From: Andrew Parsons GRO

To: Charlie Temperley GRO

Cc: Amy Prime GRO

GRO

GRO

Dave Panaech

Subject: Common Issues Judgment planning [WBDUK-AC.FID26896945]

Date: Mon, 7 Jan 2019 09:49:01 +0000

**Importance:** Normal

Inline-Images: image7146f1.PNG; imagedd4bf3.PNG; image965d9b.PNG

Charlie

I've had several calls with Rod about planning for what we do when the Common Issues judgment lands. UKGI are getting very jumpy so he wants everything super slick.

Please can you therefore prepare a series of draft emails to go out when the CI judgment gets here. Please prepare them all in one Word doc that we can send to Rod for comments.

To be sent immediately

Email to go from WBD to Rod, Mark and Jane enclosing the Judgment. To include warning about use and distribution of draft judgments.

Email to go from Rodric to Senior Management: Paula Vennells; Al Cameron; Tim Parker; and Mark Davies, telling them that the Judgment has landed and will be circulated shortly and a call will be put in the diary within the next 24 hours.

To be sent within 4 hours

Email to go from Rodric to Senior Management: Paula Vennells; Al Cameron; Tim Parker; and Mark Davies, enclosing the Judgment and to include:

- a. Above warning + an extra warning for Tom Cooper (he is a director but also works for PO's shareholder and so needs to be warned that he cannot send the Judgment to UKGI).
- b. A blank template section (to be completed later) that summarises the judgment
- c. A description of the next steps eg. call with Counsel in next 24 hours to discuss:
  - i. Key findings in the Judgment
  - ii. Commercial impact
  - iii. Media impact
  - iv. Cost consequences
  - v. Appeal possibilities

To be sent after call with senior management

Email to go from Rodric to Portland (PO's comms team), copying Mel Corfield and Mark Davies, enclosing the Judgement and including the usual warning on non-distribution.

Email to go from Rodric to UKGI, informing them that the Judgment has landed, not being provided due to CPR restrictions, explain that Rodric will call Richard (??) the GC at UKGI to discuss.

Email from Mark Underwood to go to the PO Steering Group informing them that the Judgment has landed, not getting a copy so to control circulation; summarising the key findings (blank section for now); explaining next steps (eg. senior management briefed; appeal or not; being reviewed by Portland; handing down hearing on DATE.

Email from Jonny G to Chris Jay (legal counsel at FJ) explaining that we have the judgment; cannot provide a copy as in draft; to be handed down on DATE and will then get a copy.

To be sent after handing down hearing:

Email from Rodric to UKGI enclosing the Judgment, with section providing a brief summary of the key findings and planned actions.

Email from Mark Underwood to PO steering group enclosing the judgment.

- . Email from Jonny G to Chris Jay (FJ) enclosing the Judgment, with section providing a brief summary of the key findings and planned actions.
- Email from Jonny G to Robert enclosing the Judgment, with section providing a brief summary of the key findings and planned actions.

Thanks

## **Andrew Parsons**

Partner Womble Bond Dickinson (UK) LLP



Stay informed: sign up to our e-alerts



womblebonddickinson.com

