

## Message

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**From:** Rodric Williams [GRO]  
**Sent:** 21/04/2016 12:51:29  
**To:** Mark Underwood [GRO]; Parsons, Andrew [/O=BOND PEARCE/OU=First Administrative Group/cn=Recipients/cn=ap6]  
**CC:** Matthews, Gavin [/O=BOND PEARCE/OU=First Administrative Group/cn=Recipients/cn=grm1]; Lukas, Elisa [/O=BOND PEARCE/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Elisa Lukasd54]  
**Subject:** RE: Group Action - action list

This is why we **MUST NOT** let political expediency interfere with the legal process. A point to remember when it comes to the minister meeting with anyone about this case...

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**From:** Mark Underwood [GRO]  
**Sent:** 21 April 2016 13:44  
**To:** Rodric Williams; Parsons, Andrew  
**Cc:** Matthews, Gavin; Lukas, Elisa  
**Subject:** RE: Group Action - action list

Attached. It includes the same line.

Mark

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**From:** Rodric Williams  
**Sent:** 21 April 2016 13:41  
**To:** Mark Underwood [GRO]; Parsons, Andrew  
**Cc:** Matthews, Gavin; Lukas, Elisa  
**Subject:** RE: Group Action - action list

Mark – can you pls send me the letter to BNR which formed the basis of the letter to Ian Wright?

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**From:** Mark Underwood [GRO]  
**Sent:** 20 April 2016 20:34  
**To:** Parsons, Andrew; Rodric Williams  
**Cc:** Matthews, Gavin; Lukas, Elisa  
**Subject:** RE: Group Action - action list

All,

Please find attached:

1 – email chain detailing what we had thought to be the position in respect of publically made statements about limitation periods. This includes a letter from Lord Arbuthnot to Paula, and her reply.

2- The Letter to Iain Wright MP which, in the second to last paragraph on the 2<sup>nd</sup> page, we state we will not “use as a defence in any subsequent court proceedings the fact that the 6 year time limit available in all contractual disputes has expired, where that time limit has expired while a case has been in the Scheme”

3 – the template used to send to MPs who signed the EDM in September which, in the 4<sup>th</sup> paragraph of the 2<sup>nd</sup> page, repeats the line quoted in 2 above

Mark

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**From:** Parsons, Andrew [mailto:andrew.parsons@bond-dickinson.com] **GRO**  
**Sent:** 20 April 2016 19:07  
**To:** Rodric Williams  
**Cc:** Matthews, Gavin; Mark Underwood [mailto:mark.underwood@bond-dickinson.com]; Lukas, Elisa  
**Subject:** Group Action - action list

Rodric

Action list from our meeting. I've also added in some other actions that we have discussed previously so we have everything in one place. Your actions are in yellow.

### Group Action

#### Strategy

1. Mark to send round "time bar" letter.
2. BD to draft notice for D&O insurer / broker
3. BD to prepare timeline of events / process map for litigation
4. Rod to raise with Jane the issue of a standstill agreement on claims against FJ
5. BD to advise on costs recovery (including in-house legal time) in context of group action.
6. BD to prepare short briefing note on Group Litigation procedure.
7. BD to do bullets for Rod on Chairman / Minister meeting.
8. Rod to set up meeting with Mark Davies to test the litigation strategy from a comms perspective (if Jane agrees)

#### Team

9. Rod to pitch "steering group" idea to Jane
10. BD to refine list of Counsel into a recommendation

#### Documents

11. BD to prepare letter to FJ re document preservation
12. BD to speak to Kath / Shirley re getting full story on past document gathering exercises

#### Short-term steps

13. BD to prepare protocol on "What to do on receipt of Letter of Claim"
14. BD to prepare response to Freeths last letter.

#### CCRC

15. BD to circulate updated CCRC tracker
16. BD to check whether "payments mismatch" document is in CCRC data room
17. Rod to circulate CK email re the effect of the "payments mismatch" issue on Misra / ask BAQC for advice on this

#### Chairman report

18. Rod to revert to BD on Deloitte privilege question.
19. BD to liaise with BAQC re reviewing criminal files

Kind regards  
Andy

Andrew Parsons  
Managing Associate



Direct: [GRO]  
Mobile: [GRO]

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