

FREETHS

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22 October 2018
Second letter

Our Ref: JXH/1684/2113618/1/MB
Your Ref AP6/364065.1369

Dear Sirs

POST OFFICE GROUP LITIGATION DEFENDANT'S DISCLOSURE - REDACTED DOCUMENTS

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

Thank you for confirming that a claim for privilege is the basis on which these redactions have been made.

We do however remain concerned about these redactions and whether too wide an approach has been adopted to the process of redacting PO's documents. We do not understand how the document title of G/40 could properly be redacted on the basis provided, nor the varying approach throughout that document to redacting selected words in some paragraphs (e.g. the introduction), and complete other paragraphs e.g. under the heading "Technical" (which itself seems unlikely to be a place where legal advice would be recorded).

We invite you please to reconsider these redactions, and confirm to us that (1) your trial counsel have reviewed each of these redactions and the reasons given for them, and (2) the person within your firm with control of the disclosure process has done likewise, and (3) as a result of these reviews, whether any redactions may be removed.

Please provide your response by 4pm on Tuesday 23 October 2018. We will then further consider the Claimants' position.

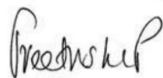
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Yours faithfully



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Please respond by e-mail where possible

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