

From: David Oliver [GRO]
Sent: 12 March 2014 09:26
To: Swil, Jonathan
Cc: Band, Christa; Belinda Crowe
Subject: RE: Mediation Scheme- confidential and privileged

Jonathan,

Thanks. the generic report has now slipped to 26 March so is unlikely to be ready in time for your work. If we get sight of a draft before then (unlikely) I will send through.

I will chase the advice as a priority.

David

From: Swil, Jonathan [GRO]
Sent: 11 March 2014 18:21
To: David Oliver [GRO]
Cc: Band, Christa; Belinda Crowe
Subject: RE: Mediation Scheme- confidential and privileged

David

In respect of my list below the key outstanding items we would be most interested in seeing are the Bond Dickinson and Cartwright King advice(s), although the other documents would be useful too if they can be obtained or exist. A copy of counsel's skeleton in the *Castleton* case, as Frank Tao mentioned, would also likely be very helpful to us.

There is mention in the documents of a generic report expected soon from Second Sight. Is that likely to become available in the remaining time before the report is due?

Many thanks

Jonathan

From: Swil, Jonathan
Sent: 05 March 2014 17:57
To: David Oliver [GRO]
Cc: Band, Christa; Belinda Crowe [GRO]
Subject: RE: Mediation Scheme- confidential and privileged

David

Ahead of the meeting tomorrow, I set out below a list of documents we have either seen reference to or which might be helpful and which don't appear to be in our bundle. I appreciate that, as you mentioned, some of these documents may not in fact exist:

- Any examples of the final form of the Post Office/Subpostmaster contract i.e. not the internal Post Office administrative version we have seen.
- Any other key documents which might govern the Post Office/Subpostmaster relationship (e.g. operating procedures or policies relating to Horizon).
- Any internal written policy for the recovery of losses from Subpostmasters.
- The final version of the Scheme Settlement Policy.
- Records of Bond Dickinson's advice.
- Records of Cartwright King's advice.
- Any relevant Post Office prosecution policy.

Please let Jonathan and/or me know if you think that this is a sensible way to proceed.

Best regards

Christa

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