

**From:** Andrew Parsons [GRO]  
**To:** Gideon Cohen [GRO]  
**Cc:** David Cavender [GRO], Owain Draper [GRO]  
**Subject:** RE: Statement [WBDUK-AC.FID26896945]  
**Date:** Thu, 23 Aug 2018 15:53:24 +0000  
**Importance:** Normal  
**Inline-Images:** image2d9511.PNG; imagee26ad3.PNG; image5d37f5.PNG

---

Another one...

You've also deleted footnote 23 in para 88, regarding remote access. If we do not cover remote access, then the entire statement needs to be changed, because the statement is premised on the notion that SPMRs have control over their accounts. That point is not 100% true, due to the remote access argument, but is 99.99% true so we need to explain the remote access concept otherwise AVDB won't be telling the truth.

Given the sensitivities on this point, we need to cover it off.

Thoughts please?

A

**Andrew Parsons**  
Partner  
Womble Bond Dickinson (UK) LLP

d:  
m:  
t:  
e:

**GRO**

[Stay informed: sign up to our e-alerts](#)



womblebond Dickinson.com



---

**From:** Gideon Cohen [mailto:GRO]  
**Sent:** 23 August 2018 16:07  
**To:** Andrew Parsons  
**Cc:** David Cavender; Owain Draper  
**Subject:** Re: Statement

Understood.

On 23 Aug 2018, at 18:06, Andrew Parsons [GRO] wrote:

**GRO**

Ok – I'm putting these back in but in simplified form. There is nothing secret about any of these – they are all publicly available points of law.

A

Andrew Parsons  
Partner  
Womble Bond Dickinson (UK) LLP

d:

m:

t:

e:

GRO

GRO

GRO

<mailto:

GRO

Stay informed: sign up to our e-alerts<<https://www.womblebonddickinson.com/uk/preferences>>

<image7fad14.PNG>

womblebonddickinson.com<<http://www.womblebonddickinson.com>>

<imagec62fee.PNG><[http://www.twitter.com/wbd\\_uk](http://www.twitter.com/wbd_uk)> <image9edc62.PNG>

<<https://www.linkedin.com/company/womble-bond-dickinson-uk-llp/>>

From: Gideon Cohen [mailto:

GRO

Sent: 23 August 2018 16:02

To: David Cavender

Cc: Andrew Parsons; Owain Draper

Subject: Re: Statement

Those were exactly my thoughts.

On 23 Aug 2018, at 17:54, David Cavender <

GRO

<mailto:

GRO

>> wrote:

Andy,

Gideon deleted those paragraphs.

I assume he did so on the basis that whilst the earlier paragraphs in that section are generic (and therefore could be said to have been reasonably in the contemplation of the parties at the time of contracting ) it would be more difficult to justify the later more granular and specific examples (which have been deleted) on the same basis.

Gideon – is this correct ?

Best,

D.

David Cavender Q.C.

<image001.jpg>

One Essex Court  
Temple  
London EC4Y 9AR

Direct dial:

GRO

Switchboard:

GRO

Fax number:

GRO

Mobile:

GRO

[www.oeclaw.co.uk](http://www.oeclaw.co.uk)<<http://www.oeclaw.co.uk>><<http://www.oeclaw.co.uk>>

The contents of this email are CONFIDENTIAL and may be PRIVILEGED. If you are not the intended recipient, please telephone (020) 7583 2000 and delete this email.

From: Andrew Parsons [mailto:[GRO](mailto:GRO)]

Sent: 23 August 2018 15:48

To: David Cavender <[GRO](mailto:GRO)>

Cc: Owain Draper <[GRO](mailto:GRO)>

<[GRO](mailto:GRO)>>; Gideon Cohen <[GRO](mailto:GRO)>

Subject: RE: Statement

David

Quick question... why did you delete the section on regulatory requirements at para 62 onwards?

This is a major pressure on POL's business and drives lots of its pressures. Indeed, Post Office is probably the most highly regulated business in the country.

