

**From:** Andrew Parsons [GRO]  
**To:** Anthony de Garr Robinson [GRO]  
**Subject:** RE: Board speaking note [WBDUK-AC.FID26896945]  
**Date:** Fri, 15 Feb 2019 20:41:28 +0000

**Importance:** Normal

**Attachments:** \_DOC\_153532945(1)\_UPDATED\_Risk\_Assessment\_Table\_-\_3\_January\_2019.docx;  
\_DOC\_154310620(1)\_Horizon\_-\_Risk\_Assessment\_Table\_-\_18\_Feb\_2019.DOCX

**Inline-Images:** image001.png; image002.png; image003.png; imagef40588.PNG; imaged4243d.PNG;  
imageb4cdb9.PNG

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Tony

I have a confession... before the Common Issues trial I took your beautiful Merits Opinion and converted it into risk assessment table. Nothing makes you feel more valued more than having your hard work reduced to Red, Amber and Green boxes! I suspect you see this as heresy but the PO board wanted a simplified version that they could use to plan risk mitigation strategies against an adverse outcome. It was then updated after the trial to show where our views had changed. I've attached a copy for info only – it will probably make you scream!

PO have asked for a similar thing for the HIT. My first draft is attached. I'm sending this to you for info, because it will be discussed at the board on Thursday. To be clear, I'm not asking you to endorse this – I appreciate that is asking too much of you and it is somehow easier for me to provide this assessment as a solicitor than you as leading Counsel.

That said, any comments appreciated. If possible, we should try to dovetail this to what you may say at the board next week.

Yours, with much shame....

A

**Andrew Parsons**  
Partner  
Womble Bond Dickinson (UK) LLP

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**From:** Anthony de Garr Robinson [GRO]  
**Sent:** 15 February 2019 12:08  
**To:** Andrew Parsons  
**Subject:** RE: Board speaking note

Thanks, Andy. I'll look at this tomorrow and let you know what I think, probably on Monday.

You absolutely don't need to worry about any risk of putting words into my mouth!

Tony

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**From:** Andrew Parsons [GRO]  
**Sent:** 15 February 2019 12:04  
**To:** Anthony de Garr Robinson [GRO]  
**Subject:** Board speaking note

Tony

I hope that this is helpful rather than inappropriate – I've bashed out a "starter for 10" speaking note for the board next week.

Feel free to amend, delete or totally disregard as you see fit, but I hope this gives you a flavour of what I think is needed. If anything, this might too much detail.

One to discuss next week perhaps.

A

**Andrew Parsons**  
Partner  
Womble Bond Dickinson (UK) LLP

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