

Laurence Lee & Co
Solicitors

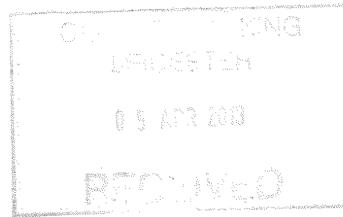
Miss Waters

Our Ref: LML.BW.JW.NEI

2nd April 2013

URGENT

By Fax: **GRO**
Cartwright King Solicitors
DX 10825
LEICESTER



529 West Derby Road
Tuebrook
Liverpool L13 8AA
United Kingdom



DX 14123 Liverpool

Dear Sirs,

**Re: REGINA -V- ANNE NEILD
LIVERPOOL CROWN COURT T2012 0934
FOR TRIAL W/C 15TH APRIL 2013**

We refer to the above.

We would be obliged if you would provide us with the following items:-

1. Unmodified, unedited call logs in original electronic format of all calls to the Business Support Centre and the Fujitsu help desk.
2. A full set of Horizon transaction records for the sub post office during our Client's tenure and in the 3 months following our Client's suspension to permit initial examination of pattern of transactions and end of day balances in relation to the behaviour of the system as well as conduct any necessary forensic accounting examination for the theft / fraud. Electronic format required.
3. A full set of Lottery system transaction records provided by the Lottery in relation to the sub post office and the corresponding records held by the Post Office to enable analysis of the Lottery records in their original electronic format for the sub post office of our Client for the period as above.
4. A full set of system transaction records from the centre that distributes and collects cash, stamps and Lottery scratch cards in their original electronic

format for the sub post office of our Client for the period as above to enable patterns and any discrepancies to be analysed.

5. The vouchers corresponding to the period for the transactions disclosed above to enable reconciliation between the computer records and the paper vouchers.
6. All records in the Business Support Centre relating to the period for the transactions disclosed above to enable reconciliation between the Horizon records and the records held by the Business Support Centre.
7. All Electronic Fund Transfer (EFT) logs relating to the period for the transactions disclosed above to enable reconciliation between the Horizon records and EFT transactions.
8. All 3rd party provided corrections as provided to the Business Support Centre relating to the period for the transactions disclosed above (e.g. incorrect account number, etc) to enable reconciliation between Horizon records and the 3rd party corrections.
9. The version of the operations manual provided to our Client and any subsequent updates provided for the use of the sub post master.
10. The training materials provided to our Client for Horizon and any subsequent updates.
11. The training provided to our Client.
12. The set of system issues recorded for consideration by Fujitsu during the tenure of our Client across the Horizon system and those systems it interfaces to, together with those systems issues unresolved at the commencement of our Client's tenure.

13. The previous audit reports for the audits at the sub post office of our Client.
14. The technical systems architecture and processes implemented by the Post Office to support the integration of Lottery sales and scratch card delivery together with any internal or external audit reports into the integrity of these processes.
15. Witness statements and other submissions by Shoosmiths Access Legal to the Post Office in relation to any proceedings initiated as per the complaints referenced in Shoosmiths' submission to the parliamentary enquiry.

16. The terms of reference for Second Sight Ltd, the forensic accountants instructed by Post Office Ltd to conduct a full enquiry into the Horizon system and any interim or final findings from their enquiry.
17. Page 98 of the exhibits refers to an email from Kevin Ryan dated 14/09. May we please have a copy of this email?
18. A copy of any notes or order documents completed by Mr Gordon-Pounder in respect of the audit that he conducted on 6th January 2012.
19. On page 37 of Mr Gordon-Pounders statement reference is made to reports printed off the Horizon system and branch trading statements which were passed to the Post Office Ltd security team. Ma we please have a copy of these documents?
20. On page 105 of the depositions Mr Gordon-Pounder states "We conducted the audit as per the audit process manual". May we please have a copy of said audit process manual?
21. We note that Mr Ali Askar was suspended on 29th September 2009 in relation to an allegation of Assault which he subsequently successfully appealed. Would you please provide us with details of said allegation?

Furthermore we confirm that we will require the attendance of the Prosecution Witnesses Tim Gordon-Pounder and Stephen Bradshaw to give evidence at our Client's Trial.

We would be grateful if you would endeavour to disclose the aforementioned items as soon as possible given the imminence of our Client's Trial. We thank you in anticipation of your assistance.

Yours faithfully,

GRO

LAURENCE LEE & CO