

# FREETHS

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8 February 2019

Our Ref: JXH/1684/2113618/3/FKS  
Your Ref AP6/364065.1369

Dear Sirs

## **POST OFFICE GROUP LITIGATION HORIZON DISCLOSURE**

We write further to your letter dated 17 January 2019.

### **Horizon Management Council**

In your letter, you confirmed that you would conduct searches across the email accounts of Mr Rees, Ms McGinn and Ms George as well as the SharePoint Site which Post Office's Information Security Team stored documents in for disclosure relating to Horizon Management Council.

Your client is obliged to provide these documents pursuant to Schedule 1 of the Fourth CMC Order dated 5 June 2018. The delay is unacceptable and is prejudicing our client in their preparation for the Horizon issues trial. Please therefore provide disclosure of these documents as soon as possible.

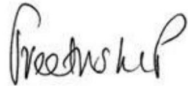
### **Audit Reports**

You also confirmed that disclosure of Audit Reports carried out by Ernst and Young for the years 2011 to 2018 have been disclosed. On 30 January 2019, you disclosed a further 102 documents relating to audits carried out by Fujitsu. Please confirm that:

1. Fujitsu was the appointed auditor of Horizon prior to the instruction of Ernst and Young; and
2. All audit reports of Horizon (carried out both internally and externally) have now been disclosed.

8 February 2019  
Page 2

Yours faithfully

A handwritten signature in black ink, appearing to read 'Freeths', written in a cursive style.

Freeths LLP  
Please respond by e-mail where possible