

From: Mandy Robertson [GRO]
To: Michael R Haworth [GRO]
Cc: Beth Hooper [GRO]
Subject: RE: URGENT Confidential - Horizon Group Action (final version of your witness statement) [WBDUK-AC.FID26896945]
Date: Thu, 23 Aug 2018 09:56:51 +0100

Importance: High

Attachments: Witness_statement_Michael_Haworth_(unsigned).pdf; C-0157-0000035_native.pdf; 200009210_native.pdf

Inline-Images: image3b002f.PNG; imagea29a58.PNG; image39a2ab.PNG; image025.png; image026.png; image027.png; image028.png; image029.png; image030.png; image031.png; image032.png; image033.png; image034.png; image035.png; image036.png

Dear Michael

I have now finalised the statement, it has been proof read and the formatting has been checked. I have converted the statement to a pdf so that the formatting does not change when I email it to you.

The finalised statement is attached for your signature.

There are two reference numbers for each document (sorry if this wasn't clear before). There is a "control number", which are the numbers above and the number we need to insert into the statements which links it to the electronic trial bundle. If you need pdf copies of all of the documents referenced before you are happy to sign it, please let me know asap.

Signing a statement of truth

The purpose of the witness statement is to provide written evidence to support Post Office'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.

You may be asked to attend court to explain the issues covered in the witness statement to the Judge, and be asked questions on the evidence by the other side.

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. The penalties for signing a statement of truth without an honest belief in the truth of the facts being verified are potentially severe. A person who makes a false statement in litigation in an attempt to interfere with the course of justice will be in contempt of court, which is punishable by a prison sentence of up to two years.

Please could you:

carefully review your witness statement;

if you are satisfied with the content of the same, please print and sign the statement of truth;

email me a PDF of the signed witness statement; and

send the original signed witness statement to Victoria Brooks at Womble Bond Dickinson, Temple Quay, 3 Temple Back East, Bristol BS1 6DZ.

Thank you very much for your hard work in getting this over the line.

Kind regards

Mandy

Mandy Robertson

Solicitor

Womble Bond Dickinson (UK) LLP

d: [GRO]
m:
t:
e:

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From: Mandy Robertson

Sent: 22 August 2018 18:35

To: 'Michael R Haworth'

Subject: RE: URGENT Confidential - Horizon Group Action (final version of your witness statement save for yellow queries) [WBDUK-AC.FID26896945]

Thank you Michael.

I will work in these final changes and be in contact tomorrow with your final version for signature.

Kind regards

Mandy

From: Michael R Haworth [mailto:[GRO]]

Sent: 22 August 2018 17:10

To: Mandy Robertson

Subject: RE: URGENT Confidential - Horizon Group Action (final version of your witness statement save for yellow queries) [WBDUK-AC.FID26896945]

Hello Mandy

I am much better now thanks.

I have read through my statement and made tracked changes as requested.

Please let me know if you need anything further

Regards

Michael



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

Michael Haworth
Network Engagement Manager
Network Gateway Team
Branch & Customer Support

Mobile number: [GRO]

Email: [GRO]

From: Mandy Robertson [mailto:[GRO]]
Sent: 22 August 2018 11:08
To: Michael R Haworth [GRO]
Subject: RE: URGENT Confidential - Horizon Group Action (final version of your witness statement save for yellow queries) [WBDUK-AC.FID26896945]
Importance: High

Hi Michael

As expected, the barrister team made a couple of small amendments to your statement.

Please could you work on this version today and send me back your statement in tracked changes. Please do not change the formatting, as this is in a specific form which the Court requires.

I look forward to hearing from you.

Kind regards

Mandy Robertson
Solicitor
Womble Bond Dickinson (UK) LLP

d: [GRO]
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t:
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From: Mandy Robertson
Sent: 21 August 2018 16:21
To: 'Michael R Haworth'
Subject: RE: URGENT Confidential - Horizon Group Action (request for assistance) [WBDUK-AC.FID26896945]
Importance: High

Hi Michael

I hope you are feeling better.

