

From: Parsons, Andrew [GRO]
Sent: Wed 28/06/2017 7:30:03 PM (UTC)
To: Rodric Williams [GRO]; Mark Underwood1 [GRO]
Cc: Prime, Amy [GRO]; Brooks, Victoria [GRO]; Lukas, Elisa [GRO]
Subject: Draft Defence
Attachment: Protocol for Second Sight 14 06 17 (Csl suggested amends)-1.docx
Attachment: 100 Bates draft Defence.docx

Rodric, Mark

Please find attached the draft defence from Tony.

There are lots of minor points chase down - many of which are already with Kath / Shirley and FJ.

The key ones that would be good to discuss tomorrow are:

1. Paras 28, 35 and 55 - these relate to the process for disputing shortfalls. We're struggling to get to the bottom of those processes and how those disputes are resolved.
2. Para 50(2) - do we say that POL previously relied on incorrect statements from FJ in relation to remote access? This is basically dropping FJ in it.

The other points I have on my mini agenda for tomorrow are:

1. Prep needed for the GE meeting.
2. Comms lines around the defence and addition of more claimants.
3. Second Sight protocol. We've had a proposal (attached) from Freeths that I can explain tomorrow.
4. Debt team protocol - next steps.

Kind regards
Andy

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