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Dear Sirs

### The Post Office Group Litigation Inadmissible Evidence

We refer to our letters of 27 June 2018, 19 July 2018 and 20 July 2018 and your firm's letter to us dated 19 July 2018.

We have explained repeatedly (including in the aforementioned correspondence) that much of the evidence your clients apparently intended to adduce would be inadmissible at the Common Issues Trial. Those concerns, as noted in that correspondence, have also been voiced by the Managing Judge. Post Office made its position clear in its Individual Defences, identifying the allegations in the Individual Particulars of Claim that were inadmissible and that should not have been included.

Unfortunately, the evidence served by your clients on 24 August has more than borne out those concerns. By way of example only, extensive evidence has been served that does not relate to the Common Issues but instead advances complaints by the Lead Claimants in relation to their training, the operation of the Helpline, problems that they claim to have encountered with Horizon, Post Office's audits of their branches, investigations into shortfalls and, lastly, events surrounding their suspension and termination. All these complaints relate to post-contractual conduct and events, and are irrelevant to the Common Issues.

We invite your clients to reconsider their decision to serve this inadmissible evidence, and to agree, without delay, to re-serve evidence with this material removed. If by Monday 3 September you agree in principle to remove this material, we can seek to agree the detail of which parts of the witness statements are affected. If not, our client reserves the right to make an application to strike out the inadmissible evidence without any further reference to you and to seek its costs of that application on an indemnity basis.

Yours faithfully

*Womble Bond Dickinson (UK) LLP*

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