

**From:** Matthews, Gavin [GRO]  
**Sent:** Tue 16/07/2013 2:48:23 PM (UTC)  
**To:** Susan Crichton [GRO] Parsons,  
Andrew [GRO]  
**Cc:** Richardson, Simon [GRO] Hugh  
Flemington [GRO] Rodric  
Williams [GRO] Jarnail A Singh [GRO]  
**Subject:** RE: For discussion [BD-4A.FID20472253]

Susan

I know that you are with Simon and Andy today so I have taken an initial look at this for you. I agree with you that I would expect the advice to me more prescriptive ie you **need** to say this in response.

I do also have concerns from a civil point of view over a couple of statements in the draft response. In particular where it states;

*"He has done so both to POL and, in expert witness statements and oral evidence, to the court. In particular he has: attested to the presence of defect detection and rectification systems; the robustness of the prosecution audit trail; and stated that, in his expert opinion, Horizon accurately records and processes all information submitted into the system. The Second Sight Interim report demonstrates that this was not the case."*

I consider this to be unhelpful given that the SS report found there to be no systemic problems with Horizon.

It shows the need for all POL letters (criminal and civil) to contain a consistent message – so that the right hand and the left hand know what they are each doing.

I am not a criminal lawyer but I would query whether the CCRC have the power to review a case where the SPM entered a plea of guilty in the magistrates' court.

I would be happy to suggest some criminal barristers to take a look at this for you

Perhaps you could discuss this with Simon and Andy today if you get the chance.

Kind regards

Gavin

**Gavin Matthews**

Partner

for and on behalf of Bond Dickinson LLP

*Bond Dickinson*

Direct: [GRO]  
Mobile:  
Office:

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**From:** Susan Crichton [mailto:GRO]  
**Sent:** 16 July 2013 13:58  
**To:** Parsons, Andrew  
**Cc:** Richardson, Simon; Matthews, Gavin; Hugh Flemington; Rodric Williams; Jarnail A Singh  
**Subject:** For discussion

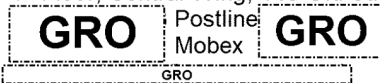
Andy – we received a letter from the CRCC yesterday which I have asked Cartwright King to review.....their advice feels odd to me as if given on a take it or leave it basis and I am not comfortable that's particularly useful in this context. Could we discuss, I am happy to go to another firm that specialises in Criminal law or a barrister, somehow it feels as if there is a conflict here which I am not sure I understand.

Thanks

Susan Crichton | HR & Corporate Services Director

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1<sup>st</sup> Floor, Central Wing, 148 Old Street, London, EC1V 9HQ



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