POL00145359

From: Susan Crichton[IMCEAEX-_O=MMS_OU=EXCHANGE+20ADMINISTRATIVE+20GROUP+20+28FYDIBOHF23SPDLT+29_CN=RECIPIENTS_CN=SUSAN+20CRICHTONC5FA6431-DC28-49AB-8F0F-BE4237A4AD4F@C72A47.ingest.local]
Sent: Thur 11/07/2013 10:57:23 AM (UTC)
To: Rodric Williams GRO
Cc: Hugh Flemington[GRO]; Jarnail A Singh[GRO]
Subject: RE: POL -v- Ishaq - Proposed letter to defence solrs

Did we ever answer the ques as to why the HR report was created?

Susan Crichton I HR & Corporate Services Director

1st Floor, Central Wing, 148 Old Street, London, EC1V 9HQ

GRO Postline Mobex GRO

GRO

From: Rodric Williams
Sent: 10 July 2013 16:15
To: 'martin.smith GRO); simon.clarke GRO
Cc: Hugh Flemington; Susan Crichton; Jarnail A Singh
Subject: FW: POL -v- Ishaq - Proposed letter to defence solrs

Further thought on privilege – if Helen's investigation into this was undertaken purely for the Second Sight Spot Reviews, the entire report could be privileged.

I attach a couple of emails which set out the basis on which we have sought to claim privilege over our work on the Spot Reviews, including our communications with Fujitsu which sought to create a joint/common interest privilege.

Please let us know if Helen's report is still disclosable in light of this.

Happy to discuss as necessary.
Kind regards, Rodric

From: Rodric Williams
Sent: 10 July 2013 15:49
To: 'martin smith'; Hugh Flemington
Cc: Jarnail A Singh; Susan Crichton
Subject: RE: POL -v- Ishaq - Proposed letter to defence solrs

Thanks Martin.

First point – we presume that Helen Rose's report is being disclosed because POL's evidence in the prosecution included an ARQ report. Is that right?

POL00145359

Second point - Helen Rose's Report is marked "Confidential and legally privileged".

I understand that she did this because she prepared the report to give to Post Office Legal for legal advice on the implications of her investigation (please call her on GRO to confirm).

Please therefore consider what information from the report needs to be disclosed to Ishaq's solicitors, and in what format, i.e. whether parts of the Report should be removed or redacted (e.g. the "Recommendations" section), or the non-privileged material (e.g. the background transaction data) repackaged for disclosure to the Defence.

If you advise that Helen's report does not attract any privilege, please ensure the reference to privilege is removed from the header (I don't want to someone else to say that the Report is privileged, but that we waived thereby giving rise to possibly difficult issues of collateral waiver).

Kind regards, Rodric

Rodric Williams I Litigation Lawyer

148 Old Street, LONDON, EC1V 9HQ

GRO

GRO

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From: martin smith GRO
Sent: 10 July 2013 10:56
To: Hugh Flemington
Cc: Jarnail A Singh; Susan Crichton; Rodric Williams
Subject: POL -v- Ishaq - Proposed letter to defence solrs

Dear Hugh,

Please find attached a copy of the letter which we propose, subject to your agreement, to send to Ishaq's solicitors.

Kind regards,

Martin.

Martin Smith
martin.smith GRO

POL00145359

martin.smith GRO
Direct: GRO

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