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Our ref
9100/31043642

By email

Date
04 January 2024

Dear Solicitor to the Inquiry

**Post Office Horizon IT Inquiry – Disclosure of documents relating to Stephen Bradshaw –
Formal production (with related documents)**

1. We refer to the email received from the Inquiry on 27 December 2023 at approximately 16:19, seeking production of documents relating to Stephen Bradshaw by 29 December 2023. We also refer to our letter dated 29 December 2023 and the documents produced to the Inquiry informally on the same date, namely:
 - i. 21 documents informally produced at approximately 16:04 on 29 December 2023; and
 - ii. 3 documents informally produced at approximately 21:35 on 29 December 2023.
2. We also refer to:
 - a. the emails received from the Inquiry on 3 January 2024 at approximately 12:15 and 15:57, our email sent to the Inquiry at approximately 23:09 on 3 January 2024 which attached a note prepared by Peters & Peters Solicitors LLP in relation to Stephen Bradshaw;
 - b. our letters to the Inquiry dated 19 and 27 December 2023, 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 various ongoing document review and disclosure exercises.
3. The purpose of this letter is to confirm that the two sets of documents informally produced to the Inquiry on 29 December 2023, as described in paragraph 1(a) above, have been uploaded to the Inquiry's Egress platform together with production indexes.

Review exercises being conducted by Peters & Peters

4. 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).

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5. In this capacity, Peters & Peters arranged for 3 documents to be produced to the Inquiry informally on 29 December 2023. These documents were formally produced to the Inquiry as **PROD064A** on 4 January 2023.
6. Notes prepared by Peters & Peters Solicitors LLP were enclosed to our letter dated 29 December 2023 and attached to our email sent to the Inquiry at approximately 23:09 on 3 January 2024.
7. A further note prepared by Peters & Peters Solicitors LLP is set out in **Annexure B** to this letter.

Review exercises being conducted by this firm

8. The **21** documents which were formally produced to the Inquiry at approximately 16:04 on 29 December 2023, as described in paragraph 1(a)(i) above, have been loaded to Egress today as **PROD288**. POL has also produced **72** additional documents on the basis that they are either:
 - a. documents which appear within the same document families as 9 of the 21 documents informally produced at 16:04 on 29 December 2023, and which are separately responsive to Rule 9 Requests or likely to be of interest to the Inquiry; and/or
 - b. children to relevant documents (i.e., they are embedded in or attached to relevant documents), having regard to the Inquiry's request sent via email on 30 November 2023.

As such, the tranche uploaded to Egress today comprises **93** documents in total. The Production Numbers of the 21 documents which refer to Stephen Bradshaw, and which were informally produced to the Inquiry on 29 December 2023, are itemised in **Annexure A** to this letter.

9. As set out above, relevant family members of 9 of the 21 documents informally produced on 29 December 2023 have been included in this production on the basis that they are separately relevant to the Inquiry (in the sense that they are responsive to Rule 9 Requests or likely to be of interest to the Inquiry).
10. Relevant family members of the remaining 12 documents informally produced on 29 December 2023 were already contained within a broader production which will be produced to the Inquiry shortly as **PROD277**. The cover letter to PROD277 will identify the 12 documents that refer to Mr Bradshaw as they appear in that production. For the avoidance of doubt, we confirm that none of the relevant family documents in PROD288 and PROD277 (i.e., the documents not listed in Annexure A) were responsive to searches for Mr Bradshaw.
11. As explained in our letter dated 29 December 2023, searches were conducted across ongoing review exercises to locate documents which refer to Mr Bradshaw, and/or which were sent to or received by Mr Bradshaw. As ever, and as was noted in our letter dated 29 December 2023, it is possible that documents relating to Mr Bradshaw may be identified through other review exercises, including reviews which have not yet been commenced.
12. Additional information regarding the documents produced to the Inquiry today is set out below.

PROD288

13. In total, **57** documents in this production have been identified as responsive to one or more Rule 9 Requests and **25** documents have been produced on the basis that they are potentially of interest to the Inquiry. Having regard to the anticipated purpose of the relevant Rule 9 Requests, the Inquiry's Terms of Reference and the Inquiry's Protocol on Disclosure of Documents, particularly paragraph 8, POL considers it necessary to produce the documents. The details of these documents are as follows:

Rule 9 Request	Number of documents (PROD288)
Request 10	4
Request 14	4
Request 16	8
Request 30	41
Request 33	1 (also relevant to Request 14)
Of interest	25

