

Message

From: Mark R Davies [GRO]
Sent: 29/11/2016 16:36:30
To: Parsons, Andrew [/o=Exchange-Org/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ad9ed344815e47e4aaa3c0e7e1740919-Andrew Pars]
CC: Rodric Williams [GRO]; Jane MacLeod [GRO]; Prime, Amy [/o=Exchange-Org/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ab7222dda3a9453eae5751238a59562-Amy Prime]
Subject: Re: Postmaster Litigation - Subject to legal privilege. [BD-4A.FID26896945]

Apologies - I have read it through and am content.

Mark Davies
Communications and Corporate Affairs Director
[GRO]

On 29 Nov 2016, at 16:34, Parsons, Andrew [GRO] wrote:

Mark – apologies for pressing – but have you had a chance to review the draft letter?

Andy

Andrew Parsons

Partner

Bond Dickinson LLP

<image65d2b5.JPG>

Direct:

Mobile:

Office:

GRO

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<image823984.PNG>

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From: Jane MacLeod [mailto:[GRO]]
Sent: 29 November 2016 09:07
To: Mark R Davies
Cc: Rodric Williams; Parsons, Andrew
Subject: RE: Postmaster Litigation - Subject to legal privilege.

Mark

Attached is the recent Freeths' letter and Sunday's draft of the full response – most of which is procedural. There have been no material changes to that response other than in relation to section 9 which I sent you last night.

We want to get the response back to Freeths today if possible given that they are due to file their Particulars of Claim on 1 December (Thursday). Please liaise with Rod and Andy if you have any queries or comments.

Thanks

Jane



Jane MacLeod

General Counsel
Ground Floor
20 Finsbury Street
LONDON
EC2Y 9AQ

Mobile number: GRO

From: Mark R Davies

Sent: 29 November 2016 09:01

To: Jane MacLeod; GRO } Rodric Williams
GRO

Subject: Re: Postmaster Litigation - Subject to legal privilege.

Hi both

Could one of you send me the full document and I will re-read. Sorry that I haven't been as close to this as I should be.

Mark

Mark Davies

Communications and Corporate Affairs Director

GRO

On 28 Nov 2016, at 23:35, Jane MacLeod GRO wrote:

Paula, Al

Following discussions with our QC and Bond Dickinson this afternoon, the following is the recommended language to be included in the response to Freeths in the wider section on remote access:

"At each stage, Post Office ascertained the position to respond to the questions it believed it was being asked. With the benefit of hindsight, some of Post Office's statements may have been incorrect in light of what has since been identified in relation to Fujitsu's administrator access rights (see below). But Post Office refutes any suggestion that it ever made false statements deliberately or did so to mislead, deceive or conceal. The Post Office personnel responsible for those statements made them in good faith: what was said reflected what they understood the position to be after they had made relevant enquiries at the time."

There have been no other material changes to the wider drafting around the remote access issue which I circulated to you earlier today.

The challenge has been to balance the risk of adverse publicity ahead of the court process (Post Office's concern) with the need to be open and transparent with the Court in admitting that certain of the information we provided previously on this issue could be construed as 'wrong'.

Given Mark D had other commitments today, I am taking him through this wording early tomorrow.

Kind regards,

Jane MacLeod
General Counsel
The Post Office
GRO

Sent from my iPad

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