

FREETHS

Womble Bond Dickinson (UK) LLP
DX 38517 Southampton3

Direct dial:
Direct fax:
Switchboard:
Email: james.hartley@freeths.co.uk

GRO
GRO

17 December 2018

Our Ref: JXH/1684/2113618/1/SJ
Your Ref: AP6/364065.1369

By Email Andrew.Parsons@freeths.co.uk **GRO**

Dear Sirs

POST OFFICE GROUP LITIGATION TRANSACTION CORRECTIONS AND BRANCH TRADING STATEMENT FLOWCHARTS

We write further to your email of 14 December 2018 (timed at 15:43), appending your proposed flowcharts. Our comments are noted below.

TC Flowchart

We have considered the flow chart you have provided in relation to TCs, and made amendments as shown on the attached document.

You will note that we have:

1. Amended references to SPMR to SPM.
2. Added in the "SPM chooses to deal with TC later" box "(select 'cancel')".
3. Added an arrow from "No, TC does not need to be processed now" to link it to the box to the left (and removed the underlining from "not").
4. Removed from the box beginning "Horizon shows details of the TC selected..." the words in parentheses "i.e. evidence and details of POL individual to contact if SPM has queries" – this is because the evidence at trial was that this information was not always provided and/or was not always clear.
5. Changed the wording in relation to "Settle Centrally" to more neutrally reflect the position.

In relation to the "Seek Evidence" option, there was no evidence at trial as to what would be the effect of selecting this option. Please provide documentary reference(s) as to the effect of selecting this option so we can consider it now.

Please read our Data Protection Privacy Notice at www.freeths.co.uk

Freeths LLP is a limited liability partnership, registered in England and Wales, partnership number OC304688. Registered Office: Cumberland Court, 80 Mount Street, Nottingham NG1 6HH. Authorised and regulated by the Solicitors Regulation Authority. A full list of the members of Freeths LLP is available for inspection at the registered office.

17 December 2018
Page 2

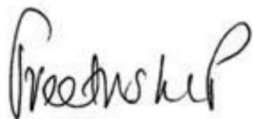
Subject to the above, we think it may be helpful for the judge to have both TC flowcharts (the attached version and the version that we sent to you on 14 December, by email timed at 18:22), as they have slightly different focuses (in that our version more clearly shows the actual buttons available). Please confirm if you agree.

Branch Trading Statement Flowchart

We would be agreeable to this flowchart being provided to the Judge, if the documentary references are removed, as there was no detailed evidence of this nature before the Court. We have provided an amended version accordingly for you to consider.

We look forward to hearing from you as soon as possible with a view to finalising these documents today, for filing at 4pm.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Freeths LLP', is written over a light blue circular stamp.

Freeths LLP

Please respond by e-mail where possible