

**From:** Melanie Corfield

GRO

**To:** Andrew Parsons

GRO

Mark Underwood1

GRO

**Subject:** RE: Urgent - speaking notes for Tom - in strictest confidence

**Date:** Mon, 17 Jul 2017 15:04:24 +0000

**Importance:** Normal

**Inline-Images:** image001.jpg; image002.png; image003.png; image004.png

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Thanks Andy and understood.

I'll advise Tom to try to deflect requests for the document for the time being. For all additional Qs I will suggest he 'takes them away' so that we can think about how to manage them (but because both parties know a lot about this case there shouldn't be any major issues).

Presumably you will let us know once defence is filed, in person, at the Court.

Mel

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**From:** Andrew Parsons

GRO

**Sent:** 17 July 2017 15:55

**To:** Melanie Corfield; Mark Underwood1

**Subject:** RE: Urgent - speaking notes for Tom - in strictest confidence

Mel

See attached comments from me. It's unclear whether these meetings would be covered by legal privilege so I would prefer not to say certain things – particularly around Post Office's future expectations or intentions.

We can provide them with the Defence but I would like to hold this back for a few weeks. If the Claimant do leak the defence we can definitively say it came from them (which will be more difficult if we've allowed the Defence to be distributed).

Thanks  
A

**Andrew Parsons**

Partner

Bond Dickinson LLP

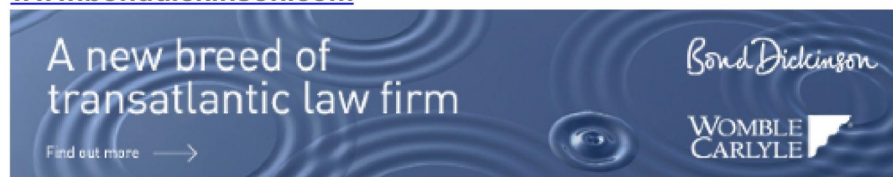
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**From:** Melanie Corfield: GRO  
**Sent:** 17 July 2017 13:14  
**To:** Andrew Parsons; Mark Underwood1  
**Subject:** Urgent - speaking notes for Tom - in strictest confidence

Hello both

Sorry to add to heavy workloads but could you please look over these two short documents – draft speaking notes for Tom M, who will call both NFSP and BEIS tomorrow. So he needs them cob.

Both are largely taken from the GE paper, but obviously a bit tailored for audience and anticipating a few likely Qs. Both NFSP and BEIS are v familiar with the issues of course but please advise if any of the detail here should be excluded/ amended.

Presumably if either party asks for a copy of the Defence Document we should be prepared to provide it, since it is a public document, even if not ideal to do so in that they should remain arms length.....

Many thanks

Mel Corfield

Communications Team

Mobile: GRO

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