

From: Nicky Mal [mailto: [REDACTED] GRO]
Sent: Thursday, March 13, 2014 03:07 PM GMT Standard Time
To: Swil, Jonathan
Cc: David Oliver [REDACTED] GRO; Belinda Crowe [REDACTED] GRO
Subject: FW: Mediation Scheme- confidential and privileged

Hi Jonathan,

Please find attached the skeleton argument for the Castleton case.

Regards
Nicky

From: Swil, Jonathan [REDACTED] GRO
Sent: 11 March 2014 18:21
To: David Oliver [REDACTED] GRO
Cc: Band, Christa; Belinda Crowe
Subject: RE: Mediation Scheme- confidential and privileged

David

In respect of my list below the key outstanding items we would be most interested in seeing are the Bond Dickinson and Cartwright King advice(s), although the other documents would be useful too if they can be obtained or exist. A copy of counsel's skeleton in the Castleton case, as Frank Tao mentioned, would also likely be very helpful to us.

There is mention in the documents of a generic report expected soon from Second Sight. Is that likely to become available in the remaining time before the report is due?

Many thanks

Jonathan

From: Swil, Jonathan
Sent: 05 March 2014 17:57
To: David Oliver [REDACTED] GRO
Cc: Band, Christa; Belinda Crowe [REDACTED] GRO
Subject: RE: Mediation Scheme- confidential and privileged

David

Ahead of the meeting tomorrow, I set out below a list of documents we have either seen reference to or which might be helpful and which don't appear to be in our bundle. I appreciate that, as you mentioned, some of these documents may not in fact exist:

- Any examples of the final form of the Post Office/Subpostmaster contract i.e. not the internal Post Office administrative version we have seen.
- Any other key documents which might govern the Post Office/Subpostmaster relationship (e.g. operating procedures or policies relating to Horizon).

- Any internal written policy for the recovery of losses from Subpostmasters.
- The final version of the Scheme Settlement Policy.
- Records of Bond Dickinson's advice.
- Records of Cartwright King's advice.
- Any relevant Post Office prosecution policy.
- Any records of the disposal/outcomes (including appeals) of the various criminal proceedings.
- Any examples of the complaint-specific reports from Second Sight (apparently these were becoming available from 27 February).
- Minutes of the Working Group.

Many thanks

Jonathan

From: Swil, Jonathan
Sent: 05 March 2014 11:56
To: David Oliver; GRO
Cc: Band, Christa; Belinda Crowe; GRO
Subject: RE: Mediation Scheme- confidential and privileged

David

To confirm, we will come to you at 9am tomorrow. We will need to leave by about 9.45am for Christa to be back for a meeting here.

We will come ready to discuss what we can propose for the Board and with any key questions we have so far on the documents (and will let you know in advance to the extent the questions are about missing documents).

Kind regards

Jonathan

From: Swil, Jonathan
Sent: 04 March 2014 17:41
To: David Oliver; GRO; Belinda Crowe
Cc: Band, Christa
Subject: RE: Mediation Scheme- confidential and privileged

Dear Belinda and David

Further to Christa's email below, I attach the draft work plan. It sets out the potential issues you discussed with Christa last week or which we have so far identified and the work we propose to do in respect of them with a view to preparing the report. Please do let us know if you have any comments.

Kind regards

Jonathan

<< File: A17823075 v0.2 140304_Work Plan.docx >>

From: Band, Christa
Sent: 04 March 2014 16:35
To: David Oliver; Belinda Crowe
Cc: Swil, Jonathan
Subject: Mediation Scheme- confidential and privileged

Dear Belinda and David

Thank you for the documents you sent through following our meeting last week.

Jonathan Swil is the Managing Associate who is going to work on this matter with me and he and I have put together a brief workplan which Jonathan can send you later. All comments will be gratefully received. In the meantime, we are working our way through the documents and issues and I thought that it would be sensible to catch up by telephone on Thursday so that we can tell you where we have got to and what questions we have.

Please let Jonathan and/or me know if you think that this is a sensible way to proceed.

Best regards

Christa

Christa Band
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