From: Andrew Parsons 4 To: Rodric Williams GRO >, Patrick Bourke ⊳, Angela Van-Den-Bogerd < GRO GRO >, Mark Underwood1 < **GRO** Cc: Ben Foat ⊲ >, Ainslie Cranwell >, "Emanuel, Catherine" **GRO** "Lord, William" < Perkins" >, Veronica Branton **GRO GRO** Zoe Brauer < **GRO** Rachel Scott <

Subject: RE: GLO - Post Office - Timetable / Actions [WBDUK-AC.FID26896945]

Date: Mon, 9 Dec 2019 11:00:10 +0000

Importance: Normal

Attachments: GLO_Board_Paper_- (06.12.19).docx

Inline-Images: image001.png; image60a4f8.PNG; imagec05cac.PNG; image43d048.PNG

Rodric

Thanks. On my three actions below.

We've amended the attached draft of the paper to include a summary of Section M in the body of the paper and added a new appendix with the answers to each Horizon Issue. This has been taken from my email last night.

Happy to address verbally at the meeting the advice on appeal and costs (as per our email this morning).

Happy with the wording on contract reform and with sharing the Workshop paper.

Thanks

A

Andrew Parsons

Partner

Womble Bond Dickinson (UK) LLP



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| From: Rodric Williams | < (| GRO | > | | |
|-----------------------------|--------------------|-----------------|-------------------|---------------|-----------------|
| Sent: 06 December 201 | 9 18:54 | | | | |
| To: Patrick Bourke < | GRO | >; Ar | ngela Van-Den-Bog | erd GR | 0 |
| GRO | ; Mark Underv | wood1 < | GRO | Þ | |
| Cc: Ben Foat | GRO | | vell < | GRO | ⊳ ; |
| Emanuel, Catherine | GRO | ; Andr | ew Parsons 4 | GRO | |
| Lord, William ≤ | GRO | ; Tim Perkins < | GRO | þ; Ve | eronica Branton |
| < GRO | }; Z | Zoe Brauer < | GRO | > | |
| Subject: RE: GLO - Po | st Office - Timeta | able / Actions | | | |

All – further to my email below, I have drafted an update paper for the Board GLO Subcommittee meeting next Tuesday 10 December 2019, which can be accessed via the following link (also attached in Word for WBD and HSF):

IRRELEVANT

The draft seeks to address the points Ben wants covered, save for:

- (v) Comms / PR timings Patrick, I have noted that this will be updated separately; and
- (vii) Considerations to Funding Agreement Negotiations removed at Ben's request.

In terms of the draft's content, the points to note/action are:

- Litigation Update; Horizon Issues Judgment
 - Andy, can WBD please provide a summary of HIJ Section M for the placeholder.
 - o I've offered a verbal update on HIJ consequentials informed by the external advice which is being prepared now that we have a complete draft judgment. Andy, can you please make sure WBD provide this (appeal Counsel; costs WBD).
- Litigation Update; HIJ Impact on Criminal Convictions
 - Kate/Will can you please review and amend as appropriate to make sure this fairly reflects the telephone con we had on 2 Dec with Brain Altman QC?
- Litigation Update; Costs
 - o Mark, can you please provide the update for the placeholder.
- Operational Impacts
 - o Mark/Angela can you please review and amend as appropriate this section, which is based on the email Angela sent to me at 23:48 last night
 - o **Tim** can you please also review and amend as appropriate this section given it refers to the paper you prepared for the Board's 26 November 2019 meeting (copied in full as Appendix 3).
 - Andy and Zoe can you please also review this to make sure you're happy with the references to the contract reforms and with making WBD's 4 December 2019 paper (copy attached) available to the SubCo via the Reading Room.

Please drop me a line if you have any questions.

Thanks all, Rod

| From: Rodric Williams Sent: 05 December 201 | | | | | | |
|------------------------------------------------------|---------------|------------|------------------|-------------|-----|---|
| To: Patrick Bourke | GRO | | ; Angela Van-D | en-Bogerd < | GRO | |
| [GRO | ; Mark Underv | wood1 ⊴ | GRO | | > | |
| Cc: Ben Foat | GRO | >; Ainslie | e Cranwell 🔙 | GRO | | |
| Emanuel, Catherine | GRO | > | ; andrew.parsons | GI | २० | > |
| Subject: FW: GLO - Post Office - Timetable / Actions | | | | | | |
| Importance: High | | | | | | |

All – I'm happy to pull together a draft paper for the Board GLO Sub-Committee covering the Agenda, which will need to address:

Mediation

a. We can flag that an oral update will be provided on the mediation.

CIJ operations plan

a. I can draft this using the operational update Tim Perkins prepared for the November Board and WBD's Contract Reform overview. Is there anything else?

HIJ operations plan

- a. <u>Angela/Mark</u>, can I please have a Board-level summary of what has been / is being done having received the draft judgment and ahead of the handing down on 16 December 2019.
- b. I can add in developments form the mediation

Convicted claimants process

a. I can address this.

Comms / PR timings

a. Patrick – can you please provide a Board-level summary on this?

<u>Budget implications – review Change budget</u>

a. Mark – can you provide this?

Does that sound like a plan? Please let me know if you have any questions/comments.

Thanks, Rod

| Sent: 04 Decemb <u>er 20</u> Fo: Watts, Alan < | GRO | ; Emanuel, Catherine | GRO | : Rodric |
|---------------------------------------------------|----------------|--------------------------------------|--------------------------|------------------------|
| Williams < | GRO GRO | ; andrew.parsons | GRO | ; Roaric >; Patrick |
| Bourke ₹ Subject: GLO - Post (| GRO | Þ | | |
| Importance: High | office Time | more / retions | | |
| | | | | |
| All | | | | |
| thought it would be h | helpful to set | out a timetable: | | |
| 4/12/19 | | | | |
| Settlement document | – POL intern | al review finalised | | |
| Settlement document | - BF to send | to Nick and Tom | | |
| Settlement document | – to go to oth | erside | | |
| 5/12/19 | | | | |
| Mediation Day 6 – res | sumes | | | |
| Settlement document | (non-financia | al components of the settlement) | | |
| Financial settlement - | offers and co | oncessions | | |
| 6/12/19 | | | | |
| Mediation Day 7 – if | needed – prol | pably further negotiation / drafting | g in respect of the sett | lement docum |
| 9/12/19 | | | | |
| GLO Litigation Activ | vity meeting P | OL 4pm | | |
| 10/12/19 | | | | |
| Board GLO Sub-Com | nmittee | | | |
| | la needs to co | ver: | | |
| | i. Mediation | | | |
| | | ations plan | | |
| | _ | ations plan | | |

iv. Convicted claimants process

- v. Comms / PR timings
- vi. Budget implications review Change budget
- vii. Considerations to Funding Agreement Negotiations

12/12/19

GE December Meeting – GLO paper (covering the above)

We need to liaise with Patrick to ensure that we can issue the joint statement in alignment with our authority with BEIS.

When can I see a finalised version of the settlement document that we are going to send to the otherside so I can socialise with Nick and Tom

Kind regards

Ben



Ben Foat

Group General Counsel

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20 Finsbury Street

LONDON EC2Y 9AQ

Mobile : GRO

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