

*Legally Privileged and Confidential*  
17 May 2019

**DTHE POST OFFICE GROUP LITIGATION**

**ACTION LIST AS AT 17 MAY 2019**

No.	Description	Responsibility	Deadline/Timeframe	Status/Comments
<b>w/c 13 May 2019</b>				
1.	Advice on next steps in recusal	Counsel	12 May 2019	Complete
2.	Decision of GLO Sub-committee on which grounds to appeal before Fraser J	HSF	15 May 2019	Complete
3.	Send draft Grounds of Appeal to Freeths	WBD	16 May 2019	Complete
4.	Exchange skeletons for Common Issues appeal hearing	DCQC	17 May 2019	Complete
5.	Paper on historical settlement discussions	WBD	w/c 13 May 2019	Ongoing - HSF awaiting information from WBD
6.	Advice on approach to recusal costs for hearing on 23 May 2019	WBD	14 May 2019	Complete
7.	Advice to PO legal team on addressing the operational impact of CI judgment on NTC Local contracts	HSF	w/c 13 May 2019	Complete
8.	Instruct Helen Davies QC	HSF	w/c 13 May	Complete – telephone call on 16 May 2019
9.	Meet with PO to discuss governance, reporting lines and details of operational workstream	HSF/PO	w/c 13 May 2019	Complete
10.	Decision on whether Dr Worden will file further supplemental report in Horizon trial	WBD/TGQC/HSF	w/c 13 May 2019	Ongoing – at present PO does not intend to apply for permission to introduce Worden 3 to the Horizon Trial. However, Worden remains adamant that this should be shared with the Court. Worden 3 will be sent to the Claimants'

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				expert Coyne on 17 May. There will then be a call to discuss next steps early next week.
11.	Finalise engagement letter	HSF/PO	w/c 13 May 2019	Ongoing - draft with Ben Foat and Rod Williams
12.	Set up weekly legal working group calls	HSF	w/c 13 May	Complete
13.	Address recusal costs with Freeths	WBD	17 May	Ongoing
<b>w/c 20 May 2019</b>				
14.	Decision on whether Dr Worden will file further supplemental report in Horizon trial	WBD/TGQC/HSF	22 May 2019	See above. PO will formally confirm whether or not it is applying for permission to introduce by 22 May 2019.
15.	Common Issues leave to appeal and costs hearing	Full team	23 May 2019	
16.	Initial substantive views from Helen Davies QC	HSF	23 May 2019	Meeting scheduled for afternoon of 23 May 2019.
17.	Claimant case summaries	PO	w/c 20 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.
18.	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 20 May 2019	As requested by Tom Cooper
19.	Prepare structure chart of PO reporting lines	HSF	w/c 20 May 2019	Following meeting with PO legal team
20.	Prepare note on governance recommendations	HSF/PO	w/c 20 May 2019	Following meeting with PO legal team

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21.	Prepare contact team sheet	HSF	w/c 20 May 2019	Following meeting with PO legal team
22.	Finalise engagement letter	HSF/PO	w/c 13 May 2019	See above