

From: "Parsons, Andrew" </O=BOND PEARCE/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=AP6>

To: "Rodric Williams"  , "Anthony de Garr Robinson"

Cc: "Porter, Tom"  , "Lorraine, Paul"

Bcc: "364065_01369_Horizon IT System_Group Action E_Mails" <{F26859284}.4A-LIVE@WCSBRI02.bondpearce.com>

Subject: Call from Freeths [BD-4A.FID26859284]

Date: Tue, 28 Jun 2016 14:48:31 -0000

Importance: Normal

Inline-Images: image001.jpg; image002.jpg; image003.jpg

Rodric, Tony

FYI only - I've just spoken to James Hartley, the Partner at Freeths. Given this is my first call with him, I thought I'd better give you a full run down.

He asked when we might be responding to the GLO letter. I've said we hoped to get something out by Thursday.

It was a slightly odd call. He asked about the process for making the GLO. In particular, whether we can jointly notify the Court that we want a GLO in principle and then follow-up with an agreed Order later. I said that our aim was to try to agree the GLO but we did have a number issues with certain provisions. I also said that we thought it might be difficult to agree the GLO without having sight of Letter of Response. He understood this point and appeared to accept that this was inevitable.

He then asked again about notifying the Court that the parties agree in principle to a GLO. I said that although my client was agreeable to a GLO in principle, I didn't understand what he was asking for – either there is an agreed Order to present to the Court or there is not and he makes an application.

He was very keen to try to get something on the Court record about there being a GLO as soon as possible. I got the strong impression that there is some form of pressure on him around getting the GLO – funding? We then had a conversation about timings. I said that we are producing a long LOR and that we can see merit in Freeths providing a full substantive response. The question then is whether the GLO should be made after this pre-action correspondence or in parallel. He didn't have a view on this.

I also asked him about his thoughts on the outline Court process after the GLO is made. He doesn't have any crystallised thinking on this at the moment but recognised that there were likely a number of preliminary issues to be addressed and that we needed to think about generic Particulars of Claim. He said that in all honesty his focus was on getting the GLO and not about what happened afterward.

All-in-all, it was a very pleasant and cooperative first call, if slightly odd that Freeths really don't have any solid thinking on how this matter might proceed.

Kind regards
Andy

Andrew Parsons
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