From: Rodric Williams GRO Wed 09/09/2015 4:49:08 PM (UTC) Sent: Susan BARTY GRO To: Tom Reid GRO Cc: FW: BBC [CMCK-UK.FID8673510] Subject: Attachment: 150904 Parnorama Rebuttal.pdf Attachment: 150907 Baroness Neville-Rolfe 7 September 2015.pdf Susan - in case it assists revising the draft letter of complaint, I attach the "rebuttal document produced for BIS" referred to in Mark's email below. I also attach the covering letter which accompanied it. Kind regards, Rodric Rodric Williams Solicitor, Corporate Services Post Office Ltd 20 Finsbury Street, London EC2Y 9AQ GRO GRO ----Original Message----From: Mark R Davies Sent: 07 September 2015 11:49 To: BARTY, Susan Cc: Rodric Williams; Patrick Bourke; Melanie Corfield; Tom Wechsler; Mark Underwood1; Jane MacLeod; Jane Hill; Reid, Tom Subject: RE: BBC [CMCK-UK.FID8673510] Hi Thanks Susan. Further to my email below, I think we should build out a section on Nick Wallis' involvement. In a nutshell I would be looking to say that (a) Mr Wallis' has clear views which threaten BBC impartiality (b) this point is underlined by the BBC previously requesting that he remove a blog post on this issue (c) we were not informed that he was involved in Panorama, which seems a breach of good faith and (d) we know he was involved because he has boasted about it on h is Facebook page. In adding this point I think we should provide examples (Mel has them) outlining where he has gone, on his blog, beyond journalism and into campaigning against PO. I would also use this letter to formally question why when approaching contributors, the BBC has never featured the views of the NFSP. Even if the NFSP has declined approaches, there is on the record footage of George Thomson talking about the issue. I think we should ask for errors in the current BBC News Online story by John Sweeney to be corrected (i.e. it states at present that we purused despite there being no evidence of theft - this is simply incorrect). I think we should also ask for the programme to be removed from iplayer. We should refer to the lack of use of public record transcripts, and cite specific points which would knock down some of the Panorama points. We might even consider using the excellent rebuttal document produced for BIS as an annex to our complaint. Thoughts? Mark ----Original Message----From: BARTY, Susan GRO

To: Mark R Davies

Sent: 04 September 2015 19:39

Cc: Rodric Williams; Patrick Bourke; Melanie Corfield; Tom Wechsler; Mark Underwood1; Jane MacLeod; Jane Hill; Reid, Tom Subject: RE: BBC [CMCK-UK.FID8673510]
Thanks, Mark.
That sounds a good idea.
Best wishes
Susan
Susan Barty Partner
T GRO M GRO F GRO E GRO
CMS Cameron McKenna LLP Cannon Place, 78 Cannon Street London EC4N 6AF United Kingdom
http://www.cms-cmck.com http://www.cms-lawnow.com
Original Message From: Mark R Davies GRO Sent: 04 September 2015 19:36 To: BARTY, Susan Cc: Rodric Williams; Patrick Bourke; Melanie Corfield; Tom Wechsler; Mark Underwood1; Jane MacLeod; Jane Hill; Reid, Tom Subject: Re: BBC [CMCK-UK.FID8673510]
Thanks Susan. I would like to review the complaint again in the light of the meeting: actually to make it even more comprehensive I think we need to formally note the views and involvement of Nick Wallis. Thanks Mark
Mark Davies Communications and Corporate Affairs Director Post Office Ltd
Mobile: GRO
> On 4 Sep 2015, at 18:39, BARTY, Susan GRO wrote:
> Thanks, Mark.
> We look forward to the further update, and will need to reflect on anything to be changed in the letter as a result. Accepting that we will probably not refer expressly to the meeting.
> Best wishes - and good weekends all
> Susan >
>
> Susan Barty > Partner
> Partiter >
> T GRO
> F GRO SRO SRO SRO SRO SRO SRO SRO SRO SRO S

