

From: Mandy Robertson [GRO]
To: Paul F Williams [GRO]
Cc: Victoria Brooks [GRO]
Subject: RE: URGENT Group Action: Horizon (confidential) - finalised witness statement for signature [WBDUK-AC.FID26896945]
Date: Fri, 3 Aug 2018 15:49:12 +0000
Importance: High
Attachments: DISPUTERESOLUTION_150999423(9)_Witness_statement_of_Paul_Williams.DOCX
; Witness_statement_of_Paul_Williams_-_Witness_statement_of_Paul_Williams.pdf
Inline-Images: image011.jpg; image012.png; image013.png; image014.png; image015.jpg;
image016.png; image017.png; image018.png; image019.png; image020.png;
image021.jpg; image05e5c4.PNG; imaged6e3b6.PNG; image13c597.PNG

Hi Paul

Thank you for getting to this so quickly.

Please find attached your finalised witness statement and exhibit for your sign off. I also attached a pdf document which show the final changes (which is namely inserting document reference numbers so that the barrister can easily identify the documents at trial).

I appreciate you are soon leaving the office for annual leave and whilst it is likely we will get extra time to file your statement, I thought it best if you could sign it in its current form before you leave today, and if we get the extension we can make any final changes.

You have been nominated as someone with knowledge of about the area identified in your statement. The witness statement which will be a material factor in defending the claim. It sets out what factually happened on the ground during the relevant time. Your evidence is therefore very important and you need to be comfortable that what you are saying is accurate.

The purpose of the witness statement is to provide written evidence to support a party's case that will be used as evidence in Court. The statement is a crucial part of the case, designed to show it in its strongest light.

Statement of truth

A witness statement must have a "statement of truth". This is a statement confirming that the person making it believes that the facts stated in the document are true. When you are signing the statement of truth, you are confirming that the facts contained within the statement are true to the best of your knowledge.

There are severe penalties for signing a statement of truth without an honest belief in the truth of the facts being verified (including imprisonment for up to two years for being in contempt of court).

Where you do not have first-hand knowledge of facts and matters which are set out in the witness statement, you should carry out sufficient investigation to satisfy yourself of the truth of the matters stated.

Next steps

Please could you carry out a final review of the statement and sign and date the same with today's date? Please then return the same to me as a pdf and if possible before you go on holiday, send the original to me by post.

The address is:

FAO Mandy Robertson
Womble Bond Dickinson
3 Temple Quay

Temple Back East
City of Bristol
BS1 6DZ

Thank you once again for your assistance.

Kind regards

Mandy

Mandy Robertson
Solicitor
Womble Bond Dickinson (UK) LLP

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From: Paul F Williams [mailto:
Sent: 03 August 2018 15:54
To: Mandy Robertson
Subject: RE: Group Action: Horizon (confidential) - draft witness statement update [WBUDK-AC.FID26896945]

Mandy

Amended statement as requested


Paul




Paul Williams
Restrictions Advisor
Agent Contracts & Services

Room 102
39 Bridge Street


St Helens
WA10 1NY

Landline: 

Mobile: 

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From: Mandy Robertson [mailto:
Sent: 03 August 2018 14:50

To: Paul F Williams
Subject: RE: Group Action: Horizon (confidential) - draft witness statement update [WBDUK-AC.FID26896945]

Hi Paul

As promised, please find attached your near final draft witness statement for your final review and comments. As with last time, please could you make any changes in tracked changes?

Kind regards

Mandy

Mandy Robertson
Solicitor
Womble Bond Dickinson (UK) LLP

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From: Mandy Robertson
Sent: 03 August 2018 11:10
To: 'Paul F Williams'
Subject: RE: Group Action: Horizon (confidential) - draft witness statement update [WBDUK-AC.FID26896945]


Hi Paul

Thank you for the update. I hope the mess-around  doesn't interfere with your holiday!

Your updated statement is currently being reviewed by a colleague and I hope to get it to you later today for your final review and comments.

Kind regards

Mandy

From: Paul F Williams [<mailto:> 
Sent: 03 August 2018 08:50
To: Mandy Robertson
Subject: RE: Group Action: Horizon (confidential) - SERV 135 letter [WBDUK-AC.FID26896945]

Hi Mandy

Late yesterday I learnt that [GRO] had been postponed, so I'm working as normal today – if you need me to review the amended statement please email it to me.

