
From: Amy Prime [GRO]
Sent: Fri 27/07/2018 10:49:08 AM (UTC)
To: Rodric Williams [GRO]
Cc: Mark Underwood1 [GRO]; Jonathan Gribben [GRO]; Andrew Parsons [GRO]
Subject: RE: Project Zebra - Privileged document query [WBDUK-AC.FID26896945]

Rodric

Shall Andy and I call you at 1pm? Mark, do you want to join this call as well?

Many thanks
Amy

Amy Prime
Solicitor
Womble Bond Dickinson (UK) LLP

d: [GRO]
m: [GRO]
t: [GRO]
e: amy.prime [GRO]
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From: Rodric Williams [GRO]
Sent: 27 July 2018 11:34
To: Amy Prime
Cc: Mark Underwood1; Jonathan Gribben; Andrew Parsons
Subject: RE: Project Zebra - Privileged document query [WBDUK-AC.FID26896945]
Sensitivity: Private

Thanks Amy.

When do you want to speak?

From: Amy Prime [GRO]
Sent: 26 July 2018 20:14
To: Rodric Williams [GRO]
Cc: Mark Underwood1 [GRO]; Jonathan Gribben [GRO]; Andrew Parsons [GRO]
Subject: Project Zebra - Privileged document query [WBDUK-AC.FID26896945]
Sensitivity: Private

Rodric

As part of Stage 3 Disclosure we have come across a number of documents which relate to Project Zebra (Deloitte's report). Whilst most of these documents are covered by privilege and therefore do not need to be disclosed, we have come across one document relating to Project Zebra which does not seem to be covered by privileged. I have attached the email chain but the document of interest is the Zebra Action Summary attached to the email. This is a document produced in response to the Zebra Report which sets out the recommendations from the Report and the remediation which should be implemented to Horizon.

Counsel's initial view is that privilege cannot be claimed over the whole of the Zebra Action Summary but the parts which repeat or summarise the contents of the Deloitte report can be redacted. To finalise this conclusion it would be helpful to obtain some further information on the background to the Deloitte Report and the Action Summary. I have set out Counsel's questions below but **would you be available for a call tomorrow to discuss these?** Stage 3 Disclosure is due on 31 August so there is some urgency to work out how to deal with this document, apologies.

Counsel's queries:

1. For what dominant purpose was the Deloitte report commissioned – e.g. obtaining legal advice or obtaining information in connection with the conduct of anticipated litigation? Counsel would also like to understand whether the Deloitte report was also obtained for the general purpose of making Horizon more robust.
2. What are the roles within Post Office of James Rees and Emma McGinn who produced the Action Summary (Julie George was Head of Information Security); who was the Action Summary produced for; what were the roles of the individuals cc'ed to the document; and for what purpose was it produced.

If the role information is not known then WBD can find out from POL HR if these people still work for POL and their roles.

3. Was the Action Summary disseminated and any actions taken as a result of it (ie. were the recommendations implemented)?

Kind regards
Amy

Amy Prime
Solicitor
Womble Bond Dickinson (UK) LLP

d: **GRO**
m: **GRO**
t: **GRO**
e: amy.prime@wbd.com **GRO**

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