

Rodric Williams

From: Mandy Robertson [GRO]
Sent: 23 October 2019 16:34
To: Rodric Williams
Cc: andrew.parsons; Gavin Matthews
Subject: FW: New CCRC Section 17 Notice - Gill [WBDUK-AC.FID26610170]
Attachments: _DOC_31752879(1)_CCRC SPEAKING NOTE - 6 NOV 2015.DOCX; RE: CCRC - electronic documents [BD-4A.FID26610170]

Hi Rod

Please find below a response to send on to the CCRC with any tweaks you may have.

I can see the internal POL preparation note for the meeting on 6 November 2015 (attached by way of a reminder – I don't believe this was shared with the CCRC). I understand that POL's electronic security files were unstructured (email attached) and this was why POL and the CCRC agreed to the filter the security files as mentioned below (in case you think this detail would be helpful).

Many thanks

.....
Dear Miles

Thank you for sending over the section 17 notice for Mrs Kashmir Kaur-Gill. Work has begun to collate the responsive documents to the request to produce materials. I thought now would be a good opportunity to recap the agreed approach to disclosure of materials.

The section 17 notices seem to contain standard wording requesting Post Office to identify and provide "all documents and other materials in its possession in relation to the case". I wanted to remind all involved of the discussions which took place in September - November 2015 between Post Office and the CCRC and reiterate the document sources Post Offices searches in response to section 17 notices.

During the discussions in late 2015, both parties debated the most efficient way to collate the potentially large volume of materials relevant to the CCRC's investigation and how best to filter the approximately 186,700 documents located around that time so as to facilitate a targeted and proportionate review by the CCRC for current and future investigations. With that in mind, at a meeting held on 6 November 2015, the CCRC requested that Post Office electronic security files be filtered in relation to each individual case, to include documents containing the defendant's surname within a particular timeframe starting 3 years before the date of conviction and ending on the date of conviction itself.

To deliver with the targeted and proportionate materials agreed, as set out in the tracker shared with the CCRC, in response to each section 17 notice Post Office searches for the following materials in addition to its own hard copy security files for each relevant defendant:

1. Hard copy security files produced/ held by RMG;
2. Hard copy prosecution files produced/ held by RMG legal/ Post Office's lawyers Cartwright King,
3. Sift Review documents produced/ held by Cartwright King;
4. Electronic documents as follows:
 - a. Mediation scheme documents;
 - b. Case files;
 - c. CDs/ tapes;
 - d. Documents held by Post Office's security team or legal; and
 - e. Documents held by RMG's Security Team on their Electronic Filing Cabinet

Once located, the material is uploaded onto the electronic data room.

We also agreed that all of the materials provided to you in relation to the CCRC's investigation are subject to section 25 of the Criminal Appeal Act 1995 and not to be disclosed without Post Office's prior consent. We agreed a blanket application of section 25 to avoid the need for Post Office to reserve its position when giving each tranche of material.

I hope that this corresponds with your understanding? If there are further materials that the CCRC is looking for, please do not hesitate to contact me so we can discuss how to facilitate providing them.

Kind regards

Rodric

Mandy Robertson

Associate
Womble Bond Dickinson (UK) LLP

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From: Rodric Williams <rodric.williams@womblebond.com> **GRO**
Sent: 11 October 2019 10:42
To: Andrew Parsons <andrew.parsons@womblebond.com> **GRO**; "martin.smith" <martin.smith@womblebond.com> **GRO**; Harry Bowyer <Harry.Bowyer@womblebond.com> **GRO**
Cc: Gavin Matthews <gavin.matthews@womblebond.com> **GRO**; Mandy Robertson <mandy.robertson@womblebond.com> **GRO**; Mark Underwood1 <Mark.Underwood1@womblebond.com> **GRO**; Melanie Corfield <Melanie.Corfield@womblebond.com> **GRO**
Subject: RE: New CCRC Section 17 Notice - Gill [WBDUK-AC.FID26610170]

Thanks Andy – that’s an excellent suggestion.
Can your team please draft something (I think you have the materials)?
Rod

From: Andrew Parsons <andrew.parsons@womblebond.com> **GRO**
Sent: 11 October 2019 10:40
To: Rodric Williams <rodric.williams@womblebond.com> **GRO**; "martin.smith" <martin.smith@womblebond.com> **GRO**; Harry Bowyer <Harry.Bowyer@womblebond.com> **GRO**
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Rodric

I think when we respond to this section 17, it would be good to remind the CCRC of the documents we are providing and from which sources. The s17 notice require PO to provide ALL documents, being what I suspect is the CCRC's standard wording, but of course we have an agreed protocol of the classes of documents we are supplying. For example, we are not searching all of Jarnail's emails for relevant material.

Do you agree that it would be a good idea to remind them of this?

A

Andrew Parsons
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From: Rodric Williams [GRO]

Sent: 11 October 2019 10:20

To: "martin.smith@[GRO]"

[GRO] Harry Bowyer [GRO]

Cc: Gavin Matthews [GRO]; Andrew Parsons [GRO]; Mandy Robertson [GRO]; Mark Underwood [GRO]; Melanie Corfield [GRO]
Subject: New CCRC Section 17 Notice - Gill

Martin, Harry - I attach a new s.17 Notices received from the CCRC yesterday for the case of Mrs Buffrey (convicted of false accounting at Oxford Crown Court in June 2010).

Can you please start collating the responsive information for this notice. Please let me know if you need to discuss.

Womble Bond Dickinson – can you please update the case tracker with this most recent application. Please also confirm whether or not this applicant is a claimant in the Group Litigation.

Thanks, Rodric



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