



Post Office Limited
Finsbury Dials
20 Finsbury Street
London
EC2Y 9AQ

Mr. Tim McCormack

By Email Only: t.j.mccormack **GRO**

19 November 2015

Dear Sir

Evidence concerning the Horizon System

I respond to your email to Post Office Limited's Chief Executive Officer dated 3 November 2015, which replied to my letter to you dated 16 October 2015 (sent again by email on 3 November 2015).

My 16 October 2015 letter asked you to provide to us the evidence you state you have concerning errors in the Horizon system so that Post Office can determine the steps to take in response. Although your 3 November 2015 email continues to refer to the existence of an error in Horizon, you do not provide any description of what the error is (e.g. the circumstances in which it might occur, how it manifests itself, its consequences etc), or any material which records or demonstrates the error (e.g. the report which "describe[s] almost exactly the circumstances of the error [you] have found" or the "internal documents", both of which are referred to in your email).

In the hope that it assures you that whatever you provide in response to my request will faithfully and accurately be reported to the appropriate personnel within Post Office Limited, as a solicitor I am professionally obliged to disclose to my client (Post Office Limited) all information of which I am aware which is material to my client's matter, which in this case is the purported error you have raised.

Until such time as you provide something substantive concerning the purported error, Post Office Limited cannot commit to taking any steps in response to it, including those suggested in your email. This is especially so when, as your email notes, the purported error may already be known to (and therefore conceivably may already have been addressed by) Post Office Limited.

Further, given that Post Office Limited cannot take matters forward until you provide something substantive to us concerning the purported error, we will not engage in any further communications with you on this matter until such time as you have done so.

I trust this has made Post Office Limited's position clear.

Yours sincerely

GRO

Rodric Williams
Solicitor
Post Office Limited