

**From:** HSF POL Inquiry Correspondence [GRO]  
**Sent:** Wed 10/01/2024 11:07:53 AM (UTC)  
**To:** Smith, Laura (Post Office Horizon Inquiry) [GRO]  
Beaumont, Julie (Post Office Horizon Inquiry) [GRO]  
Naveed, Isra (Post Office Horizon Inquiry) [GRO]  
Nadeem, Zainab (Post Office Horizon Inquiry team) [GRO] Solicitor Post Office Horizon Inquiry[Solicitor@postofficehorizoninquiry.org.uk]  
**Cc:** Rowan, Gregg [GRO]; HSF POL Inquiry Service [GRO] PO Horizon Gold-Silver [GRO]  
[GRO] POH Inquiry Correspondence [GRO]  
[GRO] HSF POL Inquiry Correspondence [GRO]  
**Subject:** Post Office Horizon IT Inquiry – Documents relating to Stephen Bradshaw [HSF-LONDON\_11.FID3019466]  
**Attachment:** 2024-01-05 - POL - Letter to the Inquiry - Documents relating to S Bradshaw.pdf

Dear Solicitor to the Inquiry,

Peters & Peters are assisting POL with the review of documents relating to Stephen Bradshaw. The content of this email has been provided by Peters & Peters.

We refer to the note prepared by Peters & Peters which was provided to the Inquiry on Friday 5 January 2024 regarding the 942 documents produced to the Inquiry that same day. In that note, Peters & Peters explained that as part of POL's efforts to identify duplicative material to the Inquiry, KPMG had run a duplicate analysis over those 942 documents. Of the 942 documents, KPMG identified **420** as being either MD5# duplicates or 98-100% textual near duplicates (TNDs) of documents previously produced to the Inquiry. However, Peters & Peters believed that a substantial number of the remaining **522** "new" documents in the production also appeared to be TNDs of documents previously produced to the Inquiry. These included ROTIs and investigation reports from Rule 9(14) Q42 cases which have been produced to the Inquiry on multiple occasions.

KPMG has therefore investigated why those documents were not identified as part of its original duplicates analysis. KPMG's conclusion was that these documents were not flagged as TNDs because they fell below the requested textual similarity threshold of 98%. KPMG explained that whilst the documents Peters & Peters had highlighted do appear to be textually similar, small variations may have caused the documents to fall below the 98% similarity requirement. KPMG therefore broadened its TND analysis from 98-99% to 90-99%. The results of that broader TND analysis indicated that **578** documents in Friday's production were either MD5# duplicates or 90-100% TNDs of documents previously produced to the Inquiry.

KPMG's most recent analysis indicates that Friday's production contains **364** "new" documents. This remains contrary to the feedback from Peters & Peters' review team, who have indicated that a very large volume of the material from Friday's production was duplicative of documents previously produced to the Inquiry. Peters & Peters has therefore begun a further manual review of the 364 "new" documents to determine whether on their face they appear similar to material previously produced to the Inquiry. It is apparent from the preliminary findings of that manual review that there is still TND of previously produced material within the 364 "new" documents. For example, Peters & Peters has seen multiple POL legal memos regarding Hughie Thomas' court hearings, Hughie Thomas' mediation application and mediation report, and multiple copies of Hughie Thomas' audit report, all of which have produced to the Inquiry previously. POL has therefore asked KPMG to investigate these examples urgently to understand why these documents have not been caught as part of its 90-99% TND analysis. In parallel, Peters & Peters is conducting a full manual review of the 364 "new" documents from Friday's production.

Following its further investigations, KPMG has been able to confirm that the additional examples were not identified as TNDs as the duplicates previously produced to the Inquiry were processed by another firm and transferred to KPMG. POL understands from KPMG that these duplicates contain 'junk' characters at the end of the extracted text file, causing them to have significant textual differences to the documents in Friday's Bradshaw-related production. This means that, even though it appears that several of the items within the "new" 364 documents in Friday's production have been produced to the Inquiry as many as five times before, they have not been picked up in KPMG's duplicate analysis. This may explain why KPMG's analysis does not correspond with Peters & Peters' view that the

"new" documents contain numerous duplicates. In addition, POL understands from KPMG that TND analysis is often not effective when analysing Excel files due to the way text extracts formulas and content from the spreadsheet. KPMG has confirmed that 44 of the 364 "new" documents from Friday's production are Excel files. POL understands that this might further explain why more potential duplicates have not been picked up as part of KPMG's TND analysis.

As POL's further investigations will take some time to complete, POL yesterday arranged for a new overlay to Friday's production prepared by KPMG to be uploaded to Egress so that the Inquiry can see which documents have been identified as duplicates as part of KPMG's current 90-99% TND analysis. However, POL will endeavour to update the Inquiry on the results of its ongoing efforts to identify further duplicates among the documents produced in Friday's Bradshaw-related production.

Yours faithfully

**Herbert Smith Freehills LLP**