

**From:** "Loraine, Paul" <[REDACTED]>  
**To:** "Rodric Williams" <[REDACTED]>  
**Cc:** "Porter, Tom" <[REDACTED]>, "Matthews, Gavin" <[REDACTED]>, "Parsons, Andrew" <[REDACTED]>

**Subject:** RE: LOC Work Plan and eSRF [BD-4A.FID26859284]

**Date:** Wed, 11 May 2016 12:06:01 +0000

**Importance:** Normal

**Attachments:** Briefing\_note\_for\_counsel.docx

**Inline-Images:** image001.jpg; image002.jpg; image003.jpg; image55b97b.JPG; image4d47cd.JPG; imagef55327.JPG; imagec928b9.JPG

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Rod

I have pulled together a draft briefing note for counsel which lifts heavily from the advice note prepared by Jonathan Swift QC in February. We can provide this (once finalised) to Jeff Onions and Tony Robinson ahead of back-to-back meetings with each of them, ideally next week. Is there any update from Jane on the counsel point (further to Andy's email below)? Once I have the green light from you, I will set up meetings with Jeff and Tony.

Gavin is tied up until 2pm and has not looked at this draft note yet but for the sake of efficiency, I thought it best to send it to you in its current form so you and Gavin can be looking at this in parallel.

Having discussed this with Andy, we were of the same mind that this need not be a traditional "instructions" document. The attached note plus the letter of claim and claim form should give Jeff and Tony what they need to get them thinking about the issues ahead of the meetings.

I'm happy to discuss the note if that would be helpful.

Thanks

Paul

**Paul Loraine**  
Solicitor  
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**From:** Parsons, Andrew [GRO]  
**Sent:** 07 May 2016 12:44  
**To:** Rodric Williams [GRO]  
**Cc:** Loraine, Paul; Porter, Tom; Matthews, Gavin  
**Subject:** LOC Work Plan and eSRF [BD-4A.FID26859284]

Rodric

Please find attached our Work Plan for responding to the LOC that encompasses the strategy and timings we discussed previously.

You'll see that the actions have been allocated between Tom P and Paul L and they'll crack on with this work next week.

There are two key points that I'd be grateful if you could help with:

1. Counsel – Please could you get Jane's approval to instruct Counsel. Once you get the green light, Paul L will put the wheels in motion. The first step will be short meetings with Tony Robinson and Jeff Onions to see who is the best fit.
2. FJ – Please can you setup an internal meeting at POL to discuss the issues around FJ (disclosure, unlawful conspiracy claim, limitation issues, etc.). If this could be arranged for w/c 16 May when I'm back that would be great.

Below is an eSRF in line with the figures we discussed the other day. I presume that this matter will be coming out of a separate project budget rather than your BAU budget. If this means that you need us to provide something else to support the budget request, please let me know.

Kind regards  
 Andy

1. Firm	Is this a new SRF or is a change being sought? (If a change, add to the scope in box 6 – highlight the text)	New
2. Firm	Matter description (brief):	Horizon Group Action
3. Firm	Total Fees Quote (incl VAT and whether <i>fixed</i> – a fixed charge irrespective of the spend; <i>capped</i> – means maximum charge up to the cap, depending on hours spent, cap not to be exceeded; or <i>variable</i> ):	Stage 1: £150,000 + VAT  Stage 2: To agreed  <del>Capped/fixed</del> /variable *Delete as appropriate
4. Firm	Initial Work Description and Work Plan (use stages when appropriate):	Stage 1: Preparing Letter of Response to Freeths including: <ul style="list-style-type: none"> <li>• Tactical advice on how to proceed</li> <li>• Investigating complaints raised</li> <li>• Managing document preservation and disclosure issues</li> <li>• Researching and advising on legal issues</li> <li>• Instructing a QC to advise on the Letter of Response and the matter generally</li> <li>• Drafting the Letter of Response</li> </ul> See attached Work Plan for further details.  Stage 2: Further work in relation to the dispute as agreed.
5. Firm	Detailed Fees Breakdown (including any anticipated disbursements and expenses) regarding Initial Work and Charges (as appropriate):	Stage 1:  BD Fees - £100k Counsel - £50k  BD's fees are based on the average monthly run cost during project Sparrow (ie. £30k per month for approx. 3.5 months).

		Counsel's fees are based on the historic costs of engaging Brian Altman QC to advise during project Sparrow.
		No expenses expected.
6. Firm	Law Firm - Main Contact for this matter:	Andy Parsons / Gavin Matthews
7. Firm	Panel Firm Partner Contact:	Andy Parsons / Gavin Matthews
8. Firm	Panel Firm Case Reference:	364065.1369
9. Firm	Instruction/Change Date:	11 April 2016
10. POL	Please indicate whether this is a project:	Yes / No
11. POL	If a project, please provide the Purchase Order Number (PON), if PON not yet available please inform us when it is, and in the meantime supply CC and GL Number (which we will use to pay invoices in the interim):	
12. POL legal	If not a project, which legal BAU budget is to be used?*	* Please insert the relevant codes.
13. POL legal	POL Legal Contact:	
14. POL legal	POL Business Contacts:	
15. POL legal	POL Legal Ref:	
16. Firm	Signed by Law Firm Partner (& date)	Andy Parsons - 7 May 2016
17. POL legal	Signed by POL Head of Legal (& date)	

**Andrew Parsons**  
Partner

*Bond Dickinson*

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