A

Andrew Parsons  
Partner  
Womble Bond Dickinson (UK) LLP

d:

m:  
t:  
e:

**GRO**

**GRO**

**GRO**

Stay informed: sign up to our e-alerts<<https://www.womblebonddickinson.com/uk/preferences>>

<image002.png>

womblebonddickinson.com<<http://womblebonddickinson.com>><<http://www.womblebonddickinson.com>>

<image003.png><[http://www.twitter.com/wbd\\_uk](http://www.twitter.com/wbd_uk)>

<image004.png><<https://www.linkedin.com/company/womble-bond-dickinson-uk-llp/>>

From: David Cavender [mailto:**GRO**]  
Sent: 23 August 2018 10:30  
To: Andrew Parsons  
Cc: Owain Draper; Gideon Cohen  
Subject: RE: Statement [WBDUK-AC.FID26896945]

Dear Andrew,

I attach a tracked version of Angela's statement which includes comments from Gideon and from me. These (relatively few) comments have been made upon the clean version provided. My comments on admissibility have also been discussed with Owain.

Best,

D.

David Cavender Q.C.

<image001.jpg>

One Essex Court  
Temple  
London EC4Y 9AR

Direct dial:

**GRO**



Switchboard:

**GRO**

Fax number:

**GRO**

Mobile:

**GRO**

[www.oeclaw.co.uk](http://www.oeclaw.co.uk)<<http://www.oeclaw.co.uk>><<http://www.oeclaw.co.uk>>

The contents of this email are CONFIDENTIAL and may be PRIVILEGED. If you are not the intended recipient, please telephone (020) 7583 2000 and delete this email.

From: Andrew Parsons [mailto:**GRO**]

Sent: 20 August 2018 17:53

To: David Cavender <**GRO**>  
<mailto:**GRO**>

Cc: Owain Draper <**GRO**>  
<mailto:**GRO**>; Gideon Cohen <**GRO**>  
<mailto:**GRO**>

Subject: FW: Statement [WBDUK-AC.FID26896945]

David

As discussed earlier – any comments appreciated on Angela's statement.

A

Andrew Parsons  
Partner  
Womble Bond Dickinson (UK) LLP

d:  
m:  
t:  
e:

**GRO**

**GRO**

**GRO**

Stay informed: sign up to our e-alerts<<https://www.womblebond Dickinson.com/uk/preferences>>

<image002.png>

womblebonddickinson.com<<http://womblebonddickinson.com>><<http://www.womblebonddickinson.com>>

<image003.png><[http://www.twitter.com/wbd\\_uk](http://www.twitter.com/wbd_uk)>

<image004.png><<https://www.linkedin.com/company/womble-bond-dickinson-uk-llp/>>

From: Andrew Parsons  
Sent: 20 August 2018 16:32  
To: 'Angela Van-Den-Bogerd'; Rodric Williams  
Cc: Victoria Brooks; Ivan Roots  
Subject: RE: Statement [WBDUK-AC.FID26896945]

Angela

Please find attached your updated statement (+ a comparison showing the changes from the original version sent to you). This includes your comments, further amendments from Counsel and some comments from me.

Once you've had a chance to review, it might be easiest for us to setup a call to go through the remaining points.

Thanks  
Andy

From: Angela Van-Den-Bogerd [mailto:GRO]  
Sent: 17 August 2018 16:59  
To: Andrew Parsons; Rodric Williams  
Cc: Victoria Brooks  
Subject: RE: Statement  
Importance: High

Andy

Please find attached the latest version of my statement. This is still work in progress as I have some queries out with the business. I will pick this up again on Monday when I should have the information I've requested. In the meantime I'm returning to you as I have some comments for you/WBD that I've tracked – could you review and let me have a response/update please. Where we've referenced other witness statements it would be helpful if I could see them. Is this possible?

I had intended to be on leave next week but in light of this being unfinished I am now in work on Monday and will pick up for the rest of the week to finalise this statement ahead of submission deadline.

Thanks,  
Angela

<image005.png>

Angela Van Den Bogerd  
People Services Director

1st Floor, Ty Brwydran,

Atlantic Close, Llansamlet  
Swansea SA7 9FJ

**GRO**

Confidential Information:

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorised review, use, disclosure or distribution is prohibited. If you are not the intended recipient please contact me by reply email and destroy all copies of the original message.

From: Andrew Parsons [mailto:**GRO**]  
Sent: 08 August 2018 21:15  
To: Angela Van-Den-Bogerd **GRO**  
**GRO** >>, Rodric Williams  
**GRO**  
Cc: Victoria Brooks <**GRO**>  
**GRO**  
Subject: Statement

Angela

Please find attached the latest draft of your statement. All comments welcomed. This has been restructured from the last version you saw, added a number of new sections and have cut out some material to make it shorter / where we have considered material to be to far over the line of admissibility.

