From: Amy Prime GRO

To: Lucy Bremner GRO

Cc: Jonathan Gribben GRO

Subject: RE: KELs

Date: Thu, 20 Dec 2018 11:41:48 +0000

Importance: Normal

Inline-Images: image001.png; image002.png; image003.png; imageab7675.PNG; image7ee08b.PNG;

image41b913.PNG

Lucy

My thought is that we need to disclose the deleted KELs – the Cs case is that they are adverse documents so I don't think we have an option.

Many thanks

Α

Amy Prime

Solicitor

Womble Bond Dickinson (UK) LLP



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From: Lucy Bremner

Sent: 20 December 2018 10:58

To: Amy Prime **Cc:** Jonathan Gribben

Subject: RE: KELs [WBDUK-AC.FID27032497]

Hi Amy,

These haven't been disclosed to Robert – we think he has obtained the information because they are referenced in another PEAK/KEL (I've looked and located the relevant ones that reference them).

Jonny has raised the query of whether we need to now disclose the deleted KELs – JG any comments welcome.

T	h	a	n	k	S

Lucy

Lucy Bremner

Associate
Womble Bond Dickinson (UK) LLP



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From: Amy Prime

Sent: 20 December 2018 09:36

To: Lucy Bremner **Cc:** Jonathan Gribben

Subject: FW: KELs [WBDUK-AC.FID26896945]

Hi Lucy

In the letter from Freeths yesterday, they requested disclosure of 2 KELs which were referred to Robert's report but had not been disclosed.

Matthew has identified these as deleted KELs, which explains why they were not disclosed to Freeths. Couple of Qs so as I can respond to Freeths:

Have the deleted KELs been given to Robert?

Alternatively, do you know if Robert has referred to KELs in his report which he has not been given copies of but he knows exist / are relevant due to the KELs being referred to in a PEAK?

Many thanks

Amy

Amy Prime Solicitor

Womble Bond Dickinson (UK) LLP d: m: t: e: Stay informed: sign up to our e-alerts womblebonddickinson.com WOMBLE BOND DICKINSON From: Matthew.Lenton **GRO** [mailto: **GRO** Sent: 20 December 2018 09:28 To: Amy Prime Cc: pete.newsome **GRO** ; Legal.Defence Jonathan Gribben; Lucy Bremner; **GRO** Dave.Ibbett GRO Subject: RE: KELs [WBDUK-AC.FID26896945] Amy, These were included in the Deleted KELs package that was sent to Jonny on 05-Nov-2018, and a PDF of each is attached. **Matthew Lenton** Post Office Account Document Manager P&PS, Digital Technology Services **Fujitsu** Lovelace Road, Bracknell, Berkshire, RG12 8SN Phone: **GRO** Email: **GRO** Web: https://www.fujitsu.com/global/ From: Amy Prime [mailto] GRO Sent: 19 December 2018 17:07 To: Lenton, Matthew GRO Cc: Newsome, Pete GRO Defence Legal (Chris Jay,) **GRO** ; Jonathan Gribben < **GRO** >; Lucy Bremner GRO

Subject: KELs [WBDUK-AC.FID26896945]

Please could you check if Fujitsu have copies of the following KELs? If so, please could you provide us with copies of these?

PorterS199P

dsed2640M

Kind regards

Amy

Amy Prime

Solicitor
Womble Bond Dickinson (UK) LLP



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