

From: Amy Prime <[REDACTED] GRO>
To: Anthony de Garr Robinson <[REDACTED] GRO>, Andrew Parsons
<[REDACTED] GRO>, Owain Draper <[REDACTED] GRO>
Cc: Elisa Lukas <[REDACTED] GRO>, Jonathan Gribben
<[REDACTED] GRO>

Subject: RE: The Post Office Group Litigation - Claim Numbers HQ16X01238 and
HQ17X012637 - Inspection of Known Error Logs [BD-4A.FID26896945]

Date: Thu, 14 Sep 2017 10:16:11 +0000

Importance: Normal

Attachments: 2017_09_01_Second_Letter_to_Freeths_Directions_.pdf

Inline-Images: image001.jpg; image002.png; image003.png; image004.png; image005.png;
image006.jpg; image007.jpg; image008.jpg; image009.jpg; image123daa.JPG;
image688651.PNG; image3954e2.PNG; image68b504.PNG

Tony

Please find attached the letter of 1 September 2017 – the relevant paragraph is 1.5.

Andy may say differently, but I don't think in this letter we used the word "*document*" in the CPR sense but, instead, to explain that the KEL is not a fixed log or a printed handbook but a live electronic database.

In terms of control, **Andy** – are any issues raised by the fact that ATOS (who I believe act as POL's agent) have access to the database?

Kind regards

Amy

Amy Prime
Solicitor
Bond Dickinson LLP

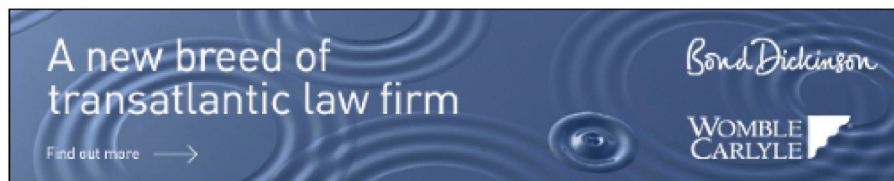
Bond Dickinson

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From: Anthony de Garr Robinson [GRO]
Sent: 14 September 2017 11:08
To: Andrew Parsons; Owain Draper
Cc: Amy Prime; Elisa Lukas; Jonathan Gribben
Subject: RE: The Post Office Group Litigation - Claim Numbers HQ16X01238 and HQ17X012637 [BD-4A.FID26896945] - Inspection of Known Error Logs

Thanks for sending the 13 October 2016 letter, Amy.

I'm a little concerned that we may be playing into their hands by provoking a CPR 31.14 application for inspection of the KEL. Unless we play our cards right, this could give them the chance to portray us as unnecessarily (and therefore suspiciously) defensive, obstructive and possibly even evasive about the KEL.

Could you also send over our letter dated 1 September 2017 – if their summary of it is fair (which I doubt) I would like to understand why we seem to have claimed that the KEL is not a document, when it plainly is, and why we don't seem to have mentioned that it is not in our control, which seems to me to be a critical point.

On the question of control, we need to be absolutely clear that we have no right to inspect or take copies of the KEL, either under the Fujitsu contract or under the law of agency (is Fujitsu holding it as our agent?), and that there is no practice under which we are habitually or usually allowed to inspect documents of this sort if we want to see them.

Best wishes,

Tony

From: Andrew Parsons [GRO]
Sent: 14 September 2017 08:08
To: Anthony de Garr Robinson [GRO]; Owain Draper [GRO]
Cc: Amy Prime [GRO]; Elisa Lukas [GRO]; Jonathan Gribben [GRO]
Subject: FW: The Post Office Group Litigation - Claim Numbers HQ16X01238 and HQ17X012637 [BD-4A.FID26896945] - Inspection of Known Error Logs

Tony, Owain

See attached - One more issue to discuss at today's con.

Mini agenda:

1. Current thinking on directions (look at Owain's draft Order)
2. Terminal preservation and inspection of KEL (as per attached).
3. Plan of action to CMC
4. Content of witness evidence and skeleton
5. Deloitte work – what next?

A

Andrew Parsons

Partner

Bond Dickinson LLP

Bond Dickinson

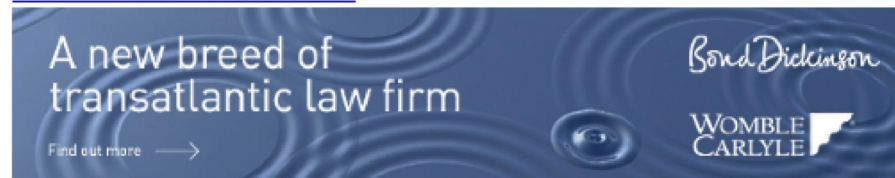
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From: Megan Attack **GRO**

Sent: 13 September 2017 18:17

To: Elisa Lukas; Amy Prime; Andrew Parsons; Peter O'Connell

Cc: James Hartley; Imogen Randall; Miranda Bond

Subject: RE: The Post Office Group Litigation - Claim Numbers HQ16X01238 and HQ17X012637 [BD-4A.FID26896945] - Inspection of Known Error Logs

Dear Sirs

Please find attached our firm's third letter of today's date.

Yours faithfully

Freeths LLP

Megan Atack

Legal Assistant

T: 0845 030 5804

F:
E:

GRO



FREETHS

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