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From: Belinda Crowe [IMCEAEX-

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569F-4526-A078-F5B4958A8917220@C72A47.ingest.local]

on Belinda Crowe < IMCEAEX-

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of 569F-4526-A078-F5B4958A8917220@C72A47.ingest.local> [IMCEAEX-

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569F-4526-A078-F5B4958A8917220@C72A47.ingest.local]

Sent: 01/09/2014 07:52:16

To: Parsons, Andrew GRO ; Rodric Williams GRO

CC: Belinda Crowe GRO

Subject:RE: Email retreival [BD-4A.FID25887215]

Great, thanks Andy Best wishes Belinda

Belinda Crowe

148 Old Street, LONDON, EC1V 9HQ

GRO]Postline:	GRO
GRO		

belinda.crowe GRO

From: Parsons, Andrew GRO

Sent: 01 September 2014 08:50 **To:** Belinda Crowe; Rodric Williams

Subject: RE: Email retreival [BD-4A.FID25887215]

A signature only makes a difference if the Statement is filed with a Court (at which point any false comment in the Statement would be a contempt of Court). I'd be minded to keep the Statement unsigned as it helps us to maintain that it is a draft document and therefore potentially subject to legal privilege (for DPA and FOIA purposes).

Kind regards Andy

Andrew Parsons

Senior Associate

for and on behalf of Bond Dickinson LLP

Bond Dickinson

Direct: Mobile: Fax: GRO

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From: Belinda Crowe GRO

Sent: 01 September 2014 08:01 **To:** Parsons, Andrew; Rodric Williams

Cc: Belinda Crowe

Subject: RE: Email retreival [BD-4A.FID20472253]

I think we just send the email to them and make them come back with the question they want answering and then deal with that what we were trying to do with the email is to make the point that they cannot have source material such as this as its totally inappropriate and also get them to ask the question which we can answer on the record.

A further question from me, is it worth getting that witness statement signed?

Best wishes Belinda

Belinda Crowe

148 Old Street	, LONDON,	EC1V	9HQ
GRO]Postline:[_	GRO	
GRO			
belinda.crowe	GRO)	

From: Parsons, Andrew GRO

Sent: 01 September 2014 07:27 **To:** Belinda Crowe; Rodric Williams

Subject: RE: Email retreival [BD-4A.FID20472253]

Yes – we have addressed the issue under investigation by SS. This was about Mr Rudkin's visit to FJ's office at Bracknell and the "covert operations centre" he apparently saw. To dispel this rumour, we have provided SS with a statement from Martin Rolfe (POL employee who conducted the visit) confirming that the "operations centre" was in fact a test environment, not connected to the live Horizon system. This was Spot Review 5.

Unless Ian is saying that Post Office are trying to conduct a massive conspiracy against SPMRs, then the trawl for emails is clearly disproportionate.

A

Andrew Parsons

Senior Associate

for and on behalf of Bond Dickinson LLP

Bond Dickinson

Direct: Mobile: GRO

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From: Belinda Crowe Sent: 29 August 2014 18: To: Rodric Williams; Parso			
Subject: RE: Email retreiv			
Apparently not.			
Belinda Crowe			
148 Old Street, LONDON GRO Postline: GRO belinda.crowe GRO	GRO		
From: Rodric Williams Sent: 29 August 2014 14: To: 'Parsons, Andrew' Cc: Belinda Crowe Subject: FW: Email retrei			
Haven't we addressed this	already through the Spot Review?		
From: Belinda Crowe Sent: 27 August 2014 08: To: Chris Aujard			
Cc: Belinda Crowe; Rodric David Oliver[] Subject: FW: Email retrei	Williams; Parsons, Andrew (GRO); Angela Van-Den-Bogerd;
basement in Bracknell from was drafted for you to send		branch Horizon data wi	to the matter of whether there is a athout the knowledge of spmrs. This is sent it. Ian raised it again in your
Ian			

You raised this matter with Belinda in my absence, I apologise I had thought we had responded on this.

