

**From:** Swil, Jonathan  
**Sent:** 23 June 2014 18:49  
**To:** 'jessica.madron@postoffice.co.uk' [GRO]  
**Cc:** Band, Christa  
**Subject:** RE: eSRF - Project Sparrow with Linklaters

Jessica

Apologies for the delay in coming back to you.

We have given the estimate some further thought. While we apologise again for not having spotted the additional time recorded against a different Post Office matter in respect of stage 1 work, we do believe the figure of approximately £167,000 for both stages is a reasonable estimate for the work we have done and may yet be asked to do. Our belief is based on the fact that we have done several items of work outside the scope of what we originally anticipated we would be asked to do, as listed under stage 2 below. For example, we did not when providing the estimate anticipate being asked to prepare speaking points for the meeting with Tony Hooper, review or prepare draft correspondence with Jenny Willott, James Arbuthnot and the Chairman of the Working Group nor prepare notes on settlement and ex gratia payments. We also believe we have only done work when asked and only what has been necessary in the circumstances, to meet Post Office's requests for advice in an efficient manner.

Please do let me know if you would like to discuss this further. However, if in light of the above you are content with the estimate, please could you send across the relevant PO number.

Many thanks

Jonathan

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**From:** Jessica Madron [mailto:jessica.madron@postoffice.co.uk] [GRO]  
**Sent:** 06 June 2014 14:21  
**To:** Swil, Jonathan  
**Subject:** FW: eSRF - Project Sparrow with Linklaters

Jonathan

I have removed the words that were highlighted in yellow as we think this is included already but we would like to revert to the original quote please, which I think was £149k as this seems to us more reasonable for the work.

Many thanks

**Kind Regards**  
**Jessica Madron**  
**Principal Lawyer**  
**Legal & Compliance**

**My working days are Tuesday to Friday.**

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**From:** Swil, Jonathan [mailto:[\[redacted\]](#) **GRO**]  
**Sent:** 30 April 2014 10:50  
**To:** Jessica Madron  
**Cc:** Renata Prywerek  
**Subject:** RE: eSRF - Project Sparrow with Linklaters

Jessica

I have set out below the further wording for the eSRF you have requested. The proposed Stage 2 work you have described in square brackets is not familiar to me. Is it currently anticipated we will be asked to do that? If we do further work not generally covered by the descriptions I sent Renata initially, we may need to revise the estimate.

As discussed, since sending the eSRF to Renata initially, we have realised there was some time for this matter held on another Post Office matter. This has now been transferred over. Apologies for not spotting this earlier. The transfer has resulted in an increase to the Stage 1 fees, as set out below.

Do let me know if you have any questions regarding the estimates or responses to the eSRF below. I should be grateful if you could send us the relevant PO Number at your earliest convenience.

Kind regards

Jonathan

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**From:** Jessica Madron [mailto:[\[redacted\]](#) **GRO**]  
**Sent:** 24 April 2014 12:03  
**To:** Swil, Jonathan  
**Cc:** Renata Prywerek  
**Subject:** FW: eSRF - Project Sparrow with Linklaters

Jonathan

I have been asked to review this eSRF and there are a few more bits of information I would find useful – as highlighted in yellow below.

If you could complete these and return it to me, that would be most helpful.

**eSRF – POL Legal**

|                                                                                                                                                                                                                                              |                                                                                           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|
| 1. Is this a new SRF or is a Change being sought? (If a change, set out brief details below):                                                                                                                                                | New eSRF                                                                                  |
| 2. Matter description (brief):                                                                                                                                                                                                               | Advice in relation to the Initial Complaint review and mediation Scheme – Project Sparrow |
| 3. Total Fees Quote<br>(incl VAT and whether <i>fixed</i> – a fixed charge irrespective of the time spent;<br><i>capped</i> – means maximum charge up to the cap, depending on hours spent, cap not to be exceeded;<br>or <i>variable</i> ): | £167,586 (incl. VAT), variable                                                            |
| 4. PO Number (to be quoted on all invoices)                                                                                                                                                                                                  | Project budget                                                                            |
| 5. CC and GL code                                                                                                                                                                                                                            |                                                                                           |

