (Yes/No, and if yes give date and brief details of any training said to have been inadequate or inappropriate)	
2.3.	Received any further training from Defendant re: Horizon? (Yes/No, and if yes give date and brief details of any)	

	training said to have been inadequate or inappropriate)	
2.4.	Contacted Helpline to seek advice re: Horizon and/or alleged shortfalls? (Yes/No, and if yes give approximate date and brief details of any advice and responses said to have been inadequate or inappropriate)	
3.	Apparent or Alleged Shortfalls	
3.1.	For each apparent or alleged shortfall attributed by the Defendant to the Claimant, specify: (a) Amount(s): (b) Date(s): (c) Paid by the Claimant to the Defendant? (Yes/No, and dates of payment)	
4.	Audit and Investigation	
4.1.	Did the Defendant conduct one or more audits of the branch prior to termination? (Yes/No, and if yes give date and brief details)	

4.2.	Was there an investigation carried out by the Defendant relating to alleged shortfalls? (Yes/No, and if yes give date and brief details of any investigation(s) in relation to which the Claimant raises a complaint)	
5.	Suspension and Termination	
5.1.	Was the Claimant suspended for a reason related to alleged shortfalls? (Yes/No, and if yes give date and brief details of any suspensions in relation which the Claimant raises a complaint)	
5.2.	If the Claimant was suspended: (a) Was the branch closed by the Defendant? (Yes/No, and if yes give date) (b) Was a temporary Subpostmaster appointed by the Defendant? (Yes/No, and if yes give date) (c) Was the Claimant prevented from accessing records within the branch? (Yes/No, and if yes give date and brief details)	

5.3.	How did the Claimant's appointment end? (Terminated by Defendant / Resigned)	
5.4.	If the Claimant's appointment was terminated by Defendant, was this for a reason related to alleged shortfalls? (Yes/No) Was that reason stated by Post Office? (Yes/No)	
5.5.	Did the Defendant give notice? (Yes/No, and if yes, state period of notice)	
5.6.	If the Claimant resigned, was this under pressure from Defendant for a reason related to alleged shortfalls (Yes/No, and if yes give date and brief details)?	
5.7.	Did the Defendant prevent or impede sale or transfer of the Claimant's business? (Yes/No, and if yes give date and brief details)	
6.	Civil and Criminal Proceedings	
6.1.	Did the Defendant pursue recovery of any alleged shortfalls by civil proceedings? (Yes/No,	

	and if yes give date and brief details)	
6.2.	If yes, what was outcome of proceedings? (Settled, Judgment for Claimant, Judgment for Defendant, currently stayed) Please give date and brief details.	
6.3.	Did the Defendant pursue any criminal proceedings against the Claimant? (Yes/No)	
6.4.	If yes, specify (with dates): (a) charges (Theft, False Accounting, and any other charges); (b) outcome (guilty after contested trial, acquitted after contested trial, guilty plea, not pursued).	
6.5.	Has any conviction been referred to the Criminal Case Review Commission or is the subject of any appeal? (Yes/No)	
7.	Nature of claims pursued	
<i>In this section, indicate whether the Claimant relies on generic Particulars of Claim in respect of the types of claim identified (in each case, Yes/No).</i>		

7.1.	Contract, tort & fiduciary duty	
(i)	Training	
(ii)	Support	
(iii)	Availability of transactional information	
(iv)	Execution / reconciling transactions	
(v)	Inappropriate attribution of alleged shortfalls	
(vi)	Demands for payment	
(vii)	Investigation	
(viii)	Suspension	
(ix)	Termination	
(x)	Pressure to resign	
(xi)	Impeding sale / transfer	
(xii)	Concealment	
(xiii)	Breaches of overarching duties	
7.2.	Harassment	
7.3.	Deceit	
7.4.	Malicious Prosecution	

