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3 October 2019

FAO: Angela Fraser Royal Courts of Justice Rolls Building London EC4 1NL

By email only

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Our ref: AP6/AP6/364065.1369 Your ref:

Dear Sirs

Post Office Group Litigation HQ16XO1238, HQ17X02637 & HQ17X04248 Horizon Issues Trial

We write further to the email sent by the Claimants' solicitors to the Managing Judge's clerk on 27 September 2019 at 12:29, which brought to the Managing Judge's attention that 32 documents relating to the Horizon Issues Trial were disclosed by Post Office on 25 September 2019.

During the course of responding to a number of queries that the Claimants' solicitors had raised in relation to the disclosure of these documents (which can be located at [H/358] of the Horizon Issues Trial Bundle), it has come to Post Office's attention that a statement within its EDQ is incorrect and that there may be previous versions of the Known Error Log that have not been disclosed to the Claimants. Please find enclosed a letter which was sent to the Claimants' solicitors today explaining the background to these documents coming to light and the proposals which have been made in respect of providing any disclosure which may be sought by the Claimants.

We would be grateful if this letter and enclosure could be provided to the Managing Judge so as he can be informed of these matters.

Yours faithfully

Womble Bond Dickinson (UK) LLP

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Copy to

Freeths LLP (solicitors for the Claimants)

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