

**From:** Anthony de Garr Robinson <[REDACTED] GRO>  
**To:** "Parsons, Andrew" <[REDACTED] GRO>  
**Subject:** RE: Bates & Others v Post Office Limited // Claim no: HQ16X01238 [BD-4A.FID26859284]  
**Date:** Tue, 5 Jul 2016 14:51:58 +0000

**Importance:** Normal

**Attachments:** 039.Bates.note\_on\_draft\_letter\_of\_response.docx

**Inline-Images:** image001.jpg; image002.jpg; image003.jpg; image004.png; image005.png; image006.png; image009.jpg; image010.jpg

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Here are my thoughts – not proof read, so I apologise for the inevitable errors. I also apologise for the delay. With more time it would have been better organised and shorter.

Best wishes,

Tony

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**From:** Parsons, Andrew [mailto:[REDACTED] GRO]  
**Sent:** 05 July 2016 15:21  
**To:** Anthony de Garr Robinson <[REDACTED] GRO>  
**Subject:** RE: Bates & Others v Post Office Limited // Claim no: HQ16X01238 [BD-4A.FID26859284]

Tony – any ETA on your comment on the LOR?

I'm sorry to chase. POL are pushing us to scope out how the next 2 weeks might look so that we can line up the right people to review the LOR and it would be good to understand your thinking before we do anything.

Andy

**Andrew Parsons**  
Partner

*Bond Dickinson*

**Direct:** [REDACTED] GRO  
**Mobile:** [REDACTED]

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**From:** Parsons, Andrew  
**Sent:** 04 July 2016 19:17  
**To:** Anthony de Garr Robinson  
**Cc:** Porter, Tom; Loraine, Paul  
**Subject:** RE: Bates & Others v Post Office Limited // Claim no: HQ16X01238 [BD-4A.FID26859284]

Agreed on a short but polite response to Freeths.

Tomorrow lunchtime is fine for comments on the LOR.

The scheme provided no protection against "victimisation". Indeed, it said the opposite- that POL could use anything found during the scheme to take action (eg. termination, civil proceedings, prosecution, etc) against a postmaster. I'm really reluctant to give anything on this point but lets discuss next time we speak.

A

Andrew Parsons  
Partner  
Bond Dickinson LLP  
Tel: GRO

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**From:** [Anthony de Garr Robinson](#)  
**Sent:** 04/07/2016 18:46  
**To:** [Parsons, Andrew](#)  
**Cc:** [Porter, Tom](#); [Loraine, Paul](#)  
**Subject:** RE: Bates & Others v Post Office Limited // Claim no: HQ16X01238 [BD-4A.FID26859284]

This is beyond a joke. They are running up costs for no good reason (or for no good reason that they have identified). A courteous but firm response seems to me to be in order. Happy to discuss over the phone tomorrow morning.

I'm conscious that I was supposed to let you have my headline comments on the draft letter of response by COB today, and that I have failed to meet that deadline. You will have something by lunchtime tomorrow, but if that causes you problems please tell me and I will get up early to accommodate you.

On your previous "victimisation" email, it seems to me that we could formulate a fair assurance that leaves our ability to take lawful action in accordance with our ordinary practices. Given the terms of our April letter, I infer that the complaint review and mediation scheme had some terms that might give us a good starting point. If there are any terms relevant to victimisation, could you let me know what they are?

Tony

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**From:** Parsons, Andrew [[mailto:](#)GRO]  
**Sent:** 04 July 2016 18:20  
**To:** Anthony de Garr Robinson <GRO>  
**Cc:** Porter, Tom <GRO>; Loraine, Paul <GRO>  
**Subject:** FW: Bates & Others v Post Office Limited // Claim no: HQ16X01238 [BD-4A.FID26859284]

Tony

FYI – latest letter from Freeths on the GLO. They have asked us to identify now which of the GLO issues we consider are not common or related issues, despite us saying that we will pick up this point in the Letter of Response (**LOR**). I've attached our last letter for ease of reference.

I'll have a think about a response – are you around tomorrow to discuss?

Kind regards  
Andy

**Andrew Parsons**  
Partner

*Bond Dickinson*

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**From:** Imogen Randall [<mailto:GRO>]  
**Sent:** 04 July 2016 17:34  
**To:** Porter, Tom  
**Cc:** Matthews, Gavin; Parsons, Andrew; James Hartley  
**Subject:** Bates & Others v Post Office Limited // Claim no: HQ16X01238

Sirs

See attached.

Freeths LLP

**Imogen Randall**

Associate

Dispute Resolution



**FREETHS**



Freeths LLP, Floor 3, 100 Wellington Street, Leeds LS1 4LT

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