
From: Thomas P Moran [GRO]
Sent: Mon 08/05/2017 7:35:35 AM (UTC)
To: Prime, Amy [GRO]; Rodric Williams [GRO]
Cc: Mark Underwood [GRO]; Parsons, Andrew [GRO]
Subject: RE: Bates & Others -v- Post Office Limited - Claim No: HQ16X01238 GLO Advertising [BD-4A.FID26940628]

Amy

I can confirm that we have made George Thomson at NFSP aware, and the response should be as advised to re-direct Freeths to NFSP directly as we have no control over the publication.

Regards

Tom

From: Prime, Amy [GRO]
Sent: 08 May 2017 08:32
To: Thomas P Moran <[GRO]>; Rodric Williams <[GRO]>
Cc: Mark Underwood [GRO]; Parsons, Andrew [GRO]
Subject: RE: Bates & Others -v- Post Office Limited - Claim No: HQ16X01238 GLO Advertising [BD-4A.FID26940628]

Tom, Rodric

Please find attached a further letter we have received from Freeths on the subject of advertising. They are seeking consent to advertise in three local newspapers (the Oxford Times, the Hampshire Observer and the Western Mail). As such, we have slightly amended our response to Freeths (attached).

Tom – please could you confirm whether Nick Beal or yourself have spoken with George (NFSP)?

Rodric – please could you confirm that you are happy for Freeths to place notices within these newspapers.

Kind regards

Amy

Amy Prime
Solicitor

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From: Prime, Amy
Sent: 04 May 2017 12:43
To: Thomas P Moran; Rodric Williams
Cc: Mark Underwood^{GRO}; Parsons, Andrew
Subject: RE: Bates & Others -v- Post Office Limited - Claim No: HQ16X01238 GLO Advertising [BD-4A.FID26896945]

Tom

Please find attached our proposed response to Freeths. Please could you confirm once Nick Beal or yourself have spoken with George (NFSP) and we will then send this.

Kind regards
Amy

From: Parsons, Andrew
Sent: 02 May 2017 13:44
To: Thomas P Moran; Rodric Williams
Cc: Mark Underwood^{GRO}; Prime, Amy
Subject: RE: Bates & Others -v- Post Office Limited - Claim No: HQ16X01238 GLO Advertising [BD-4A.FID26896945]

Agreed on the response.

A call with George is better than an email – no audit trail to disclose.

Thanks
Andy

Andrew Parsons
Partner

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From: Thomas P Moran [GRO]
Sent: 02 May 2017 13:39
To: Parsons, Andrew; Rodric Williams
Cc: Mark Underwood [GRO]; Prime, Amy
Subject: RE: Bates & Others -v- Post Office Limited - Claim No: HQ16X01238 GLO Advertising [BD-4A.FID26896945]

Thanks, noted. Nick Beal will be speaking to George on a planned call later today so will note this to him. He's absolutely confirmed that the magazine is entirely NFSP so our letter should simply make that clear and re-direct them.

Cheers

Tom

From: Parsons, Andrew [GRO]
Sent: 02 May 2017 10:01
To: Thomas P Moran [GRO]; Rodric Williams [GRO]
Cc: Mark Underwood [GRO]; Prime, Amy [GRO]
Subject: RE: Bates & Others -v- Post Office Limited - Claim No: HQ16X01238 GLO Advertising [BD-4A.FID26896945]

Tom – be careful about emailing George. Your email may not be privileged. Keep it neutral.
A

Andrew Parsons
Partner

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From: Thomas P Moran [GRO]
Sent: 02 May 2017 09:47
To: Parsons, Andrew; Rodric Williams
Cc: Mark Underwood [GRO]; Prime, Amy
Subject: RE: Bates & Others -v- Post Office Limited - Claim No: HQ16X01238 GLO Advertising [BD-4A.FID26896945]

Thanks. George is very negative about Freeths's approach and I do not think will accept this in his publication. It is not our decision.

For the avoidance of doubt, we have no direct control over the magazine which is edited independently by the NFSP. So the obvious approach would be to inform them of that and redirect them to contact the NFSP direct. In the meantime I would inform George of the position by forwarding the letter, which I'll do now.

Nick – please can you confirm the position re the magazine?

I propose you draft a reply on that basis, Andy.

Thanks
Tom

From: Parsons, Andrew [GRO]
Sent: 02 May 2017 09:08
To: Thomas P Moran [GRO]; Rodric Williams [GRO]
Cc: Mark Underwood [GRO]; Prime, Amy [GRO]
Subject: RE: Bates & Others -v- Post Office Limited - Claim No: HQ16X01238 GLO Advertising [BD-4A.FID26896945]

Tom, Rodric

May we have call to discuss the below? I'd like to get your thoughts on the NFSP angle.

I can do any time today (save for 14:30 to 16:30) and any time on Thursday. Let me know when is best for you.

Kind regards
Andy

Andrew Parsons
Partner

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From: Parsons, Andrew
Sent: 27 April 2017 18:17
To: 'Thomas P Moran'; 'Rodric Williams'
Cc: Mark Underwood; **GRO**; Prime, Amy
Subject: FW: Bates & Others -v- Post Office Limited - Claim No: HQ16X01238 GLO Advertising [BD-4A.FID26896945]

Tom, Rodric

Please see attached a letter from Freeths re advertising the GLO. Most of this is just process points which we will deal with in due course, however in the penultimate para they ask for POL's consent to place an advert in Subpostmaster Magazine.

This raises an interesting opportunity. From POL's perspective, it is difficult for it to object to this advert. The Subpostmaster Magazine is an obvious conduit through which to raise awareness of the GLO and a Court would look dimly on POL trying to block this. However, the magazine is not, as I understand it, under POL's control; control rests with the NFSP who are free to take whatever stance they like.

Are the NFSP still generally supportive of POL and Horizon? If so, it would be quite a powerful message if Freeths approached the NFSP and the NFSP refused to allow the advert on the grounds that they thought the litigation was meritless. This type of message would have to be reported up to Freeths' insurers and funders, and it would perhaps knock their confidence if a key "Union" was standing by POL rather than the Claimants.

Thoughts?
Andy

From: Imogen Randall **GRO**

Sent: 27 April 2017 17:52
To: Parsons, Andrew; Prime, Amy
Cc: Lisa Bennett; Fenner, Kizzie; Lukas, Elisa; James Hartley
Subject: Bates & Others -v- Post Office Limited - Claim No: HQ16X01238 GLO Advertising

All

See attached.

Freeths LLP

Imogen Randall
Associate
Dispute Resolution

E: 
T: 
F: 
M: 

FREETHS

Freeths LLP, 1 Vine Street, Mayfair, London W1J 0AH



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LITIGATION TEAM OF THE YEAR
FINALIST



CORPORATE TEAM OF THE YEAR
FINALIST

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