Rod – your comments also welcomed. In particular, there are some comments marked in green for your attention.

Kind regards  
Andy

Andrew Parsons  
Partner  
Womble Bond Dickinson (UK) LLP

d:  
m:  
t:  
e:

**GRO**

**GRO**

**GRO**

Stay informed: sign up to our e-alerts<<https://www.womblebond dickinson.com/uk/preferences>>

<image002.png>

womblebond dickinson.com<<http://womblebond dickinson.com>><<http://www.womblebond dickinson.com>>

<image003.png><[http://www.twitter.com/wbd\\_uk](http://www.twitter.com/wbd_uk)>

<image004.png><<https://www.linkedin.com/company/womble-bond-dickinson-uk-llp/>>

Please consider the environment! Do you need to print this email?

The information in this e-mail and any attachments is confidential and may be legally privileged and protected by law. angela.van-den-bogerd [REDACTED] GRO

[REDACTED] GRO } only is authorised to access this e-mail and any attachments. If you are not angela.van-den-bogerd [REDACTED] GRO

[REDACTED] GRO }, please notify

andrew.parsons [REDACTED] GRO

[REDACTED] GRO } as soon as possible and delete any copies. Unauthorised use, dissemination, distribution, publication or copying of this communication or attachments is prohibited and may be unlawful. Information about how we use personal data is in our Privacy Policy<<https://www.womblebond dickinson.com/uk/privacy-policy>> on our website.

Any files attached to this e-mail will have been checked by us with virus detection software before transmission. Womble Bond Dickinson (UK) LLP accepts no liability for any loss or damage which may be caused by software viruses and you should carry out your own virus checks before opening any attachment.

Content of this email which does not relate to the official business of Womble Bond Dickinson (UK) LLP, is neither given nor endorsed by it.

This email is sent by Womble Bond Dickinson (UK) LLP which is a limited liability partnership registered in England and Wales under number OC317661. Our registered office is 4 More London Riverside, London, SE1 2AU, where a list of members' names is open to inspection. We use the term partner to refer to a member of the LLP, or an employee or consultant who is of equivalent standing. Our VAT registration number is GB123393627.

Womble Bond Dickinson (UK) LLP is a member of Womble Bond Dickinson (International) Limited, which consists of independent and autonomous law firms providing services in the US, the UK, and elsewhere around the world. Each Womble Bond Dickinson entity is a separate legal entity and is not responsible for the acts or omissions of, nor can bind or obligate, another Womble Bond Dickinson entity. Womble Bond Dickinson (International) Limited does not practice law. Please see [www.womblebond dickinson.com/legal](http://www.womblebond dickinson.com/legal)<<http://www.womblebond dickinson.com/legal>> <<http://www.womblebond dickinson.com/legal>> notices for further details.

Womble Bond Dickinson (UK) LLP is authorised and regulated by the Solicitors Regulation Authority.

\*\*\*\*\*

This email and any attachments are confidential and intended for the addressee only. If you are not the named recipient, you must not use, disclose, reproduce, copy or distribute the contents of this communication. If you have received this in error, please contact the sender by reply email and then delete this email from your system. Any views or opinions expressed within this email are solely those of the sender, unless otherwise specifically stated.

POST OFFICE LIMITED is registered in England and Wales no 2154540. Registered Office: Finsbury



Dials, 20 Finsbury Street, London EC2Y 9AQ.

\*\*\*\*\*

---

This email has been scanned by the Symantec Email Security.cloud service.  
For more information please visit <http://www.symanteccloud.com>

---

---

This email has been scanned by the Symantec Email Security.cloud service.  
For more information please visit <http://www.symanteccloud.com>

---

---

This email has been scanned by the Symantec Email Security.cloud service.  
For more information please visit <http://www.symanteccloud.com>

---

---

This email has been scanned by the Symantec Email Security.cloud service.  
For more information please visit <http://www.symanteccloud.com>

---

---

This email has been scanned by the Symantec Email Security.cloud service.  
For more information please visit <http://www.symanteccloud.com>

---

---

This email has been scanned by the Symantec Email Security.cloud service.  
For more information please visit <http://www.symanteccloud.com>

---