
From: Patrick Bourke [GRO]
Sent: Thur 13/07/2017 4:47:34 PM (UTC)
To: Andrew Parsons [GRO]
Cc: Prime, Amy [GRO]; Rodric Williams [GRO]
Subject: RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

Andy

I've just completed my reading and I'm bound to say that this is a really excellent job. Try as I might, I can't find *anything* which gives me real pause for thought. Insofar as that's not a terrible reflection on my attention to detail, it's quite a piece of work.

If I might just raise one tiny exception to this – the reference in paragraph 9 “and to provide any necessary cooperation” did just strike me as setting a pretty high bar – perhaps it needs to be, but I'd prefer to lose “any” or, better still, refer to providing “appropriate and reasonable cooperation”.

Best wishes

Patrick

From: Andrew Parsons [GRO]
Sent: 13 July 2017 10:07
To: Mark Underwood [GRO]; Jane MacLeod; Angela Van-Den-Bogerd; Mark R Davies; Stuart Nesbit; Patrick Bourke; Rob Houghton; Rodric Williams; Thomas P Moran; Tom Wechsler; Mark Ellis; Melanie Corfield
Cc: Kevin Morgan
Subject: RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

All

FYI - The section list below has been updated with who has reviewed each section.

Thanks Tom and Tom for your comments last night.

Andy

Andrew Parsons
Partner

Bond Dickinson LLP

Bond Dickinson

Direct: [GRO]
Mobile: [GRO]
Office: [GRO]

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From: Andrew Parsons

Sent: 12 July 2017 08:48

To: 'Mark Underwood'; Jane MacLeod; Angela Van-Den-Bogerd; Mark R Davies; Stuart Nesbit; Patrick Bourke; Rob Houghton; Rodric Williams; Thomas P Moran; Tom Wechsler; Mark Ellis; Melanie Corfield

Cc: Kevin Morgan

Subject: RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

All

Please find attached an extract from the full Defence. This is the summary section – it provides a good overview of the Defence that we will be discussing later today.

One point that would also be good to discuss is whether anyone would like to review the Defence (its 80 pages) or sections of it. To help with this, I've set out below a brief index to the Defence.

Section A: This is the fact heavy section of the defence; the rest of the defence is more legal.

1. Overview of postmaster contracts – KATH / SHIRLEY / ANGELA
2. Branch accounting contracts – KATH / SHIRLEY / ANGELA
3. Fujitsu, Horizon and remote access – FUJITSU / DELOITTE
4. Helplines – KATH / SHIRLEY / ANGELA / GAYLE PEACOCK
5. Post Office investigations – KATH / SHIRLEY / ANGELA
6. Termination of postmaster contracts KATH / SHIRLEY / ANGELA
7. Termination of postmaster contracts KATH / SHIRLEY / ANGELA
8. Suspense accounts – STILL BEING WORKED ON BY DELOITTE

The sections below are more legally focused and have been reviewed by Rodric Williams

Section B: Contract terms and legal duties re postmasters

Section C: Contract terms and legal duties re assistants and employees

Section D: Duties in tort

Section E: Agency duties

Section F: Fiduciary duties

Section G: Breaches by Post Office

Section H: Claims for deceit

Section I: Harassment claims

Section J: Duress and unconscionable dealing

Section K: Malicious prosecution

Section L: Unjust enrichment

Section M: Loss and damage

Section N: Generic defences raised by Post Office

Post Office's counterclaim

Kind regards
Andy

From: Mark Underwood GRO
Sent: 11 July 2017 13:46
To: Jane MacLeod; Angela Van-Den-Bogerd; Mark R Davies; Stuart Nesbit; Patrick Bourke; Rob Houghton; Rodric Williams; Thomas P Moran; Tom Wechsler; Andrew Parsons; Mark Ellis; Melanie Corfield
Cc: Kevin Morgan
Subject: RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

Dear all, further to my note earlier today, please find attached the final Decision Paper.

Mark



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Experience**

Mark Underwood

Head of Portfolio: Legal, Risk &
Governance

Ground Floor
20 Finsbury Street
London EC2Y 9AQ

Mobile number: GRO

From: Mark Underwood GRO
Sent: 11 July 2017 09:30
To: Jane MacLeod; Angela Van-Den-Bogerd; Mark R Davies; Stuart Nesbit; Patrick Bourke; Rob Houghton; Rodric Williams; Thomas P Moran; Tom Wechsler; 'Parsons, Andrew'; Mark Ellis; Melanie Corfield
Cc: Kevin Morgan
Subject: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

Dear all,

We have a PLSG meeting on Wednesday 12 July @12 in Tonbridge (1.11). Ahead of that meeting please find attached:

1. The Agenda
2. Decision Paper: Access to Second Sight
3. Decision Paper: Standstill Agreement with Fujitsu
4. Decision Paper: Communications Strategy
5. Decision Paper: Wider Risks to POL **[To follow later today]**
6. Open actions list as at 11 July 2017

Please let me know if you are intending to dial in.

Many thanks, and apologies for the delay in circulating these papers.

Mark

GRO

Dial-in numbers:

United Kingdom Freefone: GRO

United Kingdom International direct: GRO

Chairperson passcode: GRO

Participant passcode: GRO



**2017 Winner of the
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for Customer
Experience**

Mark Underwood

Head of Portfolio: Legal, Risk &
Governance

Ground Floor
20 Finsbury Street
London EC2Y 9AQ

Mobile number: GRO

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