

From: "Parsons, Andrew" <[REDACTED]>
To: Anthony de Garr Robinson <[REDACTED]>
Cc: "Loraine, Paul" <[REDACTED]>, "Porter, Tom" <[REDACTED]>, "Owain Draper" <[REDACTED]>
<[REDACTED]>

Subject: Post Office - Letter of Response v2 [BD-4A.FID26859284]

Date: Sun, 10 Jul 2016 12:13:26 +0000

Importance: Normal

Attachments: _DOC_33329095(1)_Note_on_Malicious_Prosecution.docx;
_DOC_33327965(1)_Note_on_Unlawful_means_Conspiracy.docx;
_DOC_33327897(1)_Note_on_Harassment.docx;
_LETTER_33142705(4)_Letter_of_Response.DOCX

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

Tony

Please find attached an updated version of the LOR. There are still a number of points to be bottomed out but I hope the structure is now a bit tighter (it also needs a good proof read and formatting sorting out)

I would be grateful if you (or Owain) could help draft the following sections:

- Section 4: Legal duties
- Section 6A: Breach of contract.

In terms of other activities that will feed into the LOR:

- We have just received Deloitte's report on remote access. We're speaking to Deloitte tomorrow and will then update you.
- We're re-reviewing the Letter of Claim to make sure we haven't missed anything.
- I'm meeting POL on Thursday to work through the tactical points (and would welcome your input on the decision papers when you get a chance).

Otherwise, the plan is to submit a near final draft of the LOR to POL for approval on Friday. When do you think you might be able to draft the above sections? Also, could we have a chat about running through the whole letter?

FYI – please find attached brief research notes on malicious prosecution, unlawful means conspiracy and harassment. Notes to follow on misfeasance and HRA.

Kind regards
Andy

Andrew Parsons
Partner

Bond Dickinson

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