

From: "Deas, Emma" <[REDACTED]>
To: Andrew Parsons <[REDACTED]>, Rodric Williams <[REDACTED]>, "Emanuel, Catherine" <[REDACTED]>
Subject: RE: GLO Board Paper - (05.11.19) (004).docx
Date: Mon, 11 Nov 2019 22:13:50 +0000
Importance: Normal
Attachments: GLO_Board_Paper_-_ (05.11.19)_(004)_-_Amended.docx
Inline-Images: image001.png; image002.png; image003.png

All,

Please see attached with our proposed changes. The changes of substance are:

To update the position on exchange of lead Claimant criteria – further to Freeths letter late last week we have agreed to write to the Court re: the move to 12 December 2019 with a further CMC in January. I have not amended the appendices bearing in mind we do need to write to the Court in respect of this change and the further CMC.

The amendment to the numbers on the Claimants' post termination losses.

I have also included Andy's suggested changes.

Kind regards,

Emma

From: Andrew Parsons <[REDACTED]>
Sent: 11 November 2019 21:55
To: Rodric Williams <[REDACTED]>; Emanuel, Catherine <[REDACTED]>; Deas, Emma <[REDACTED]>
Subject: Re: GLO Board Paper - (05.11.19) (004).docx

Rod

Just one point from me which is that I wouldn't say that we are only disputing the unorthodox claims. The claim for loss of profits is perfectly ordinary, the Cs are just adopting an interpretation of the law that maximises their recoverable losses.

If you agree, I would change the conclusion to read “unorthodox or potentially significant”.

And in the body of the report at the top of page 4, I would delete the word unorthodox so it just says “the most contentious claims”.

A

Andrew Parsons

Partner
Womble Bond Dickinson (UK) LLP

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From: Rodric Williams < >
Sent: Monday, November 11, 2019 9:08 pm
To: andrew.parsons; Emanuel, Catherine; Deas, Emma
Subject: GLO Board Paper - (05.11.19) (004).docx

Andy, Emma, Kate,

With apologies for the lateness, but could you please take a look at the attached report to the Board Subcommittee, which provides an update on the Group Litigation and – more importantly – an overview of the approach being taken to the Further Issues Defences so that we can “bring them along” with us.

Could I please have your comments back tonight? I apologise for asking this, but I need to get it to our Company Secretary tonight, so it can be distributed to the SubCo members ahead of the (brought forward) meeting on Wednesday.

Thanks, Rod

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