7.5.	Unjust Enrichment	
8.	Nature of claims for loss	
8.1.	Repayment of alleged shortfalls (Yes/No and amount)	
8.2.	Loss of investment (Yes/No, and approximate value, subject to expert evidence)	
8.3.	Loss of earnings during suspension (approximate value and brief details)	
8.4.	Loss of earnings for failure to give notice (approximate value)	
8.5.	Loss of earnings post termination (period claimed and approximate value) [If not already dealt with at 8.2 above]	
8.6.	Stigma and/or reputational damage (Yes/No and brief details)	
8.7.	Personal Injury (Yes/No and brief details, subject to expert evidence)	
8.8.	Losses related to bankruptcy/other	

	insolvency procedures (Yes/No and brief details)	
8.9.	Losses related to prosecution (Yes/No and brief details)	
8.10.	Any other loss not covered above (identify category and provide, brief details and amount).	

The information provided in this Schedule is true to the best of the Claimant's knowledge and belief on the basis of the information presently available to the Claimant. However, the information is provided prior to disclosure by the Defendant, prior to any expert evidence, and figures provided in relation to loss are approximations only.

I believe that the facts stated in this Schedule are true.

Signed:

Date:

IN THE HIGH COURT OF JUSTICE

Claim No. HQ16XO1238

QUEEN'S BENCH DIVISION

THE POST OFFICE GROUP LITIGATION

BEFORE SENIOR MASTER FONTAINE

BETWEEN:

ALAN BATES & OTHERS

Claimants

- and -

POST OFFICE LIMITED

Defendant

SCHEDULE 4

PUBLICITY

Under paragraph 36 of this Order, the Lead Solicitors shall advertise the making of this GLO, and an invitation to prospective Claimants to consider joining the Post Office Group Litigation, substantially in the following form:-

INVITATION / PUBLICATION NOTICE TO JOIN GLO

The Post Office Group Action

The High Court made a Group Litigation Order on [] in relation to a Group Action against Post Office Limited, being pursued by individuals who:

- a. Work or previously worked in Post Office branches as: (i) Subpostmasters; or (ii) assistants to Subpostmasters; or (iii) Crown Office employees; and
- b. Such work took place during a time when their branch was using the 'Horizon' system (the IT system operated by Post Office); and
- c. Claim to have suffered loss (financial and non-financial) as a result of Post Office Ltd attributing alleged 'shortfalls' in branch accounts to an individual for which the individual says they were not responsible and/or where the cause of these apparent 'shortfalls' was not determined.

The Court has ordered that any individual who wishes to pursue such a claim may join the Group Action by being added to the Group Register of claims from

The Court has appointed Freeths LLP { [] GRO } as the Claimants' Lead Solicitors to the Group Action. Freeths LLP are working with Justice For Subpostmasters Alliance (JFSA) on this matter.

However, Claimants may instruct any firm of Solicitors to participate in this litigation. A list of Solicitors instructed in these claims may be obtained from the Law Society (www.lawsociety.org.uk [] GRO)

All individuals must have their claims investigated before they can be added to the Group Register so they need to come forward as soon as possible. The Court has imposed a cut-off date of 26 July 2017 for bringing a claim to join the Group Action and the Court may decide that anyone who has not joined at that date may lose their opportunity to be part of the litigation.

The making of a Group Litigation Order is a procedural matter only to enable the Court to manage litigation affecting multiple parties, and does not imply any view as to the merits of the claims put forward. This advertisement does not contain legal advice. Potential claimants may wish to seek legal advice as to the pros and cons of the different options open to them in respect of the potential legal claims they may have against the Post Office as a result of loss suffered in relation to alleged 'shortfalls' in branch accounts. If you are unsure if you can make a claim, please contact the Lead Solicitors.

This advertisement is published by the Order of the High Court of Justice.

IN THE HIGH COURT OF JUSTICE

Claim No. HQ16XO1238

QUEEN'S BENCH DIVISION

THE POST OFFICE GROUP LITIGATION

BEFORE SENIOR MASTER FONTAINE

BETWEEN:

ALAN BATES & OTHERS

Claimants

– and –

POST OFFICE LIMITED

Defendant

GROUP LITIGATION ORDER

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