

**From:** Owain Draper <[REDACTED] GRO>  
**To:** Amy Prime <[REDACTED] GRO>  
**Cc:** David Cavender <[REDACTED] GRO>, Gideon Cohen <[REDACTED] GRO>  
Andrew Parsons <[REDACTED] GRO>, "Dave Panaech"  
<[REDACTED] GRO>, Beth Hooper <[REDACTED] GRO>  
**Subject:** Re: Freeths correspondence re POL redacted documents [WBDUK-AC.FID26896945]  
**Date:** Tue, 23 Oct 2018 07:15:38 +0000  
**Importance:** Normal  
**Inline-Images:** image5289ad.PNG; image36f704.PNG; imagebfb473.PNG

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Dear Amy,

2pm would be fine for me.

Can I suggest that we start with a call with me & Gideon, please?

We can then brief David and he can give a view on the documents.

Best,

Owain

> On 23 Oct 2018, at 07:57, Amy Prime <[REDACTED] GRO> wrote:

>

> David, Owain Gideon

>

> I appreciate that these side matters will be disruptive to your trial preparation, but please could we have a call this afternoon to discuss the below matter in more detail – would 2pm or 4pm be convenient for you?

>

> Freeths have raised some queries about the redactions applied by Post Office to two documents in the trial bundle. These are G/40 (POL-0218577) and G/44 (POL-0219338) - redacted and unredacted copies of these documents can be found in the attached zip file.

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> 1. G/40 (POL-0218577) – the sections which have been redacted are highlighted in yellow in the "unredacted –G40" document.

>

> The background to the action summary is: in 2014 and as part of the Mediation Scheme, Linklaters produced a piece of advice for Post Office on the complaints made by SPMRs about Horizon. A copy of this advice is attached. Linklaters recommended that Deloitte undertake a review of the integrity of Horizon – this review is known as Project Zebra and a copy of Deloitte's report is also attached.

>

> Post Office's position is that the Deloitte report was produced on the recommendation of Linklaters and for the purpose of understanding Post Office's litigation risk if the mediation scheme collapsed. The Cs do not know of the existence of Deloitte report (save for the fact that there is an internal expert appointed by POL, which was not allowed to be included in its costs budget).

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> The Zebra Action Summary is an ancillary document which was produced by Post Office in response to the Deloitte Report which sets out how controls suggested by the Deloitte Report could be implemented into practice. Whilst the Action Summary itself is not a privileged document, following a call with Tony and Simon we took the decision to redact from this document any references to the Deloitte Report on the basis

that the Deloitte Report is covered by litigation / legal advice privilege and references to the Deloitte Report / its findings in a subsequent document could be redacted on the same basis.

>

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> 2. G/44 (POL-0219338) - the sections which have been redacted are highlighted in yellow in the "unredacted -G44" document.

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> This document is a paper produced by Angela Van Den Bogerd and Tom Moran (who is POL's Network Development Director) for the Audit and Risk Committee on the recovery of agent losses. The document itself is not privileged but on page 4 redactions have been applied where reference has been made to legal advice/ litigation decisions during the mediation scheme to not pursue the recovery of debt and the reactivation of this policy during the Group Action.

>

> Freeths have asked that David reviews these redactions and the basis for them so as to confirm whether any redactions can be removed (Freeths second letter of 22 October 2018).

>

> I should mention that some of this may have been caused as a retaliation to us trying to find out why one of Bates documents has been redacted on the grounds of privilege – a clip of the correspondence and copy of the document in question is attached.

>

> Kind regards

> Amy

>

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> Amy Prime

> Solicitor

> Womble Bond Dickinson (UK) LLP

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> amy.prime@GRO

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> <Documents on G40 and G44.zip>

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