



Solicitor to the Inquiry  
Post Office Horizon IT Inquiry  
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Our ref  
9100/31043642

By email

Date  
29 December 2023

Dear Solicitor to the Inquiry

**Post Office Horizon IT Inquiry – Disclosure of documents relating to Stephen Bradshaw**

1. We refer to:
  - a. the email received from the Inquiry on 27 December 2023 at approximately 16:19 which requested the production of all outstanding material in relation to Mr Stephen Bradshaw by no later than 4 pm on Friday, 29 December 2023;
  - b. our letters to the Inquiry dated 19 and 27 December, both of which enclosed notes prepared by Peters & Peters Solicitors LLP in relation to the Phase 4 hearings and witnesses;
  - c. the Inquiry's letter dated 14 December 2023 in relation to the same topic; and
  - d. our letters to the Inquiry dated 20 October and 22 November 2023 in relation to ongoing document review and disclosure exercises.

Review exercises being conducted by this firm

2. POL is conducting ongoing disclosure related exercises, as discussed in the correspondence referenced above. In this section of this letter we address only current review exercises which are being conducted by this firm for POL (i.e., not any disclosure related exercises which have not been commenced nor any reviews that are being conducted by other firms).
3. Searches have been conducted across all ongoing review exercises to locate documents which refer to Mr Bradshaw, and/or which were sent to or received by Mr Bradshaw. For the avoidance of any uncertainty, we confirm the searches were not limited to reviews that specifically relate to Mr Bradshaw. To the contrary, a number of the reviews do not relate directly to Phase 4 hearings and/or any other witnesses who are scheduled to give evidence in the January hearings. Based on these searches, KPMG have identified 21 documents which refer to Mr Bradshaw, copies of which are enclosed with this letter.
4. Of the 21 documents identified as relating to Mr Bradshaw, we note that the tranche includes organisational charts, lists of contact details, case summaries, spreadsheets, and pleadings. None of the documents appear to be communications exchanged between Mr Bradshaw and others.

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5. Due to various pre-production checks and other steps that ~~are~~ required prior to upload to Egress, a formal production onto Egress will not be possible until the week starting 2 January 2024. In the circumstances, POL is today informally producing the 21 documents identified as relating to Mr Bradshaw by providing a zip file of the documents in native format enclosed within this letter. POL will produce these documents to the Inquiry formally as soon as possible.
6. There may be technical duplicates within the documents being informally produced today. So that the Inquiry can readily identify technical duplicates, the informal production contains a list of documents together with MD5 values.
7. As ever, it is possible that documents relating to Mr Bradshaw may be identified through other review exercises, including reviews which have not yet been commenced.

Review exercises being conducted by Peters & Peters

8. Peters & Peters are assisting POL with its disclosure in relation to the Criminal Case Studies module of Phase 4 of the Inquiry (amongst other matters). A note prepared by Peters & Peters Solicitors LLP is **enclosed**.
9. Please do not hesitate to contact us if you have any queries or wish to discuss.

Yours faithfully

*Herbert Smith Freehills LLP*

**Herbert Smith Freehills LLP**

*Enc.*

**Post Office Horizon IT Inquiry**

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

1. In its email dated 27 December 2023 (sent at 4:19pm), the Inquiry requested that all outstanding material relating to Stephen Bradshaw to be provided no later than 4:00pm on 29 December 2023. POL regrets that it is not possible to make a formal production of all outstanding material by that time.
2. The three audio tapes relating to Stephen Bradshaw's interview of "Joan Francis Bailey" (which it is assumed relate to the case of Joan Bailey) were sent by courier to a third-party company for digitisation on 27 December 2023. The digitisation process was completed on 28 December 2023 in the afternoon and the audio files are currently being transcribed.
3. POL will arrange for the informal production of the transcribed files as soon as they are completed. However, it will not be possible to make a formal production of that material until the week beginning 2 January 2024.
4. In the circumstances POL anticipates it being possible to produce the three transcripts informally, by email, on Friday 29 December 2023.
5. In respect of the additional checks for Stephen Bradshaw, relating to potential additional email addresses and display names, it has not been possible to make progress since the update provided on Wednesday 27 December 2023. That is because of the time needed to migrate data to the CCRC workspace maintained by KPMG on POL's behalf. It is currently estimated that the data will be available for review by the end of Friday 29 December 2023 (although that may be after working hours). Peters & Peters have a review team in place, and, following the application of search terms, will start to review the material as it arrives on the CCRC workspace. Should there be any new material identified of relevance to the Inquiry, POL anticipates producing it as soon as possible in the week beginning 2 January 2024.
6. POL apologises that it is unable to meet the deadline set by the Inquiry in respect of Stephen Bradshaw.

**Peters & Peters Solicitors LLP**

**29 December 2023**