14. In addition to the documents described at [13], **11** documents have been produced on the basis that they are embedded or attached to relevant documents. In the production index and load file, the documents which have been produced on the basis they are embedded or attached to a relevant document are referred to as 'Family' in the R9 Relevant field and index, 'Yes' in the 'Child to Relevant' field and index, and 'Other' in the R9 Request field and index. The 'family relationship' between these attachments and their hosts can be understood through the attachments' 'Begin Attachment' field, which will correspond with its host's 'Begin Bates' field. 'Junk' documents split out during processing (e.g., embedded images) have not been separately produced.
15. All documents in this production have been produced in native format, as available in Relativity.
16. Of the 93 documents being produced today, KPMG have informed us that **74** are exact duplicates of previously produced documents, and a further **7** documents are near duplicates of previously produced documents (in that they are 90-99% textually similar). Consequently, approximately **12** of the documents produced to the Inquiry today are substantively 'new'. POL has included a 'duplicate' field in the production index and load file which indicates where a document is an exact or near duplicate of a previously disclosed document, which should assist the Inquiry.
17. 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.

ANNEXURE A

Production Numbers for the 21 documents produced to the Inquiry on 29 December 2023 at approximately 16:04.

Production Number	Sort date	Unified Title
POL-0179533	26/09/2014 12:50	Pack for MPs meeting 18th June version 3d.doc
POL-0179541	26/09/2014 12:54	Pack for MPs meeting 18th June version 3d.doc
POL-0179554	19/11/2014 09:07	Pack for MPs meeting 18th June version 3d.doc
POL-0179569	21/01/2015 02:00	Pack for MPs meeting 18th June version 3d.doc
POL-0179587	04/02/2015 11:35	Pack for MPs meeting 18th June version 3d.doc
POL-0179593	04/02/2015 11:35	Pack for MPs meeting 18th June version 3d.doc
POL-0179600	05/02/2015 01:50	Pack for MPs meeting 18th June version 3d.doc
POL-0179608	27/02/2015 04:42	Pack for MPs meeting 18th June version 3d.doc
POL-0179521	25/10/2005 13:17	Discipline Report Hughie Thomas October 2005.doc
POL-0179522 (POL-0175753 in PROD277)	21/07/2006 10:44	Middle Manager Appointments v0.8.PPT
POL-0179523 (POL-0175755 in PROD277)	31/07/2006 09:03	Middle Manager Appointments v0.9.PPT
POL-0179524 (POL-0175756 in PROD277)	11/08/2006 10:02	Clerical & Admin appointments 11 August.PPT
POL-0179525 (POL-0175757 in PROD277)	11/08/2006 10:18	Clerical & Admin appointments 11 August.PPT
POL-0179526 (POL-0175758 in PROD277)	11/08/2006 10:18	Clerical & Admin appointments 11 August.PPT
POL-0179527 (POL-0175760 in PROD277)	15/09/2006 13:58	Structure charts as at 15 September.PPT
POL-0179528 (POL-0175769 in PROD277)	07/08/2008 14:53	POL Org Chart.ppt
POL-0179529 (POL-0175771 in PROD277)	20/10/2008 15:42	POL Org Chart.ppt
POL-0179610 (POL-0175963 in PROD 277)	19/11/2015 11:12	Security Team Contacts 02 March 2015.xls
POL-0179611 (POL-0176657 in PROD277)	14/01/2020 12:09	Microsoft_Excel_Worksheet9.xlsx
POL-0179612 (POL-0179421 in PROD277)	01/07/2021 12:09	RESPONDENT's NOTICE 30.7.20 SOR TO CACD (final).pdf
POL-0179613 (POL-0179426 in PROD277)	02/07/2021 10:14	RESPONDENT's NOTICE 30.7.20 SOR TO CACD (final).pdf

ANNEXURE B

Post Office Horizon IT Inquiry

Note provided by Peters & Peters regarding disclosure by POL in relation to Stephen Bradshaw's data

1. In its email dated 27 December 2023 (sent at 4:19pm), the Inquiry requested that all outstanding material relating to Stephen Bradshaw be provided no later than 4:00pm on 29 December 2023.

Audio Transcripts

2. On 29 December 2023, POL produced (by way of informal production), the transcripts of three audio tapes relating to Stephen Bradshaw's interview of "Joan Francis Boiley" (*sic* Bailey) and undertook to make formal production of that material in the week beginning 2 January 2024. POL has today formally produced those three transcripts via the Egress platform (**PROD064A**).

Material Arising from Additional Checks

3. The additional checks referred to in our notes of 27 and 29 December 2023 and 3 January 2024 in respect of Stephen Bradshaw, relating to potential additional email addresses and display names, have now concluded. POL had hoped to produce the material arising out of that review today. However, pre-production checks in respect of that material are still ongoing. POL therefore anticipates that those documents will be produced to the Inquiry via Egress tomorrow.