

**From:** Andrew Parsons [GRO]  
**To:** Tom Beezer [GRO] David Cavender [GRO]  
**Cc:** Gideon Cohen [GRO] Amy Prime [GRO]  
**Subject:** RE: URGENT: Litigation Options - CONFIDENTIAL AND SUBJECT TO LEGAL PRIVILEGE. [WBDUK-AC.FID26896945]  
**Date:** Fri, 15 Mar 2019 23:47:27 +0000  
**Importance:** Normal  
**Attachments:** draftPOL.DOCX  
**Inline-Images:** image001.png; image002.png; image003.png; image4c6b18.PNG; imagec52c57.PNG; imagef95f0b.PNG

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Tom

I've had a good go at this. My version attached.

Did Jane want us to offer a recommendation on whether to do this or not? It seems like we are sitting on the fence slightly, but sometimes she prefers that.

A

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

d:  
m:  
t:  
e:

**GRO**

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**From:** Tom Beezer  
**Sent:** 15 March 2019 20:46  
**To:** David Cavender  
**Cc:** Gideon Cohen; Amy Prime; Andrew Parsons  
**Subject:** RE: URGENT: Litigation Options - CONFIDENTIAL AND SUBJECT TO LEGAL PRIVILEGE. [WBDUK-AC.FID26896945]

All

See attached.

I may be on Jane's wavelength – I may not be...

I took Jane's few questions verbatim and addressed them as best I could with the info know to me or that I can ferret out. I limited myself to two pages.

All comments welcomed.

Andy, I followed Nick B's format and warning at the header of the doc. Normal ? Useful ?

All - be as harsh as you like. I am not proud.

I would like to get something out to Jane early tomorrow – 10am or earlier.

I hope I have broken the back of it for you and it is quick and easy to comment...

Cheers

T

Andy/Primer – note this is NOT a doc' on the system yet it is from my desktop...

**Tom Beezer**  
Partner  
Womble Bond Dickinson (UK) LLP

d:   
m:  
t:  
e:

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**From:** David Cavender [REDACTED] GRO  
**Sent:** 15 March 2019 19:24  
**To:** Tom Beezer  
**Cc:** Gideon Cohen; Amy Prime; Andrew Parsons  
**Subject:** Re: URGENT: Litigation Options - CONFIDENTIAL AND SUBJECT TO LEGAL PRIVILEGE. [WBDUK-AC.FID26896945]

Tom,

Many thanks for this. Sounds like a plan.

I can attend the board meeting if necessary.

Best

D.

Sent from my iPhone

On 15 Mar 2019, at 18:50, Tom Beezer [REDACTED] GRO wrote:

David, Gideon

The plan is that I cobble together a short note addressing Jane's points (see below – addressing the first set of points anyway, perhaps not the financial impact questions on which I have no info') and then send that out to you & Andy P later tonight or early tomorrow morning.

Andy will be in the land of the living again tomorrow am and so will comment and make into the kind of note we would actually send to POL (as I am new into all of this and kind of shooting blind) and it would be great if you could cast your eye over it too. It won't be long as it needs to be really punchy and accessible for non-legal Board members. Either AP or I will send to Jane by (say) 10am tomorrow. This e mail is just to give you a heads up on that, and if you are around to review, then great. If not then no worries.

David – there is talk of a POL Board Meeting on Monday afternoon at some point. 5pm has been mentioned. Jane has not said it yet (and may not) but I can see the request coming that you (and perhaps me too) join that meeting. If that request comes, are you free to do that ? I think this is the meeting at which they decide yes/no on recusal application.

I have asked Rob at OEC (at Jane's request) to see if Lord Neuberger were available in theory to dial in.

I'll be in touch with a draft later.

Kind regards

Tom Beezer  
Partner  
Womble Bond Dickinson (UK) LLP  
d:  
m:  
t:  
e: **GRO**

**GRO**

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From: Tom Beezer  
Sent: 15 March 2019 15:52  
To: Andrew Parsons; David Cavender **GRO**  
Cc: Amy Prime; Gideon Cohen **GRO**  
Subject: RE: URGENT: Litigation Options - CONFIDENTIAL AND SUBJECT TO LEGAL PRIVILEGE.  
[WBODUK-AC.FID26896945]

Parson...lets discuss this when you surface at some point.

David – copied to you too as we may need some input from you as my bank of historic knowledge on all this is thin to put it kindly !

Jane says:

We are setting up a board call for 5pm Monday, and I will need to issue a ‘plain English’ paper to the Board over the weekend to get them familiarised with the issue. In particular that will need to address:

- Why we are considering a recusal application
- What the application (if successful) will achieve
- Risks of not proceeding
- Prospects of success: what advice have we received, who from
- Process & timing

In addition, the following Monday (25th) we have a scheduled Board meeting and I will need to be able to

brief in more detail on an appeal, recognising that it will still be a work in progress. However as we don't have another scheduled Board until end May, it is likely that we will need the Board to endorse the appeal strategy at end March, with a further approval meeting/call once the appeal grounds are finalised and we can assess 'risk'.

As mentioned I think that as part of the initial Appeal discussion, the board will want to understand the scale of the financial risk of:

- (a) not appealing (and therefore how many existing & historic contracts will be affected by the judgement?)
- (b) appealing and losing (same as above?)
- (c) appealing and winning – restores contracts to pre-judgement position

Recognising in each case that the consequences apply not just to the claimant group but to all postmasters on those contracts types, and potentially, all those on other contract types but who have substantially the same provisions.

I copy this to us all at this point to get us all thinking.  
t

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