

Message

**From:** Mark Underwood1 [GRO]  
**Sent:** 18/11/2016 21:15:22  
**To:** Parsons, Andrew [GRO]; Jane MacLeod [GRO]; Rodric Williams [GRO]  
**CC:** Lukas, Elisa [GRO]; Prime, Amy [GRO]  
**Subject:** RE: Remote Access Wording  
**Attachments:** \_DOC\_34370494(1)\_Letter to Freeths - Remote Access Wording v2 mu.docx

Andy, Jane & Rod,

I have track changed my comments, for your consideration, in the attached version.

Mark

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**From:** Parsons, Andrew [GRO]  
**Sent:** 18 November 2016 19:25  
**To:** Jane MacLeod; Rodric Williams  
**Cc:** Mark Underwood1; Lukas, Elisa; Prime, Amy  
**Subject:** Remote Access Wording

Jane, Rodric

As discussed in the con with Tony, please find attached our draft wording on the "remote access" issues. This wording will be part of a longer letter to Freeths that we hope to circulate next week.

In the attached, we refer to certain information provided by FJ to Post Office about editing transaction data. This information was by way of an email (attached) that was arguably subject to litigation privilege. By referring to this information in our letter (i) we may be waiving privilege in that email and (ii) Freeths could push for a collateral waiver of privilege in other emails from FJ on the same topic.

We have not expressly referred to the email in the letter to minimise this risk. However, my view is that if we do not explain that Post Office relied on information provided by FJ, Post Office's story is severely weakened and hence some risk of waiving privilege should be taken.

Happy to discuss this point in more detail. All comments on the attached are welcomed.

Kind regards  
Andy

**Andrew Parsons**  
Partner  
Bond Dickinson LLP

*Bond Dickinson*

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