| From: "Parsons, Andrew"  To: "Matthews, Gavin"  GRO  Subject: FW: Response to Brian Altman QC's Interim Report.  Date: Thu, 15 Aug 2013 08:20:24 +0100  Importance: Normal  Attachments: RESPONSE_TO_BRIAN_ALTMAN_QC'S_INTERIM_REPORT.pdf;  REVIEW_PROTOCOL.pdf; DISCLOSURE DUTY_TO_RECORD_&_RETAIN.pdf  Inline-Images: ck-logo.gif; 1500chambers-twitter-linkedin.gif; image001.jpg; image002.jpg; image009.jpg; image010.jpg; image011.jpg |
|--|
| FYI re Brain Altman and criminal issues.   |
| Attached is CK's response to BAQC's advice.  |
| Susan and Hugh called me on Tues around their disclosure duty. CK are essentially saying that POL needs to track and investigate every single complaint, query or issue about Horizon in order to comply with criminal disclosure duties This is obviously very difficult, if not impossible, for POL to achieve.  |
| POL are going to ask CK for an alternative proposal. They're also going to check with CK whether POL is obliged to investigate every query or whether it is just required to disclose what it knows and not look any deeper.   |
| They also want to put the same questions to BAQC.  |
| When BAQC is back, there needs to be a con with CK (see CK's note) and a separate con with just POL.   |
| Nothing we can do until BAQC is back.  |
| Gavin – we can pick this up when you're back from hols.  |

## **Andrew Parsons**

Α

Senior Associate

for and on behalf of Bond Dickinson LLP





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From: Susan Crichtor GRO

**Sent:** 13 August 2013 18:28 **To:** Parsons, Andrew

Subject: FW: Response to Brian Altman QC's Interim Report.

Thought you might be interested to see what had started that particular "hare" running!

#### Susan Crichton I General Counsel

1st Floor, Central Wing, 148 Old Street, London, EC1V 9HQ



susan.crichtor GRO



From: martin smith GRO

Sent: 13 August 2013 16:33

To: Susan Crichton

Subject: Response to Brian Altman QC's Interim Report.

Susan,

Please find attached Harry Bowyer's Response to Brian Altman QC's Interim Report. I asked Harry to draft the response in Simon Clarke's absence given the urgency of the situation.

I would be grateful if Harry's Response could be sent to Brian Altman QC together with the Review Protocol and Simon Clarke's Advice on Disclosure.

Kind regards,

Martin.

Martin Smith
martin.smith
martin.smith

Direct: GRO

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