
IRRELEVANT

From: Andrew Parsons <[REDACTED] GRO>
Sent: 15 July 2018 22:39
To: Anthony de Garr Robinson <[REDACTED] GRO>; Simon Henderson <[REDACTED] GRO>
<[REDACTED] GRO> <[REDACTED] GRO>
Cc: Jonathan Gribben <[REDACTED] GRO> Lucy Bremner <[REDACTED] GRO> Rebecca Keating <[REDACTED] GRO>
Subject: FW: Expert Requests for Information [WBDUK-AC.FID26896945]

All

Another useful document to discuss at the con on Tuesday. This is Robert's summary conclusions on the Horizon Issues.

Kind regards

Andy

Andrew Parsons

Partner
Womble Bond Dickinson (UK) LLP


d: 
m: 
t: 
e: 

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From: robert worden [mailto:] **GRO**
Sent: 14 July 2018 16:19
To: Andrew Parsons; Jonathan Gribben
Cc: 'Chris Emery'
Subject: RE: Expert Requests for Information [WBDUK-AC.FID26896945]

Andy -


Another possible item for the Tuesday agenda, at your discretion.

We have completed a first sketch - I'll call it no more than that - of the summary of opinions for our report. It does illustrate the grouping of expert issues, and contains some very preliminary ideas of what we would hope to conclude - but obviously we can only conclude when we have done the work! Remarks to ourselves are in square brackets.

It is attached here, so if you want to forward it to other attendees and put it on the agenda, please do so. No problem if you think it best not to.

Best Regards

Robert

From: Andrew Parsons [mailto:] **GRO**
Sent: 13 July 2018 22:20
To: robert worden; Jonathan Gribben
Cc: 'Chris Emery'
Subject: RE: Expert Requests for Information [WBDUK-AC.FID26896945]

Robert – I like the thrust of your approach but I think it might be time for WBD to take over the correspondence with Coyne on information. Again to be discussed on Tuesday.

Jonny – can you start to build an agenda so that we don't lose this stuff.

A

Andrew Parsons

Partner
Womble Bond Dickinson (UK) LLP



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From: robert worden [mailto:] GRO
Sent: 12 July 2018 21:23
To: Andrew Parsons; Jonathan Gribben
Cc: 'Chris Emery'
Subject: FW: Expert Requests for Information

Andy, Jonny -

No doubt you have seen this tedious communication (lawyered?) which I need to reply to. I'd appreciate your advice on how to.

What I'd be inclined to say -

Dear Jason -

I have no reason to believe that joint requests will be addressed more quickly. As far as I know, Fujitsu and PO are trying to expedite all requests as fast as they can.

Also, your requests are your requests. You must investigate what you want to investigate, independent of my views on their relevance. I assume you do not want your requests altered in substance in an effort to make them joint requests, so I see little purpose for you in incurring the extra delay of trying to do so - as we may not succeed in any case. I do not wish to delay you.

I am quite prepared to have a WP exchange with you on our respective focus (foci?) and priorities, as I think that would help us both and therefore help the court. As your report will be served first, I suggest you lead this process - and I will attempt, as far as possible, to reply to a similar level of detail - although we must expect that your focus is at the moment better defined than mine.

Robert

(Massaging his requests to make them joint requests calls to mind the phrase 'lipstick on a pig'.)

Views?

From: Jason Coyne [mailto:] GRO
Sent: 12 July 2018 01:16

To: robert.worden; Imogen.Randall; James.Hartley; andrew.parsons@gro **GRO** jonathan.gribben@gro **GRO**
Cc: 1935 Post Office
Subject: Expert Requests for Information

Dear Robert,

I write on an open basis attaching the request for information, which we have prepared and has been further refined since our recent without prejudice correspondence.

Whilst I understand that you do not agree to a number of the requests being included, or that they should be joint requests, I would like a final opportunity to see to what extent the requests can be agreed or otherwise. I have no doubt that any agreed joint requests will be addressed more quickly.

You have expressed that your focus and priorities are not necessarily aligned with mine. I can't currently see why that would be. Could you please explain your focus and priorities? If I understand, then I might be able to assist you as we both review the considerable volume of documentation.

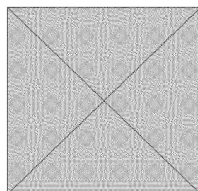
In the event that various requests are not agreed, please provide your reasons why not and then I can consider perhaps modifying the request to gain your agreement.

In the event that you do not believe any of the requests to be relevant, please say why and I can consider removing them or modify them to ensure relevance.

To retain momentum, please provide your response within 7 days so that we are in a position to seek further direction from the court to the extent necessary at the hearing at the end of July.

Kind Regards,

Jason Coyne
Partner, IT Group UK Limited



A: Unit 5 Lockside Office Park, Lockside Road, Preston, PR2 2YS

P:

M:

E:

W: www.itgroup-uk.com



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