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**From:** Callard, Richard - UKGI[/O=HMT/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6988FBA346C64632AA2C6DDACEAC7D18-CALLARD, RICHARD (RC)]  
**Sent:** Thur 07/06/2018 1:14:10 PM (UTC)  
**To:** Cooper, Tom - UKGI [GRO]  
**Subject:** RE: Post Office Group Litigation - SUBJECT TO LEGAL PRIVILEGE

Excellent email!

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**From:** Cooper, Tom - UKGI  
**Sent:** 07 June 2018 14:06  
**To:** Rodric Williams [GRO]  
**Cc:** Lambert, Helen - UKGI [GRO]; O'Neill, Elizabeth - UKGI [GRO]  
Callard, Richard - UKGI [GRO]; Clarke, Stephen - UKGI [GRO] Jane MacLeod [GRO]  
**Subject:** Re: Post Office Group Litigation - SUBJECT TO LEGAL PRIVILEGE

Rod

I don't think we can operate this way. We've been asking repeatedly for an update from you as had been agreed would be provided after each board meeting. In the absence of something from you it looks like we will have to draft something again which is not ideal.

The protocol is also outstanding still.

Please could you and Jane come over next week to discuss.

I'll ask Marcus to find a time that works for everyone.

Tom

Tom Cooper  
Director

**UK Government Investments**

1 Victoria Street | London | SW1H 0ET

[GRO]  
E: [GRO]  
PA: [GRO]

*Please note that with immediate effect, my email address has changed to [GRO]*

*I will still receive emails sent to my old address until 30 April 2018. Thereafter you will only be able to contact me on my new address and emails sent to my [GRO] address will not be forwarded.*

*I would be grateful if you could note this and change my contact details accordingly.*

On 7 Jun 2018, at 13:00, Rodric Williams <[GRO]> wrote:

Helen,

I had understood that the report I sent on 14 May 2018 had been shared with Alex following the Board and Subcommittee meetings held in May, the outcome of which is that a further meeting on the Postmaster Litigation will be held between Alex, Tom and our senior management later in the summer, once the practical implications of counsels' opinion (which is essentially lengthy and complex legal analysis) had been assessed by Post Office.

In light of that development, I had no longer anticipated the need to provide a formal briefing on the merits opinion. We have however provided you with five separate updates on developments with the Postmaster Complaints in the intervening period.

In addition to the CCMC held on Tuesday, we are also this week finalising Defences to the Individual Particulars of Claim filed by five of the Lead Claimants in the Common Issues trial, each of which is c.50 pages long. These must be filed with the Court tomorrow. I trust you will appreciate that hitting this critical court deadline needs to take priority over any additional reporting.

Kind regards, Rodric

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**From:** Lambert, Helen - UKGI [REDACTED] **GRO**  
**Sent:** 06 June 2018 11:14  
**To:** Rodric Williams [REDACTED] **GRO**  
**Cc:** O'Neill, Elizabeth - UKGI [REDACTED] **GRO**; Cooper, Tom - UKGI  
[REDACTED] **GRO**; Callard, Richard - UKGI [REDACTED] **GRO**; Clarke, Stephen -  
UKGI [REDACTED] **GRO**  
**Subject:** RE: Post Office Group Litigation - SUBJECT TO LEGAL PRIVILEGE

Hi Rodric

I hope all is well.

I am sure you have been busy with the CMC yesterday, but was hoping you might be able to give me an update on the below. The urgency in getting an update on the case to Alex is increasing significantly and we would appreciate if you could provide the update, in particular on the merits opinion, so that we are able to do so as soon as possible.

Many thanks  
Helen

Helen Lambert | Legal Seconded  
**UK Government Investments**  
1 Victoria Street | London | SW1H 0ET

[REDACTED] **GRO**  
E: [REDACTED] **GRO**  
[REDACTED] **GRO**

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**From:** Lambert, Helen - UKGI  
**Sent:** 31 May 2018 09:29  
**To:** 'Rodric Williams' [REDACTED] **GRO**  
**Cc:** O'Neill, Elizabeth - UKGI [REDACTED] **GRO**  
**Subject:** RE: Post Office Group Litigation - SUBJECT TO LEGAL PRIVILEGE

Rodric

Please find attached the protocol with minor amendments. We hope this can now be considered agreed.

I was also wondering whether you might be able to give me an expected timescale for receipt of the written update following last week's board meeting.

Many thanks  
Helen

Helen Lambert | Legal Seconded  
UK Government Investments  
1 Victoria Street | London | SW1H 0ET

**GRO**

E: **GRO**

**From:** Rodric Williams **GRO**

**Sent:** 22 May 2018 13:32

**To:** Lambert, Helen - UKGI **GRO** O'Neill, Elizabeth - UKGI  
**GRO**

**Subject:** Post Office Group Litigation - SUBJECT TO LEGAL PRIVILEGE

Elizabeth, Helen,

### Information Sharing Protocol

Please find attached the draft Protocol, the amendments to which seek to reflect the discussion we held last week. I hope these are acceptable, but please let me know if not.

### Case Management Conference

By way of an update, a Costs & Case Management Conference has been listed for a half-day hearing on 5 June 2018, which (time permitting) will deal with the parties' respective costs budgets and the progress the parties' experts have made in preparing for the Horizon issues trial to held in March 2019.

Kind regards, Rodric



2017 Winner of the Global  
Postal Award for Customer  
Experience

**Rodric Williams**

Head of Legal - Dispute Resolution & Brand  
20 Finsbury Street  
London EC2Y 9AQ

**GRO**

E: **GRO**

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