

## Message

**From:** Jane MacLeod [GRO]  
**on behalf of** Jane MacLeod [GRO]  
**Sent:** 01/06/2018 12:06:23  
**To:** Tim Parker [GRO]; Ken McCall [GRO]; Carla Stent [GRO]; Tim Franklin [GRO]; Cooper, Tom - UKG [GRO]; Shirine Khoury-Haq [GRO]  
**CC:** Paula Vennells [GRO]; Alisdair Cameron [GRO]; Veronica Branton [GRO]  
**Subject:** Postmaster Litigation - Confidential and subject to Legal Privilege - Do not Forward.

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A further Case Management Conference in relation to the Postmaster Litigation is scheduled for the afternoon of Tuesday 5 June. The purpose of the hearing is to make orders in relation to disclosure of documents relating to the March 2019 hearing on the Horizon issues, and cost management. In accordance with normal procedure, Skeleton Arguments have now been filed with the Court by both sides. The purpose of this note is to flag that Freeths have made reference in their skeleton argument to the potential value of the claims as being £80-£90 million. The relevant statement is:

*"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). 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 stage<sup>45</sup> and the figures should be relied upon solely as a suitable guide for the purposes of proportionality considerations in costs budgeting."*

It is possible that this figure will be picked up by the press, and therefore we wanted you to be aware. Should there be any press commentary, our response will be:

*"We note that the claimants' solicitors have provided an estimated value of claims of £80-90 million in a hearing regarding potential costs. That estimate recognised that no detailed schedules of loss have been produced to date by the claimants and that the number is therefore speculative. Post Office continues to vigorously defend the claims, and welcomes the opportunity to have these issues finally addressed through the Court process"*

I will shortly send a similar briefing to the UKGI lawyers in accordance with the draft Information Sharing Protocol.. I will also flag the above statement to EY. Given the qualifications around the statement, we continue to believe that no provision should be required, and as the statement is speculative, we do not believe that any reference to this number should be included in the disclosure in the draft accounts.

Please let me know if you have any questions.

Jane



**Jane MacLeod**

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