For me the starting point in considering your request is to understand why you feel you need access to this information. The processes established by the Working Group are fairly clear: upon receipt of a CQR POL produces a report (along with relevant supporting documentation) which is then sent to you for the purpose, inter alia, of providing a basis upon which you can prepare a corresponding report for the Working Group. To the extent that you reasonably feel there are ambiguities or omissions in the POL report you have the option of either commenting on this matter in your report (to the extent it is not material), or (to the extent that it is material) requesting, via appropriate channels (and at all times copying in Angela), clarification of issues raised. The point here is that such requests are specific and focussed on matters directly relevant to the report produced by POL; they should therefore be made after receipt of the POL reports, not before they are written, not be overly general in nature, and certainly not so broad as to require the release of an entire class of document, e.g. an entire inbox for POL employees. Put another way, it seems to me that the Working Group has not asked you to conduct a trawl of the primary source documentation and records maintained by POL to ascertain what it

relevant, and what is not. Apart from the need to maintain an orderly and workable process, there are it seems to me very good reasons to ensure that we maintain discipline and focus on the cases at hand.

The current situation contrasts quite markedly to that which prevailed in the period prior to the release of your interim report, when you were undertaking what was essentially an investigatory exercise. Given your role then, I can entirely understand why generic information was provided to you as it no doubt formed the factual basis by reference to which you wrote your report. However, the focus of your work now is on the mediation scheme, where your role is significantly different from that which you occupied in respect of the interim report, and as such I cannot see any compelling rationale for disclosure. Indeed, to retrieve files, documents and emails, review them and redact information which is commercially confidential, privileged or personal would involve considerable time and resource, which I would find difficult to justify without a clear need.

If you would like to let Angela know the actual question you are seeking to answer, we will endeavour to provide you with the answer.

Regards				
Chris				
Belinda Crowe				
148 Old Street, LONDON, EC1V 9 GRO Postline GRO	-·-·- <u>·</u> i			
belinda.crowe GRO				
From: Ian Henderson Date: 30 April 2014 08:54:01 BST	GRO	•		
To: 'Belinda Crowe' 🤄	GRO	}		
Cc: 'Angela Van-Den-Bogerd' ∢	GR	0	>, < <u>mediation@</u>	GRO >,
< <u>david.oliver</u> GRO >				
Subject: RE: Email retreival				
Belinda				
I'd be grateful for a response to m	y 13 March email	(attached)?		
Many thanks				
With best wishes				
Ian R Henderson CCE CISA F Advanced Forensics - Londo				
Forensic computing expert	witness and ele	ectronic disclos	ure specialis	t
UK Mobile: GRO Email: irh GRO				
Website: http://advancedfo	rensics.com			
LinkedIn: http://linkedin.gramma		,		
Twitter: http://twitter.com				

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Advanced Forensics - London, UK</td></tr><tr><td>Forensic computing expert witness and electronic disclosure specialist</td></tr><tr><td>UK Mobile: GRO</td></tr><tr><td>Email: irh GRO Website: http://advancedforensics.com LinkedIn: http://linkedin.com GRO Twitter: http://twitter.com GRO CONFIDENTIALITY. This email and any attachments are confidential and may also be privileged.</td></tr><tr><td>If you are not the intended recipient, please notify me at irh GRO and delete the email and any attachments.
From: Ian Henderson GRO Sent: 12 September 2013 11:20 To: 'Andy Holt' Cc: 'rwarming GRO Subject: RE: Email retreival
Andy
The request is for all of 2008 for employee Martin Rolfe
We require both Sent and Received – ideally the entire NSF file from the backup of the Domino server

Depending what is found, there may be further request for an extended time frame or emails relating to other

employees.

With best wishes Ian R Henderson CCE CISA FCA Advanced Forensics - London, UK Forensic computing expert witness and electronic disclosure specialist UK Mobile: GRO Email: <u>irh</u> GRO Website: http://advancedforensics.com LinkedIn: http://linkedin.com GRO Twitter: http://twitter.com GRO CONFIDENTIALITY. This email and any attachments are confidential and may also be privileged. If you are not the intended recipient, please notify me at irh delete the email and any attachments. From: Andy Holt **Sent:** 11 September 2013 14:54 **To:** Ian Henderson Subject: Email retreival lan Remind me the name of the person and the time frame of emails you want - I have given CSC clarity on the requirement, they just need this to progress. Presume you want both sent and received. Does that cover your requirement. Andy Andy Holt I Business Relationship Management **GRO** andy.holt(**GRO** ******************* This email and any attachments are confidential and intended for the addressee only. If you are not the named recipient, you must not use, disclose, reproduce, copy or distribute the contents of this communication. If you have received this in error, please contact the sender by reply email and then delete this email from your system. Any views or opinions expressed within this email are solely those of the sender, unless otherwise specifically stated. POST OFFICE LIMITED is registered in England and Wales no 2154540. Registered Office: 148 OLD STREET, LONDON EC1V 9HQ. *******************

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