

Message

From: John Grimmer; **GRO**
Sent: 19/03/2019 14:30:09
To: Amy Prime [/o=Exchange-Org/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ab7222dda3a9453eaed5751238a59562-Amy Prime]
CC: Andrew Parsons [/o=Exchange-Org/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ad9ed344815e47e4aaa3c0e7e1740919-Andrew Pars]; Tom Beezer [/o=Exchange-Org/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=179d9f227294473d81b50e72aacb0623-Tom Beezer]; Charlie Temperley [/o=Exchange-Org/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=93d2049671dc4d7393ed4433a868da7c-Charlie Tem]
Subject: RE: Private and confidential: Instructions to Counsel - Post Office Group Litigation - Impact of Common Issues

Hi Amy

Thank you for the email and instructions which I have forwarded to counsel

As requested I have also asked him to give me an indication of the likely time frame and time to be expended on the work and will get back to you as soon as I hear from him

Kind regards

John

John Grimmer
 Senior Clerk
 The Chambers of William Clegg QC



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From: Amy Prime <[REDACTED]>
Sent: 18 March 2019 20:28
To: John Grimmer <[REDACTED]>
Cc: Andrew Parsons <[REDACTED]> Tom Beezer <[REDACTED]>; Charlie Temperley <[REDACTED]>
Subject: Private and confidential: Instructions to Counsel - Post Office Group Litigation - Impact of Common Issues

Dear John

Thank you for your time on the phone earlier.

As discussed, the first trial in the Post Office Group Litigation (the Common Issues Trial) concluded in December 2018 and the Judgment was handed down on 15 March 2019. I attach a copy of the Judgment and its appendices.

The purpose of the Common Issues Trial was to determine a series of questions regarding the nature and interpretation of the contracts between POL and the Subpostmaster Claimants. The Judgment is not at all favourable to POL and all material points have been found in favour of the Claimants.

The second trial (the Horizon Issues Trial) is currently in its second week and is due to finish on 8 May 2019. It is expected that the Judgment in the Horizon Issues Trial will not be received until a few months after its conclusion.

Post Office would like to instruct Brian Altman QC to review the Common Issues Trial Judgment and its appendices and advise on **to what extent the Judgment could undermine the basis of historic criminal convictions of Subpostmasters by POL**. As discussed, one of the particular areas of interest for Post Office is that as a result of the Judgment POL is no longer able to rely on disputed branch trading statements as a settled statement of account, but Post Office would welcome wider comments / concerns on the impact of this judgment on historic convictions.

If Mr Altman QC would like any further documents other than the judgment (ie, pleadings or witness evidence), please do not hesitate to let us know. Also, if it would be assistance for a hardcopy of the judgment to be provided, again please let us know.

Once Mr Altman QC has had an opportunity to consider the papers, please could you give an indication of fees for this advice and the likely timeframes within which it can be provided.

If there are any questions, or it would be helpful to provide any further background or clarifications on the instructions, please let me know.

Kind regards
Amy

Amy Prime
Solicitor
Womble Bond Dickinson (UK) LLP

d: [REDACTED]
m: [REDACTED]
t: [REDACTED]
e: [REDACTED]

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