

FREETHS

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13 March 2019

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

By Email andrew.parsons@freeths.co.uk **GRO**

Dear Sirs

HORIZON ISSUES TRIAL: DISCLOSURE OF AUDIT REPORTS

We write further to our letter of 28 February 2019 in respect of pre-2011 audits of Horizon, which have still not been disclosed.

As you know, the Claimants are due to begin cross examination of the Defendant's witnesses on Monday. It is obvious that the content of the audits is likely to be relevant to the evidence of many of the Defendant's witnesses, including potentially Mrs Van Den Bogerd, in addition to the evidence of Mr Membery (whose witness statement is directly concerned with audits).

We first asked for audit reports on 19 September 2018 {H/115/2}:

"We would be grateful if you could now disclose the annual reports, produced by Ernst & Young or otherwise, for each year since the introduction of Horizon, so that the experts and the Court will be able to consider how the system developed over time."

We again made a specific request on 21 December 2018, (as audits are referred to in Mr Membery's witness statement) {H/154/2}:

"Audit reports of Horizon carried out annually by Ernst and Young or otherwise"

You did not raise Royal Mail's alleged concern about providing these documents until 27 February 2019, which we responded to very promptly, on 28 February making clear the Claimants' position. We do not repeat here the contents of that letter.

Please now disclose the audits, today, or otherwise clearly state Post Office's position.

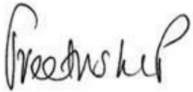
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Please in any event provide a response to this letter today, so that, if required, this matter can be raised at Court tomorrow.

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