

From: Amy Prime [GRO]
To: Andrew Parsons [GRO]
Cc: Lucy Bremner [GRO], Jonathan Gribben [GRO]

Subject: FW: Post Office Group Litigation: HIT - Disclosure of Audit Reports [WBDUK-AC.FID26896945]

Date: Wed, 13 Mar 2019 18:44:14 +0000

Importance: Normal

Attachments: Letter_to_WBD_-_Audit_Reports.pdf;
_LETTER_154771370(1)_Freeths_13_Mar_19__Disclosure_of_Audit_Reports.docx

Inline-Images: image001.png; image4e570a.PNG; imaged499b5.PNG; imagec651c6.PNG;
imageda3ccc.PNG; image24d044.PNG; imagedf69bd.PNG

Andy

Sorry this is my mistake – I completely forgot to phone Rod about the RMG audit reports.

Attached is a draft letter to Freeths. My plan (which needs some help from Rod is):

- Rod calls RMG legal and confirms that they won't give disclosure of the documents. If so, Rod warns them that we are going to jointly ask with the Claimants that the Judge makes an order for third party disclosure. The order should be limited to pre-2011 annual audit reports of Horizon produced by Ernst & Young, which they are able to locate under a reasonable and proportionate search. It would be helpful if RMG could confirm how long it would take them to find the documents.
- We need to work out how to deal with the costs of the third party disclosure – I think they should be borne by the Cs, but not sure if the joint approach to the judge causes an issue with this.
- Once this has been set up we can then send the attached letter to Freeths.

Sorry and let me know if you want me to phone Rod.

Thanks
A

Amy Prime
Solicitor
Womble Bond Dickinson (UK) LLP

d:
m:
t:
e:

GRO

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From: Angélique Richardson [mailto:[GRO]]

Sent: 13 March 2019 13:45

To: Andrew Parsons; Amy Prime; Emma Campbell-Danesh; Victoria Brooks; Jonathan Gribben; Michael Wharton; Anna

WBD_000190.000001

Martin; Dave Panaech; Lucy Bremner; Beth Hooper; Katie Simmonds; Sushma MacGeoch; Rachel Lawrie; Jane Atkinson; Charlie Temperley
Cc: James Hartley; Imogen Randall; Dean Hill; Stephanie Jameson; Chloe Oram; Nicola Pettit; Francesca See; Miranda Bond; Angélique Richardson
Subject: Post Office Group Litigation: HIT - Disclosure of Audit Reports

Dear Sirs,

Please see attached correspondence.

Yours faithfully,
Freeths LLP

Angélique Richardson
Legal Assistant

T: [REDACTED] GRO



FREETHS

Freeths LLP
Floor 3, 100 Wellington Street
Leeds LS1 4LT

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