

Legally Privileged and Confidential
10 May 2019

THE POST OFFICE GROUP LITIGATION

ACTION LIST AS AT 10 MAY 2019

No.	Description	Responsibility	Deadline/Timeframe	Status/Comments
w/c 7 May 2019				
1.	Updated Grounds of Appeal and Skeleton to be circulated	DCQC	7 May 2019	Complete
2.	Review updated Grounds of Appeal and Skeleton	Full team	7/8 May 2019	Complete
3.	Prepare and circulate board paper on Common Issues appeal	HSF	7/8 May 2019	Complete
4.	Meeting with GLO Sub-Committee on Common Issues Appeal	Full team	9 May 2019	Complete
5.	Decision on approach to costs hearing on 23 May 2019	WBD/HSF	w/c 29 April 2019	Complete with respect to Common Issues costs. There is a separate matter concerning Recusal costs to be determined (see below)
6.	Write to Freeths regarding Common Issues costs	WBD	10 May 2019	Complete
7.	Confirm to Freeths that Common Issues appeal issues will be brought to their attention in advance of 14 May	WBD	7 May 2019	Complete – the plan is to send to Freeths the draft Grounds of Appeal
8.	Agree cease and desist letters regarding PO variation letter for mailwork services.	PO/HSF/WBD	w/c 7 May 2019	Complete
9.	Finalise engagement letter	HSF/PO	w/c 7 May 2019	Ongoing - draft with Ben Foat and will be finalised once precise scope of work determined (see below)
10.	Decision on whether Dr Worden will file further supplemental report in Horizon trial	WBD/TGQC	w/c 7 May 2019	Ongoing – A letter reserving the PO's position but giving an indication of current thinking pending that expert meeting has been sent to

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				the Freeths and a response received.
11.	Paper on historical settlement discussions	WBD	w/c 7 May 2019	Ongoing - HSF following up with WBD
w/c 13 May 2019				
12.	Send draft Grounds of Appeal to Freeths	WBD	13 May 2019	This may change depending on the date of the hearing (see below)
13.	Exchange skeletons for Common Issues appeal hearing	DCQC	14 May 2019	This may change depending on the date of the hearing (see below)
14.	Common Issues appeal hearing	Full team	16 May 2019	Currently listed for 16 May however Freeths have written to the Court (10 May 2019) requesting that the hearing be moved to 23 May to afford them further time to respond to PO draft Grounds of Appeal.
15.	Claimant case summaries	WBD/PO	w/c13 May 2019	To provide not just a summary of the relevant facts pertaining to each claimant but also what the Judge's position is and what are PO's honest version of the facts.
16.	Paper outlining the extent to which the substance of any of the 20 implied terms are covered by Necessary Cooperation or Stirling v Maitland terms	PO	w/c 13 May 2019	This is to discover at high level how big the differences are between the parties.
17.	Paper on historical settlement discussions	WBD	w/c 13 May 2019	HSF following up with WBD
18.	Advice to PO legal team on addressing the operational impact of CI judgment on NTC Local contracts	HSF	w/c 13 May 2019	HSF following up with Rod Williams
19.	Prepare note on governance and reporting lines	HSF/PO	14 May 2019	HSF meeting with Ben Foat and Rod Williams to progress on 14 May.

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No.	Description	Responsibility	Deadline/Timeframe	Status/Comments
20.	Advice on approach to recusal costs for hearing on 23 May 2019	WBD	14 May 2019	This has been delayed as a result of Freeths' claim for additional costs and wasted costs – confirmed to us 10 May. This new information will inform approach to these costs.
21.	Finalise engagement letter	HSF/PO	w/c 13 May 2019	See above
22.	Finalise approach to Dr Worden's supplemental report in Horizon trial	WBD/TGQC/HSF	w/c 13 May 2019	See above