

From: Victoria Brooks <GRO>
To: Ed Duffield <GRO>, Helen Creech <GRO>, Ivan Roots <GRO>, Dave Panaech <GRO>, Mandy Robertson <GRO>
Cc: Andrew Parsons <GRO>

Subject: Group action - witness evidence - generic evidence [WBDUK-AC.FID26896945]

Date: Tue, 3 Jul 2018 14:02:46 +0000

Importance: Normal

Attachments: _DOC_150432261(5)_List_of_witnesses_and_issues_to_be_covered_-_following....nrl;
_DOC_150578291(1)_Horizon_Group_Action_-_Witness_Contact_Sheet_3_Jul_18.nrl;
POST_OFFICE_EVIDENCE_-_list_of_subjects.docx;
Helen_Dickinson_Signed_Statement.pdf;
_DISPUTERESOLUTION_38847158(1)_Angela_Van_Den_Bogerd_Proof_of_Evidence_(....docx;
_DOC_150130033(1)_Proof_of_Evidence_Sarah_Rimmer_(amended_by_SR_22_May_1....docx;
_DOC_150194633(4)_Proof_of_Evidence_John_Breeden_final_version_16.05.18....docx;
_DISPUTERESOLUTION_38104083(3)_Proof_of_Evidence_-_Kendra_Dickinson.docx; _DOC_38565379(3)_Proof_of_Evidence_-_Kim_Abbotts.docx; _E-MAIL_38235208(2)_Proof_of_Evidence_-_Michael_Z_Shields.DOCX; _DOC_38270676(1)_Proof_of_Evidence_-_Kjetil_Fuglestad.docx; _DISPUTERESOLUTION_38029946(2)_Proof_of_evidence-Alison_Bolsover.docx;
_DISPUTERESOLUTION_38103726(2)_Proof_of_Evidence_Dawn_Phillips.DOCX;
_DOC_38087595(2)_Proof_of_Evidence_-_Michelle_Stevens.docx;
_DOC_150432261(5)_List_of_witnesses_and_issues_to_be_covered_-_following....docx

Inline-Images: image10193c.PNG; image6c203c.PNG; image99f475.PNG

All

I attach:

Draft list of issues to be covered in witness evidence organised by name of witness (there will be some more issues added/ fleshed out and some issues may be moved around a little which we are working on, but this will give you the general theme of each witness's evidence. It is likely many of the unallocated issues will be added to Angela's statement). Copy as is and link attached. I will circulate a new version when this is updated;

For context, counsel's original list from which the list of issues came;

Contact details list;

The plan for the generic evidence is for Angela Van-Den-Bogerd to give the main evidence, and this to be surrounded by statements covering other areas. We will also need to do witness statements for some other witnesses to cover off specific points in the individual defences – we will progress these once the statements below are in hand.

Back in January / February there was a project where we went out to see most of the witnesses below to proof them. These were more general chats so the proofs we have done are often very informal and written as they spoke. However, for those witnesses where we have done a proof, this is attached and I suggest this would be a good starting

point for their evidence. Some of these have not been signed off, but we do not actually need those proofs signed off since we are now moving to formal statements, and can just use the proofs as raw materials.

Please can you start calling your witnesses to introduce yourself and start doing the pre-work needed before seeing them, and arrange calls or meetings with them as appropriate?

Dave is working on an email relating to policy documents which may need to be picked up with the witnesses, and this will follow asap.

The deadline for statements is 10 August. This includes both generic and specific (which are not covered in this email) so this will be a busy period.

Please do ask me any queries.

Thank you for your assistance with this.

Kind regards

Victoria

Name of WBD lawyer	Name of witness	Status of any proof done previously
Ivan	Angela Van-Den-Bogerd	Signed - attached
Dave	Nick Beal	None – Paul Inwood proof may be useful – Nick is doing a mark up of it so this is to follow
Dave	Stewart Barclay	None – Paul Inwood proof may be useful – Nick is doing a mark up of it so this is to follow
Dave	John Breeden	Attached – in the process of being finally approved by John
Ed	Sarah Rimmer	Signed – attached Ed, Mandy did the proof on this one so if you can't manage all 3, this is probably the one to leave for Mandy/me.
Ed	Rachel Chari	None
Ed	Kendra Dickinson	Attached – to be approved
Helen	Kim Abbotts	Attached – to be approved
Helen	Helen Dickinson	Signed - attached
Mandy	Michael Shields	Attached – to be approved
Mandy	Kjetil Fuglestad	Attached – to be approved
Helen	Michelle Stevens (Alison Bolsover) – please hold off contacting for now as we are still deciding about this witness	Michelle's and Alison's are attached – to be approved

	Dawn Philips may also be relevant - attached
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Victoria Brooks
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d:
t:
e:

GRO

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