

14 November 2018

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Our ref:
AP6/ALP1/364065.1369
Your ref:

Dear Sirs

**Post Office Group Action
Waiver of Privilege - POL-0218577**

We refer to your Counsel's comment during the course of today concerning whether the heading on document G/40 has been properly redacted.

As a result of this, it has come to our attention that the document title within Magnum of G/40 contains the word "Zebra". This word, when considered within the context of the wider document, is privileged. The inadvertent inclusion of this word within the title of this document was due to this information being pulled from the metadata behind this document. That metadata should not have been, but was inadvertently, disclosed.

As explained in our third letter of 23 October 2018, at your request the redactions applied to this document have already been reviewed by junior trial Counsel. Mr Draper and Mr Cohen confirmed that the redactions have been correctly applied on the basis of legal advice and litigation privilege. The redaction of the word "Zebra" fell within these considerations.

We therefore propose that G/40 is renamed in the trial bundle to remove reference to "Zebra" and an overlay providing the same fix is produced so as to amend the details of the document which has disclosed. Please provide your agreement to the above by **4pm tomorrow** or before the document is referred to in Court (whichever is sooner) so as the amendments to the trial bundle as soon as possible.

Yours faithfully

Womble Bond Dickinson (UK) LLP

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