

From: Ivan Roots [GRO]
To: Angela Van-Den-Bogerd [GRO]
Cc: Victoria Brooks [GRO]
Subject: RE: Your Witness statement [WBDUK-AC.FID26896945]
Date: Mon, 23 Jul 2018 17:27:57 +0000
Importance: Normal
Attachments: _DISPUTERESOLUTION_150938081(1)_Witness_Statement_of_Angela_Van_Den_Bo
gerd_(IAR_v3).DOCX
Inline-Images: image011.png; image012.png; image013.png; image014.png; image015.png;
image5593fb.PNG; imageeab162.PNG; imagee6462c.PNG; imagefef56c.PNG

Dear Angela

Please find attached the rough draft of your witness statement which I have prepared in conjunction with Victoria. Victoria is dealing separately with issues raised by Counsel relating to implied terms.

This is very much a working draft and I have highlighted in yellow the questions I will need to ask you in order to fill out the statement and deal with the issues that counsel have raised.

Some of the questions I need to ask you may strike you as a little basic but then again I am to some extent in the same position as the Trial Judge who will need to be led through your evidence and have the operations of Post Office explained to him.

I should say that I am still reviewing the documents relating to training to see if I can supply more material for your statement as I appreciate that your knowledge of the training given to Subpostmasters is not extensive.

It would be really helpful if we could set up an appointment to discuss the statement on the phone in the first instance. Are you likely to have any time this week?

Kind regards

Ivan

Ivan Roots
Associate
Womble Bond Dickinson (UK) LLP

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t:
e:

GRO

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From: Angela Van-Den-Bogerd [mailto:**GRO**]
Sent: 09 July 2018 08:38
To: Ivan Roots
Cc: Victoria Brooks; Mark Underwood1; Rodric Williams
Subject: RE: Your Witness statement [WBODUK-AC.FID26896945]

Hi Ivan

That's fine. If you could have it in my inbox before the 23rd that would be helpful.

Thanks,

Angela



Angela Van Den Bogerd

People Services Director

1st Floor, Ty Brwydran,

Atlantic Close, Llansamlet
Swansea SA7 9FJ

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From: Ivan Roots [mailto:**GRO**]
Sent: 06 July 2018 16:20
To: Angela Van-Den-Bogerd **GRO**

Cc: Victoria Brooks [GRO]; Mark Underwood1

GRO

; Rodric Williams <

GRO

Subject: Your Witness statement [WBDUK-AC.FID26896945]

Dear Angela

This is just a brief email to introduce myself. I have been asked by Victoria Brooks to assist in the drafting of your witness statement and I am based in this firm's Southampton office.

I appreciate that we have quite a detailed proof of evidence for you already and – given you are on holiday from 11 to 23 July inclusive - I propose to turn that proof into a draft witness statement while you are on holiday so that you have it to consider upon your return.

In the statement I will try to anticipate what your answers are likely to be to the questions we have but I anticipate there will be some points I cannot address without either meeting you or speaking with you on the phone.

I trust this all makes sense but please contact me if you have any queries.

Kind regards

Ivan

Ivan Roots

Associate

Womble Bond Dickinson (UK) LLP

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