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**To:** "rodric.williams@[REDACTED]>  
**Cc:** "Parsons, Andrew" <[REDACTED]>, "Matthews, Gavin" <[REDACTED]>, "Lorraine, Paul" <[REDACTED]>  
**Subject:** Horizon - Disclosure [BD-4A.FID26859284]

**Date:** Fri, 6 May 2016 13:21:21 +0000

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Good afternoon Rodric

#### Disclosure work streams

I just wanted to send you a brief update email regarding the work we're doing on disclosure, in light of Freeths letter of claim.

We are now progressing the **two main points arising out of the letter** – the first being to consider the disclosure request, the second being to consider our obligations with regard to data retention and to take necessary steps to mitigate the risk of coming under criticism of the court in due course for failing to preserve relevant documents.

**With regard to the first point** (responding to the disclosure request) – we have reviewed the requests and given some thought to the reasonableness of each. Noting that we are not in any rush, strategically, to respond at speed we intend to wait to receive a word version of the letter of claim before producing an itemised list of our position/proposed response in each instance.

**With regard to the second point** (considering data retention and taking appropriate steps) - we are producing a table of the potentially relevant documentation (setting out what exists, where it is located, and what steps need to be taken to ensure it is retained). We will look to circulate this in draft form next week. We also have a call scheduled with Kath and Shirley on Monday next week to discuss document availability, location, etc.

As an aside – Andy mentioned that you were **writing to Fujitsu** to put them on notice of the claim, and ask them to ensure that potentially relevant documents are now retained. We should give some thought to whether we need to send similar notices to other third party providers at this stage. We will revert with thoughts in this regard next week.

Please don't hesitate to give me a call if you would like to discuss any of the above in the meantime.

Kind regards

**Tom Porter**  
Associate

*Bond Dickinson*

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**GRO**

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