

## Message

**From:** Rodric Williams [rodric.williams] **GRO**  
**Sent:** 06/11/2019 00:17:52  
**To:** Ben Foat [Ben.Foat] **GRO**  
**CC:** Watts, Alan [Alan.Watts] **GRO**; Emanuel, Catherine [Catherine.Emanuel] **GRO**; Lerner, Alex [Alex.Lerner] **GRO**; andrew.parsons [andrew.parsons] **GRO**; Jonathan Gribben [jonathan.gribben] **GRO**; Michael Wharton [michael.wharton] **GRO**; Sherrill Taggart [Sherrill.Taggart] **GRO**; Kenneth Garvey [Kenneth.Garvey] **GRO**; Ainslie Cranwell [Ainslie.Cranwell] **GRO**  
**Subject:** UPDATED KEL Disclosure Actions Table - as at 05.11.19  
**Attachments:** KEL Disclosure Actions Table (05.11.19).docx

Ben,

I have further updated the KEL Action table in light of the progress made with the audit (see SharePoint link below, also attached in Word).

<https://poluk.sharepoint.com/:w:/s/POA001/legal/EVnirAvM5HBp91BOxqcgIMBHfYFowPmec-vQ485QPqtscg>

I understand that the auditors were today finishing off their final checks before they proceed to write up their report. We will be confirming this with them first thing tomorrow, at which point the Table may need some final tweaking.

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.

**DRAFT EMAIL BEGINS**

All,

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

1. The Claimants, having been provided with the further information they requested about this issue and told about the audit commissioned on the KEL disclosure, have informed us and the Court that they do not intend to review the new KELs or make further submissions on this issue.
2. The audit is nearing completion, with final checks to be completed before the audit report is written. We expect to receive that report early next week.
3. The audit has not yet identified any further KELs which need to be disclosed to the Claimants or would require Post Office to change the submissions we made about Horizon when the trial closed. If (as seems likely) this remains the position following completion of the audit, the KEL issue will not require the Horizon trial to be reopened or delay delivery of the judgment on the trial (which is now imminent).

Please do let me know if you have any queries.

**DRAFT ENDS**

Please let me know if you require anything further.

Rod

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**From:** Ben Foat

**Sent:** 02 November 2019 14:32

**To:** Rodric Williams <rodric.williams> **GRO**

**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**

**GRO** Jonathan Gribben <jonathan.gribben> **GRO** Michael Wharton <michael.wharton> **GRO**

Kenneth Garvey <Kenneth.Garvey [REDACTED]>; Sherrill Taggart <Sherrill.Taggart [REDACTED]>

**Subject:** RE: UPDATED KEL Disclosure Actions Table - as at 01.11.19

Thanks Rod

This is helpful but I think timing wise it would be helpful for this to be urgently update on Monday morning re the audit issue so we cant finalise it properly. So, lets get the audit issue sorted so we can give a final view to the Board Monday morning.

Thanks  
Ben



**Ben Foat**

Group General Counsel  
Ground Floor  
20 Finsbury Street  
LONDON  
EC2Y 9AQ

Mobile: [REDACTED]

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**From:** Rodric Williams <rodric.williams [REDACTED]>

**Sent:** Friday, November 1, 2019 7:23:04 PM

**To:** Ben Foat <Ben.Foat [REDACTED]>

**Cc:** Watts, Alan <Alan.Watts [REDACTED]>; Emanuel, Catherine <Catherine.Emanuel [REDACTED]>; Lerner, Alex

<Alex.Lerner [REDACTED]>; Ainslie Cranwell <Ainslie.Cranwell [REDACTED]>; andrew.parsons <andrew.parsons [REDACTED]>

[REDACTED]; Jonathan Gribben <jonathan.gribben [REDACTED]>; Michael Wharton <michael.wharton [REDACTED]>

Kenneth Garvey <Kenneth.Garvey [REDACTED]>; Sherrill Taggart <Sherrill.Taggart [REDACTED]>

**Subject:** UPDATED KEL Disclosure Actions Table - as at 01.11.19

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/EbCRCoxZ17NDtynkVwcFXEUBqP3Qj9HB6hD1doQzEw0Ceg>

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**  
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