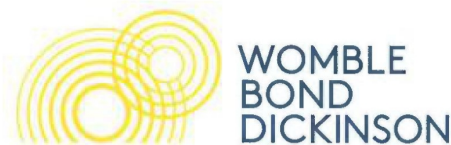


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27 September 2019

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Dear Sirs

**Post Office Group Litigation
Horizon Issues Trial - Disclosure**

We refer to your letter dated 25 September 2019.

Our client has provided the recent disclosure in accordance with its ongoing duties. On 9 May 2018, Post Office disclosed KELs as ordered. Peaks were disclosed on 27 September 2018 (their disclosure is not addressed in any Court Order). As you know, the KEL and Peak databases are live systems with new and updated documents being regularly produced by Fujitsu. On 17 January 2019, an updated tranche of KELs was disclosed at your request, which request you were at liberty to repeat.

The 17 Peaks and the versions of the 14 KELs disclosed this week were created by Fujitsu after the date that the Peaks (27 September 2018) and KELs (17 January 2019) were disclosed. Four of the KELs were originally raised by Fujitsu before 17 January 2019 and so earlier versions of those KELs have already been disclosed as required / requested.

Paul Smith of Post Office first received draft copies of the 12 recently disclosed KELs from Fujitsu on 3 September 2019 and then received further versions on 9 and 13 September, which were then passed to us on 16 September and steps taken to determine whether they needed to be disclosed. We then obtained from Fujitsu copies of the KELs and other related documents (being the other 2 KELs and 17 Peaks as described in our previous letter) and disclosure of them, along with the flowchart document, was subsequently given. The metadata in the flowchart document shows it was created on 29 August 2019 and it became an approved process document in early September 2019 before the process went live yesterday.

If you believe that these documents should have been disclosed earlier, we invite you explain your reasoning for this, with references to the specific documents and the relevant Court Orders you seek to rely on.

There is no Court Order requiring the parties to notify the Court that further disclosure has been given and this is not part of any usual practice that we are aware of. You will no doubt let us now if you think otherwise and advise your clients on the steps they may wish to take in connection with the disclosed documents.

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Yours faithfully

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