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Also by fax GRO

Date: 11 April 2013  
Our Ref: AB2/24040  
Your Ref: LML.BW.JW.NEI

Dear Sirs,

**LETTER TO DEFENCE WHERE THERE IS MATERIAL TO DISCLOSE - ONGOING  
DISCLOSURE (DEFENCE CASE STATEMENT)**

**R v Anne NIELD & another**

**COURT AND NEXT HEARING DATE: Liverpool Crown Court - w/c 15.04.2013**

I have considered your defence statement dated 12/9/12 provided under Section 5 Criminal Procedure and Investigations Act 1996 (CPIA). Under section 7 CPIA I am required to disclose to you any prosecution material which has not been previously disclosed and which might reasonably be expected to assist your defence, as described in your statement.

A copy of a schedule of non-sensitive unused material prepared by Post Office Limited has already been sent to you. The items listed below are those which I consider might reasonably be expected to assist your defence, as described in your statement, and which have not already been disclosed to you. The numbers refer to the numbers on the schedule previously provided. Where indicated, copies of the items listed are attached. Material marked as available for inspection can be viewed by arrangement with the disclosure officer.

An additional schedule has been produced and is attached and has been endorsed. The Statement of Steve Bradshaw dated 10<sup>th</sup> April 2013 is additional to this together with exhibit SB/58.

This material is disclosed to you in accordance with the provisions of the CPIA, and you must not use or disclose it, or any information recorded in it for any purpose other than in connection with these criminal proceedings. If you do so without the permission of the court, you may commit an offence.

I have considered your letter of the 2<sup>nd</sup> April 2013, but at this stage do not consider there is any further material to disclose at this stage. You may of course apply to the court under section 8 CPIA. The court will assess your application in the light of your defence statement.

If you request access to any item which has been marked for disclosure by inspection, it is essential that you preserve this letter in its present form, as access will only be granted upon production of this letter and the schedule previously provided to the person supervising access.

If you have a query in connection with this letter, please contact me.

Yours faithfully

**Andrew Bolc**  
Solicitor

[REDACTED]