

From: Andrew Parsons <[REDACTED]>
To: robert worden <[REDACTED]>, Katie Simmonds <[REDACTED]>
<[REDACTED]>, 'robert worden' <[REDACTED]>
Cc: 'Chris Emery' <[REDACTED]>, Jonathan Gribben <[REDACTED]>
<[REDACTED]>, Lucy Bremner <[REDACTED]>
Subject: RE: Report 3 to court [WBDUK-AC.FID26896945]
Date: Wed, 22 May 2019 13:45:54 +0000
Importance: Normal
Inline-Images: image001.png; image002.png; image003.png; imagecfbe47.PNG; image1881be.PNG;
image970d06.PNG

Email is fine but just remember who you are writing to – the email will be to the clerk but with a view to it being passed to the Judge.

Also, please copy the following people to the email:

Me

Coyne

James Hartley <[REDACTED]>

A

Andrew Parsons
Partner
Womble Bond Dickinson (UK) LLP

d: [REDACTED]
m: [REDACTED]
t: [REDACTED]
e: [REDACTED]

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From: robert worden <[REDACTED]>
Sent: 22 May 2019 14:44
To: Katie Simmonds <[REDACTED]>, 'robert worden'
<[REDACTED]>
Cc: 'Chris Emery' <[REDACTED]>, Andrew Parsons <[REDACTED]>
Jonathan Gribben <[REDACTED]>, Lucy Bremner <[REDACTED]>
Subject: RE: Report 3 to court [WBDUK-AC.FID123887118]

Katie -

I assume my letter can take the form of an email. That is what I would prefer. Otherwise it makes several attachments and is confusing.

Robert

From: Katie Simmonds <[REDACTED]>
Sent: Wednesday, May 22, 2019 2:13 PM
To: robert worden <[REDACTED]>; robert worden <[REDACTED]>
Cc: 'Chris Emery' <[REDACTED]>; Andrew Parsons <[REDACTED]>;
Jonathan Gribben <[REDACTED]>; Lucy Bremner <[REDACTED]>
Subject: RE: Report 3 to court [WBODUK-AC.FID123887118]

Robert,

In terms of the email address to send the report to, this should be sent to Angela Fraser (who is the Judge's clerk) at [angela.fraser@\[REDACTED\]](mailto:angela.fraser@[REDACTED]) and you should explain that you are writing to email the Managing Judge in the Post Office Group Litigation case. We would address your email to "Ms Fraser" and ask her if your letter could be passed to the Managing Judge.

In relation to the wording of your email, we recommend you cover the following points:

1. You should address your letter to "Mr Justice Fraser" and start it "Dear Judge".
2. Heading line should include "Post Office Group Litigation".
3. Your email/ letter is written on your own initiative, although explain that you have asked for some guidance on drafting it from Post Office's lawyers.
4. Refer to the discussion in Court on 11 April during which Tony Robinson QC (1) outlined the further analyses which you wished to discuss further with Mr Coyne relating to Horizon Issues 1, 12 and 13 and (2) confirmed that as a result of these further analyses, you believe that your views had changed and were obliged to inform the Court. Explain that this further work was your own initiative, and not prompted by Post Office or its lawyers.
5. Explain that it is your view that the changes in your analyses are material and have therefore prepared the further supplemental report.
6. Explain that a draft version of the report was first provided to Mr Coyne on 25 April, nearly 4 weeks ago, and a final version on an open basis last Thursday 16 May.
7. Explain that when cross-examined on the Horizon Issues, you may need refer to your updated / new views in contained within your further supplemental report.
8. Update the Court in terms of your discussions with Mr Coyne and explain you have not been able to have what you would describe as a substantive discussion concerning the further supplemental report.

9. Confirm on the basis that trial will be resuming on 4 June, you believe the Court should now be aware of the further supplemental report and are therefore providing a copy to the Managing Judge.
10. Explain that your understanding is that it is not Post Office's intention to make any application to the Court in relation to the further supplemental report.

Kind regards

Katie

Katie Simmonds

Associate
Womble Bond Dickinson (UK) LLP


d: 
m: 
t: 
e: 

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From: robert worden [[mailto:](#) 
Sent: 21 May 2019 17:51
To: Andrew Parsons; Jonathan Gribben; Katie Simmonds; Lucy Bremner
Cc: 'Chris Emery'
Subject: Report 3 to court

Andy -

As you know, I will send report 3 to the court tomorrow. No changes from the open version I sent to Coyne.

Please could you tell me the email address to send it to, the correct form of address, and some minimal required words, that I might add to?

Thanks

Robert

Please consider the environment! Do you need to print this email?

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