

From: Andrew Parsons [GRO]
To: Mandy Robertson [GRO]
Cc: Victoria Brooks [GRO]
Subject: RE: Paul Williams statement [WBDUK-AC.FID26896945]
Date: Mon, 13 Aug 2018 18:10:12 +0100
Importance: Normal
Attachments: _DISPUTERESOLUTION_150999423(9)_Witness_statement_of_Paul_Williams.nrl
Inline-Images: imagec0edcc.PNG; imaged217b7.PNG; imagedb2da0.PNG

Mandy

Thanks for this. A few small comments and changes attached. However, I don't think this addresses the big questions on Bates' case.

The key question for me though is whether POL sent out the full contract terms with the Transfer Pack or not. If not, how did Bates get a copy of the full contract?

I think (and this might be a guess) that the process might have been as follows:

- A conditions of appointment document was sent out before the branch transferred.
- The branch transferred and on the same day the SPMR signs his acknowledge of appointment (in the Transfer Pack).
- The full contract was left in the branch by the old SPMR. This was ok though because it was in the branch when they signed the contract.
- However, what happened for new branches where there was no existing branch?

Also can you look at para 18 again and also re-read the first 36 paras of the Bates Defence. Can Paul say that the Two Page Document was a mistake.

Lets discuss.

A

Andrew Parsons
Partner
Womble Bond Dickinson (UK) LLP

d: [GRO]

m:
t:
e:

GRO

[Stay informed: sign up to our e-alerts](#)



womblebond dickinson.com



-----Original Message-----

From: Mandy Robertson

Sent: 09 August 2018 10:05

To: Andrew Parsons

Cc: Victoria Brooks

Subject: RE: Paul Williams statement [WBDUK-AC.FID26896945]

Hi Andy

Hope all is well.

Please find attached the latest version of Paul's witness statement.

Many thanks

Mandy

Mandy Robertson

Solicitor

Womble Bond Dickinson (UK) LLP

d:
m:
t: +

GRO

www.womblebond dickinson.com

-----Original Message-----

From: Victoria Brooks

Sent: 09 August 2018 09:39

To: Mandy Robertson

Cc: Andrew Parsons

Subject: Paul Williams statement

Mandy

Could you send the latest word version of this to Andy please? Andy, Paul actually signed it as he was going to be away and we hadn't yet applied for an extension, but he is back before the 24th so we intend to change as needed.

Thanks

Victoria

Victoria Brooks

Managing Associate

Womble Bond Dickinson (UK) LLP

d: GRO

m:

t: GRO

www.womblebond dickinson.com

Sent from my iPhone

