

From: "Prime, Amy" [GRO]
To: Anthony de Garr Robinson [GRO], Owain Draper [GRO]
Cc: "Parsons, Andrew" [GRO], "Lukas, Elisa" [GRO]

Subject: Horizon - GPOC [BD-4A.FID26896945]

Date: Fri, 24 Mar 2017 17:06:48 +0000

Importance: Normal

Attachments: Signed_Generic_Particulars_of_Claim_23.03.17.pdf;
Appendix_A_Subpostmasters_contract.pdf;
Appendix_B_Redacted_Temporary_SPM_contract.pdf;
Appendix_C_Redacted_NT_Contract.pdf;
Appendix_D_Redacted_Franchise_Agreement.pdf;
Comparison_of_GPOC_at_23012017_and_23032017.pdf

Inline-Images: image2398bf.JPG; image9ce89c.PNG; image401ade.PNG; imagece0685.PNG

Tony, Owain

Attached is the GPOC which were provided yesterday (there is also a comparison the revised draft GPOC).

It is a fairly chunky document and we are still reviewing it but thought it would be helpful to have a call next week to discuss a high level strategy for how we wish to respond. I have asked your clerk to find a suitable time.

Our current thinking points on the defence are:

- Is it forensic / what level of detail do we go into?
- Do we refuse to plead to some points?
- Do we keep to a strict pleading only?
- Are we just reactive to the matters pleaded or assert a positive position?
- Do we assert a counterclaim (this brings with it the need to state a positive case).

The best approach may be for Owain to put together a very rough first draft so as we can get a feel for the approach and the areas which require further investigation and refine from there – of course welcome to thoughts.

Kind regards
Amy

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