

## Message

**From:** David Oliver1 [GRO]  
**Sent:** 12/03/2014 10:23:46  
**To:** Swil, Jonathan [/O=LAW/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Jswil]  
**CC:** Belinda Crowe [GRO]; andrew.parsons [GRO]  
**Subject:** FW: Advice for Linklaters [BD-4A.FID20472253]  
**Attachments:** Advice for Linklaters.zip

Jonathan

Please find attached the key BD advice. Please feel free to follow up directly with Andy (cc'd and contact details below).

D

**David Oliver**  
**Programme Manager**  
**Initial Complaint and Mediation Scheme**

[GRO]

**Mobile** [GRO]

---

**From:** Parsons, Andrew [mailto:andrew [GRO]]  
**Sent:** 12 March 2014 10:00  
**To:** David Oliver1; Chris Aujard  
**Cc:** Matthews, Gavin  
**Subject:** Advice for Linklaters [BD-4A.FID20472253]

David, Chris

Please find attached the key pieces of formal advice that have been prepared by BD. There are obviously 1000s of other emails which provide further ad hoc advice.

A few documents to note in particular:

1. Note of meeting with Richard Morgan QC.

Back in 2012, before SS were engaged, the primary concern was that SPMRs would bring something akin to a class action against POL. This was being driven by Shoosmiths and the 100+ SPMRs they had gathered together. Off the back of Shoosmiths' attempts to get a test case off the ground (which was ultimately unsuccessful), we instructed Richard Morgan QC to advise on whether POL should instruct an expert to produce a pre-emptory report giving Horizon a clean bill of health. (I think at this time the intention was to use Deloitte - apologies I was not directly involved in these events). Attached is a summary of the key points from the con with RMQC in which he advises against instructing an expert.

2. Settlement presentation.

This presentation is for a talk I gave to what was at that time the Sparrow Steering Group. (Chris - you may recall that this was the lead decision making body for Sparrow before the Programme Board was constituted and was attended by a number of ExCo members). This presentation was the starting point for the settlement policy.

3. Insurances risks note

This note had the dual purpose of advising the board (its contents were later reflected in a board paper) and acting as notification to POL's insurers – hence why this doesn't look like a traditional piece of legal advice.

Kind regards

Andy

**Andrew Parsons**

Senior Associate

for and on behalf of Bond Dickinson LLP



Direct:  
Mobile:  
Fax:



Follow Bond Dickinson:



[www.bonddickinson.com](http://www.bonddickinson.com)

**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. [david.oliver@bond-dickinson.com](#) only is authorised to access this e-mail and any attachments. If you are not [david.oliver@bond-dickinson.com](#) please notify [andrew.parsons@bond-dickinson.com](#) 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.

Any files attached to this e-mail will have been checked by us with virus detection software before transmission. Bond Dickinson 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 Bond Dickinson LLP, is neither given nor endorsed by it.

This email is sent for and on behalf of Bond Dickinson LLP which is a limited liability partnership registered in England and Wales under number OC317661. Our registered office is St Ann's Wharf, 112 Quayside, Newcastle Upon Tyne, NE1 3DX, 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.

Bond Dickinson 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: 148 OLD STREET, LONDON EC1V 9HQ.

\*\*\*\*\*