

**From:** Owain Draper [GRO]  
**To:** Amy Prime [GRO] 'Simon Henderson'  
[GRO]  
**Cc:** Andrew Parsons [GRO] Lucy Bremner [GRO]  
[GRO], Jonathan Gribben [GRO]  
**Subject:** Re: Post Office Group Litigation - Redactions [WBDUK-AC.FID26896945]  
**Date:** Sun, 10 Mar 2019 09:24:19 +0000  
**Importance:** Normal  
**Inline-Images:** image001.png; image002.png; image003.png

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(This email failed to send yesterday)

Dear Amy,

Thank you for the further input.

I am satisfied that the remaining redactions are appropriate. I do not say that they could not be challenged, but they are legitimately made.

Kind Regards,

Owain

Owain Draper

One Essex Court, Temple

EC4Y 9AR

Switchboard: [GRO]

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**From:** Amy Prime [GRO]  
**Date:** Saturday, 9 March 2019 at 15:50  
**To:** Owain Draper [GRO] 'Simon Henderson' [GRO]  
**Cc:** Andrew Parsons [GRO] Lucy Bremner [GRO]  
Jonathan Gribben [GRO]  
**Subject:** RE: Post Office Group Litigation - Redactions [WBDUK-AC.FID26896945]

Owain

Please find our comments below in red.

Kind regards  
Amy

Amy Prime  
Solicitor

Womble Bond Dickinson (UK) LLP

d:  
m:  
t:  
e:

**GRO**

GRO

<mailto:

GRO

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From: Owain Draper [mailto:**GRO**]

Sent: 08 March 2019 20:07

To: Amy Prime; 'Simon Henderson'

Cc: Andrew Parsons; Lucy Bremner; Jonathan Gribben

Subject: Re: Post Office Group Litigation - Redactions [WBODUK-AC.FID26896945]

Dear Amy,

Revised draft letter attached (it of course still needs amending for the notes to counsel, etc).

Save where indicated below, I agree that the redactions are appropriate for the reasons given in your note. In some cases, all I have is a query.

1. Doc 2 – no comments.

1. Doc 3 – I do not understand the full context to the Data Centre Tower procurement. If it is irrelevant to Horizon and accounting, then I agree with the redaction. This is not relevant to the Horizon Issues trial. This programme was a procurement exercise in 2014 which was cancelled without a contract being awarded, which seems to have related to the restructuring of POL's IT following the separation from Royal Mail.

1. Doc 4 as above re Data Centre Tower (pp. 97-99). See above

1. Docs 5-9: I have not reviewed these given that the intention is to remove the redactions.

1. Doc 9 – pages 39-46 are borderline. This is partly discussion of business strategy but partly reflects

ongoing legal advice, even discussing the legal strategy for the scheme. I don't think it can be spliced. I would retain the redaction, but there is risk here. Others could take a different view. Have discussed with Andy and we agree – redactions will remain.

1. Doc 10 – no comments.

1. Doc 11 – this is the first time a big issue comes up. I am not sure (but could be persuaded) that it is a safe rule to apply that all references to Project Sparrow are privileged. Imagine the reference were purely to “SPM Horizon allegations” or similar. It often seems to be used as shorthand for that, rather than reflecting advice or the conduct of claims. The redaction on p. 2 looks to be legal advice, but the redaction on p. 6 looks to be more about the lessons PO learned from the process of defending complaints – i.e. a business output based on the experience so far. Have discussed with Andy and redactions to the single word "Sparrow" will remain, but we will narrow slightly the larger redaction on page 6 so as just the reference to Sparrow is just redacted.

1. Doc A – no comments.

1. Doc B – no comments.

1. Doc C – I do not understand the practical rationale for redacting the updates for the un-redacted mitigation item. I think this will be challenged (even though the material looks irrelevant to me). Given this document was redacted on the basis of irrelevance and confidentiality, we will un-redact the entire document (subject to a privilege check), with an overarching comment in the letter that we have unredacted this document not because we think the material is relevant but so as to prevent disputes between the parties on redactions.