| 6. Initial Work Description & Work Plan (including completing the table):                                                              | <p>Work will be divided into two stages:</p> <p>Stage 1: The preparation of a report covering legal issues in respect of claims made in the Scheme (already completed)</p> <p>Stage 2: Assistance (including by preparing papers and attending meetings/calls) to formulate options for implementing alternatives to the Scheme.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                        |                             |                       |         |       |      |                    |       |      |           |       |      |           |       |      |         |      |      |                        |                             |                       |         |    |      |                    |    |      |
|----------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|-----------------------------|-----------------------|---------|-------|------|--------------------|-------|------|-----------|-------|------|-----------|-------|------|---------|------|------|------------------------|-----------------------------|-----------------------|---------|----|------|--------------------|----|------|
| 7. Details of any proposed changes (if applicable):                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                        |                             |                       |         |       |      |                    |       |      |           |       |      |           |       |      |         |      |      |                        |                             |                       |         |    |      |                    |    |      |
| 8. Detailed Fees Breakdown (including any anticipated disbursements and expenses) regarding Initial Work and Changer (as appropriate): | <p>Stage 1: £94,655 (excl. VAT) (already completed but not invoiced)</p> <table border="1"> <thead> <tr> <th>Level of fee earner(s)</th> <th>Anticipated amount of hours</th> <th>Hourly rate/rate card</th> </tr> </thead> <tbody> <tr> <td>Partner</td> <td>50.80</td> <td>£692</td> </tr> <tr> <td>Managing Associate</td> <td>73.00</td> <td>£452</td> </tr> <tr> <td>Associate</td> <td>22.60</td> <td>£400</td> </tr> <tr> <td>Associate</td> <td>47.80</td> <td>£348</td> </tr> <tr> <td>Trainee</td> <td>4.40</td> <td>£168</td> </tr> </tbody> </table> <p>Stage 2: £45,000 (excl VAT) work broken down on following assumptions:</p> <ul style="list-style-type: none"> <li>- Preparing a short document on the Horizon report,</li> <li>- Attending four or five substantial telephone calls and two of three face to face meetings with the Post Office; and</li> <li>- Preparing a report setting out future options and their viability is shorter and requires less preparatory work than the stage 1 report.</li> <li>- [Developing appropriate questions for POL to submit to an independent expert]</li> </ul> <table border="1"> <thead> <tr> <th>Level of fee earner(s)</th> <th>Anticipated amount of hours</th> <th>Hourly rate/rate card</th> </tr> </thead> <tbody> <tr> <td>Partner</td> <td>32</td> <td>£692</td> </tr> <tr> <td>Managing Associate</td> <td>50</td> <td>£452</td> </tr> </tbody> </table> | Level of fee earner(s) | Anticipated amount of hours | Hourly rate/rate card | Partner | 50.80 | £692 | Managing Associate | 73.00 | £452 | Associate | 22.60 | £400 | Associate | 47.80 | £348 | Trainee | 4.40 | £168 | Level of fee earner(s) | Anticipated amount of hours | Hourly rate/rate card | Partner | 32 | £692 | Managing Associate | 50 | £452 |
| Level of fee earner(s)                                                                                                                 | Anticipated amount of hours                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Hourly rate/rate card  |                             |                       |         |       |      |                    |       |      |           |       |      |           |       |      |         |      |      |                        |                             |                       |         |    |      |                    |    |      |
| Partner                                                                                                                                | 50.80                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | £692                   |                             |                       |         |       |      |                    |       |      |           |       |      |           |       |      |         |      |      |                        |                             |                       |         |    |      |                    |    |      |
| Managing Associate                                                                                                                     | 73.00                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | £452                   |                             |                       |         |       |      |                    |       |      |           |       |      |           |       |      |         |      |      |                        |                             |                       |         |    |      |                    |    |      |
| Associate                                                                                                                              | 22.60                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | £400                   |                             |                       |         |       |      |                    |       |      |           |       |      |           |       |      |         |      |      |                        |                             |                       |         |    |      |                    |    |      |
| Associate                                                                                                                              | 47.80                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | £348                   |                             |                       |         |       |      |                    |       |      |           |       |      |           |       |      |         |      |      |                        |                             |                       |         |    |      |                    |    |      |
| Trainee                                                                                                                                | 4.40                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | £168                   |                             |                       |         |       |      |                    |       |      |           |       |      |           |       |      |         |      |      |                        |                             |                       |         |    |      |                    |    |      |
