

From: "Parsons, Andrew" [GRO]
To: Rodric Williams [GRO] Mark Underwood1 [GRO]
Cc: "Prime, Amy" [GRO] "Brooks, Victoria" [GRO]
[GRO] "Lukas, Elisa" [GRO]

Subject: Draft Defence

Date: Wed, 28 Jun 2017 19:30:03 +0000

Importance: Normal

Attachments: Protocol_for_Second_Sight_14_06_17_(Csl_suggested_amends)-1.docx;
100_Bates_draft_Defence.docx

Inline-Images: image51c24.JPG; image178204.PNG; image6f7c85.PNG; image535641.PNG

Rodric, Mark

Please find attached the draft defence from Tony.

There are lots of minor points chase down - many of which are already with Kath / Shirley and FJ.

The key ones that would be good to discuss tomorrow are:

1. Paras 28, 35 and 55 - these relate to the process for disputing shortfalls. We're struggling to get to the bottom of those processes and how those disputes are resolved.
2. Para 50(2) - do we say that POL previously relied on incorrect statements from FJ in relation to remote access? This is basically dropping FJ in it.

The other points I have on my mini agenda for tomorrow are:

1. Prep needed for the GE meeting.
2. Comms lines around the defence and addition of more claimants.
3. Second Sight protocol. We've had a proposal (attached) from Freeths that I can explain tomorrow.
4. Debt team protocol - next steps.

Kind regards
Andy

Andrew Parsons
Partner
Bond Dickinson LLP

Bond Dickinson

Direct: [GRO]
Mobile: [GRO]
Office: [GRO]

Follow Bond Dickinson:



www.bond dickinson.com

A new breed of
transatlantic law firm

Find out more →

Bond Dickinson

WOMBLE
CARLYLE

The advertisement is a horizontal banner with a dark blue background featuring a subtle pattern of concentric ripples. On the left, the headline 'A new breed of transatlantic law firm' is written in a white, sans-serif font. Below it, the text 'Find out more' is followed by a white right-pointing arrow. On the right side, the 'Bond Dickinson' logo is displayed in a white, elegant script font. Below the logo, the 'WOMBLE CARLYLE' logo is shown in a white, bold, sans-serif font, with a small white square graphic element to the right of the text.