



Strictly private & confidential

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Our ref:

14 December 2023

Dear Sir / Madam

Continued late disclosure by POL: Phase 4 hearings and witnesses

1. We refer to Post Office Limited's (POL's) ongoing late disclosure of relevant documents said to be responsive to Rule 9 requests, Section 21 Notices or otherwise of interest to the Inquiry in relation to Phase 4 and/or Phase 4 individual witnesses.
2. We understand that POL's Counsel has recently asked Counsel to the Inquiry for the names of witnesses for the remainder of the Phase 4 hearings in order to continue POL's various disclosure exercises resulting in the late disclosure of documents.
3. The Inquiry provides a provisional list of names in Annex 1 to this letter. Please note this is a provisional list of individuals that the Inquiry wishes to call (or obtain a statement from) and should not be taken as confirmation that those persons will in fact provide evidence or information to the Inquiry.
4. For the avoidance of doubt, the purpose of providing POL with this information is to ensure prompt disclosure of any further late documents in respect of overdue Rule 9 requests, Section 21 Notices or other documents of interest in order to ensure that the Inquiry's hearings can remain listed as scheduled, if at all possible.
5. POL must disclose any additional documents by the following deadlines:
 - (a) Any additional documents said to be related to Stephen Bradshaw by 4.00pm 20 December 2023.
 - (b) For all other persons in Annex 1, no later than 4.00pm 10 January 2024. If POL is able to disclose documents earlier than this, then they ought to do so by upload to Egress in the usual way.
6. This letter is marked as strictly private and confidential and is captured by the terms of the Inquiry's undertakings. POL is only to use the information in Annex 1 for the reasons contained in this letter (ie. to facilitate the prompt disclosure of any further late documents).

7. The final timetable for the additional Phase 4 hearings to be held in January will be provided to Core Participants and published on the website shortly.

Yours sincerely

GRO

Laura Smith
Senior Lawyer (Australian qualified)
Post Office Horizon IT Inquiry

Annex 1

Stephen Bradshaw

Irrelevant to disclosure hearing held 12 January 2024