

From: Andrew Parsons <[REDACTED]>
To: Thomas P Moran <[REDACTED]>
Cc: Amy Prime <[REDACTED]>, Rodric Williams <[REDACTED]>

Subject: RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

Date: Thu, 13 Jul 2017 09:07:17 +0000

Importance: Normal

Inline-Images: image001.jpg; image002.png; image003.png; image004.png; image005.png;
image006.png; image007.png; imagef27b7b.JPG; image9245cb.PNG;
image9fb2b9.PNG; imageb8d1b3.PNG

Tom

Thanks for the comments. I've set out below a few explanations for the approach taken on some of your comments.

We've (including Rodric – cc'd) taken an intentional decision to refer to Crown branches rather than Directly Managed branches because this mirrors the wording in the GPOC. We considered trying to change terminology but decided it could become confusing if we refer to DMBs through the litigation and Freeths refer to Crowns. A judge would just get irritated by this and would likely end up using "Crown" because its shorter to say! I appreciate that this is not the currently used Post Office terminology but we believe this is the best approach. Hope that's ok?

The word "embarrassing" has a particular legal meaning in Defences. It's a signal to the Judge that a bit of the Claim has been very poorly written to cover up for the fact that the Claimants don't believe it to be true.

The word "typically" has been used to mirror the language in the GPOC. In a normal defence, you would never say "typically" something happens, but give a definitive view on the subject. Due to the generic nature of the Defence that definitive approach would create hostages to fortune so we've used "typically" to soften certain points. This is the same word used by the Claimants and so by using their language we cannot be criticised.

At a number of points you ask whether we can positively frame the case. Although I understand why you would want to do this, it would then create an evidential burden on Post Office to prove that positive case. For example., if we say that people were instructed to behave honestly, we would then need to adduce evidence of those instructions (which may mean trawling through thousands of documents and producing witness statements for dozens of people). If we say that people were not instructed to behave dishonestly, then the absence of any evidence proves our point and it is Freeths that need to find the evidence to support their allegation.

Kind regards

Andy

Andrew Parsons
Partner
Bond Dickinson LLP

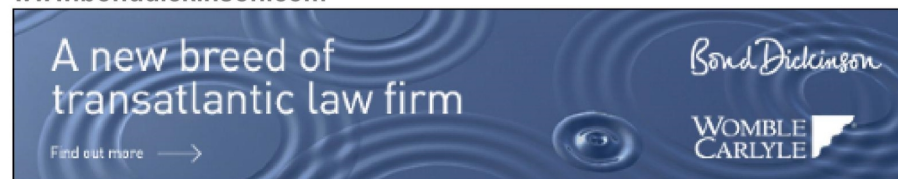
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From: Thomas P Moran [mailto:**GRO**]
Sent: 13 July 2017 00:08
To: Andrew Parsons
Cc: Amy Prime
Subject: RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

Andy and Amy

I've gone through the draft (and their doc). Here are my (very minor) comments.

Thanks

Tom

From: Andrew Parsons [mailto:**GRO**]
Sent: 12 July 2017 14:49
To: Mark Underwood1 <**GRO**>; Jane MacLeod
<**GRO**>; Angela Van-Den-Bogerd <**GRO**>;
Mark R Davies <**GRO**>; Stuart Nesbit <**GRO**>; Patrick
Bourke <**GRO**>; Rob Houghton <**GRO**>; Rodric
William <**GRO**>; Thomas P Moran <**GRO**>; Tom
Wechsler <**GRO**>; Mark Ellis <**GRO**>; Melanie Corfield
<**GRO**>
Cc: Kevin Morgan <**GRO**>; Amy Prime <**GRO**>
Subject: RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

All

Please find attached the draft Defence for your review and comment. As discussed earlier, if possible please provide comments rather than amendments to the actual text. I've also attached the Claimants' Generic Particulars of Claim for reference.

You'll see a few points where input from Deloitte and Fujitsu is needed – we expect to get this today.

Please send any comments to me and Amy Prime (copied).

Thanks
Andy

Andrew Parsons
Partner
Bond Dickinson LLP

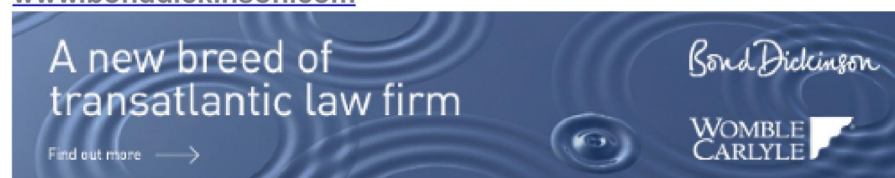
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From: Mark Underwood1 [[mailto:](#) **GRO**]
Sent: 12 July 2017 14:40
To: Jane MacLeod; Angela Van-Den-Bogerd; Mark R Davies; Stuart Nesbit; Patrick Bourke; Rob Houghton; Rodric Williams; Thomas P Moran; Tom Wechsler; Andrew Parsons; Mark Ellis; Melanie Corfield
Cc: Kevin Morgan
Subject: RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

Dear all, please find attached the open action list, which includes those taken today.

I have highlighted in yellow those that require people's imminent attention.

Many thanks

Mark



Mark Underwood
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From: Mark Underwood1
Sent: 11 July 2017 13:46
To: Jane MacLeod; Angela Van-Den-Bogerd; Mark R Davies; Stuart Nesbit; Patrick Bourke; Rob Houghton; Rodric Williams; Thomas P Moran; Tom Wechsler; 'Parsons, Andrew'; Mark Ellis; Melanie Corfield
Cc: Kevin Morgan
Subject: RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

Dear all, further to my note earlier today, please find attached the final Decision Paper.

Mark



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Cc: Kevin Morgan
Subject: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

Dear all,

We have a PLSG meeting on Wednesday 12 July @12 in Tonbridge (1.11). Ahead of that meeting please find attached:

The Agenda

Decision Paper: Access to Second Sight

Decision Paper: Standstill Agreement with Fujitsu

Decision Paper: Communications Strategy

Decision Paper: Wider Risks to POL [**To follow later today**]

Open actions list as at 11 July 2017

Please let me know if you are intending to dial in.

Many thanks, and apologies for the delay in circulating these papers.

Mark

GRO

Dial-in numbers:

United Kingdom Freefone:

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United Kingdom International direct:

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Chairperson passcode: 85009207 then #

Participant passcode: 82368934 then #



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