

Message

From: Robert Findlay [GRO]
Sent: 21/04/2016 08:39:41
To: Rodric Williams [GRO]
CC: Lin Norbury [GRO]; Angela Van-Den-Bogerd [GRO]
Subject: RE: IMPORTANT EMAIL RE: PRESERVATION OF DOCUMENTS / HIGH COURT LITIGATION
Attachments: image005.png; image006.png; image002.png

Hi Rod

I have just received this from Lin and I note that Mr Frank Holt from Glenmoriston Stores is named as one of the claimants on the list. Mr Holt is still suspended and we are in the middle of a long drawn out conduct case with him. To this end I actually sent him an invite to an informal meeting yesterday to discuss the findings of a report completed by Wendy Mahoney, Case Review Team Leader. My question is should I carry on this case as normal or should I stop what I am doing at the present time? [GRO] in this case is the subject of a report to the Procurator Fiscal and the indications from security are that the case will proceed to court.

Your advice would be appreciated.

Thanks
Robert



Robert Findlay
Agents Contract Advisor

Post Office Ltd.
2nd Floor The Markets Crown Office,
6/16 New York Street Leeds LS2 7DZ

[GRO]

From: Lin Norbury
Sent: 20 April 2016 23:23
To: Colin Burston; Carol Ballan; Gary Adderley; Denise Reid; Alan Lusher; Paul Southin; Robert Findlay; Anita Bravata
Subject: FW: IMPORTANT EMAIL RE: PRESERVATION OF DOCUMENTS / HIGH COURT LITIGATION

Dear All

Please read the message below and the attachments carefully.

Any immediate queries give me a call or we can discuss collectively at next week's team meeting.

Regards

Lin



Lin Norbury
Agents Contracts Deployment Manager South

Upper Floors, The Markets Post Office
6-16 New York Street
LEEDS
LS2 7DZ

[GRO]

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This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorised review, use, disclosure or distribution is prohibited. If you are not the intended recipient please contact me by reply email and destroy all copies of the original message.

From: Rodric Williams

Sent: 20 April 2016 22:53

To: Alwen Lyons; Craig Tuthill; Lin Norbury; John Breeden; Joe Connor; Hector Campbell; Angela Van-Den-Bogerd; Kathryn Alexander; Shirley Hailstones; Chris Broe; Andy Garner; Julie George; John M Scott; Nick Beal; Anne Allaker

Cc: Jane MacLeod; Patrick Bourke; Mark Underwood1; Neena Sharma; Lorraine Lynch; Piero D'Agostino; Jessica Madron; Ben Foat; Elisa Lukas

Subject: IMPORTANT EMAIL RE: PRESERVATION OF DOCUMENTS / HIGH COURT LITIGATION

IMPORTANT – PLEASE READ THIS MESSAGE IN ITS ENTIRETY. IT IS ESSENTIAL THAT ITS CONTENTS ARE COMPLIED WITH.

IF YOU HAVE ANY QUESTIONS IN RESPECT OF ITS CONTENTS OR EFFECT THEN PLEASE CONTACT ELISA LUKAS OR RODRIC WILLIAMS IN LEGAL SERVICES.

As you may be aware, 91 mostly former postmasters have issued a High Court claim against Post Office Limited advancing allegations about the Horizon IT system and Post Office's engagement with them. A list of the 91 claimants is attached, and we have been told that others may join the claim in due course.

Now that Post Office has seen the claim, you and your team members must familiarise yourselves with Post Office's document disclosure obligations, and ensure that you comply with them. Please therefore circulate this email to your team members who may hold documents related to the claimants and/or their claim.

In short, the three crucial document rules that must be followed are:

- (1) You must not *destroy* or *delete* any documents which may be relevant to the claim.** In particular, make sure that any automatic deleting/archiving systems are suspended now until further notice. If you have any question about whether a document is relevant, please contact Legal Services and preserve the document in the meantime;
- (2) You must not *amend* any existing documents which may be relevant to the claim.** For example, do not make handwritten notes on existing documents or try to change the content of a document; and
- (3) You must recognise that any documents that you *create* from now on may have to be disclosed to the other side in the case.** If in any doubt, think about whether you would be happy for the email or document to be read out loud in court.

I attach a more detailed note on this, which can be used as a reference going forward.

If you have any questions concerning these requirements, please contact Elisa Lukas or me for further guidance.

With thanks for your cooperation, Rodric

FAQs

1. What is a 'document'?

Documents are defined very broadly to mean anything in which any information is recorded. Examples include: emails, paper documents, handwritten notes, Word/Excel/PowerPoint documents (including *draft* versions of these

documents), database records, minutes of calls or meetings, text messages, internal memos, meeting agendas or tape recordings.

2. What are 'relevant' documents?

Relevant documents are any documents that could: **either support or undermine the case of any party to the litigation.**

END



Rodric Williams

Solicitor, Corporate Services

Post Office Ltd

20 Finsbury Street, London EC2Y 9AQ

GRO

GRO