From: Matthews, Gavin GRO

Sent: Thur 26/02/2015 3:20:26 PM (UTC)

To: Rodric Williams[{ GRO

Subject: FW: Draft Letter to CCRC

Attachment: image001.png

Rod

Brian's comments - interesting point re SS - my view is we should spell out the limitation on privilege.

Regards

Gavin

From: Brian Altman [mailto: GRO

Sent: 26 February 2015 15:15

To: Matthews, Gavin

Subject: RE: Draft Letter to CCRC

Gavin

I have read through the letter and considered it against the CCRC letter.

I agree with option 1.

We should put the ball back in the CCRC's court so that they tell us what interests them or it'll be a never-ending hunt for irrelevance.

My one other thought re option 1 is this: we don't know why the CCRC have started enquiring now, but a good guess would be the MPs' interest and perhaps the parliamentary committee. While I never subscribe to conspiracy theories it may be the case that Second Sight is in cahoots with certain parliamentarians or others and has reported POL to the CCRC or sought an enquiry, which leads me to the point: do we need to make clear who a "third party" is for the purposes of para 1.? i.e. that the definition includes Second Sight? Or looked at another way should we make clear in the letter for the avoidance of doubt (or is it sufficiently clear) that the privilege POL is asserting is POL's and does not extend to anyone other than POL and its <u>legal</u> advisers.

Maybe that is too paranoid but it was a thought.

Otherwise I am content with the option 1 draft.

Brian

From: Matthews, Gavin [mailto]

GRO

Sent: 26 February 2015 14:43

To: Brian Altman

Subject: FW: Draft Letter to CCRC

Brian

As just discussed, here is Rod's email and the draft letter to the CCRC.

Please can we have your comments. Although I drafted it on the basis of option 2 above I believe option 1 as drafted by Rod is more sensible.

As stated, POL want to send the letter by the end of the week.

Kind regards

Gavin

From: Rodric Williams [mailto: GRO GRO

Sent: 26 February 2015 13:19

To: Jane MacLeod

Cc: Chris Aujard; Matthews, Gavin **Subject:** Draft Letter to CCRC

Jane,

With apologies for the delay, please find attached my revised draft letter to the CCRC. I also attach the letter to which it responds for ease of reference.

The main change to Gavin's first draft concerns our response to the requirement that POL provide "an updated summary of the decisions and actions taken by the Post Office as a result of Brian Altman QC's report or copies of the documents recording those decisions and actions."

Brian's report makes a quite a few recommendations. Reporting on each of them is likely to be a time consuming exercise which may produce a lot material irrelevant to the CCRC's investigation. I think we can therefore respond in one of two ways, either:

- 1. ask the CCRC (nicely) to identify the specific recommendations in the report which are pertinent to its investigation; or
- 2. commit to providing everything within a longer time frame.

My preference is for Option 1, but I have included both alternatives in the draft.

Please let me have your comments. Gavin – can you please forward to Brian for his comments.

Kind regards, Rod



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