

From: "Parsons, Andrew" <[REDACTED] GRO>
To: "Prime, Amy" <[REDACTED] GRO>, "Lukas, Elisa" <[REDACTED] GRO>
Subject: RE: Post Office Defence [BD-4A.FID26940628]
Date: Tue, 4 Jul 2017 21:31:29 +0000

Importance: Normal

Attachments: _DOC_36289589(1)_107_Bates_draft_Defence_-_AP_comments_4_July.nrl

Inline-Images: image001.jpg; image002.png; image003.png; image004.png; image005.gif;
image006.jpg; image222d8f.JPG; image360147.PNG; image1ce30b.PNG;
image256516.PNG

Thanks Amy

I've now reviewed the rest of the Defence and answered some of Tony's questions. Please can you / EL now do the whole document and use the attached version.

Also, please can we send the Defence to Kath and Shirley and ask them to review paras 11-34 and 49-57.

A

Andrew Parsons
Partner
Bond Dickinson LLP

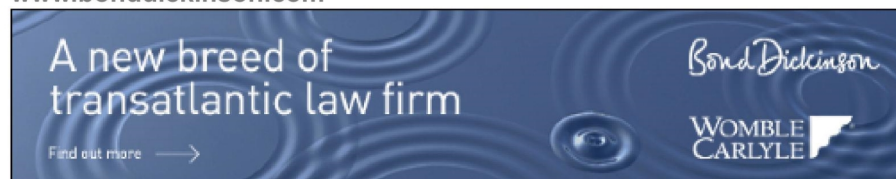
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From: Prime, Amy
Sent: 04 July 2017 22:17
To: Parsons, Andrew; Lukas, Elisa
Subject: RE: Post Office Defence [BD-4A.FID26940628]

Elisa – shall I do a first pass through this tomorrow morning and let you know which ones I can't answer – if you don't know the answer to these, we can take the outstanding ones to POL? Sound like a plan?

A

Amy Prime
Solicitor
Bond Dickinson LLP

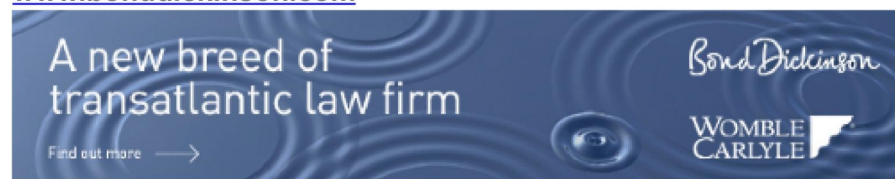
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From: Parsons, Andrew
Sent: 04 July 2017 20:18
To: Prime, Amy; Lukas, Elisa
Subject: FW: Post Office Defence [BD-4A.FID26940628]
Importance: High

Amy, Elisa

Please can you go through the attached and try to answer any questions up to para 116? Many of these are little points – like confirming the number of claimants. Other questions will need to go to POL.

Why 116? Because that's where I've already reviewed to. I'll review the rest tomorrow and then let you know what else needs to be checked.

Thanks
A

Andrew Parsons
Partner

WBD_000359.000002

Bond Dickinson LLP

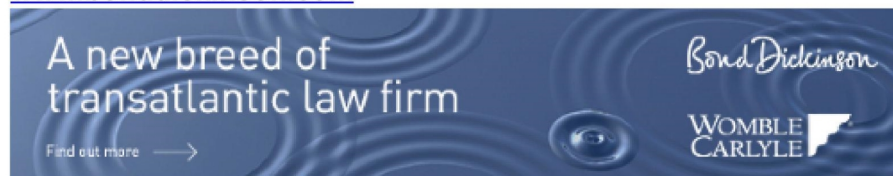
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From: Anthony de Garr Robinson [[mailto:](#) **GRO**]
Sent: 04 July 2017 19:01
To: Parsons, Andrew; Owain Draper
Cc: Prime, Amy
Subject: Post Office Defence
Importance: High

Dear Andy and Owain,

I enclose a complete first draft Defence, which pleasingly comes in at under 80 pages.

The back end of the pleading (dealing with damages and then our defences) is somewhat rudimentary. Owain, you will see that I have flagged some gaps and other points that you are the best person to address (do a search for the word "Owain").

Other things being equal, I would spend a few hours tomorrow morning considering the pleading and how it could be improved/enhanced/tightened up. But in view of the cost constraints, I will do something completely different instead.

Andy, you have control, although Owain ought to have a proper chance to review and suggest improvements (including the gaps and points I have flagged for him).

Finally, we ought to arrange dates for the circulation and review of the next draft and for its transformation into the final draft for client approval.

Best wishes,

WBD_000359.000003

Tony

Anthony de Garr Robinson QC

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