

From: Rodric Williams [/O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=RODRIC WILLIAMSE9C114F4-B03F-4595-B082-CE89BE5C79D47B]
Sent: Mon 11/03/2013 6:12:45 PM (UTC)
To: Ivan Swepson [GRO]; Simon Baker [GRO]
Cc: Alison Bolsover [GRO]; Andrew Winn [GRO]; Craig Tuthill [GRO]; Dave Posnett [GRO]; Rod Ismay [GRO]; Hugh Flemington [GRO]
Subject: SR Protocol - Strictly Private and Confidential – Subject to Legal Privilege

Strictly Private and Confidential – Subject to Legal Privilege

All,

As you are aware, allegations that the Horizon system is defective and/or that the processes associated with it are inadequate have been, and continue to be, the subject of legal challenges. We must therefore assume that the parties who want to pursue these allegations will look to use our responses to the Spot Requests to advance their allegations, including through the Courts.

Given this background, we need to ensure that the information we provide in the responses is accurate, complete, and does not unnecessarily expose Post Office Limited. To this end, I propose the following:

1. All drafts have a header stating:
 - a. the author;
 - b. that it is a draft, citing which version;
 - c. the date it was made; and
 - d. the statement that it is “Strictly Private & Confidential; Subject to Legal Privilege”;
2. Drafts are circulated only to the recipients to this email;
3. Emails which circulate drafts are clearly marked “Strictly Private and Confidential – Subject to Legal Privilege”;
4. Once a draft has been “peer reviewed”, it is sent (initially through me) to our external solicitors for legal advice on whether it fairly represents Post Office Limited’s legal position (e.g. under our contractual arrangements with subpostmasters) and that it properly preserves Post Office Limited’s ability to advance that position before the Courts.

Please let me know if you have any comments on this proposal. I will send a separate email tomorrow addressing how we should communicate with Fujitsu when we need their input to complete a response.

Kind regards, Rodric

Rodric Williams | Litigation Lawyer



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