

**From:** Victoria Brooks <[REDACTED]>  
**To:** Helen Creech <[REDACTED]>, Ed Duffield <[REDACTED]>  
Andrew Parsons <[REDACTED]>  
**Subject:** Fwd: Statements of Kendra Dickinson and Alison Bolsover [WBDUK-AC.FID27103678]  
**Date:** Tue, 14 Aug 2018 16:49:44 +0100  
**Importance:** Normal  
**Inline-Images:** image001.png; image002.png; image003.png; imageda7fa2.PNG; imagea3218e.PNG; imagecc7484.PNG

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Please see final confirmation from Counsel that these statements will not be served.

Andy are you happy for Ed/ Helen To let Alison and Kendra know this, and saying we will need to finalise the statements in a couple of weeks for potential use for the Horizon issues trial? Please thank them for their efforts.

Also Mark U is coordinating availability / cover and Angela is creating a team approach so is it ok for me to let them know too? I'll explain we will need time from them but not availability throughout November.

Thanks

Victoria

**Victoria Brooks**  
Managing Associate  
Womble Bond Dickinson (UK) LLP



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**From:** Owain Draper <[REDACTED]>  
**Date:** 14 August 2018 at 16:09:55 BST  
**To:** Andrew Parsons <[REDACTED]> Gideon Cohen <[REDACTED]>  
**Cc:** Anthony de Garr Robinson <[REDACTED]>, David Cavender <[REDACTED]>  
Victoria Brooks <[REDACTED]>  
**Subject:** Re: Statements of Kendra Dickinson and Alison Bolsover [WBDUK-AC.FID27103678]

Dear Andy,

I agree. I cannot see how either statement is material to the Common Issues.

A few quick observations on the content (for another day):

(1) As a matter of presentation, it would be good not to refer to the provision of “services” by Post Office to SPMs (here, the Helpline). I know that it is common in big organisations refer to any assistance or interaction as a “service” provided to a “customer” (see HMRC for example), but we should avoid this language where possible because of the Supply of Goods and Services Act 1982.

(2) There are a few unhelpful passages in the Dickinson statement where she puts things a lot lower than I would expect – for example, she does not reject in strong terms the suggestion that Helpline advisers may have advised SPMs to submit false accounts. I expect this is because the draft is in a relatively early stage of development, but I raise it now because it is potentially an important point. Surely any adviser providing that kind of highly inappropriate advice would be in breach of important rules and guidance, would be taken to task, etc etc (?)

Kind Regards,

Owain

Owain Draper

One Essex Court, Temple

EC4Y 9AR

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From: Andrew Parsons <GRO>  
Date: Tuesday, 14 August 2018 at 13:48  
To: Gideon Cohen <GRO>, Owain Draper <GRO>  
Cc: Anthony de Garr Robinson <GRO>, David Cavender <GRO>, Victoria Brooks <GRO>  
Subject: RE: Statements of Kendra Dickinson and Alison Bolsover [WBDUK-AC.FID27103678]

Thanks Gideon

I agree. Any alternative views from anyone else?

If not, we will stop further work on these statements.

A

Andrew Parsons  
Partner  
Womble Bond Dickinson (UK) LLP

d:  
m:  
t:  
e:

GRO

**GRO**

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From: Gideon Cohen [<mailto:> **GRO**]

Sent: 14 August 2018 13:04

To: Andrew Parsons; Owain Draper

Cc: Anthony de Garr Robinson; David Cavender; Victoria Brooks

Subject: RE: Statements of Kendra Dickinson and Alison Bolsover [WBDUK-AC.FID27103678]

Andy,

I have now been through these - my view is that they are almost entirely inadmissible (although obviously likely to be relevant to breach in due course). Small sections in the Bolsover statement are admissible, but these overlap with evidence which is already being given by other witnesses. So my view is that we should not serve either statement (or take any sections for deployment in other statements).

All best

Gideon

Gideon Cohen  
Barrister

One Essex Court  
Temple  
London EC4Y 9AR

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From: Andrew Parsons [**GRO**]

Sent: 14 August 2018 10:22

To: Owain Draper; Gideon Cohen

Cc: Anthony de Garr Robinson; David Cavender; Victoria Brooks

Subject: Statements of Kendra Dickinson and Alison Bolsover [WBDUK-AC.FID27103678]

Owain, Gideon

Please find attached the draft statements of

1. Kendra Dickinson – which principally relates to supports for postmaster
2. Alison Bolsover – which principally relates to Transaction Corrections and debt recovery

We had these put together to gain a understanding of these areas but my view is that (i) we don't need the level of detail covered by these statements and (ii) this is all largely inadmissible.

Would you mind briefly reviewing and then advising on:

1. Whether we need these statements at all?
2. If there are any sections / paragraphs in these statements that might be useful? If there are short bits we might be able to include these in someone else's statement.

Thanks  
Andy

Andrew Parsons  
Partner  
Womble Bond Dickinson (UK) LLP

d:  
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GRO <mailto:GRO>

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