

From: "Parsons, Andrew" <[REDACTED] GRO>
To: "Brian Altman" ([REDACTED] GRO)
Cc: "Prime, Amy" ([REDACTED] GRO)
Subject: Letter of Response to the Group Litigation - subject to litigation privilege [BD-4A.FID26859284]
Date: Mon, 18 Jul 2016 16:19:13 +0000
Importance: Normal
Attachments: _DOC_33380020(1)_DRAFT_Letter_of_Response_16_July_2016.docx; 28.04.16 - _Letter_of_Claim_(8).pdf
Inline-Images: image001.jpg; image002.jpg; image003.jpg

Brian

As mentioned previously, would you mind reviewing our draft Letter of Response (**LOR**) that we have prepared for the Group Litigation with the postmasters?

The LOR is long, so please do not review the whole thing. We have highlighted below all the references to prosecutions or criminal law matters – please could you review these sections?

- 5(F): Factual Allegations: criminal investigations and prosecutions (paragraphs 5.48 to 5.79)
- 6(D): Misfeasance in public office (paragraphs 6.30 to 6.32)
- 6(E): Malicious Prosecution (paragraphs 6.33 to 6.42)
- 8(B): Barred claims: criminal cases (paragraphs 8.8 to 8.12)
- Schedule 4: Section 8: False accounting (8.1 – 8.6)

Some of these sections mention factual matters that are not within your knowledge so we're not asking for your sign off of these sections. I should however be grateful if you could flag whether we've misstated any of the criminal law concepts. All other comments of course welcomed.

Just in case you need it, I've attached the Letter of Claim to which our letter responds. No need to review the LOC but you've got it just in case.

If possible, comments / amendments by the end of this week would be appreciated.

Kind regards
Andy

Andrew Parsons
Partner

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