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9 March 2019

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**By email only**

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Dear Sirs

**Post Office Group Litigation  
Redacted Documents**

We write further to your letter of 5 March 2019.

The challenges to these redactions have been raised three working days before the beginning of the Horizon Issues Trial. With the exception of two documents, the Claimants were provided with disclosure of these documents in either July or August 2018. The Claimants have had 6 months to raise concerns about the redactions applied but has chosen not to do so until now. The re-review of these documents is a time-consuming process, and has been a regrettable distraction from preparation for trial. The documents run to c.1000 pages in total.

As per your request, Post Office's legal team and junior Counsel have reviewed the redacted documents with which you have raised concerns. A response to each concern is set out at Schedule 1 to this letter. For some of the documents, the redactions applied have been narrowed and replacement documents will be provided to Elevate. Where these documents are in the trial bundle we shall arrange for replacement documents to be uploaded.

It should be noted that where redactions have been narrowed or removed we do not believe these documents to have any bearing on the Horizon Issues Trial since the redactions covered irrelevant information or, at best, material of only arguable peripheral relevance. These redactions have been removed in many instances for the sake of pragmatic co-operation and to reduce the scope of any disputes between the parties over the redaction of documents.

Yours faithfully

*Womble Bond Dickinson*

**Womble Bond Dickinson (UK) LLP**

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Trial Bundle Reference	Begin Bates	WBD Comment
F/1415 & F/1416	POL-0220141 POL-0444078	<p>As explained in our letter of 3 January 2019, an incorrect redacted version of the document was exhibited to Mr Godeseth's witness statement.</p> <p>A re-review of part-privileged documents which contain the term "mediation scheme" has been undertaken. As a result of this review, some or all of the redactions applied to the following documents have been removed.</p> <p>The first four documents are email chains which had been part redacted. It should be noted that the redacted data within these documents had already been disclosed to the Claimants in later versions of these email chains. The redacted information has therefore already been disclosed to the Claimants in January 2018 and no prejudice has been caused.</p> <ul style="list-style-type: none"> <li>• POL-0022823 (disclosure of the previously redacted sections of this email chain was provided on 25 January 2018 as POL-0022822)</li> <li>• POL-0024131 (disclosure of the previously redacted sections of this email chain was provided on 25 January 2018 as POL-0024128)</li> <li>• POL-0025092 (disclosure of the previously redacted sections of this email chain was provided on 25 January 2018 as POL-0025090)</li> <li>• POL-0025094 (disclosure of the previously redacted sections of this email chain was provided on 25 January 2018 as POL-0025090)</li> <li>• POL-0511200</li> <li>• POL-0221031</li> </ul>
F/864	POL-0215569	<p>Document has been redacted on the basis of confidentiality and irrelevance. This document does not contain similar text to that contained in POL-0215720 and all relevant / adverse sections have been disclosed.</p> <p><i>[Note – your letter refers to POL-0121520 but the correct reference is POL-0215720]</i></p>
F/1017	POL-0215581	<p>Document has been redacted on the basis of confidentiality and irrelevance. This document does not contain similar text to that contained in POL-0215720 and all relevant / adverse sections have being disclosed.</p> <p><i>[Note – your letter refers to POL-0121520 but the correct reference is POL-0215720]</i></p>
F/619	POL-0215622	<p>Document has been redacted on the basis of confidentiality and irrelevance. Whilst we do not believe these sections to be relevant to the Horizon Issues Trial, so as to reduce the scope of any disputes between the parties over the redaction of documents, a unredacted version of this document is being disclosed.</p>
F/639	POL-0215539	<p>Document has been redacted on the basis of confidentiality and irrelevance. The section on "Executive Correspondence (flagcases)" is a standalone paragraph in the document and the remainder of the document</p>



Trial Bundle Reference	Begin Bates	WBD Comment
		<p>does not assist with the context of understanding of this paragraph.</p> <p>We understand that the "purdah" refers to the restrictions which were placed on MPs during the 2010 elections.</p>
F/658	POL-0215545	Document has been redacted on the basis of confidentiality and irrelevance. Whilst we do not believe these sections to be relevant to the Horizon Issues Trial, the redaction of the sections under the heading of IT have been removed. We confirm there is no document author within the redacted sections of the document.
F/657	POL-0215543	Document has been redacted on the basis of confidentiality and irrelevance. The redaction at the end of this document has been removed so as to show the author of the document.
F/1135	POL-0215589	The majority of the document has been redacted on the basis of confidentiality and irrelevance. Some sections of the document have been redacted on the basis of legal advice and/or litigation privilege. Whilst we do not believe these sections to be relevant to the Horizon Issues Trial, so as to reduce the scope of any disputes between the parties over the redaction of documents, some of the redactions have been removed from this document.
F/1664	POL-0221328	<p>The majority of the document has been redacted on the basis of confidentiality and irrelevance. Some sections of the document has been redacted on the basis of legal advice and/or litigation privilege.</p> <p>For assurance, the pages which follow 87 and 88 do not relate to transaction corrections.</p>
F/1180	POL-0220835	Document has been redacted on the basis that it refers to legally privileged material. The redactions on page 6 have been narrowed.
F/1217	POL-0220855	Document has been redacted on the basis that it refers to legally privileged material.
F/123	POL-0444058	The document which you have referred to is an unredacted document. Please could you confirm the correct trial bundle reference.
F/1350	POL-0221527	Document has been redacted on the basis that it refers to legally privileged material.
F/1420	POL-0143345	The document which you have referred to is an unredacted document. Please could you confirm the correct trial bundle reference.
F/1501	POL-0221075	Document has been redacted on the basis that it refers to legally privileged material.
F/1520	POL-0221124	Document has been redacted on the basis that it refers to legally privileged material.
F/1540	POL-0220593	Document has been redacted on the basis that it refers to legally privileged material.
F/1634	POL-0221290	Document has been redacted on the basis that it refers to legally privileged material.

<b>Trial Bundle Reference</b>	<b>Begin Bates</b>	<b>WBD Comment</b>
F/1495.2	POL-0511132	Document has been redacted on the basis that it refers to legally privileged material.
F/1495.3	POL-0511131	Document has been redacted on the basis that it refers to legally privileged material.
F/1549	POL-0220220	Document has been redacted on the basis that it refers to legally privileged material.