

From: "Loraine, Paul" </O=DICKINSON DEES/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=LORAIN, PAUL>

To: "Matthews, Gavin" [GRO] >

Subject: Briefing note for Counsel

Date: Tue, 10 May 2016 09:18:45 -0000

Importance: Normal

Attachments: Briefing_note_for_counsel.nrl

Morning Gavin

Andy asked me to pull together a briefing note for our 2 counsel candidates (Jeff Onions and Tony Robinson). Please see a draft note attached.

This note is a sanitised version of the note produced for POL by Jonathan Swift QC and Christopher Knight in February 2016. I have taken out references to "us" / "we" and so on and taken out the recommendations they made to POL on various points. I have also added in some further material to cover the recent months (mediation scheme ending / group action claim issued etc.).

Andy and I agreed that this document does not need to be a classic "instructions to counsel" document. We thought a briefing note of this type plus the claim form and letter of claim would give Jeff and Tony what they need to get them thinking about the issues for the purposes of an initial meeting.

Andy wants to get a meeting with counsel in the diary for next week, ideally for Monday 16 May 10am-12. Before I sort this out, I need to have sign off on this note from you and Rod so we can provide it to counsel in reasonable time ahead of any meeting.

Please can you let me know when, realistically, you will be able to look at this? I know you're busy on a tender.

For timing reasons, would it be preferable for me to send this to Rod now so you can both be looking at this in parallel?

Thanks

Paul