

20 September 2017

For the Attention of Mr J Hartley  
Freeths LLP  
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100 Wellington Street  
Leeds  
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**By email only**

Email: james.hartley@freeths.co.uk 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 at any stage 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.

We anticipate being able to arrange a date for inspection within the next [7] days. Please could you confirm the name of your expert and his dates of availability. Please also confirm that any information gathered by your expert from the KEL will be treated as being subject to CPR 31.22.

Yours faithfully

**Bond Dickinson LLP**

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