

**From:** Chris M Day [mailto:GRO]  
**Sent:** 17 March 2014 09:00  
**To:** Chris Aujard  
**Cc:** Ruth Phillips  
**Subject:** Fw: Liknlaters scope paper

Chris,  
Let's catch up on this (and cover off insurance next steps as we briefly discussed at dinner on Thursday) later today.  
Ruth, please find us a suitable time.  
Thanks,  
Chris

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**From:** Neil McCausland [mailto:GRO]  
**Sent:** Monday, March 17, 2014 08:56 AM Coordinated Universal Time  
**To:** 'Alasdair Marnoch' [mailto:GRO]; Alwen Lyons  
**Cc:** 'Alice Perkins' [mailto:GRO]; Virginia Holmes [mailto:GRO]; 'Callard Richard (ShEx)' [mailto:GRO]; 'Susannah Hooper' [mailto:GRO]; Tim Franklin [mailto:GRO]; Paula Vennells; Chris M Day; Chris Aujard  
**Subject:** RE: Liknlaters scope paper

I tend to agree with Alasdair here.  
The review was 'fuller' than I had expected it to be.  
Coming away from the ARC, my head had the following questions;

1. From a strict legal point of view, what is our bottom line for compensation from the cases in the scheme? (i.e. - if we were to hand this over to the insurers, what would the outcome likely to be? At the ARC this seemed to be a very small figure, in that we thought there were weak legal grounds from the claimants).
2. What is our likely bill if we follow our current path? (From Belinda's paper, this felt like more than £5m internal costs, and more than £6m costs in compensation - but both these figures felt like they had ample potential to grow)
3. Depending on the first 2 answers, are we still right to pursue the current path, or is there a more pragmatic way that we can accelerate the cases? I viewed this as an internal decision, as it is loaded with politics and complications.

So, I think question 1 needs legal input, but questions 2 and 3 felt more like we should be coming up with the answers ourselves.

All the best  
Neil

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**From:** Alasdair Marnoch [mailto:GRO]  
**Sent:** 16 March 2014 18:56  
**To:** Alwen Lyons  
**Cc:** Alice Perkins; Neil McCausland [mailto:GRO]; Virginia Holmes [mailto:GRO]; Tim Franklin [mailto:GRO]; Callard Richard (ShEx); Susannah Hooper; Paula Vennells; Chris M Day; Chris Aujard  
**Subject:** Re: Liknlaters scope paper

Alwen

I agree with the legal review of our current legal position but do not believe we should be starting a review of the Scheme. In my mind this could undermine our plan and create confusion. The key question is, notwithstanding all

the other work, what is our minimum legal position of the PO in relation to the claims made. As we discussed at the ARC we may chose to take a less legalistic view (commercial, reputation, political, fairness etc) but in mind the question is strictly a legal one.

Happy to discuss with CA if that will help.

A

Sent from my iPhone

On 14 Mar 2014, at 09:59, "Alwen Lyons" <[redacted]> wrote:

Dear All

Just a gentle reminder.

On Tuesday I circulated a paper, on behalf of Chris Aujard, setting out the scope of the Sparrow work which we are asking Linklaters to undertake. (Copy attached for convenience).

We need to push ahead with this work so could I ask for any comments by no later than first thing Monday morning.

Thank you Susannah for yours.

Many thanks  
Alwen  
Alwen Lyons | Company Secretary  
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