

**From:** Angela Van-Den-Bogerd [GRO]  
**To:** Shirley Hailstones [GRO], "Parsons, Andrew"  
[GRO], Kathryn Alexander  
**Cc:** "Prime, Amy" [GRO], "Porter, Tom"  
[GRO]  
**Subject:** RE: Letter of Response to Freeths - Legally privileged [BD-4A.FID26859284]  
**Date:** Tue, 19 Jul 2016 20:45:24 +0000  
**Importance:** Normal  
**Attachments:** \_DOC\_33380020(1)\_DRAFT\_Letter\_of\_Response\_16\_July\_2016\_SH\_190716\_AVDB\_190716.docx  
**Inline-Images:** image003.png; image004.jpg; image005.jpg; image006.jpg; image002.png

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Andy

I tracked my changes into the document Shirley sent you earlier.

Thanks,  
Angela



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**From:** Shirley Hailstones  
**Sent:** 19 July 2016 17:16  
**To:** Parsons, Andrew; Kathryn Alexander  
**Cc:** Angela Van-Den-Bogerd; Prime, Amy; Porter, Tom  
**Subject:** RE: Letter of Response to Freeths - Legally privileged [BD-4A.FID26859284]

Hi Andy

Please see attached. For ease of use, I've amalgamated comments from Kath & I (Kath's have a (KA) after the comment).

Anything else, then please let us know.

Thanks  
Shirley

**Shirley Hailstones**  
Support Services Resolution  
Manager  
Post Office Limited  
Guildhall, 57 Queen St



Glasgow  
G1 3AT  
Tel: [redacted]  
Email: [redacted] GRO

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**From:** Parsons, Andrew [mailto:[redacted] GRO]  
**Sent:** 18 July 2016 13:24  
**To:** Kathryn Alexander; Shirley Hailstones  
**Cc:** Angela Van-Den-Bogerd; Prime, Amy; Porter, Tom  
**Subject:** Letter of Response to Freeths - Legally privileged [BD-4A.FID26859284]

Kath, Shirley

Please find attached our draft Letter of Response (**LOR**) to Freeths on the Group Litigation.

This letter responds to the Letter of Claim from Freeths and presents Post Office's legal defence. In doing so, we set out a number of factual points about Post Office and how it operates. Although this letter has built on the many reports produced over the last few years, we wish to re-verify that the facts we are putting forward are correct. To that end, would you both mind carefully reviewing the sections highlighted below to make sure that what we are saying is correct?

Sections to be reviewed:

- Section 4A: Factual background to the Post Office and postmaster relationship
- Section 5 in full
- Schedule 4: Background to operation of a Post Office branch
- Schedule 5: Contract Models and Variations

If possible, please could you provide any comments or amendments by track changes. Please err on the side of caution – if you're not sure if something is correct, please flag it. Apologies for the short notice but I should be grateful if could come back with any comments / amendments by cob tomorrow.

In order to preserve legal privilege, please do not circulate the draft LOR to anyone else. You may discuss it with colleagues if necessary to do so but if you need to forward it to someone else for input, please can you speak to me first.

Kind regards  
Andy

**Andrew Parsons**  
Partner

*Bond Dickinson*

Direct: [redacted]  
Mobile: [redacted] GRO

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