>
> CMS Cameron McKenna LLP Cannon Place, 78 Cannon Street London EC4N > 6AF United Kingdom
> http://www.cms-cmck.com > http://www.cms-lawnow.com
> >
>Original Message > From: Mark R Davies GRO > Sout: 04 Southwher 2015 18:27
> Sent: 04 September 2015 18:27 > To: Rodric Williams; Patrick Bourke; Melanie Corfield; Tom Wechsler;
> Mark Underwood1; BARTY, Susan; Jane MacLeod; Jane Hill
> Subject: BBC >
> All
 Rod and I met James Harding, BBC director of news and current affairs, and Ceri Thomas, editor of Panorama today as you know. The BBC's head of complaints also attended.
> It was useful to have the opportunity to land our points about the BBC approach and the reality of the cases featured. I am really grateful to Rod for attending and his excellent support, and Mel for her pack.
> James Harding listened and responded positively without making any commitments, as we would expect. But we have landed key points.
> We were encouraged to go ahead with a complaint, which we will do. We were also assured that future interview requests will reflect the constraints we are under.
> I will update you more fully on Monday.
> Past wishes
> Best wishes > Mark
>
> Mark Davies
> Communications and Corporate Affairs Director Post Office Ltd
> Mobile: GRO
> >
> ***********************************
> This email and any attachments are confidential and intended for the addressee only. If you are not the named recipient, you must not use, disclose, reproduce, copy or distribute the contents of this communication. If you have received this in error, please contact the sender by reply email and then delete this email from your system. Any views or opinions expressed within this email are solely those of the sender, unless otherwise specifically stated.
> POST OFFICE LIMITED is registered in England and Wales no 2154540. Registered Office: Finsbury Dials, 20 Finsbury Street, London EC2Y 9AQ.
>
>
> ************************************
> Amsterdam, Antwerp, Barcelona, Beijing, Belgrade, Berlin, Bratislava, Bristol, Brussels, Bucharest, Budapest, Casablanca, Cologne, Dubai, Dusseldorf, Edinburgh, Frankfurt, Geneva, Glasgow, Hamburg, Istanbul, Kyiv, Leipzig, Lisbon, Ljubljana, London, Luxembourg, Lyon, Madrid, Mexico City, Milan, Moscow, Munich, Muscat, Paris, Podgorica, Prague, Rio de Janeiro, Rome, Sarajevo, Seville, Shanghai, Sofia, Strasbourg, Stuttgart, Tirana, Utrecht, Vienna, Warsaw, Zagreb and Zurich.
> CMS Cameron McKenna LLP is a member of CMS Legal Services EEIG (CMS
> EEIG), a European Economic Interest Grouping that coordinates an > organisation of independent law firms. CMS EEIG provides no client

> services. Such services are solely provided by CMS EEIG's member firms > in their respective jurisdictions. CMS EEIG and each of its member > firms are separate and legally distinct entities, and no such entity > has any authority to bind any other. CMS EEIG and each member firm are liable only for their own acts or omissions and not those of each other. The brand name "CMS" and the term "firm" are used to refer to some or all of the member firms or their offices. Further information can be found at www.cmslegal.com CMS Cameron McKenna LLP is a limited liability partnership registered in England and Wales with registration number OC310335. It is a body corporate which uses the word "partner" to refer to a member, or an employee or consultant with equivalent standing and qualifications. It is authorised and regulated by the Solicitors Regulation Authority of England and Wales with SRA number 423370 and by the Law Society of Scotland with registered number 47313. A list of members and their professional qualifications is open to inspection at the registered office, Cannon Place, 78 Cannon Street, London EC4N 6AF. Members are either solicitors or registered foreign lawyers. VAT registration number: 974 899 925. Further information about the firm can be found at www.cms-cmck.com The contents of this e-mail (including any attachments) are confidential and may be legally privileged. If you are not the intended recipient of this e-mail, any disclosure, copying, distribution or use of its contents is strictly prohibited, and you should please notify the sender immediately and then delete it (including any attachments) from your system. Notice: the firm does not accept service by e-mail of court proceedines, other processes or formal notices of any kind without specific prior written aereement.
e-mail of court proceedings, other processes or formal notices of any kind without specific prior written agreement.
>
>
> *************************************
> ***
>
>

This email and any attachments are confidential and intended for the addressee only. If you are not the named recipient, you must not use, disclose, reproduce, copy or distribute the contents of this communication. If you have received this in error, please contact the sender by reply email and then delete this email from your system. Any views or opinions expressed within this email are solely those of the sender, unless otherwise specifically stated.
POST OFFICE LIMITED is registered in England and Wales no 2154540. Registered Office: Finsbury Dials, 20 Finsbury Street, London EC2Y 9AQ.

This email and any attachments are confidential and intended for the addressee only. If you are not the named recipient, you must not use, disclose, reproduce, copy or distribute the contents of this communication. If you have received this in error, please contact the sender by reply email and then delete this email from your system. Any views or opinions expressed within this email are solely those of the sender, unless otherwise specifically stated.
POST OFFICE LIMITED is registered in England and Wales no 2154540. Registered Office: Finsbury Dials, 20 Finsbury Street, London EC2Y 9AQ.