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Our ref
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By email

Date
19 December 2023

Dear Solicitor to the Inquiry

Post Office Horizon IT Inquiry – Disclosure by POL: Phase 4 hearings and witnesses

We enclose a note prepared by Peters & Peters Solicitors LLP. This note refers to the Inquiry's letter dated 14 December 2023 in relation to the Phase 4 hearings and witnesses.

Yours faithfully

Herbert Smith Freehills LLP

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Post Office Horizon IT Inquiry

**Note provided by Peters & Peters regarding disclosure by POL in relation to Phase 4
hearings and witnesses**

1. Peters & Peters Solicitors LLP ("**Peters & Peters**") are assisting POL with the work in relation to the Criminal Case Studies. The content of this note has been provided by Peters & Peters.
2. In its letter dated 14 December 2023, the Inquiry directed POL to disclose the following categories of additional documents by the following deadlines:
 - a. Any additional documents said to be related to Stephen Bradshaw by 4.00pm 20 December 2023.
 - b. For all other persons in Annex 1 (of the Inquiry's letter), no later than 4.00pm 10 January 2024.
3. As confirmed in Herbert Smith Freehills' letter to the Inquiry dated 24 November 2022, the current exercise of reviewing and producing material relating to Stephen Bradshaw is complete.
4. At paragraph 5(b) (and Annex 1) of its letter, the Inquiry seeks disclosure of documents related to the Rule 9 and Section 21 requests or of interest in respect of 19 potential witnesses in the Inquiry. Taking into account the inherent constraints due to the forthcoming holiday period POL would be grateful for confirmation from the Inquiry as to which cases from the Devolved Jurisdictions the Inquiry has selected as case studies, in order that POL can begin actioning this request in respect of all potentially relevant witnesses as soon as possible. To that end POL respectfully requests this information by 4.00pm on Tuesday 19 December 2023.
5. This information is essential for POL to devise appropriate search terms to be applied over the relevant repositories managed on behalf of POL.
6. POL notes the Inquiry's position that the list of custodians included at Annex 1 of its letter is provisional only. In respect of its efforts to harvest, review, and produce material to the Inquiry, POL would be greatly assisted by any indication (as soon as the Inquiry is able to provide it) as to which of those custodians will not be called to give evidence and the order in which any witnesses will be called to give evidence.

19 December 2023

Peters & Peters Solicitors LLP