| From: Sent: | Sharron Logan | GRO | | | | | | |
|----------------|---|---------------|--------------|--------------------|-----------------------------|---------|--|--|
| To: | Helen Dickinson | GRO | Christo | pher G Knight | GRO | | | |
| | Simon I Hutchinson | GRO | | Robert Daily! | GRO | ; Steve | | |
| | Bradshaw | | evin Ryan | GRO | Andrew S Mc | Cabe | | |
| | GRO | ; Jim Coney | <u></u> | GRO | , Matt Mowbray | | | |
| | GRO | Steven Mose | ley | GRO | Joel Watson | | | |
| | GRO | Philip Nelson | (| GRO | ; Andrew Wise | | | |
| | GRO | Sandra Daykin | | GRO | Stephanie J Ball | | | |
| | GRO | | | | | | | |
| CC: | Mark Raymond | GRO | Wayne Z | <u>'</u> Griffiths | GRO | | | |
| Subject: | FW: IMPORTANT EMAIL RE: PRESERVATION OF DOCUMENTS / HIGH COURT LITIGATION | | | | | | | |
| Attachments: | Disclosure of document image001.png; image00 | . , | nts and Inte | nded Claimants a | as at 12.05.17.xlsx; image0 | 03.png; | | |

Hi all

Message

Please ensure you read this email carefully and comply with the requirements of it with immediate effect. Of particular note is point 3 below.

We will go through this in more detail at our meeting next week but in the meantime if you have any questions then please direct them to myself or Helen.

Thanks all,



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Security Operations Lead - South

G11, 1 Future Walk
Chesterfield, S49 1PF
GRO
GRO

For Government Security Classifications OFFICIAL please use:

GRO

From: John Breeden Sent: 15 May 2017 14:45

To: Lesley McNally; Gayle A Peacock; Sharron Logan; Kim Abbotts; Steve Norris

Cc: Mark Raymond; Pamela J Heap; Tamara Coley; Mark Ellis

Subject: FW: IMPORTANT EMAIL RE: PRESERVATION OF DOCUMENTS / HIGH COURT LITIGATION

All,

Please see the email below and attachments provided by Rod Williams following his session at the team meeting on Thursday.

Please forward to your teams in accordance with the instructions provded below.

Thanks

John



John Breeden

Head of Agency Contracts Deployment

c/o Branch Services Support Team
Post Office Ltd
1st Floor Future Walk
West Bars
Chesterfield
S49 1PF

GRO

| From: Rodric W | 'illiams | | | | | | |
|--|-----------|--------------|-----|--|--|--|--|
| Sent: 12 May 2 | 017 17:55 | | | | | | |
| To: Mark Ellis | GRO | John Breeden | GRO | | | | |
| Cc: Yuri Tsukita | GRO | | | | | | |
| Subject: IMPORTANT FMAIL RE: PRESERVATION OF DOCUMENTS / HIGH COURT LITIGATION | | | | | | | |

Mark, John - following your Lead Team meeting yesterday, I set out below an email to circulate to your teams reminding them of the approach we need to take to documents as the defendant in the "Post Office Group Litigation" (<u>Bates & Ors v. Post Office Limited</u>, Claim No. HQ16X01238 in the High Court of Justice, Queen's Bench Division).

IMPORTANT – PLEASE READ THIS MESSAGE IN ITS ENTIRETY. IT IS ESSENTIAL THAT ITS CONTENTS ARE COMPLIED WITH.

IF YOU HAVE ANY QUESTIONS IN RESPECT OF ITS CONTENTS OR EFFECT THEN PLEASE CONTACT YURI TSUKITA OR RODRIC WILLIAMS IN LEGAL SERVICES.

As you may be aware, 198 mostly former postmasters have issued a High Court claim against Post Office Limited advancing allegations about the Horizon IT system and Post Office's engagement with them. I attach a list of the 198 "claimants", which also includes the further postmasters who have said they intend to join the claim.

The claim requires you and your team members to be familiar with Post Office's document disclosure obligations, and to ensure that you comply with them. <u>Please therefore circulate this email to your team members who may hold</u> documents related to the claimants and/or their claims.

In short, the three crucial document rules that must be followed are:

- (1) You must not destroy or delete any documents which may be relevant to the claim. In particular, make sure that any automatic deleting/archiving systems are suspended <u>now</u> until further notice. If you have any question about whether a document is relevant, please contact Legal Services and preserve the document in the meantime;
- (2) You must not *amend* any existing documents which may be relevant to the claim. For example, do not make handwritten notes on existing documents or try to change the content of a document; and
- (3) You must recognise that any documents that you *create* from now on may have to be disclosed to the other side in the case. If in any doubt, think about whether you would be happy for the email or document to be read out loud in court.

I attach a more detailed note on this, which can be used as a reference going forward.

If you have any questions concerning these requirements, please contact Yuri Tsukita or me for further guidance.

With thanks for your cooperation, Rodric

FAQs

1. What is a 'document'?

Documents are defined very broadly to mean anything in which any information is recorded. Examples include: emails, paper documents, handwritten notes, Word/Excel/PowerPoint documents (including *draft* versions of these documents), database records, minutes of calls or meetings, text messages, internal memos, meeting agendas or tape recordings.

2. What are 'relevant' documents?

Relevant documents are any documents that could: **either support or undermine the case of any party to the litigation.**

END



Rodric Williams

Head of Legal, Dispute Resolution & Brand 20 Finsbury Street London EC2Y 9AQ

T: GRO GRO