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22 September 2017

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Our ref:
AP6/AP6/364065.1369
Your ref:
IFR/1803/212876/1/ER

For the Attention of Mr J Hartley
Freeths LLP
Floor 3
100 Wellington Street
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By email only

Email: james.hartley@**GRO**

Dear Sirs

**The Post Office Group Litigation
Known Error Log ("KEL")**

We refer to your third letter of 13 September 2017.

We note that in your letter you have sought to portray Post Office as refusing to provide access to the KEL. The possibility of accessing the KEL was not refused by Post Office. Our client's position was that the KEL was not relevant to these proceedings for the reasons stated in its Generic Defence, but that it would try to facilitate access to the KEL at an appropriate time. We had stated that in our view the appropriate time was at the same time as similar disclosure was given.

Whilst we disagree with a number of the points in your letter (including your right to inspect the KEL under CPR 31.14), given your anxiety to inspect it Post Office has discussed with Fujitsu the methods by which access can be provided.

The KEL is a database which cannot easily be downloaded and provided to you. Fujitsu has therefore kindly agreed that the Claimants' IT expert may inspect the KEL at its premises in Bracknell. This will enable your expert to understand the nature of the KEL and to satisfy himself as to the relevance of any of the entries in it.

Please could you confirm the name and details of your expert and his dates of availability over the next two weeks. As the KEL contains some information that is confidential and commercially sensitive, Fujitsu has asked that your expert signs a routine non-disclosure agreement. We have asked Fujitsu to provide a draft for your approval.

Yours faithfully

GRO

Bond Dickinson LLP