

Message

From: Andrew Parsons [GRO]
Sent: 17/04/2019 15:50:00
To: Jane MacLeod [GRO]
CC: Amy Prime [GRO]; Ben Foat [GRO]
Subject: RE: Catch up [WBDUK-AC.FID26896945]
Attachments: _DOC_155376407(1)_Common Issues Judgment - Appeal Scope.XLSX; _DOC_151942522(2)_Group Litigation Timetable - Updated on 17 April 2019.DOCX

Jane

A further update on the actions below:

- Please find attached an updated appeal table, now with initial input from DCQC (but not yet a full review). LGQC and LNQC are of the view that Post Office should only be making very limited concessions. This is because they fear that making concessions is a slippery slope, and even making a few concessions indicates to the Court of Appeal that the SPM contracts are incomplete and open to further implied terms. They therefore advise that the implied terms that DCQC suggested be conceded, should only be offered to the Court as incidents of the "necessary cooperation" term rather than freestanding implied terms in their own right. This is still a concession, but delivered in a way that runs less risk of undermining our wider legal arguments on when terms should and should not be implied.

I'll now give some thought as to how we can distil this into a more digestible paper for the board subcommittee.

- Please find attached an up to date litigation timetable.

The Counsel team (Grabiner, Neuberger and Cavender) and I are looking to meet / have a conference call on Tuesday to prepare for the board sub-committee meeting the following day. This is mainly to make sure that we have a unified set of messages to deliver. If I can find a convenient time for them all, I'll forward this to you and you and / or Ben are welcome to join us.

Kind regards
Andy

Andrew Parsons
Partner
Womble Bond Dickinson (UK) LLP

GRO
e: [GRO]

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From: Andrew Parsons
Sent: 17 April 2019 09:55
To: 'Jane MacLeod' [GRO]

Cc: Amy Prime [GRO] 'Ben Foat' [GRO]
Subject: RE: Catch up

Password for the case summary is [GRO]

A

From: Andrew Parsons
Sent: 17 April 2019 09:45
To: 'Jane MacLeod' [GRO]
Cc: Amy Prime [GRO] Ben Foat [GRO]
Subject: RE: Catch up [WBDUK-AC.FID26896945]

Jane

I'll give you a call in a moment to explain the attached documents (all of which are working drafts and not for circulation).

Kind regards
Andy

From: Jane MacLeod [GRO]
Sent: 17 April 2019 09:37
To: Andrew Parsons [GRO]
Cc: Amy Prime [GRO] Ben Foat [GRO]
Subject: Catch up

Hi Andy

Could we have a quick chat sometime this morning to see where we are up to? In particular:

- Where did you get to on the letter to the CofA?
- Common Issues appeal documentation – where are we up to?
- Timetable – a while ago I think you agreed to prepare an update timetable of all the various hearings/CMCs etc indicating which ones were stayed?
- Board briefing for next week – we need to coordinate work!

Many thanks,

Jane



Jane MacLeod
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