

13 March 2019

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Dear Sirs

**The Post Office Group Litigation
Horizon Issues Trial – Disclosure of Audit Reports**

We write further to your letter of today's date.

The pre-2011 annual audit reports produced by Ernst & Young relating to Horizon are not within Post Office's control and it cannot therefore provide disclosure of them. Post Office cannot compel Royal Mail Group to provide these documents and we explained in our letter of [x] that it may be necessary to obtain an order from the Court for disclosure of these documents. The Claimants have not sought to obtain such an order.

To resolve this matter, it is proposed that the Judge is asked jointly by both parties to make an Order that Royal Mail Group provide disclosure of the pre-2011 annual audit reports of Horizon produced by Ernst & Young, which they are able to locate under a reasonable and proportionate search. Please could you confirm that you agree with this approach.

Yours faithfully

Womble Bond Dickinson (UK) LLP

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