



HERBERT  
SMITH  
FREEHILLS

Solicitor to the Inquiry  
Post Office Horizon IT Inquiry  
5th Floor, Aldwych House  
71-91 Aldwych  
London, WC2B 4HN

Herbert Smith Freehills LLP  
Exchange House  
Primrose Street  
London EC2A 2EG  
T F **GRO**  
DX28 London Chancery Lane

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

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9100/31043642

Date  
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By email

Dear Solicitor to the Inquiry

**Post Office Horizon IT Inquiry – Disclosure by POL in relation to Stephen Bradshaw**

We enclose a note prepared by Peters & Peters Solicitors LLP ("**Peters & Peters**"). This note refers to the Inquiry's email of 27 December 2023 (sent at 4:19pm) and Peters & Peters' notes dated 27 and 29 December 2023 and 3 and 4 January 2024 in relation to outstanding material relating to Stephen Bradshaw.

Yours faithfully

*Herbert Smith Freehills LLP*

**Herbert Smith Freehills LLP**

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**POST OFFICE HORIZON IT INQUIRY**

**Note provided by Peters & Peters regarding disclosure by POL in relation to Stephen Bradshaw**

1. In its email dated 27 December 2023 (sent at 4:19pm), the Inquiry requested that all outstanding material relating to Stephen Bradshaw be provided no later than 4:00pm on 29 December 2023.
2. In our notes dated 27 and 29 December 2023 and 3 and 4 January 2024, we informed the Inquiry that additional checks were being undertaken in respect of Stephen Bradshaw's data relating to potential additional email addresses and display names. Those additional checks have now been completed and POL has identified 942 documents (including families) that fall to be produced as a result of that review work. POL has today arranged for these documents to be produced to the Inquiry via Egress, together with production index PROD065. 49 of the 942 documents have been produced in image format in order to ensure that privileged family documents were not produced to the Inquiry. The remainder of the documents in the production have been produced in native format.
3. POL is endeavouring to do its utmost to identify duplicative material to the Inquiry. Of the 942 documents in this production, 420 have been identified by KPMG as being either MD5# duplicates or 98-100% textual near duplicates (TNDs) of documents previously produced to the Inquiry. However, Peters & Peters believes that a substantial number of the remaining 522 documents in the production also appear to be TNDs of documents previously produced to the Inquiry. These include ROTIs and investigation reports from Rule 9(14) Q42 cases which have been produced to the Inquiry on multiple occasions. KPMG is therefore investigating why those documents have not been identified as part of its duplicates analysis.
4. Relevant information from KPMG's analysis to date is provided in the production index, which shows whether a document has been identified as an MD5# or TND duplicate of material that has previously been produced to the Inquiry. Any MD5# duplicates at a family level have been excluded from the production. POL understands that KPMG has identified 318 documents in the Bradshaw production as exact item level MD5# duplicates of previously produced documents, 58 documents that are 100% TNDs of previously produced documents and 44 documents that are 98-99% TNDs of previously produced documents.
5. Of the documents in the production that are potentially "new" (as referred to in paragraph 3 above): 352 are responsive to Rule 9(14); 84 are responsive to Rule 9(17); 23 are responsive to CLI 49 and/or have been tagged as "of interest to the Inquiry"; and a further 63 are responsive to Rule 9(6), which POL assumes will be of lesser interest to the Inquiry.
6. POL apologises that it has been unable to identify fully all duplicates in time for this production. With KPMG's assistance, POL is endeavouring to provide an updated analysis of duplicates to the Inquiry as soon as possible.

**Peters & Peters Solicitors LLP**

**5 January 2024**