Please find attached a draft copy of your witness statement, together with the key documents referred to.

You will see there are a couple of final queries in yellow. Please could you have a look at these queries and answer them in tracked changes?

At the same time as you looking at the statement, the barrister team is also looking at your statement. There may be a couple of further minimal changes.

I look forward to hearing from you on our queries in yellow. I will of course notify you of any final changes suggested by the barrister team. I hope to be in a position to send you the finalised statement for you to sign by close of play tomorrow. This needs to be signed by close of play on Thursday.

Thank you for your continued assistance.

Kind regards

Mandy

From: Michael R Haworth [[mailto:](#) [GRO]]
Sent: 15 August 2018 12:41
To: Mandy Robertson
Subject: RE: Confidential - Horizon Group Action (request for assistance) [WBDUK-AC.FID26896945]

Hello Mandy

I am currently off work sick however, I've been through your questions below and entered responses. Hope these help.

I should be back in work next week.

Regards

Michael



**2017 Winner of the
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for Customer
Experience**

Michael Haworth
Network Engagement Manager
Network Gateway Team
Branch & Customer Support

Mobile number: [GRO]

Email: [GRO]

From: Mandy Robertson [mailto:[GRO]]
Sent: 15 August 2018 10:20
To: Michael R Haworth [GRO]
Subject: RE: Confidential - Horizon Group Action (request for assistance) [WBODUK-AC.FID26896945]

Hi Michael

I am in the process of finalising your witness statement today. Would you be able to assist with a few final queries:

1 You mentioned a specific interview file - Do you still have this? Was this something personal to you or was it a standard POL doc? (if not, we should note as much to avoid this question being asked) – this was a file that was personal to me & no I do not still have this.

2 Since you were a CA until 2014, did you just appoint Subpostmasters or also Operators under the NT contracts? I ask because would you have used the same structure even for different types of applicant? – thinking about it, it was actually more like 2010 that I changed roles. I can't honestly accurately remember the contracts in place at the time I was interviewing.

3 Are you able to send us a copy of the scoring frameworks which you used during your time as a CA? What was the maximum number of points an applicant could score? – I don't still have this but it was a standard process that all CAs worked to at the time. Tab 25 from the previous docs you sent me contains some details relating to the scoring framework. There were a total of 7 competencies and I think the each competency was marked out of 5.

4 Was your list of standard interview questions something you created, or a general Post Office document? Do you still have a copy of your questions? – I created this but seem to remember it was based on a standard document that all CAs used. I do not still hold a copy.

5 Please could you elaborate on the section of the interview about "following standards" – was this Post Office ones or in general? - this section was aiming to identify what experience the applicant had in working to laid down guidelines, legislation, quality standards, service standards, etc. and how they ensured they achieved / maintained these. This was not related to Post Office standards (unless they had previous PO experience on which they wished to draw).

6 We talked about losses and gains. You said you would tell Subpostmasters that sometime errors would correct themselves at a later date. What did you mean by this, and how would this happen? - I would mention that sometimes a corresponding error may be identified at a later date which could result in an accounting Transaction Correction being issued to the branch, eg if an incorrect amount had been claimed for cash remitted out to the cash centre. Or perhaps, if the stock had been incorrectly declared when balancing and on rechecking at the next balance, the correct figure was then declared. I did however state that in the meantime they would be showing a shortage in their balance and they would be responsible for making this good. As we discussed, I did also make it clear that if for example, payment wasn't taken from a customer or incorrect cash paid out to a customer, then these were errors that would not come back and they were fully responsible for making them good.

7 When you ran over the summary of the contractual requirements, you mentioned a crib sheet. Are you able to provide us with a copy of that? How long was the crib sheet? This is the one where you would use the book example. - the sheet I ran through was a copy of the document that had previously been sent to the applicant (I think this was 2 pages and went with the invite to interview letter). I do not still hold a copy of this document.

