

Message

From: Mark Underwood1 [GRO]
on behalf of Mark Underwood1 [GRO]
Sent: 28/09/2018 18:26:50
To: Jane MacLeod [GRO]; Julie Thomas [GRO]; Mark Raymond [GRO]; Debbie G Jones [GRO]; Thomas P Moran [GRO]; David Higham [GRO]; Sheinaze Aboobakar [GRO]; Katrina Holmes [GRO]; Simon Talbot [GRO]; David Southall [GRO]; John Breeden [GRO]; Angela Bettison [GRO]
CC: Rodric Williams [GRO]
Subject: Postmaster Group Litigation: support from members of your team during October and November
Importance: High

Dear all,

On 11 April 2016, a High Court claim was issued on behalf of a number of postmasters against Post Office in relation to various legal, technical and operational matters - many of which have been the subject of significant media coverage over the past decade.

The litigation is being managed by the Court through a Group Litigation Order (GLO) and will be phased. The first trial begins on 5 November 2018 and is currently scheduled for 4 weeks. It will consider the nature and effect of the legal relationship that existed (and exists) between sub-Postmasters and Post Office as set out in the express terms of the contracts; and whether as the Claimants argue, some or all of the additional 21 terms should be implied into the contract.

This trial will involve witness evidence and the purpose of this email is to check that the members of your team who have provided witness statements and will be required to attend court in November have made you aware that, for a number of days in October and November, they will be unable to perform their BAU duties as they will either be:

1. Receiving witness familiarisation training

We have arranged witness familiarisation training for all of our witnesses. This is run by Bond Solon (<https://www.bondsolon.com/witness-familiarisation/>). The current scheduling is as per the below table:

Monday 15 October Bolton	Tuesday 16 October Bolton	Wednesday 17 October Chesterfield	Thursday 18 October London	Friday 19 October London
<u>Session 1</u> 9:30-17:30	<u>Session 2 AM</u> 9:30-12:30	<u>Session 1 AM</u> 9:30-13:30	<u>Session 1</u> 9:30-17:00	<u>Session 2 AM</u> 9:30-12:30
Sarah Rimmer	Sarah Rimmer	David Longbottom	Nick Beal	Angela Van-Den-Bogerd
Michael Haworth		John Breeden	Angela Van-Den-Bogerd	
Michael Shields	<u>Session 2 PM</u> 13:30-16:30	Andrew Carpenter	Tim Dance	<u>Session 2 PM</u> 13:30-16:30
Michael Webb	Paul Williams		Elaine Ridge	Nick Beal
Paul Williams		<u>Session 2 PM</u> 14:30-17:30		
Brian Trotter		John Breeden		
Helen Dickinson				

2. Pre- reading

As you will understand, it is vital that our witnesses understand the wider background to this litigation and are familiar with the Claimants' evidence and relevant documents. Our Lawyers will be producing folders of relevant documents for each witness, tailored to their specific areas of evidence. The case is very document heavy, so it may take each witness 2 - 3 days of reading to go through them.

3. Attending meetings with the legal team

We will need some of witnesses to attend meetings or conference calls with the legal team to discuss specific issues. Placeholder appointments should already be each Witness's diary.

4. In court, providing witness evidence

The Court has ordered that by 26 October 2018 the parties are to have agreed and informed the Court of the order / timing in which each witness will be heard at trial. Before then, the only information we know is that:

- The cross examination of witnesses will take place from Thursday 8 November until Monday 26 November – 10 hearing days as the Court will not sit on Fridays, save for ad hoc issues that arise and need to be dealt with.
- The Claimants, who have 6 witnesses, will 'go first'.

As soon as the trial timetable is finalised, it will be shared with the witnesses and yourselves.

Witnesses

Each witness has been asked to:

- Block out their diaries for the whole of November 2018 on the basis that we should be able to release most of this time back to them once we have agreed the running order for witnesses.
- Let us know if they have any holidays or other unavoidable appointments between now and November so that we can make arrangements for training and meetings.
- Let their line manager know that the trial is coming up and what will be required of them and to make plans for their BAU work to be covered so that adequate time can be given to trial preparation.
- Change their privacy settings to "private" on all social media accounts that they use for personal matters until the trial is over.

We are arranging hotels for each witnesses, nearby to the court for:

- The day and night before they are giving evidence;
- For each day and night they are giving evidence; and
- For some witnesses, on the days that the Claimants are giving evidence.

The full list of Post Offices 14 Witnesses is included in the below table, along with what team they work in and who their respective line managers and GE members are:

Individual	Team	Line Manager	GE Member
Angela Van-Den-Bogerd	Group Litigation Team	Jane MacLeod	Jane MacLeod
John Breeden	Agency Contracts and Agents Services team (part of Network Operations)	Julie Thomas	Alisdair Cameron
Helen Dickinson	Security Operations	Mark Raymond	Alisdair Cameron

Tim Dance	Network Programmes	Debbie Jones	Debbie Smith
Nick Beal	Agents Development and Remuneration	Tom Moran	Debbie Smith
Sarah Rimmer	Agent Remuneration and Expense	David Higham	Alisdair Cameron
Michael Shields	Agents Application Team	Sheinaze Aboobakar	Alisdair Cameron
Michael Haworth	Network Gateway team	Katrina Holmes	Alisdair Cameron
Mike Webb	Network Support Team	Simon Talbot	Alisdair Cameron
Andy Carpenter	Agents Contracts Deployment Team - North	David Southall	Alisdair Cameron
David Longbottom	Network Operations team	Angela Bettison	Alisdair Cameron
Brian Trotter	Agents Services Contract Team	John Breeden	Alisdair Cameron
Paul F Williams	Agents Contracts & Services	John Breeden	Alisdair Cameron
Elaine Ridge	NA – no longer in the business	NA – no longer in the business	NA – no longer in the business

I hope the above note is helpful and that each of your team members who are witnesses have already informed you our need for their time and expertise over the coming months.

If you do have any concerns or questions please do not hesitate to get in touch. Otherwise, thank you very much for your support and please pass on my thanks to each of the individuals included in the above table who have each, without exception, been fantastic in helping Post Office prepare for the upcoming trial.

Kind Regards

Mark



**2017 Winner of the Global Postal Award
for Customer Experience**

Mark Underwood

Head of Portfolio: Legal, Risk & Governance

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