

Message

From: Prime, Amy [Amy.Prime@GRO]
Sent: 28/11/2016 18:49:33
To: Rodric Williams [rodric.williams@GRO]
CC: Parsons, Andrew [Andrew.Parsons@GRO]; Lukas, Elisa [Elisa.Lukas@GRO]
Subject: RE: Royal Mail and Fujitsu - document preservation [BD-4A.FID26896945]
Attachments: Claim Form.pdf

Rodric

Further to my email, please find below in red draft wording for the email to be sent from you to Royal Mail and Fujitsu. Once these have been sent please could you provide us with copies for our records?

Subject to Litigation Privilege

*As you may be aware, a group of former and current postmasters, branch assistants and Crown Office employees have brought a legal claim against Post Office in relation to Horizon. Their claim is very broad, alleging failings in Horizon as well as Post Office's training and support (the **Action**). A copy of the Claim Form is attached.*

In light of this proposed litigation, please can you ensure that all documents that you hold on behalf of Post Office and which are, or may be, relevant to the Action are preserved. Please ensure that this includes any electronic documents (and associated metadata) which would otherwise be deleted in accordance with your document retention policy or in the ordinary course of business.

If you have any queries about the preservation of documents please do not hesitate to contact me.

If you have any queries about the above please feel free to call.

Kind regards

Amy

Amy Prime
Solicitor
Bond Dickinson LLP

Bond Dickinson

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From: Prime, Amy
Sent: 28 November 2016 10:02
To: Rodric Williams
Cc: Parsons, Andrew; Lukas, Elisa
Subject: Royal Mail and Fujitsu - document preservation [BD-4A.FID26896945]

Morning Rodric

At paragraph 16.16 of our response to the Letter of Reply, we confirm that "*Both Royal Mail and Fujitsu are aware of this litigation and they have both been told that they should preserve documents they hold that are in Post Office's control*". Tony has recommended that a very bland email is sent to Royal Mail and FJ (separately) which confirms these

points, are you happy with this approach? If so, we can provide the emails for you to send. We would like these to be standalone emails so as we can disclose them to Freeths if needs be.

It would of course be fine to have the initial conversation with them by phone but so as to provide the reassurance to Freeths we will need to have set out the position in writing before the response is sent.

If you are happy with the above we can have the draft emails with you by this afternoon / evening.

Kind regards

Amy