

From: Andrew Parsons [GRO]
Sent: Wed 28/08/2019 3:23:41 PM (UTC)
To: Melanie Corfield [GRO]
Cc: Angela Van-Den-Bogerd [GRO]; Laura Tarling [GRO]; Martine Munby [GRO]; Mark Underwood1 [GRO]; Drummond, James [GRO]
Subject: RE: GLO - in strictest confidence and subject to legal privilege - collateral [WBDUK-AC.FID26896945]
Attachment: Collateral.zip

Mel

I have no comments on documents 4, 8 and 22. My comments on the other documents are attached as track changes / comment bubbles. They are largely repetition of the same points. I haven't double checked all the dates and figures but they seem to be in the correct ball-park.

The one repeating message throughout the documents is that Horizon is robust because both experts say so. This is correct as at today, but if the Judge finds that Horizon is not robust then he will likely have found a reason to side-step or disavow the expert evidence. In those circumstances then I'm not sure that this comms message will hold water. It may be worth working up an alternative comms package on the basis that the Judge throws out the expert's views.

Also if the Judge finds that Horizon is bad, will you still be putting out a comms line that is directly contrary to the Judge's view? I can understand why you might want to put any a counter-measure that Horizon is robust but you might be criticised for saying that Horizon is fine when the Judge says that it is not. This could then be spun as Post Office failing to listen. This is a comms point (so feel free to tell me to go away!) but do you need a plan for some more contrite lines around accepting that Horizon is not robust?

Just my two cents...

A

Andrew Parsons

Partner

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From: Melanie Corfield [GRO]
Sent: 28 August 2019 10:48
To: Andrew Parsons [GRO]
Cc: Angela Van-Den-Bogerd [GRO]; Laura Tarling [GRO]; Martine Munby [GRO]; Mark Underwood1 [GRO]; Drummond, James [GRO]
Subject: GLO - in strictest confidence and subject to legal privilege - collateral

Hi Andy,

With apologies later than I planned, I attach the folder of comms collateral for a high level legal view please regarding our positioning and messaging. This is in line with our strategy that in all circumstances we must, overall, be confident about the system.

Please give me a ring if you want to discuss.

Document 6 (questions and answers) is one still very much in development as we are still working through more detail which will go into some of the answers, particularly on technical matters re Horizon itself – and we will need your help as previously discussed about engaging with Fujitsu legal team at a sensible point.

Many thanks

Mel Corfield

Communications Team

Mobile: GRO

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