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**To:** Victoria Brooks <[REDACTED]@GRO>  
**Subject:** Post Office litigation - Statement of Angela Van Den Bogerd [WBDUK-AC.FID26896945]  
**Date:** Thu, 12 Jul 2018 13:46:41 +0000  
**Importance:** Normal  
**Attachments:** \_DISPUTERESOLUTION\_150646026(1)\_Witness\_Statement\_of\_Angela\_Van\_Den\_Bo  
gerd.nrl  
**Inline-Images:** imaged00ecc.PNG; image143718.PNG; imagec09f57.PNG; image19451d.PNG

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Hello Victoria

I hope that you are having a good break from work.

I attach what is the first – and very rough – draft of Angela's witness statement. I have not found preparing this witness statement a straightforward task. To be honest, when we were initially approached to assist with the witness statements, I envisaged that we would be given a checklist of questions to ask witnesses and would then feed that information back to the fee earners who were dealing with the litigation on a day to day basis to complete the witness statements.

However I have transposed Angela's proof of evidence into a witness statement and then sought to blend in the list of issues which you circulated into the structure of the statement. I found it difficult to correlate the list of issues with Angela's proof and so I spoke with Andy Parsons to give me a structure to work to in terms of preparing the witness statement.

The attached witness statement is therefore based on his suggestions as to how the statement should be structured. He did say that the part of the witness statement that follows the heading "Contractual liabilities of postmasters" at para 195 is something that needs to be dealt with by you, given your much greater experience of this case and more detailed knowledge of the pleadings. Therefore, the preparation of Angela's witness statement is going to be a joint enterprise, I think.

I have highlighted in yellow the issues which were earmarked by Counsel for Angela to deal with. I am afraid I wasn't really able to think of how Angela would respond to those questions simply because I don't know enough about the case to be able to speculate on what she might say. I am also conscious of the fact that I don't want to let my lack of knowledge of the case be too obvious to her by saying things in the statement that are clearly incorrect.

One specific query I have is that in the proof of evidence Angela refers to Postmasters whereas in the defined terms for the statements which Dave sent round we are referring to them as Subpostmasters. I did not want to change all of Angela's references in the proof from Postmasters to Subpostmasters because I understand that there is an important contractual distinction between Postmasters and Subpostmasters as far as this litigation is concerned.

I am sorry if I haven't made as much progress as you might have anticipated but I hope it is understandable why I haven't.

I know you are back on Monday and I am in the office all of next week so we have the working week to get something suitable to send to Angela as she wants to have the statement in her inbox by the time she returns from holiday on 23

July.

I look forward to speaking to you on Monday and to discussing how we will take this statement forward.

Kind regards.

Ivan

**Ivan Roots**

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