

## Message

**From:** Veronica Branton [GRO]  
**Sent:** 22/03/2018 09:21:09  
**To:** Jane MacLeod [GRO]; Mark Underwood1 [GRO] Rodric Williams [GRO]; Andrew Parsons [GRO]; Amy Prime [GRO]  
**CC:** Patrick Bourke [GRO]; Diane Blanchard [GRO]; Thomas P Moran [GRO]; Mark R Davies [GRO]  
**Subject:** RE: Litigation and Appointment - next steps

Hi all

I've mocked up the agenda. Please could you let me know who the leads are for the items? Is the protocol for the engagement with UKGI for the Subcommittee to decide>

Best wishes

Veronica

### Postmaster Litigation Subcommittee Agenda



Date		Chair		Secretaries	
26 March 2018		<ul style="list-style-type: none"><li>Tim Parker (Chairman)</li><li>Toni Cooper</li><li>Ken McGee</li><li>Paula Ventella</li><li>Seelak Chandra</li></ul>		<ul style="list-style-type: none"><li>Jane MacLeod (Company Secretary)</li><li>Veronica Branton (Admin Secretary)</li><li>Mark Davies (Group Director, Communications)</li><li>Tom Moran (Subwork Development/Grants)</li><li>Andrew Parsons (Bond Director)</li><li>Rod Williams (Head of Legal, DR &amp; Brand)</li><li>Mark Underwood (Head of Portfolio, Legal, Risk &amp; Compliance)</li></ul>	
Start Time	Finish Time				
17.00hrs	18.00hrs				
Location					
Room 110 Stratford					
Agenda Item		Agenda Number	Purpose	Lead	Time
1.	Terms of Reference	Noting	To note the ToRs which have gone to the Board for approval on 27 March 2018.	Jane MacLeod	17.10
2.	Litigation timetable & suggested dates for future meetings	Noting	To note the timetable & suggested dates for future meetings.		17.15
3.	Update on developments since January board meeting <ul style="list-style-type: none"><li>Scope of disclosure</li><li>Scope of Horizon bearing</li><li>Appointment of IT expert</li><li>Agreement for security for assets.</li></ul>	Noting	To receive and discuss minutes and developments.		17.15
4.	Protocol for engagement with UKGI	Decision	To agree the protocol for engagement with UKGI.	Jane MacLeod	17.40
5.	Contingency planning	Discussion	To discuss.		17.45
6.	GCRC				17.50

### Postmaster Litigation Subcommittee



Agenda Item	Agenda Number	Purpose	Lead	Time	
7. GCRC <ul style="list-style-type: none"> <li>Review of meeting with Chairman to discuss appropriate minutes approval.</li> </ul>	Noting			17.50	



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**Veronica Branton**  
Head of Secretariat

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**GRO**

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**From:** Jane MacLeod

**Sent:** 21 March 2018 22:59

**To:** Mark Underwood1 **GRO**; Rodric Williams **GRO**  
Parsons, Andrew **GRO**; Amy Prime **GRO**  
**Cc:** Patrick Bourke **GRO**; Veronica Branton **GRO**; Diane  
Blanchard **GRO**; Thomas P Moran **GRO**; Mark R Davies  
**GRO**

**Subject:** RE: Litigation and Appointment - next steps

Agreed – we should add CCRC update as an extra item. Under ‘AOB’ consider adding timing of meeting with Counsel to discuss interim merits opinion.

I'd like to circulate the following to the ‘committee’ members ahead of the meeting:

- ToR (as agreed at the PLSG last week )
- 2018/19 Litigation Timetable (including committee timings which we discussed last week)
- Protocol for engagement with UKGI (final comments please ....)

Could we have these finalised on Friday please?

Attendees on Monday should be:

- Tim P, Ken McCall, Tom C, Paula & Al (optional)
- me, Tom M, Andy, Rod, Mark D, Mark U
- Veronica

**Veronica** - would you please mock up an agenda as per below (including an extra item ‘update on CCRC’)?

Thanks

Jane



**Jane MacLeod**

Group Director of Legal, Risk & Governance  
Ground Floor  
20 Finsbury Street  
LONDON  
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**GRO**

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**From:** Mark Underwood1

**Sent:** 21 March 2018 17:35

**To:** Jane MacLeod <[GRO]>; Rodric Williams <[GRO]>; Parsons, Andrew <[GRO]>; Amy Prime <[GRO]>  
**Cc:** Patrick Bourke <[GRO]>; Veronica Branton <[GRO]>; Diane Blanchard <[GRO]>  
**Subject:** RE: Litigation and Appointment - next steps

Hi Jane – the agenda looks good to me. Di is setting up the call on Friday, and I think Rod is looking at the template from UKGI.

