

Message

From: Andrew Parsons [GRO]
Sent: 22/03/2018 09:50:41
To: Rodric Williams [GRO]
CC: Amy Prime [GRO]; Paul Stewart [GRO]; Jonathan Gribben [GRO]
Subject: FW: Litigation and Appointment - next steps [BD-4A.FID26896945]
Attachments: Draft Protocol.docx

Rodric

Do you need any input from us on the UKGI template?

My quick thoughts are that the key reporting windows should tie into our timings for Counsel's opinion, which are:

- End of April (after we have the Cs individual pleadings) – so report to UKGI in May?
- September (after all documentary and witness evidence is received) – report to UKGI in early October before trial?

We could also add a reporting date post-trial?

I know you know this.... but we need to be careful about sharing privileged information with UKGI. Are we putting in place some protocol for sharing this information with limits on what UKGI can do with it?

A

Andrew Parsons

Partner

Womble Bond Dickinson (UK) LLP

GRO



womblebond Dickinson.com



From: Jane MacLeod [GRO]
Sent: 21 March 2018 15:56
To: Rodric Williams; Andrew Parsons
Cc: Patrick Bourke; Mark Underwood1; Veronica Branton; Diane Blanchard
Subject: FW: Litigation and Appointment - next steps

(Veronica – for awareness re Monday committee meeting; Di – for awareness re setting up a possible call on Friday)

All

I am being chased by UKGI for our views on this – can I have your thoughts? We have the first Board sub-committee meeting on Monday and I would like to flag this to them?

Also, we need to work up an agenda for that sub-committee meeting. So far my suggestions would be:

- ToR
- Litigation timetable & suggested dates for future meetings
- Update on developments since January board meeting:

- Scope of disclosure
- Scope of Horizon hearing
- Appointment of IT expert
- Application for security for costs
- Engagement with UKGI
- Contingency planning
- AOB

Anything else – we only have an hour? Could we have a call on Friday to discuss?

Thanks

Jane



Jane MacLeod

Group Director of Legal, Risk & Governance
Ground Floor
20 Finsbury Street
LONDON
EC2Y 9AQ

GRO

From: O'Neill, Elizabeth - UKGI [GRO]
Sent: 01 March 2018 15:51
To: Patrick Bourke [GRO]
Cc: Jane MacLeod [GRO]; Rodric Williams [GRO]; Callard, Richard - UKGI [GRO]; Cooper, Tom - UKGI [GRO]; Lambert, Helen - UKGI [GRO]
Subject: Litigation and Appointment - next steps

Patrick, Helen,

Thank you for your time last week.

As discussed, I attach a standard form litigation protocol along the lines of what we would propose to submit to the Permanent Secretary. As you will see, this sets out various touchpoints in the litigation process, and the steps we intend to take to ensure the Permanent Secretary remains fully informed at each salient point.

If you are able to provide more detail on the litigation timetable, or indeed if you have any comments or suggestions, we would be happy to amend the protocol bespoke to the current litigation.

Separately I'd be grateful, as I indicated in my email to Helen on Monday, if in anticipation of Tom Cooper's appointment, you could let me know if you intend to agree an NDA similar to the one you have with Richard, and if so, forward me the proposed text so that Tom and I may consider.

Kind regards,

Elizabeth

From: Patrick Bourke [GRO]
Sent: 23 February 2018 15:10
To: O'Neill, Elizabeth - UKGI [GRO]

Cc: Jane MacLeod [GRO], Rodric Williams [GRO]; Callard,
Richard - UKGI [GRO]
Subject: Litigation Meeting

Dear Elizabeth

It was a pleasure to meet with you this morning.

I just wanted to confirm that we have understood the need for an appropriately structured information flow in relation to the matters we discussed earlier, and agree that some form of protocol to govern those arrangements makes very good sense.

While recognising that there is no set format in this regard, it would nonetheless be helpful for us to draw inspiration from similar arrangements you have put in place with other ALBs. You kindly offered to share something with us for that purpose.

We will come back to you with our take on how this might work best in our case, having regard to the particularities of our governance arrangements and the litigation itself.

In the meantime, do please feel free to get in touch if there is anything you'd like to discuss.

Kind regards

Patrick



**2017 Winner of the
Global Postal Award for
Customer Experience**

Patrick Bourke
Corporate Affairs Director
1st Floor

20 Finsbury Street

London EC2Y 9AQ

[GRO]

This email and any attachments are confidential and intended for the addressee only. If you are not the named recipient, you must not use, disclose, reproduce, copy or distribute the contents of this communication. If you have received this in error, please contact the sender by reply email and then delete this email from your system. Any views or opinions expressed within this email are solely those of the sender, unless otherwise specifically stated.

POST OFFICE LIMITED is registered in England and Wales no 2154540. Registered Office: Finsbury Dials, 20 Finsbury Street, London EC2Y 9AQ.

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

This email and any files transmitted with it are intended solely for the use of the individual(s) to whom they are addressed. If you are not the intended recipient and have received this email in error, please notify the sender and delete the email. This footnote also confirms that our email communications may be monitored to ensure the secure and effective operation of our systems and for other lawful purposes, and that this email has been swept for malware and viruses.