

Message

From: 2ndSight [REDACTED] **GRO**
on behalf of 2ndSight [REDACTED] **GRO**
Sent: 03/06/2015 14:15:08
To: Rodric Williams [REDACTED] **GRO**
CC: Patrick Bourke [REDACTED] **GRO**; Jane MacLeod [REDACTED] **GRO**
rjw [REDACTED] **GRO**; 'Chris Holyoak' [REDACTED] **GRO**; Mark Underwood1 [REDACTED] **GRO**
Subject: M035 - Josephine Hamilton
Attachments: M035_POL_Security Report_PT_012.pdf

Sensitivity: Company Confidential

Rodric

Thank you for your letter dated 2 June 2015. Please note that I am replying on behalf of both Ron Warmington and myself.

The main premise of your letter is not correct.

The document in question, (the "Security Report"), was quite properly disclosed to Second Sight and the Working Group via Huddle around March 2014. I attach a copy of the document that was disclosed to us. I am sure that the Huddle audit logs will provide further information about this disclosure.

The document was not marked as being subject to Legal Professional Privilege and a careful reading of the document does not find any mention of legal advice, the normal basis upon which Legal Professional Privilege is claimed.

I would be grateful if you would explain in detail why you now consider this document to be subject to Legal Professional Privilege and therefore protected from disclosure. I am obviously concerned that other mis-classified documents may have been improperly withheld from disclosure.

Dealing with the specific questions in your letter and using your numbering:

1. The undertaking you refer to is not relevant as the "Security Report" was disclosed to the Working Group, including Second Sight, in accordance with terms of reference for the Working Group;
2. It formed part of a number of documents disclosed to the Working Group that were considered with the POIR;
3. Second Sight considered a number of representations and other matters after disclosure of the draft CRR. This resulted in the CRR being updated and finalised;
4. We have requested access to the complete legal files held by Post Office relating to this and other cases. However, this access has not been provided, which we regard as regrettable. This limitation in scope was made clear in the final CRR.

With best wishes

Ian Henderson
Director

Second Sight

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