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15 October 2019

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Dear Sirs

**Post Office Group Litigation  
Horizon Issues Trial – Horizon Disclosure**

We write further to your letter dated 11 October 2019 and in relation to your request for information relating to the previous versions of disclosed KELs.

We are treating your letter with urgency. In order to provide responses to all of the points raised within your letter, we will need to check certain points with Fujitsu. We are already in the process of liaising with Fujitsu in relation to this issue and therefore hope to be in a position to provide a substantive response to your letter by the end of this week.

As you will be aware, a number of the explanations requested in your letter call for the provision of information which would be privileged. In the interests of transparency and cooperation our client wishes to assist with fulsome explanations. However, so that the question of waiver does not become an impediment to our provision of a swift response, please can you confirm whether you are willing to agree that our client's responses will not lead to any wider or collateral waiver?

Yours faithfully

*Womble Bond Dickinson (UK) LLP*

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