

STRICTLY CONFIDENTIAL – SUBJECT TO LEGAL PROFESSIONAL PRIVILEGE

Bates & 90 Others v. Post Office Limited**Postmaster Litigation Steering Group Actions**

<u>Meeting</u>	<u>Action</u>	<u>Owner</u>	<u>Progress</u>	<u>Target Date</u>	<u>Completed</u>
07.06.16	1.1 Circulate Second Sight's Reports	RW			20.06.16
	1.2 Circulate Letter of Response Timetable	RW			20.06.16
	1.3 Amend and Finalise PLSG Terms of Reference	RW			20.06.16
	1.4 Reiterate Communications Protocol	RW			20.06.16
	1.5 Develop Internal Stakeholder Communication Lines	RW/ MD			20.06.16
22.06.16	2.1 Update PLSG on "Sparrow"-related accruals carried forward into FY 2016/17	NS			14.07.16
	2.2 Develop alternative legal costs options to hourly rate charging	BD (AP)	Work underway with Counsel. Report back next week.	26 August	
	2.3 Identify candidates from existing FSA teams for 2x PO level roles in discrepancy investigations team	AVDB			14.07.16
	2.4 Provide "key personnel" list to TM and TW	BD (AP)			23.06.16
	2.5 Amend "rolling" agenda	RW			23.06.16
14.07.16	3.1 Bond Dickinson to reflect decisions made on each of their 7 decision papers, in LoR	AP			15.07.16
	3.2 Bond Dickinson to share Deloitte's 'Report', highlighting section of note	AP			29.07.16
	3.3 Progress M004 (Jones) & M037 (Phillips) contractual issues as according to BAU processes	AVDB	Being progressed as BAU with guidance from Andy Parsons as appropriate.	03 Aug	22.08.16
	3.4 Ascertain whether permission has been granted for M141 (Rees) to transfer control of the lottery terminal, from POL, to M141. If it has, explore rationale and BAU process	TM & AVDB	This is with Tom to provide update	19 Aug	

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	3.5 Meet with RH and SG to discuss Fujitsu costs	JM, PB & MU	Meeting took place 17 Aug. Note sent to FJ	12 Aug	17.08.16
	3.6 BD to ask Freeths for their governance structure (e.g. decision and funding points)	AP	Awaiting Freeths to address other relevant points on GLO	30 Sept	
	3.7 BD to invoice for work to date (including TRQC)	AP			28.08.2016 (will arrive at POL 14 days later)
	3.8 Provide update on 2 requested POs to AVDB	TM			03.08.16
20.07.16	4.1 In principle, the tone of LoR was approved. However, BD are to review the tone used in the Exec Summary and other particular instances within the LoR	AP			21.07.16
	4.2 Where a statement of fact is made in the LoR, BD are to ascertain its provenance	AP			21.07.16
	4.3 BD are to draw out the distinction between SS's two separate phases of work	AP			21.07.16
	4.4 BD are to redraft sections of the LoR critical of SS, to focus on the areas POL has previously called out e.g. scope & expertise	AP			21.07.16
	4.5 BD are to speak to Paul Inwood and ascertain the levels of investment (historically and present day) required of Postmasters.	AP			Not necessary in the end
	4.6 BD are to land, in the LoR, that POL also makes a significant investment. Where appropriate, terminations protect this.	AP			21.07.16
	4.7 BD are to investigate the typical levels of investments required in franchise models	AP			Not necessary in the end
	4.8 BD are to remove "Reasonably" from Para 2.1.3 of the LoR	AP			21.07.16
	4.9 BD are to set out, in the Exec Summary, the scale of the Horizon System and POL's Network	AP			21.07.16
	4.10 BD are to circulate the draft language on RA. MU to set up a call for tomorrow to discuss	AP & MU			21.07.16
	4.11 BD are to provide a chronology of statements made by POL in relation to RA	AP	Work begun	15 Sept	
	4.12 MU to share email from Fujitsu with RH	MU	JM shared with SG members on 26 July		26.07.16

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03.08.16	5.1 AP to run a session with a wider audience (possibly incl GE) re what to expect / process / next steps.	AP	To be kept under review whether necessary		
	5.2 BD to make a court application to challenge the addition of the 107 extra claimants on the Claim Form	AP	Application prepared and being submitted	05 Aug	05.08.16
	5.3 BD to progress on the basis that POL is happy to allow the claims or Scottish and Northern Irish PMRs to be heard in an English court	AP	Correspondence sent to Freeths to confirm this	03 Aug	05.08.16
	5.4 Produce a template to report on and keep the SG abreast of spend	MU	Template Complete. Circulate for comments / approval	19 Aug	22.08.16
	5.5 Produce a forecast of spend for 16/17 & thereafter	MU & AP	Work underway with Counsel. Report back next week	26 August	
	5.6 Circulate Comms Paper	MU			04.08.2016
	5.7 Fully engage Junior Counsel (Owain Draper)	AP		05 Aug	18.08.2016
	5.8 Set up 'meet & greet' with Junior Counsel	AP		26 Aug	18.08.2016
	5.9 Pull together list of individuals, key to replicating the POIR process. Share with TM re NT Preference Exercise	MU		19 Aug	10.08.2016
	5.10 Pull together data from the business, held on each claimant. Replicate process used for production of POIRs.	AP	Forms part of scoping exercise re data retention	Ongoing	
22.08.16	6.1 BD to progress preservation of POL documents as according to option 4 of the associated decision paper	AP		23 Aug	
	6.2 Ascertain the location of hard copy documents previously held in Leeds, St Helens and Dearne offices	AP / RW		26 Aug	
	6.3 Draft 'Standstill' agreement email and share with Rob for approval in terms of content and timing	RW		26 Aug	
	6.4 Make TM aware of any implications that may exist as a consequence of the NT preference exercise	AP		23 August	