

**From:** "Westbrook, Mark (UK - Manchester)" [mailto:GRO]  
**To:** Rodric Williams [mailto:GRO], "Parsons, Andrew"  
[mailto:GRO], "James, Gareth (UK - Manchester)"  
[mailto:GRO]  
**Subject:** RE: Draft Report - Release to Bond Dickinson LLP and Cartwright King LLP [BD-4A.FID20472253]  
**Date:** Fri, 22 Aug 2014 17:41:07 +0000

**Importance:** Normal

**Attachments:** Project\_Zebra\_Consolidated\_Report\_Draft\_Subject\_to\_Change\_21\_08\_2014\_18\_06.pdf

**Inline-Images:** image001.jpg; image002.png; image003.png; image004.png; image005.png;  
image006.gif; image007.gif; image008.png; image009.jpg; image010.jpg; image011.jpg

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Thanks Rodric.

Please find attached the version of the report requested, and detailed in the HH.

Have a great weekend.

Thanks,

Mark

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**From:** Rodric Williams [mailto:GRO]  
**Sent:** 22 August 2014 17:25  
**To:** Westbrook, Mark (UK - Manchester); Parsons, Andrew; James, Gareth (UK - Manchester)  
**Subject:** RE: Draft Report - Release to Bond Dickinson LLP and Cartwright King LLP [BD-4A.FID20472253]

Thank you Mark.

Please find attached the letter countersigned by Bond Dickinson and Post Office Limited.

Have a good weekend!

Rodric Williams | Litigation Lawyer



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**From:** Westbrook, Mark (UK - Manchester) [mailto:GRO]  
**Sent:** 22 August 2014 13:00  
**To:** Parsons, Andrew; Rodric Williams; James, Gareth (UK - Manchester)  
**Subject:** RE: Draft Report - Release to Bond Dickinson LLP and Cartwright King LLP [BD-4A.FID20472253]

Andrew, Rodric,

Please find attached hold harmless as requested. If you can sign and send back (both parties) I will issue the report to Andrew.

Many thanks,

Mark

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**From:** Westbrook, Mark (UK - Manchester)  
**Sent:** 22 August 2014 07:08  
**To:** 'Parsons, Andrew'; Rodric Williams; James, Gareth (UK - Manchester)  
**Subject:** RE: Draft Report - Release to Bond Dickinson LLP and Cartwright King LLP [BD-4A.FID20472253]

As an update HH ready to go barring final approvals which I am hoping I will get today.

Will issue as soon for signature as soon as able.

Thanks,

Mark

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**From:** Parsons, Andrew [[mailto:](#) GRO]  
**Sent:** 21 August 2014 09:14  
**To:** Rodric Williams; Westbrook, Mark (UK - Manchester); James, Gareth (UK - Manchester)  
**Subject:** RE: Draft Report - Release to Bond Dickinson LLP and Cartwright King LLP [BD-4A.FID20472253]

Mark

Have you had a chance to get clearance for BD to look at your report? It would be good to get this done asap (ie. this week).

Kind regards  
Andy

**Andrew Parsons**  
Senior Associate  
for and on behalf of Bond Dickinson LLP

*Bond Dickinson*

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Mobile:  
Fax:

**GRO**

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**From:** Rodric Williams GRO  
**Sent:** 15 August 2014 16:29  
**To:** Westbrook, Mark (UK - Manchester); James, Gareth (UK - Manchester)  
**Cc:** Parsons, Andrew  
**Subject:** RE: Draft Report - Release to Bond Dickinson LLP and Cartwright King LLP

Mark,

As we have just discussed, I appreciate that the "Horizon: Desktop Review of Assurance Sources and Key Control Features; Draft for discussion" report dated 23 May 2014 (the "Draft Report") does not yet incorporate all of Post

Office Limited's comments. However, I am concerned that given our current workloads and resources, getting the Draft Report to a "final Draft" stage may take some time. In order to progress matters (which I am anxious to do), I would like to release the Draft Report to Bond Dickinson (Andy Parsons, cc'ed) in its current format, subject of course to them providing to Deloitte a suitable "hold harmless" letter.

I have looked at the "hold harmless" letter which Linklaters provided on 30 April 2014 (copy attached), and wonder whether if the Draft Report could be released to Bond Dickinson on similar terms, subject to the first paragraph being amended as follows (I would have provided you with a mark-up, but don't have a Word version!):

"We have now had an opportunity to consider your request for access to our report "Horizon: Desktop Review of Assurance Sources and Key Control Features; Draft for discussion" dated 23 May 2014, which was prepared for Post Office Limited under the terms of our engagement letter dated 9 April 2014 and Change Order Number 01 dated 6 May 2014. Post Office Limited has instructed Bond Dickinson LLP as advisors and have asked that we allow Bond Dickinson LLP access to the Draft (in its current draft form) to enable them to provide legal advice to Post Office Limited, to prepare documents based on the Draft for internal Post Office Limited use, and to make reference to the Draft in future communications with Post Office Limited as required (the "Purpose")."

Please let me know if we can proceed on this or some other basis.

Kind regards, Rodric

Rodric Williams | Litigation Lawyer



148 Old Street, LONDON, EC1V 9HQ

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**From:** Westbrook, Mark (UK - Manchester) [[mailto:](#) GRO]

**Sent:** 24 July 2014 08:43

**To:** James, Gareth (UK - Manchester); Rodric Williams

**Subject:** RE: Draft Report - Release to Bond Dickinson LLP and Cartwright King LLP

Hi Rod,

Further to Gareth's note, and in anticipation of you sending through your final edits, could you provide the postal addresses and contacts for both firms mentioned below in order that I might insert into the HH.

Thanks,

Mark

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**From:** James, Gareth (UK - Manchester)  
**Sent:** 21 July 2014 12:59  
**To:** Rodric Williams; Westbrook, Mark (UK - Manchester)  
**Subject:** RE: Draft Report - Release to Bond Dickinson LLP and Cartwright King LLP

Hi Rod – thanks for this. There is a light-weight process for your solicitors in this regard, which we will progress whilst you're away.

I would however like to get the report into a final version (or at least an agreed "final draft") before sharing externally. Are you ok for us to receive and process such changes that you're on with and then share the 'final draft' version from that point?

All the best

Gareth

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**From:** Rodric Williams [<mailto:rodric.williams@deloitte.co.uk>] **GRO**  
**Sent:** 21 July 2014 12:23  
**To:** James, Gareth (UK - Manchester); Westbrook, Mark (UK - Manchester)  
**Subject:** Draft Report - Release to Bond Dickinson LLP and Cartwright King LLP

Gareth, Mark,

So that we can share your draft Report with our solicitors to enable them to provide Post Office Ltd with legal advice, can you please send through "release"/ "hold harmless" letters for:

Gavin Matthews, Partner  
Bond Dickinson LLP  
Oceana House  
39-49 Commercial Road  
Southampton SO15 1GA

-and-

Martin Smith, Partner  
Cartwright King LLP  
Majority House  
51 Lodge Lane,  
Derby DE1 3HB

Alternatively, please let me know if such letters are not required.  
Kind regards, Rod

Rodric Williams | Litigation Lawyer



148 Old Street, LONDON, EC1V 9HQ

**GRO**

Postline:

**GRO**

**GRO**





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