Though strictly speaking a separate matter, the only other agenda item to consider including or reference when speaking is the CCRC?

Mark



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### Mark Underwood

Head of Portfolio: Legal, Risk & Governance

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20 Finsbury Street  
London EC2Y 9AQ

[GRO]

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**From:** Jane MacLeod

**Sent:** 21 March 2018 15:56

**To:** Rodric Williams <[GRO]>; Parsons, Andrew <[GRO]>

**Cc:** Patrick Bourke <[GRO]>; Mark Underwood1 <[GRO]>

Veronica Branton <[GRO]>; Diane Blanchard <[GRO]>

**Subject:** FW: Litigation and Appointment - next steps

[GRO]

(Veronica – for awareness re Monday committee meeting; Di – for awareness re setting up a possible call on Friday)

All

I am being chased by UKGI for our views on this – can I have your thoughts? We have the first Board sub-committee meeting on Monday and I would like to flag this to them?

Also, we need to work up an agenda for that sub-committee meeting. So far my suggestions would be:

- ToR
- Litigation timetable & suggested dates for future meetings
- Update on developments since January board meeting:
  - Scope of disclosure
  - Scope of Horizon hearing
  - Appointment of IT expert
  - Application for security for costs
- Engagement with UKGI
- Contingency planning
- AOB

Anything else – we only have an hour? Could we have a call on Friday to discuss?

Thanks

Jane



**Jane MacLeod**

Group Director of Legal, Risk & Governance  
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**From:** O'Neill, Elizabeth - UKGI <[REDACTED]>  
**Sent:** 01 March 2018 15:51  
**To:** Patrick Bourke <[REDACTED]>  
**Cc:** Jane MacLeod <[REDACTED]>; Rodric Williams <[REDACTED]>; Callard, Richard - UKGI <[REDACTED]>; Cooper, Tom - UKGI <[REDACTED]>; Lambert, Helen - UKGI <[REDACTED]>  
**Subject:** Litigation and Appointment - next steps

Patrick, Helen,

Thank you for your time last week.

As discussed, I attach a standard form litigation protocol along the lines of what we would propose to submit to the Permanent Secretary. As you will see, this sets out various touchpoints in the litigation process, and the steps we intend to take to ensure the Permanent Secretary remains fully informed at each salient point.

If you are able to provide more detail on the litigation timetable, or indeed if you have any comments or suggestions, we would be happy to amend the protocol bespoke to the current litigation.

Separately I'd be grateful, as I indicated in my email to Helen on Monday, if in anticipation of Tom Cooper's appointment, you could let me know if you intend to agree an NDA similar to the one you have with Richard, and if so, forward me the proposed text so that Tom and I may consider.

Kind regards,

Elizabeth

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**From:** Patrick Bourke <[REDACTED]>  
**Sent:** 23 February 2018 15:10  
**To:** O'Neill, Elizabeth - UKGI <[REDACTED]>  
**Cc:** Jane MacLeod <[REDACTED]>; Rodric Williams <[REDACTED]>; Callard, Richard - UKGI <[REDACTED]>  
**Subject:** Litigation Meeting

Dear Elizabeth

It was a pleasure to meet with you this morning.

I just wanted to confirm that we have understood the need for an appropriately structured information flow in relation to the matters we discussed earlier, and agree that some form of protocol to govern those arrangements makes very good sense.

While recognising that there is no set format in this regard, it would nonetheless be helpful for us to draw inspiration from similar arrangements you have put in place with other ALBs. You kindly offered to share something with us for that purpose.

We will come back to you with our take on how this might work best in our case, having regard to the particularities of our governance arrangements and the litigation itself.

In the meantime, do please feel free to get in touch if there is anything you'd like to discuss.

Kind regards

Patrick



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