Kind regards

Paul



Paul Williams

Restrictions Advisor
Agent Contracts & Services

Room 102
39 Bridge Street
St Helens
WA10 1NY

Landline: [GRO]

Mobile: [GRO]

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From: Mandy Robertson [mailto:[GRO]]
Sent: 31 July 2018 14:46
To: Paul F Williams
Subject: RE: Group Action: Horizon (confidential) - SERV 135 letter [WBUDK-AC.FID26896945]

Hi Paul

Due to the circumstances [GRO] we may be able to get more time to finalise your witness statement, as on review by my colleague there is another individual claimant (Bates) which it would be helpful to get your thoughts on. When are you back from annual leave please?

I will need to double check that we can push the deadline with the powers that be.

Kind regards

Mandy

Mandy Robertson
Solicitor
Womble Bond Dickinson (UK) LLP

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e: [GRO]

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From: Mandy Robertson
Sent: 31 July 2018 14:20
To: 'Paul F Williams'
Subject: RE: Group Action: Horizon (confidential) - SERV 135 letter [WBDUK-AC.FID26896945]

Great, I was just about to ask what your middle name was.

Thank you for clarifying.

Many thanks

Mandy

From: Paul F Williams [mailto:**Sent:** 31 July 2018 14:18
To: Mandy Robertson
Subject: RE: Group Action: Horizon (confidential) - SERV 135 letter [WBDUK-AC.FID26896945]

Hi Mandy

I've just realised that page one says "witness statement of Paul F Williams"

I do not have a middle name - the "F" is an email convention added to distinguish me from another Paul Williams who also does not have a middle initial – so for accuracy it should be the "witness statement of Paul Williams"

Regards

Paul



Paul Williams
Restrictions Advisor
Agent Contracts & Services
Room 102
39 Bridge Street
St Helens
WA10 1NY
Landline:
Mobile:

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From: Mandy Robertson [mailto:] GRO
Sent: 31 July 2018 13:05
To: Paul F Williams
Subject: RE: Group Action: Horizon (confidential) - SERV 135 letter [WBDUK-AC.FID26896945]

Thank you very much Paul. I will be in contact with any final comments shortly, to hopefully send you a finalised version for signature tomorrow.

Kind regards

Mandy

Mandy Robertson
Solicitor
Womble Bond Dickinson (UK) LLP

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From: Paul F Williams [mailto:] GRO
Sent: 31 July 2018 12:51
To: Mandy Robertson
Subject: RE: Group Action: Horizon (confidential) - SERV 135 letter [WBDUK-AC.FID26896945]

Mandy

Although you did a very good job of catching my thoughts yesterday I have clarified a few minor points here and there, hopefully my changes all make sense.

Kind regards

Paul



Paul Williams

Restrictions Advisor
Agent Contracts & Services

Room 102
39 Bridge Street

St Helens
WA10 1NY

Landline: [] GRO

Mobile: [] GRO

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From: Mandy Robertson [mailto:mandy@wombledickinson.com] **GRO**
Sent: 31 July 2018 10:49
To: Paul F Williams
Subject: RE: Group Action: Horizon (confidential) - SERV 135 letter [WBDUK-AC.FID26896945]

Hi Paul

Please find attached your draft statement for your initial thoughts and comments.

This is being looked at by a colleague, so may change slightly following her thoughts, but given the turnaround time I thought it best to send to you now.

Please could you put any comments/ changes in tracked changes?

Kind regards

Mandy

Mandy Robertson
Solicitor
Womble Bond Dickinson (UK) LLP

d: **GRO**
m:
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From: Mandy Robertson
Sent: 30 July 2018 10:00
To: 'Paul F Williams'
Subject: Group Action: Horizon (confidential) - SERV 135 letter [WBDUK-AC.FID26896945]

Dear Paul

Ahead of our call in half an hour, please find attached an example SERV 135 letter we have on file, albeit this one isn't in your name.

I look forward to discussing the same shortly.

Kind regards

Mandy

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