

Message

From: Mark Underwood1 [GRO]
Sent: 21/11/2016 09:14:49
To: Parsons, Andrew [GRO]
CC: Rodric Williams [GRO]
Subject: RE: Remote Access Wording

Yep no worries, whatever works

Mark

From: Parsons, Andrew [mailto:GRO]
Sent: 21 November 2016 09:14
To: Mark Underwood1
Cc: Rodric Williams
Subject: RE: Remote Access Wording

Mark – My diary is tight today so I'll only be arriving just before the meeting.

I can do after the meeting?

A

Andrew Parsons
Partner
Bond Dickinson LLP

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Mobile: [GRO]
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From: Mark Underwood1 [mailto:GRO]
Sent: 21 November 2016 09:12
To: Parsons, Andrew
Cc: Rodric Williams
Subject: FW: Remote Access Wording

Hi Andy – please see below note from Jane. Can we pick up this afternoon – prior to the PLSG?

Thanks

Mark

From: Jane MacLeod
Sent: 21 November 2016 09:03
To: Rodric Williams; Mark Underwood1
Subject: Fwd: Remote Access Wording

Would you please make sure that Rob H is happy with this wording and that we discuss with him how to approach FJ on this?

Thanks

Jane MacLeod
General Counsel
The Post Office
GRO

Sent from my iPad

Begin forwarded message:

From: Mark Underwood1 <[redacted] GRO>
Date: 20 November 2016 at 14:34:09 GMT
To: "Parsons, Andrew" <[redacted] GRO>, Jane MacLeod
<[redacted] GRO>, Rodric Williams <[redacted] GRO>
Cc: "Lukas, Elisa" <[redacted] GRO>, "Prime, Amy" <[redacted] GRO>
Subject: RE: Remote Access Wording

Thanks Andy,

My greatest concern is that we don't qualify the statement that transaction data can be deleted / changed by detailing that - although theoretically possible - because the logistical challenges that would need to be overcome are so huge, it really is not a credible line of enquiry.

I really do think we need to include a qualification which, in some detail, sets out the logistical challenges. Without this qualification, I think the letter could be quite damaging (particularly if leaked to the Network / Media) as it provides soundbites that give credibility to an allegation that actually lacks any merit.

If I recall correctly, we are not obligated to respond to Freeths Reply, but we have a desire to do so and before we receive Particulars on 1 Dec? I think this gives us enough time to apply suitable pressure on Deloitte to provide us with this information? If they are confident enough to have made statements that this is possible, then presumably they have the information necessary to be able to detail exactly how it can happen?

Mark

From: Parsons, Andrew [mailto:[redacted] GRO]
Sent: 20 November 2016 13:17
To: Mark Underwood1; Jane MacLeod; Rodric Williams
Cc: Lukas, Elisa; Prime, Amy
Subject: RE: Remote Access Wording

Thanks Mark.

I've updated the attached. Where I agreed with your suggested amendments, I've included them and deleted the respective comment. In relation to your other questions, I've added my answers to the attached.

A

Andrew Parsons
Partner
Bond Dickinson LLP


Bond Dickinson

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From: Mark Underwood1 [mailto:
Sent: 18 November 2016 21:15
To: Parsons, Andrew; Jane MacLeod; Rodric Williams
Cc: Lukas, Elisa; Prime, Amy
Subject: RE: Remote Access Wording

Andy, Jane & Rod,

I have track changed my comments, for your consideration, in the attached version.

Mark

From: Parsons, Andrew [mailto:
Sent: 18 November 2016 19:25
To: Jane MacLeod; Rodric Williams
Cc: Mark Underwood1; Lukas, Elisa; Prime, Amy
Subject: Remote Access Wording

Jane, Rodric

As discussed in the con with Tony, please find attached our draft wording on the "remote access" issues. This wording will be part of a longer letter to Freeths that we hope to circulate next week.

In the attached, we refer to certain information provided by FJ to Post Office about editing transaction data. This information was by way of an email (attached) that was arguably subject to litigation privilege. By referring to this information in our letter (i) we may be waiving privilege in that email and (ii) Freeths could push for a collateral waiver of privilege in other emails from FJ on the same topic.

We have not expressly referred to the email in the letter to minimise this risk. However, my view is that if we do not explain that Post Office relied on information provided by FJ, Post Office's story is severely weakened and hence some risk of waiving privilege should be taken.

Happy to discuss this point in more detail. All comments on the attached are welcomed.

Kind regards
Andy

Andrew Parsons
Partner
Bond Dickinson LLP

Bond Dickinson

Direct: **GRO**
Mobile: **GRO**
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