



26 April 2016

Deloitte LLP

By email only

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Our ref:
GRM1/AP6/364065.1369
Your ref:

Dear Sirs

Alan Bates and 90 others v. Post Office Limited
Claim number: HQ16X01238

We act for Post Office Limited in relation to the above Court proceedings.

You have been historically instructed by Post Office to undertake certain analytical work in relation to contemplated claims against Post Office by certain subpostmasters regarding the Horizon system. Those claims have now crystallised into the above proceedings. As such, we write to provide you with further instructions.

For the sake of clarity, all your past and future work for Post Office is subject to litigation privilege. Your role in this matter is as an expert advisor to Post Office and not as an expert witness who may be called to give evidence in Court. Although you may on occasion receive instructions from us, you will remain directly engaged by Post Office.

We understand that you have now scoped the core procedures that may be subject to examination during the above Court proceedings and which may therefore to be subject to further review by you. Before you provide a written report of your findings to date, we should be grateful if you would present those findings to Post Office at a meeting. This presentation will assist Post Office in scoping any future work as well as enabling it to seek advice from us and / or Jonathan Swift QC in relation to any other steps Post Office could be taking in relation to the claims being brought by the subpostmasters.

We recognise that in order to give this presentation you may need to make certain notes and / or produce slides. If you do so, please be aware that these documents will be subject to privilege and should be marked "Private and Confidential – Subject to Privilege".

Please can you liaise with Mark Underwood at Post Office in order to arrange a convenient time for your meeting.

Yours faithfully

Bond Dickinson LLP

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