Message	
From:	Rodric Williams [rodric.william GRO
Sent:	04/11/2019 10:08:12
То:	Ben Foat [Ben.FoaGRO
CC:	Watts, Alan [Alan.Watts GRO Emanuel, Catherine [Catherine.Emanuel GRO Lerner, Alex
	[Alex.Lerner GRO Ainslie Cranwell [Ainslie.Cranwell GRO andrew.parsons
	[andrew.parsons GRO Jonathan Gribben [jonathan.gribben GRO Michael Wharton
	And the second s
Cubinat.	[Sherrill.Taggart GRO Re: UPDATED KEL Disclosure Actions Table - as at 01.11.19
Subject:	RE. OPDATED REL DISCIOSUTE ACTIONS Table - as at 01.11.19
Ben - just Rod	acknowledging this. I'll provide the update as soon as possible.
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The section Decad	
Thanks Rod	
	ful but I think timing wise it would be helpful for this to be urgently update on Monday morning re the audit e cant finalise it properly. So, lets get the audit issue sorted so we can give a final view to the Board Monday
Thanks	
Ben	
	Ben Foat
/ p/nc	Group General Counsel
	Ground Floor
	20 Finsbury Street
	LONDON
	EC2Y 9AQ
	Mobile : GRO
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	y, November 1, 2019 7:23:04 PM
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uk.com>; Jo	onathan Gribben <jonathan <michael.wharton="" gribben="" gro="" gro<="" michael="" td="" wharton=""></jonathan>
	arvey < Kenneth.Garvey GRO; Sherrill Taggart < Sherrill.Taggar
	DOATED KEL Disclosure Actions Table as at 01 11 10

Ben,

I have updated the KEL Action table in light of the response received from Freeths today (see SharePoint link below, also attached in Word).

https://poluk.sharepoint.com/:w:/s/POA001/legal/EbCRCoxZ17NDtynkVwcFXEUBqP3Qi9HB6hD1doQzEw0Ceg

I have again also sought to flag the main developments in the form of a draft covering email for you to send to the Board as you see fit.

Please let me know if you require anything further. Rod

DRAFT EMAIL BEGINS

All.

Attached is our KEL's action tracker which outlines the progress that has been made. In summary:

- 1. The Claimants have now indicated to the Court that they do not intend to make further submissions on the KEL issue because they do not want to delay delivery of the Horizon judgment.
- 2. The audit of the completeness of Fujitsu's KEL disclosure has commenced and is proceeding at pace. A preliminary view will be provided on Monday 4 November on whether Post Office may need to take further action to comply with its legal duties around document disclosure in the litigation.
- 3. Advice on what (if anything) should be communicated to the Court and/or Claimants about the audit, and the impact this could have on the litigation, will be provided at that time.

Please do let me know if you have any queries.

DRAFT ENDS



Rodric Williams

Head of Legal - Dispute Resolution & Brand 20 Finsbury Street London EC2Y 9AO

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GRO

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