

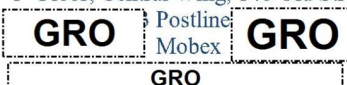
Message

From: Susan Crichton [/O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=SUSAN CRICHTONC5FA6431-DC28-49AB-8F0F-BE4237A4AD4F]
Sent: 14/08/2013 13:55:47
To: Parsons, Andrew [GRO]
CC: Hugh Flemington [GRO]
Subject: RE: Response to Brian Altman QC's Interim Report.
Attachments: image003.jpg; image004.jpg; image005.jpg; image006.jpg; image007.jpg; image008.gif; image009.gif; image010.jpg

Agreed – we had a call with CK this morning and we definitely need a con with Brian when he gets back – we may need this in two parts one with CK and one with just POL ... need to work on tactics. Could you see when he is available?

Susan Crichton I General Counsel

1st Floor, Central Wing, 148 Old Street, London, EC1V 9HQ



From: Parsons, Andrew [GRO]
Sent: 14 August 2013 08:47
To: Susan Crichton
Subject: RE: Response to Brian Altman QC's Interim Report.

Susan

The bit of the advice that concerns me is:

"I would advise that either the conference calls be continued or that some other centrally based mechanism be designed, so as to permit the collation of all Horizon-related defects, bugs, complaints, queries and Fujitsu remedies, arising from all sources, into one location. Such a mechanism would amount to proper compliance with that aspect of a prosecutor's duty relating to the recording and retention of relevant information."

This approach is very robust but the question is whether this is workable in practice? Perhaps CK could be asked to consider if there is an easier but still defensible way to meet the disclosure duty?

I'll forward CK's note on to Brian when he gets back from hols. I think a con with CK and Brian (and someone who is not part of the criminal team to objectively supervise ie. you, me, Rodric or Hugh?) would be a good idea. Do you want me to make the arrangements for this con?

Kind regards
Andy

Andrew Parsons
Senior Associate

for and on behalf of Bond Dickinson LLP

Bond Dickinson

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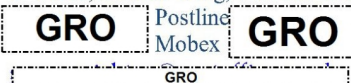
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From: Susan Crichton **GRO**
Sent: 13 August 2013 18:28
To: Parsons, Andrew
Subject: FW: Response to Brian Altman QC's Interim Report.

Thought you might be interested to see what had started that particular "hare" running!

Susan Crichton I General Counsel

1st Floor, Central Wing, 148 Old Street, London, EC1V 9HQ



From: martin smith **GRO**
Sent: 13 August 2013 16:33
To: Susan Crichton
Subject: Response to Brian Altman QC's Interim Report.

Susan,

Please find attached Harry Bowyer's Response to Brian Altman QC's Interim Report. I asked Harry to draft the response in Simon Clarke's absence given the urgency of the situation.

I would be grateful if Harry's Response could be sent to Brian Altman QC together with the Review Protocol and Simon Clarke's Advice on Disclosure.

Kind regards,

Martin.

Martin Smith



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