

From: Mandy Robertson [GRO]
To: "paul.f.williams" [GRO]
Subject: Confidential - Horizon Group Action (request for assistance) [WBDUK-AC.FID26896945]
Date: Fri, 27 Jul 2018 13:21:25 +0000

Importance: Normal

Attachments: Briefing_note_re_preparing_witness_evidence_re_Lead_Claimants_25_Jul_18.pdf

Inline-Images: image4b7611.PNG; image435328.PNG; image39b2e2.PNG

Dear Paul

I am a solicitor in the team here at Womble Bond Dickinson and have been passed your contact details to get in touch with you to arrange to take a witness statement in connection with the above litigation.

I understand we have not yet been in contact with you to take initial notes (called a Proof of Evidence) in relation to the court claim. You have however been mentioned as someone with knowledge on a specific topic which would assist Post Office in defending the group action brought against it.

I would like to talk to you specifically about a standard form letter headed "SERV 135" which was sent out in your name to Subpostmasters. In the SERV 135 letter, you drew the recipients' attention to "the following extracts, from your Contract", which quoted extracts from 7 clauses of the SPMC. As to this letter these extracts included the following:

- i. Under the heading "SECTION 12 – LOSSES", an extract from Section 12 clause 12 of the SPMC which read: "The Subpostmaster is responsible for all losses caused through his own negligence, carelessness or error, and also for all losses of all kinds caused by his Assistants. Deficiencies due to such losses must be made good without delay".
- ii. Under the heading "SECTION 19 – SUSPENSION FROM OFFICE", an extract from Section 19 clause 4 of the SPMC which read: "A Subpostmaster may be suspended from office at any time if that course is considered desirable in the interest of [Post Office] in consequence of his: a) being arrested, b) having civil or criminal proceedings brought or made against him, c) where irregularities or misconduct at the office(s) where he holds appointments(s) have been established to the satisfaction of [Post Office], or are admitted, or are suspected and are being investigated".
- iii. Under the heading "SECTION 4 – ABSENCE ON HOLIDAY – HOLIDAY SUBSTITUTION ALLOWANCE", an extract from Section 4 clause 1 of the SPMC which read: "A Subpostmaster is not entitled to annual leave as such, but subject to certain conditions he may claim for reimbursement of the necessary cost of his substitution when taking a holiday. To qualify for his reimbursement, the Subpostmaster must be able to certify that he renders on average not less than 18 hours personal service each week".

Do you recall any Subpostmasters (and most notably Mrs Pamela Stubbs) ever contacting you directly with any questions regarding the extracts set out in the standard form letter?

I would like, if possible, to arrange a short call during the course of next week so that we discuss my query above which we will need to cover in your brief statement. I envisage the statement will be no more than a couple of pages. The statement needs to be finalised by the end of next week to give sufficient time to deal with the court deadline of 8 August 2018.

Please find attached a briefing note which contains an update about the court process, the provision of witness statements and what is required over the next few weeks to meet the court deadline.

When would be convenient to speak early next week? I would like to set aside an hour in our diaries to talk through this issue. I am around generally all of next week. Please could you also confirm you are available next week until 8 August 2018 to assist with finalising your statement?

I look forward to speaking to you soon.

Kind regards

Mandy

Mandy Robertson

Solicitor

Womble Bond Dickinson (UK) LLP

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m:
t:
e:

[GRO]

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