

From: Rodric Williams[/O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=RODRIC WILLIAMSE9C114F4-B03F-4595-B082-CE89BE5C79D47B]
Sent: Sat 13/07/2013 12:48:36 AM (UTC)
To: Susan Crichton [GRO]
Cc: Hugh Flemington [GRO] Jarnail A Singh [GRO]
Subject: RE: POL -v- Ishaq - Proposed letter to defence solrs

The background to the HR report is:

- Second Sight approached Angela van den Bogerd last winter about it as part of their review, but before the Spot Review process was established.
- Angela asked Helen (who is in the Security team) to look at the transaction data to see if she could identify any anomalies.
- Helen then made enquiries of Gareth Jenkins at Fujitsu, as she would often do if she needed to understand anything specific about how Horizon works.
- Helen's work (and therefore the report) only went so far. The work done on the Spot Review response went into the transaction in greater detail, and therefore supersedes Helen's report.
- Helen nevertheless packaged her work up into the report, which John Scott asked be sent to Legal for review (hence the reference to legal privilege on the report).

This information has been passed on to Cartwright King.

Rodric Williams | Litigation Lawyer



148 Old Street, LONDON, EC1V 9HQ



GRO

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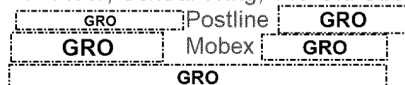
POST
OFFICE

From: Susan Crichton
Sent: 11 July 2013 11:57
To: Rodric Williams
Cc: Hugh Flemington; Jarnail A Singh
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 | HR & Corporate Services Director

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



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?

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 | Litigation Lawyer



148 Old Street, LONDON, EC1V 9HQ



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POST
OFFICE

From: martin smith [mailto:]

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

GRO

Direct:

GRO

CartwrightKing
SOLICITORS

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