

From: Jane MacLeod <[REDACTED] GRO>
To: Mark Underwood1 <[REDACTED] GRO>, Andrew Parsons
[REDACTED] GRO, Rodric Williams <[REDACTED] GRO>
Thomas P Moran <[REDACTED] GRO>, Melanie Corfield
[REDACTED] GRO
Cc: Amy Prime <[REDACTED] GRO>, Jonathan Gribben <[REDACTED] GRO>
[REDACTED] GRO
Subject: Re: Skeleton arguments [BD-4A.FID26896945]
Date: Fri, 1 Jun 2018 05:56:34 +0000
Importance: Normal
Inline-Images: image001.png; image002.png; image003.png; image004.png

I think we should flag to BEIS/UKGI in advance given the possibility (even if remote) of this being picked up by the press.

Equally we should flag to GE, the Board and the auditors. I'll draft a note and circulate shortly for comment.

Jane MacLeod
Group Director Legal, Risk & Governance
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From: Mark Underwood1
Sent: Thursday, May 31, 2018 8:51:35 PM
To: Andrew Parsons; Rodric Williams; Jane MacLeod; Thomas P Moran; Melanie Corfield
Cc: Amy Prime; Jonathan Gribben
Subject: RE: Skeleton arguments [BD-4A.FID26896945]

Thanks Andy – I am not sure, I will pick this up with Jane on Monday, as I am on leave tomorrow. I note the following sentence may indicate that we don't and provide insight into what appears to be a rather crude tactic ahead of Tuesday:

should be relied upon solely as a suitable guide for the purposes of proportionality considerations in costs budgeting.

Mark



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Mobile number: [REDACTED] GRO

From: Andrew Parsons [GRO]
Sent: 31 May 2018 19:39
To: Rodric Williams [GRO]; Mark Underwood1
<[GRO]>; Jane MacLeod [GRO]; Thomas P Moran
<[GRO]>; Melanie Corfield [GRO]
Cc: Amy Prime [GRO]; Jonathan Gribben [GRO]
Subject: Skeleton arguments [BD-4A.FID26896945]

All

Please find attached each parties' skeleton arguments for the CMC next week. Most of this was expected. There was one surprising paragraph in the Claimant's skeleton:

39. The likely aggregate value of the case is estimated to be of the order of £80 to £90 million (or in excess thereof, subject to further quantum analysis and formulation).⁴⁴ The Claimants have not been directed to produce detailed schedules of loss, though the Schedules of Information contain detailed information on relevant heads of loss. The range given here derives from the Claimants' solicitors' analysis of the information contained in the Schedules of Information. By its nature, it is an estimate based upon present information. There are inherent difficulties to setting out the quantum of these claims at this stage⁴⁵ and the figures should be relied upon solely as a suitable guide for the purposes of proportionality considerations in costs budgeting.

This is the first time that we have had any aggregated claim valuation (and this is much lower than the total of their SOIs).

A few thoughts:

Mel – just FYI in case this is reported in the press.

Rod – do you need to tell UKGI about this?

Mark – do we need to tell the auditors?

Kind regards
Andy

Andrew Parsons
Partner
Womble Bond Dickinson (UK) LLP

d:
m:
t:
e:

GRO



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