| Level of fee earner(s)                                                                                                                 | Anticipated amount of hours                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Hourly rate/rate card  |                             |                       |         |       |      |                    |       |      |           |       |      |           |       |      |         |      |      |                        |                             |                       |         |    |      |                    |    |      |
| Partner                                                                                                                                | 32                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | £692                   |                             |                       |         |       |      |                    |       |      |           |       |      |           |       |      |         |      |      |                        |                             |                       |         |    |      |                    |    |      |
| Managing Associate                                                                                                                     | 50                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | £452                   |                             |                       |         |       |      |                    |       |      |           |       |      |           |       |      |         |      |      |                        |                             |                       |         |    |      |                    |    |      |
| 9. POL Legal Contact:                                                                                                                  | Rodric Williams                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                        |                             |                       |         |       |      |                    |       |      |           |       |      |           |       |      |         |      |      |                        |                             |                       |         |    |      |                    |    |      |
| 10. POL Business Contacts                                                                                                              | Belinda Crowe and David Oliver                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                        |                             |                       |         |       |      |                    |       |      |           |       |      |           |       |      |         |      |      |                        |                             |                       |         |    |      |                    |    |      |
| 11. Law Firm – Main Contact for this matter:                                                                                           | Linklaters, Jonathan Swil                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                        |                             |                       |         |       |      |                    |       |      |           |       |      |           |       |      |         |      |      |                        |                             |                       |         |    |      |                    |    |      |
| 12. Panel Firm Partner Contact:                                                                                                        | Linklaters, Christa Band                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                        |                             |                       |         |       |      |                    |       |      |           |       |      |           |       |      |         |      |      |                        |                             |                       |         |    |      |                    |    |      |
| 13. Panel Firm Case Ref:                                                                                                               | Linklaters, Christa Band/ Jonathan Swil                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                        |                             |                       |         |       |      |                    |       |      |           |       |      |           |       |      |         |      |      |                        |                             |                       |         |    |      |                    |    |      |
| 14. Instruction/Change Date:                                                                                                           | 28/2/14                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                        |                             |                       |         |       |      |                    |       |      |           |       |      |           |       |      |         |      |      |                        |                             |                       |         |    |      |                    |    |      |
| 15. POL Legal Ref [to be quoted on all invoices]:                                                                                      | POL1424                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                        |                             |                       |         |       |      |                    |       |      |           |       |      |           |       |      |         |      |      |                        |                             |                       |         |    |      |                    |    |      |
| <i>Signed by Law Firm Partner (&amp; date):</i>                                                                                        | Christa Band 7/4/14                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                        |                             |                       |         |       |      |                    |       |      |           |       |      |           |       |      |         |      |      |                        |                             |                       |         |    |      |                    |    |      |
| <i>Signed by POL Head of Legal (&amp; date):</i>                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                        |                             |                       |         |       |      |                    |       |      |           |       |      |           |       |      |         |      |      |                        |                             |                       |         |    |      |                    |    |      |

Many thanks

Kind Regards  
**Jessica Madron**  
Principal Lawyer  
Legal & Compliance

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