

From: Amy Prime [GRO]
To: David Cavender [GRO]
Cc: Andrew Parsons [GRO], Owain Draper [GRO], Gideon Cohen [GRO]
Subject: RE: Trial Bundle [WBDUK-AC.FID27103678]
Date: Fri, 21 Sep 2018 16:36:01 +0000
Importance: Normal
Attachments: 2018.09.12_Fifth_Letter_to_Freeths_(Trial_Bundle_Index)_ (1).pdf;
2018.09.12_Enclosure_to_Fifth_Letter_to_Freeths__WBD_Draft_Index_579152_1_(1).docx
Inline-Images: image001.jpg; image002.png; image003.png; image004.png; image55f9d1.PNG; image6868e4.PNG; imageb5e538.PNG

David

Please find attached a first draft of the trial bundle index which we sent to Freeths on 12 September. The bundle naming does not exactly reflect the outline in Schedule 1 of 6th CMC Order as this index was produced beforehand, but Bundle E is Section D in the attached index.

Your understanding is correct. This bundle is intended to contain a chronological run of the documents which relate to the Lead Claimants (mix of exhibits and other documents in disclosure). So far we have inserted the documents which have been disclosed and are dated prior to the contract being entered / the C entering into the branch. We have asked the Cs to confirm any other documents which they wish to include in this section and to add the documents which they disclosed late after we had already produced the index.

We have chased Freeths for a response to this, but no comments have been received yet. We will chase again on Monday.

Kind regards
Amy

Amy Prime
Solicitor
Womble Bond Dickinson (UK) LLP

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e: [GRO]

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From: David Cavender [mailto:[GRO]]
Sent: 21 September 2018 13:32

To: Amy Prime
Cc: Andrew Parsons; Owain Draper; Gideon Cohen
Subject: Trial Bundle

Hi Amy,

I have been thinking about Bundle E of the proposed trial bundle "Lead Claimants Documents Bundle". I am right in thinking that this will be a mix of the documents in their exhibits and relevant (additional parts) of the disclosure in chrono order ??

When might that part of the bundle be ready ? It is obviously particularly important for my cross examination prep to get that part as soon as possible.

Best,

D.

David Cavender Q.C.

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Temple
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From: Amy Prime [mailto:**GRO**]
Sent: 17 September 2018 15:33
To: David Cavender **GRO**
Subject: FW: Post Office Group Litigation: Strike Out Application

David

Please find attached the strike out application as served.

Thanks

Amy

Amy Prime

Solicitor

Womble Bond Dickinson (UK) LLP

d:
m:
t:
e:

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