

Message

From: Rodric Williams [GRO]
on behalf of Rodric Williams <[GRO]> [GRO]
Sent: 13/03/2014 22:00:23
To: Chris Aujard [GRO]; 'andrew.parsons@[GRO]
[GRO]
CC: Belinda Crowe [GRO]
Subject: Re: Access to legal files

Sensitivity: Company Confidential

Andy - I will fwd you the dox we have around the past disclosure to give context to the response.
Kind regards, Rodric

From: Chris Aujard
Sent: Thursday, March 13, 2014 08:52 PM
To: Parsons, Andrew <[GRO]>
Cc: Belinda Crowe; Rodric Williams
Subject: Re: Access to legal files

Thanks Andy- I do agree; if you could pen something out for me to send, that would be much appreciated. Kind regards
Chris

Sent from my iPhone

On 13 Mar 2014, at 06:31 pm, "Parsons, Andrew" <[GRO]> wrote:

Chris

My thoughts on Ian's request below for access to legal files:

First, I'm not sure if this means civil legal files or prosecution files or both.

Second, providing access would almost certainly destroy any legal privilege.

Historically, I understand that SS may have had some limited access to legal files for their first report. I assume that this is the "agreement" that Ian refers to below. This was controlled (I think) under a NDA/privilege agreement. In this context, the risk to privilege was reduced because the case specific information was not being disclosed in SS report - rather they were drawing general threads from the files.

The situation now is markedly different. The info in the legal files, if disclosed to SS, is now inevitably going to the Applicants. In this situation, there is practically no chance of preserving privilege.

For this reason my recommendation is to (1) refuse disclosure of the legal files and (2) remind SS of the previous agreement so to prevent disclosure of any privileged material in their possession already (assuming that agreement exists - which I'll go away and check).

If you agree, I believe that this is something that should be addressed in writing, even if that is only an email. I'd be happy to pen something for you to send if that helps.

Kind regards
Andy

Andrew Parsons
Senior Associate
for and on behalf of Bond Dickinson LLP
Sent by blackberry
Mobile: [REDACTED] GRO

From: Belinda Crowe [REDACTED] GRO
Sent: Thursday, March 13, 2014 04:58 PM
To: Parsons, Andrew
Cc: Rodric Williams <[REDACTED] GRO >; Chris Aujard <[REDACTED] GRO >; Belinda Crowe <[REDACTED] GRO >
Subject: FW: Access to legal files

As discussed. Please copy me into any response to Ian.
Best wishes
Belinda

Belinda Crowe
[REDACTED] GRO
[REDACTED] GRO Postline: [REDACTED] GRO
[REDACTED] GRO
belinda.crowe@[REDACTED] GRO

From: Ian Henderson [REDACTED] GRO
Sent: 13 March 2014 12:57
To: Belinda Crowe
Cc: Chris Aujard; rjw [REDACTED] GRO David Oliver1
Subject: Access to legal files
Sensitivity: Confidential

Belinda

We have previously agreed that in cases where Second Sight requires access to any legal files held by POL, we will ask for the files to be recovered from storage and sent to London. I will then come in to 148 Old Street and review the files.

This is obviously much more cost effective than us asking for paper or scanned copies of the entire file, which was the previous process under the Spot Review procedures.

As a result of reviewing the latest batch of CQRs I would be grateful if you can request the following legal files:

1. M041 - Wendy BUFFERY
2. M118 - Carl PAGE

Please let me know when these files are available for me to review.

Many thanks

With best wishes

Ian R Henderson CCE CISA FCA
Advanced Forensics - London, UK

Forensic computing expert witness and electronic disclosure specialist

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