

Message

**From:** Thomas P Moran [thomas.p.moran@GRO]  
**Sent:** 27/11/2016 13:27:01  
**To:** Jane MacLeod [jane.macleod@GRO]  
**CC:** Parsons, Andrew [/o=Exchange-Org/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ad9ed344815e47e4aaa3c0e7e1740919-Andrew Pars]  
**Subject:** Re: Letter to Freeths - legally privileged [BD-4A.FID26896945]

Ok thanks, sounds sensible.

On Nov 27, 2016, at 1:06 PM, Jane MacLeod [GRO] wrote:

My proposal - which I discussed with the team on Friday) was to mention it to GE tomorrow morning and then circulate the 'remote access' section to Paula, Al, Mark D and Rob H for any final comments during tomorrow.

Jane MacLeod  
Sent from my iPhone

On 27 Nov 2016, at 11:04, Thomas P Moran [GRO] wrote:

Thanks for this, will read it later today.

Jane - what do you think we should do re GE (or a subset thereof) briefing and/or sign off?

Tom

On Nov 27, 2016, at 9:39 AM, Parsons, Andrew [GRO] wrote:

All

Please find attached a draft Letter to Freeths in response to their last substantive letter (copy also attached). This incorporates comments from Tony and Rod.

The majority of this letter addresses legal and procedural points. The key substantive area is section 9 on Remote Access (in particular, Rob, I'd be really grateful if you could review this section).

Following feedback from Deloitte, we cannot definitively say that PO (as distinct from FJ) never had the ability to change Horizon data because Deloitte and the current staff at FJ just don't have enough knowledge of Old Horizon to confirm this. This was a point made in an early draft but it has now been removed.

We have (I hope) now found a formulation of words that avoids having to overtly throw FJ to the wolves and avoids any risk of waiving privilege in any documents, but still gives us a fair story to tell. We have also toned down the admissions of making incorrect statements, though they are still there. I hope this might make it easier to get this letter cleared through GE and FJ.

We have a call scheduled for 5pm tomorrow with Tony which we can use to run through any comments. Comments by email before then are also welcomed.

The final version of the letter will be thoroughly proof read before sending  
so please ignore any typos.

Kind regards  
Andy

**Andrew Parsons**

Partner

Bond Dickinson LLP

<imagece3080.JPG>

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<Letter of Response.pdf>

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