

## Message

**From:** Rodric Williams [GRO]  
**Sent:** 31/10/2018 15:03:18  
**To:** Patrick Bourke [GRO]; Mark Underwood1 [GRO];  
 Andrew Parsons [GRO]  
**Subject:** FW: Post Office Group Litigation - SUBJECT TO LEGAL PRIVILEGE - DO NOT FORWARD  
**Attachments:** Computer Weekly 29 October 2018.pdf

FYI only – update to UKGI following yesterday's Board meeting.....

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**From:** Rodric Williams  
**Sent:** 31 October 2018 15:01  
**To:** Watson, Richard - UKGI [GRO]; Fox, Joshua - UKGI [GRO]  
**Cc:** Jane MacLeod <[GRO]>; Cooper, Tom - UKGI [GRO]  
**Subject:** Post Office Group Litigation - SUBJECT TO LEGAL PRIVILEGE - DO NOT FORWARD

**Post Office Group Litigation - SUBJECT TO LEGAL PRIVILEGE - DO NOT FORWARD**

Richard, Josh,

In accordance with the Information Sharing Protocol agreed on 11 June 2018, I set out below a summary of the discussion held at the meeting of Post Office's Board on 30 October 2018 concerning the Post Office Group Litigation, which was attended by Post Office's leading counsel David Cavender QC and Andrew Parsons from Post Office Limited's solicitors Womble Bond Dickinson.

1. **Common Issues Trial**

- Strike Out Judgment. The judgment has not changed the substance of Post Office's legal case, and although it demonstrated the unpredictable nature of the judge, he continues to assert that he will follow the law in deciding the Common Issues.
- The Claimants' Case. Despite being very lengthy, the Claimants' Opening Statement (received 27 October 2018) has not added much clarity to their case, and did not raise any new argument not already addressed in our preparations.
- The "tone" of Post Office's case. The judge's comments in the Strike Out Judgment have been taken on board. We may however need to press home with the Claimant witnesses certain points necessary to Post Office's case.

2. **Horizon Issues Trial**

- The Claimants' IT expert Jason Coyne has produced his first formal report on the Horizon system.
- Mr Coyne has not identified any "smoking gun" to show Horizon has a fundamental defect. He has instead listed all the bugs he found in the Horizon technical documents to then draw the conclusion that "*it was highly likely for bugs / errors / defects to have the potential to*" cause shortfalls and undermine the reliability of Horizon.
- Mr Coyne does not however seek to explain the effect or extent of the identified bugs/errors/defects, without which there is an analytical gap linking the listed bugs etc to Mr Coyne's conclusion.
- This point will be addressed as part of Post Office's expert report, which is due to be filed on 30 November 2018.

I also take this opportunity to draw to your attention two recent press articles on the Group Litigation:

- in the Law Society Gazette reporting on the Strike Out Judgment (see link below):  
<https://www.lawgazette.co.uk/law/judge-berates-aggressive-litigation-tactics-from-an-earlier-era/5067986.article>

- in Computer Weekly (which has long covered the Postmaster Complaints), prefacing next week's Common Issues trial (see attached pdf).

Kind regards, Rodric



2017 Winner of the Global Postal Award for Customer Experience

**Rodric Williams**

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