

From: Anthony de Garr Robinson [GRO]
To: 'Andrew Parsons' [GRO], Owain Draper [GRO]
Cc: Amy Prime [GRO], Elisa Lukas [GRO], Jonathan Gribben [GRO]
Subject: RE: The Post Office Group Litigation - Claim Numbers HQ16X01238 and HQ17X012637 [BD-4A.FID26896945] - Inspection of Known Error Logs
Date: Thu, 14 Sep 2017 10:08:14 +0000
Importance: Normal
Inline-Images: image001.jpg; image002.png; image003.png; image004.png; image005.png; image006.jpg; image007.jpg; image008.jpg; image009.jpg

Thanks for sending the 13 October 2016 letter, Amy.

I'm a little concerned that we may be playing into their hands by provoking a CPR 31.14 application for inspection of the KEL. Unless we play our cards right, this could give them the chance to portray us as unnecessarily (and therefore suspiciously) defensive, obstructive and possibly even evasive about the KEL.

Could you also send over our letter dated 1 September 2017 – if their summary of it is fair (which I doubt) I would like to understand why we seem to have claimed that the KEL is not a document, when it plainly is, and why we don't seem to have mentioned that it is not in our control, which seems to me to be a critical point.

On the question of control, we need to be absolutely clear that we have no right to inspect or take copies of the KEL, either under the Fujitsu contract or under the law of agency (is Fujitsu holding it as our agent?), and that there is no practice under which we are habitually or usually allowed to inspect documents of this sort if we want to see them.

Best wishes,

Tony

From: Andrew Parsons [mailto:[GRO]]
Sent: 14 September 2017 08:08
To: Anthony de Garr Robinson [GRO], Owain Draper [GRO]
Cc: Amy Prime [GRO], Elisa Lukas [GRO], Jonathan Gribben [GRO]
Subject: FW: The Post Office Group Litigation - Claim Numbers HQ16X01238 and HQ17X012637 [BD-4A.FID26896945] - Inspection of Known Error Logs

Tony, Owain

See attached - One more issue to discuss at today's con.

Mini agenda:

1. Current thinking on directions (look at Owain's draft Order)
2. Terminal preservation and inspection of KEL (as per attached).
3. Plan of action to CMC
4. Content of witness evidence and skeleton
5. Deloitte work – what next?

A

Andrew Parsons
Partner
Bond Dickinson LLP

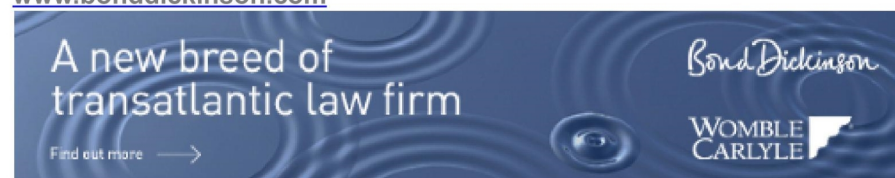
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From: Megan Attack [<mailto:GRO>]
Sent: 13 September 2017 18:17
To: Elisa Lukas; Amy Prime; Andrew Parsons; Peter O'Connell
Cc: James Hartley; Imogen Randall; Miranda Bond
Subject: RE: The Post Office Group Litigation - Claim Numbers HQ16X01238 and HQ17X012637 [BD-4A.FID26896945] - Inspection of Known Error Logs

Dear Sirs

Please find attached our firm's third letter of today's date.

Yours faithfully
Freeths LLP

Megan Attack

Legal Assistant

T: **GRO**

F: **GRO**

E: **GRO**



FREETHS

Freeths LLP, Floor 3, 100 Wellington Street, Leeds, LS1 4LT

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