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Secure Email: [REDACTED]

Fax: **GRO**

Date: 23 January 2013  
Our Ref: MS2/24676

Dear Sirs,

**Re: R -v- Khayyam Ishaq,  
Trial at Bradford Crown Court - 25<sup>th</sup> February 2013.**

Thank you for your letters of 4<sup>th</sup> December 2012 and 14<sup>th</sup> January 2013. We note that you have still not fully particularised the alleged problems with the Horizon system to which your client has referred in his defence case statement.

Dealing with your most recent letter first, we can confirm that it is counsel's intention to provide a note of his opening.

We enclose the tape recordings of your client's interviews herewith and so far as the prosecution witnesses are concerned, we can confirm that we are not aware of any previous convictions.

There is no material in respect of which a PII application would be made. There will be no PII application in this case.

We understand that the disc provided with our letter 26<sup>th</sup> October 2012 was unrestricted. If you are having difficulties viewing the data, may we invite you contact the Officer in the Case for assistance? Steve Bradshaw can be contacted on **GRO**

So far as the requests for other Branch Trading Statements are concerned, the audit took place on 8<sup>th</sup> February 2011 which was not the end date of a trading period. With regard to the requests for the Branch Trading Statements which pre-date the indictment period, your client will no doubt be aware that he was under an obligation to keep such records. Please refer to your client for this information.



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Your client was also under an obligation to retain stock records and so you may also wish to refer to your client for this information too. So far as the stock received records are concerned, please explain the purpose of this request.

With regard to the specific requests at part 11 of the Defence Case Statement, we would comment as follows:-

- 11(i) This request does not correlate to the test for disclosure.
- 11(ii) Please see the statement of Gareth Jenkins of 15<sup>th</sup> January 2013.
- 11(iii) This request is a fishing expedition.
- 11(iv) The Post Office do not have any full results.
- 11(v) Please see the statement of Gareth Jenkins previously referred to.
- 11(vi) This was contained on the disc enclosed with our letter of 26<sup>th</sup> October 2012.
- 11(vii) This is effectively a request for screen shots. The Horizon system does not take a screen shot of each transaction. However the defendant will be familiar with the screens on the Horizon system.
- 11(viii) The original signed statement of Umair Liaquat was handed to the Bradford Magistrates Court on 25<sup>th</sup> July 2012.

Yours faithfully,

Cartwright King.