



Post Office Limited
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PRIVATE AND CONFIDENTIAL

By post and email

Ron Warrington & Ian Henderson
Second Sight Support Services Limited
Tythe Farm
Maugersbury
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GL54 1HR

2 June 2015

Dear Sirs

M035 – Josephine Hamilton (the "Applicant")

We refer to the above Applicant and, in particular, to your final Case Review Report (CRR) dated 24 March 2015 in relation to the Applicant's case.

At paragraph 4.10 of the CRR, you quote from a "Post Office Investigator's Report dated 17 May 2006" (the "Security Report"). At paragraph 4.11 of the CRR, you speculate about the impact the Security Report may have had on the criminal prosecution brought against the Applicant.

The Security Report was not appended to the final version of the POIR because it is protected from disclosure by legal professional privilege. That privilege belongs to Post Office Limited and does not extend to anyone beyond Post Office Limited and its professional legal advisors. Post Office Limited continues to assert privilege over the Security Report.

As a consequence of your disclosure, on 6 May 2015 we received a request from the Applicant for a copy of the Security Report which noted that the document quoted in the final CRR at paragraph 4.10 was not present in the pack of documents appended to the POIR. We have responded refusing the Applicant's request on the basis that the document is privileged (see attached).

We nevertheless remain concerned about your disclosure of the Security Report. Please therefore explain to us in writing why:

1. you considered its disclosure to be consistent with the undertaking provided on 19 October 2012, a copy of which is appended to this letter, confirming that certain documents provided by Post Office Limited are privileged, that the benefit of that privilege shall at all times belong to Post Office Limited, and that the documents and their contents "*will be held in complete confidence and will not be disclosed to any other party or used for any other purpose whatsoever without the prior written consent of Post Office Ltd*";
2. you referred to it when it was not appended to the POIR;
3. you referred to it in your final report only, and not in the draft CRRs on which Post Office Limited was able to provide comment;

4. you commented on it as you have when you are not in possession of all material information and when matters of criminal law and procedure are outside your scope of expertise.

We look forward to receiving your response within the next 7 days. Post Office Limited's position remains fully reserved in the meantime.

Yours faithfully

GRO

Rodric Williams

Solicitor

For and on behalf of Post Office Limited