8 Can you remember when the process switched from letters to calls, informing the applicant that they had been successful at interview? - sorry, I can't remember. When it did change, it was purely the addition of a phone call and did not replace the letters. The calls would be made to both the successfully and unsuccessful applicants (if there were several being interviewed for the same branch).

9 Was the date of transfer often the date after audit? If so, why? How do you know this? - sorry, I can't remember. I don't remember referring to this when we spoke. I suggest you contact HR about this or perhaps someone in the Agent Contract Deployment team (eg, John Breeden).

I will work your answers into your statement, which should be with you by the end of this week for signing.

Thank you for your continued assistance with this.

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: 01 August 2018 12:53

To: 'Michael R Haworth'

Subject: RE: Confidential - Horizon Group Action (request for assistance) [WBDUK-AC.FID26896945]

Hi Michael

I have added a few more points to your draft statement to cover later today, for you to have a skim over before our call (if you have time).

Kind regards

Mandy

From: Mandy Robertson
Sent: 31 July 2018 13:58
To: 'Michael R Haworth'
Subject: RE: Confidential - Horizon Group Action (request for assistance) [WBDUK-AC.FID26896945]

Hi Michael

Ahead of our meeting tomorrow, please find attached the bones of your statement, with some questions for us to cover on our call as a starting point.

I look forward to speaking to you.

Kind regards

Mandy

From: Mandy Robertson
Sent: 27 July 2018 16:26
To: 'Michael R Haworth'
Subject: RE: Confidential - Horizon Group Action (request for assistance) [WBDUK-AC.FID26896945]

Hi Michael

Thank you for getting back to me so quickly. Please could I pencil some time in your diary for 2pm on Wednesday for an hour next week? I should have the start of the draft statement by then and we can pick it up again the following week on your return (I hope you are ok).

Kind regards

Mandy

From: Michael R Haworth [mailto:[REDACTED]] [GRO]
Sent: 27 July 2018 16:06
To: Mandy Robertson
Subject: RE: Confidential - Horizon Group Action (request for assistance) [WBDUK-AC.FID26896945]

Hello Mandy

Unfortunately I have limited availability next week. I am scheduled to have an eye operation on Thursday and will be off on the Friday. If all goes to plan, I should be available the following week.

As far as next week is concerned, I am contactable:

Monday afternoon after 2pm

Tuesday – most of the day (I can re-arrange things around this)

Wednesday – 2pm – 5pm

Please let me know what fits in best for you

Regards

Michael



Michael Haworth
Network Engagement Manager

Network Gateway Team

Branch & Customer Support

Mobile number [REDACTED] [GRO]

Email [REDACTED] [GRO]

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From: Mandy Robertson [mailto:[REDACTED]] [GRO]
Sent: 27 July 2018 14:56
To: Michael R Haworth [mailto:[REDACTED]] [GRO]
Subject: Confidential - Horizon Group Action (request for assistance) [WBDUK-AC.FID26896945]

Dear Michael

I hope you are well? Thank you for your help a couple of months ago regarding the claim brought against Post Office by Mr Sabir. My colleague Victoria found your input was invaluable to getting the right information to finalise Post Office's defence to his claim.

We are now in the process of preparing witness statements, with a deadline of 8 August 2018. Please find attached a briefing note which contains an update about the court process, the provision of witness statements and what is required over the next few weeks to meet the court deadline.

We would like to take a short statement from you which covers some of the points you assisted with a couple of months ago. I propose to draft a short statement based on the information you provided to Victoria early next week and then, if possible, to arrange a call later in the week so that we can go through the relevant details which we will need to cover in your statement. I envisage this will be a short statement of no more than four or five pages.

When would be convenient to speak late next week? I would like to set aside an hour in our diaries to talk through the issues. Please could you also confirm you are available next week until 8 August 2018 to assist with finalising your statement?

Thank you in advance for your assistance. It is much appreciated. If you need any help clearing your desk for time to deal with this, please let me know and I can ask for help on this.

Kind regards

Mandy

Mandy Robertson
Solicitor
Womble Bond Dickinson (UK) LLP

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e:

[GRO]

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