

Message

**From:** Rodric Williams [GRO]  
**Sent:** 11/05/2018 12:43:23  
**To:** Mark Underwood [GRO]; Andrew Parsons [/o=Exchange-Org/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ad9ed344815e47e4aaa3c0e7e1740919-Andrew Pars]  
**Subject:** RE: PL Subcommittee minutes 260318 v1.docx [BD-4A.FID26896945]

Agreed.

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**From:** Mark Underwood1  
**Sent:** 11 May 2018 13:42  
**To:** Andrew Parsons [GRO]; Rodric Williams [GRO]  
**Subject:** RE: PL Subcommittee minutes 260318 v1.docx [BD-4A.FID26896945]

I had thought so to. Lets discuss on our call at 330



**2017 Winner of the Global Postal Award  
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**Mark Underwood**  
Head of Portfolio: Legal, Risk & Governance

Ground Floor  
20 Finsbury Street  
London EC2Y 9AQ

[GRO]

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**From:** Andrew Parsons [GRO]  
**Sent:** 11 May 2018 13:29  
**To:** Mark Underwood1 [GRO]; Rodric Williams [GRO]  
**Subject:** Fwd: PL Subcommittee minutes 260318 v1.docx [BD-4A.FID26896945]

What updates is Veronica referring to?

Have I missed something? I thought Tuesday was purely a verbal discussion.

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**From:** Veronica Branton [GRO]  
**Sent:** Friday, May 11, 2018 1:22 pm  
**Subject:** RE: PL Subcommittee minutes 260318 v1.docx [BD-4A.FID26896945]  
**To:** Rodric Williams [GRO], Andrew Parsons [GRO], Jane MacLeod [GRO]  
**Cc:** Ben Foat [GRO]

Dear all

Please could you let me know when the updates for the PL Subcommittee meeting on 15 May will be ready?

Best wishes

Veronica

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**From:** Rodric Williams  
**Sent:** 08 May 2018 21:28  
**To:** Andrew Parsons <[REDACTED]>; Jane MacLeod <[REDACTED]>; Veronica Branton <[REDACTED]>  
**Cc:** Ben Foat <[REDACTED]>  
**Subject:** RE: PL Subcommittee minutes 260318 v1.docx [BD-4A.FID26896945]

Jane,

### 26 March 2018 Subcommittee Minutes

I have no comments on your or Andy's amendments to the Minutes. I have in the attached version merely:

- added in the dates of the meetings referred to in para's 1.1 and 7; and
- deleted "RW" from the "Action" column for para's 3.3 and 7, because as amended these para's don't call out any specific actions.

### 15 May 2018 Subcommittee Agenda / Merits Opinion

The agenda set out in your 2 May 2018 email for next week's meeting is dominated by the Merit's Opinion. Andy and I propose to deal with that as follows:

- we will review an advanced working draft as soon as it is available, and prepare a precis of what is sure to be a long document.
- the precis's aim is to:
  - o summarise the Opinion for you and your communications to your GE colleagues;
  - o act as the QCs' speaking note at the meeting (which we will ask David Cavender to lead);
  - o possibly be provided to UKGI as an update, but only once the information sharing protocol is agreed.
- while reviewing the draft Opinion, we will also consider whether the precis should cover the "next steps and forward plan" and "contingency planning" agenda items, or if these should be kept separate.

### UKGI Information Sharing Protocol

UKGI have not yet responded to the email I sent on 2 May 2018 with the latest version of the protocol. I do not intend to chase them for a response, as I think we can justifiably (but politely) refuse UKGI direct access to the Opinion or any precis of it until we are comfortable that the appropriate structures are in place to protect the privilege in a highly sensitive document.

Without the protocol, I believe we can offer UKGI an oral update on our current approach to the Group Litigation as informed by the Opinion and Board discussions. I would prefer to provide this in a face-to-face meeting clearly stated to be privileged. We could provide the update by phone, but that could require us to email an agenda, opening up the possibility of a wider ranging email exchange (e.g. as per the 30 April email between UKGI and Patrick).

Against this, the "carrot" of a more detailed, written update on the Opinion may be what we need to get UKGI to agree our version of the protocol.

Please let me know if you disagree with, or have any comments on, the proposed approach  
Rod

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**From:** Andrew Parsons <[REDACTED]>  
**Sent:** 08 May 2018 08:36

**To:** Jane MacLeod <[REDACTED] GRO>; Veronica Branton <[REDACTED] GRO>  
**Cc:** Rodric Williams <[REDACTED] GRO>  
**Subject:** RE: PL Subcommittee minutes 260318 v1.docx [BD-4A.FID26896945]

Jane

Please find attached a couple of small changes from me. My principal change is to add a statement at the top of the minutes making clear that they are privileged (as if this wasn't obvious enough!)

Andy

**Andrew Parsons**  
Partner  
Womble Bond Dickinson (UK) LLP

**GRO**



womblebond Dickinson.com



**Andrew Parsons**  
Partner  
Womble Bond Dickinson (UK) LLP

**GRO**



womblebond Dickinson.com



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**From:** Jane MacLeod <[REDACTED] GRO>  
**Sent:** 07 May 2018 23:05  
**To:** Veronica Branton  
**Cc:** Andrew Parsons; Rodric Williams  
**Subject:** PL Subcommittee minutes 260318 v1.docx

Veronica

Please find attached my mark-up of the draft minutes of the first meeting of postmaster litigation committee. There are a couple of names and dates to be inserted (date of January board meeting, May committee meeting and name of our IT expert) and I have tried to make the language even more anodyne. **Rod/Andy** – please check that you are comfortable with these?

Many thanks,

Jane

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