1. Doc D - no comments.

1. Doc E – no comments.

1. Doc F – no comments.

1. Doc G – subject to any further context that you can give me, I think pages 30-33 are just about relevant and arguably adverse. Pages 64-66 don't seem to me to reflect legal advice, but Andy will know better. Are the “controls” referred to in (e)-(f) on p.188 controls relevant to Horizon's operation by FJ? If so, this looks relevant to me. Given this document was redacted on the basis of irrelevance and confidentiality, we will un-redact the entire document (subject to a privilege check), with an overarching comment in the letter that we have unredacted this document not because we think the material is relevant but so as to prevent disputes between the parties on redactions.

1. Doc H – no comments.

1. Doc I – p.6 I think the last sentence of the redacted section is not privileged (apart from the name Project Sparrow). That is very borderline, however. Redaction will be narrowed to provide disclosure of the last sentence (apart from Sparrow).

1. Doc J – this raises the issue whether we want to insist on redacting the name “Project Sparrow” every time it is used. We know the Judge will attack on this, but there is a principled justification. In some documents, “Sparrow” seems to be used in a very broad sense – see Doc R below. Redactions on the word Sparrow to

remain

1. Docs K, L and M – as above.

1. Doc N – I agree the line drawn here – the recommendations from Sparrow themselves are legal advice, but how they are implemented is not privileged.

1. Doc O – see above re Sparrow for the first (small) redaction on page 7. The rest is properly redacted whatever view is taken on the word Sparrow.

1. Doc P – advice/LP here.

1. Doc Q – advice/LP here.

1. Doc R – a good example of Sparrow being used in what I think is a very broad sense. One for Andy to consider, in my view, as I am not persuaded at the moment that “Sparrow” is not sometimes used so loosely as to risk losing any privilege. Have spoken with Andy and view is that all redactions to remain. Document is dated 10/2016 after the claim was issued. This is a direct reference to litigation risk.

Kind Regards,

Owain

Owain Draper

One Essex Court, Temple

EC4Y 9AR

Switchboard: [GRO]

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From: Amy Prime [GRO]  
Date: Wednesday, 6 March 2019 at 11:19  
To: 'Simon Henderson' [GRO]; Owain Draper [GRO]  
Cc: Andrew Parsons [GRO]; Lucy Bremner [GRO]  
Jonathan Gribben [GRO]  
Subject: FW: Post Office Group Litigation - Redactions [WBDUK-AC.FID26896945]

Dear Simon, Owain

We have reviewed the redacted documents which the Cs have raised issue with and considered whether any redactions should be removed. You will see in our draft response (attached) that for each document we have set out the basis on which the redactions have been applied and included an additional column which contains some further information for Counsel.

Freeths have requested that Counsel review each of these documents as they anticipate raising issues with them at trial. There are 32 documents in total. It would be appreciated if you could go through these documents and let us know if you have any concerns with the redactions applied and if you agree with the redactions which we are proposing to remove. If you need any further information or have any questions, please let me know. The redaction watermark on the document has been changed to a transparent colour so as you can see the text behind.

The documents can be accessed here: <https://ukwbd.hiq.com/clientnetuk/documentHome.action?metaData.siteID=2350&metaData.parentFolderID=208147&metaData.moduleView=columnView&metaData.paginationNo=0&metaData.loadMoreNo=0&sortOrder=0&filterShared=0>

We would like to respond to Freeths by Friday lunchtime.

Kind regards  
Amy

Amy Prime  
Solicitor  
Womble Bond Dickinson (UK) LLP

d:  
m:  
t:  
e:



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From: Miranda Bond [mailto:GRO]

Sent: 05 March 2019 11:52

To: Charlie Temperley; Andrew Parsons; Amy Prime; Emma Campbell-Danesh; Victoria Brooks; Jonathan Gribben; Michael Wharton; Anna Martin; Dave Panaech; Lucy Bremner; Beth Hooper; Katie Simmonds; Sushma MacGeoch; Rachel Lawrie; Jane Atkinson; Mandy Robertson

Cc: James Hartley; Imogen Randall; Dean Hill; Stephanie Jameson; Chloe Oram; Nicola Pettit; Francesca See; Angélique Richardson

Subject: Post Office Group Litigation - Redactions

Dear Sirs,

Please see attached our firm's second letter of today's date.

Yours faithfully,  
Freeths LLP

Miranda Bond  
Legal Assistant  
T: [REDACTED]

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