

From: Jonathan Gribben [GRO]
Sent: Wed 06/03/2019 5:06:17 PM (UTC)
To: Anthony de Garr Robinson [GRO]
Cc: Andrew Parsons [GRO]; Simon Henderson [GRO]
Drape [GRO]; Rebecca Keating [GRO]
[GRO]
Subject: RE: Remote access queries [WBDUK-AC.FID123822914]
Attachment: Coyne Report - Remote Access 3.221 - 3.287 (3rd March).docx
Attachment: OCP 15926 (POL-0499891).pdf
Attachment: OCP 12388 (POL-0496432).pdf
Attachment: OCR 19384 (POL-0503272).pdf
Attachment: OCR 19367 (POL-0503249).pdf
Attachment: PIMAN001_1.4 (POL-0058986).doc
Attachment: PIMAN001_2 (POL-0149392).doc

Dear Tony,

This email deals with the document points in your email below.

The OCPs and OCRs are attached. I have copied in Lucy and Jane who will advise whether or not they are in the bundle/add them if not, but the general rule is that all documents referred to in a witness statement or expert report are in the bundle plus any others that have been added by either party.

There are multiple versions of the TIP Transaction Repair User Guide (PI/MAN/001):

BeginBates	File Name	Control Number	Document Date
POL-0054836	PIMAN001_0.doc	138130023	26/07/2000 13:18
POL-0054909	PIMAN001_1.3.doc	138130024	29/07/2000 10:46
POL-0058985	PIMAN001_1.4.doc	138072306	05/03/2001 13:45
POL-0058986	PIMAN001_1.4.doc	138130025	05/03/2001 13:45
POL-0148315	PIMAN001_1.5.doc	138072307	09/11/2016 13:27
POL-0149391	PIMAN001_1.6.doc	138072308	11/01/2017 11:10
POL-0149392	PIMAN001_2.doc	138072309	11/01/2017 11:18

The issue in the remote access note relates to 2009/2010, so I attach v1.4 which based on the document dates was the current version in 2009/2010 and also v2 which is the most recent version of the document.

Let me know if you want to discuss.

Kind regards
Jonny

Jonathan Gribben
Managing Associate

Womble Bond Dickinson (UK) LLP

d: **GRO**
m:
t:
e: jonathan.gribber@womblebonddickinson.com **GRO**
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**From:** Anthony de Garr Robinson **GRO****Sent:** 06 March 2019 12:29**To:** Andrew Parsons; Jonathan Gribben; Simon Henderson; Owain Draper; 'Rebecca Keating'**Subject:** Remote access queries

Dear Andy,

I've gone through the Legacy Horizon parts of your remote access notes and have the following queries on those parts:

1. Your comments on Coyne 2 paras 3.234-242, 3.247-248 and 3.249-265 have questions for Fujitsu which have not been answered. Also 5.423. These questions need to be answered quickly!
2. Paras 2.224-231 and paras 3.232-233:
 - a. You refer to OCPs for this change, but they are not in the bundle. Should they not be in the bundle (same question arises for all remote access Peaks)? Could you send over a copy of the OCPs (or OCRs?) so I can see if they demonstrate anything helpful, and if so what?
 - b. In 3.224-231, it is said that a configuration object was changed. What was the change, precisely? Given that the stock numbers in the branch accounts changed, why isn't it every bit as objectionable on Cs' case as a transaction data change? Could it not result in a false figure being inserted?
3. Paras 3.243-246:
 - a. You refer to two OCRs but they are not in the bundle. Should they not be in the bundle (same question arises for all remote access Peaks)? Could you send over a copy of the OCRs so I can see if they demonstrate anything helpful, and if so what?
3. Paras 3.247-248:
 - a. Does the TIP Transaction Repair User Guide say anything helpful? Is it in the trial bundles? Should it be?
4. Paras 3.249-262:
 - a. What was actually proposed here? Which counters would have been deleted and which counters' data would have been replaced?
 - b. What was the alternative solution that was adopted.
 - c. Why did the peak say "closing as insufficient evidence"?
 - d. The peak refers to problems with the OTI. What is the OTI and why would problems with the OTI have caused the peak to be cloned?
5. Your comment on 5.424 refers to Gareth Jenkins' comments. Can they please be set out in this note?

From: Andrew Parsons **GRO****Sent:** 06 March 2019 09:25

To: Anthony de Garr Robinson **GRO** Jonathan Gribben **GRO**
Simon Henderson **GRO** Owain Draper **GRO** 'Rebecca Keating'
GRO

Subject: RE: remote access query

Tony

The existing transaction data was not changed. Two new transactions were injected:

- One added a stock adjustment of +1p for Romanian Lei
- One added a cash adjustment for -1p.

See page 6 of the attached.

A

Andrew Parsons

Partner

Womble Bond Dickinson (UK) LLP


d: 
m: 
t: 
e: andrew.parsons@womblebond.com

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From: Anthony de Garr Robinson 
Sent: 06 March 2019 08:39
To: Andrew Parsons; Jonathan Gribben; Simon Henderson; Owain Draper; 'Rebecca Keating'
Subject: remote access query

Dear Andy and Jonny,

I don't know how I missed this, but does para 18 of SP3 mean what I think it means – that Legacy Horizon transaction injections could be used to change the opening position of stock in a branch's accounts? If so, why does he say in para 17 that branch accounts data was not modified?

Best wishes,

Tony

Anthony de Garr Robinson QC

Switchboard:

Fax:

The GRO logo, consisting of the letters 'GRO' in a bold, sans-serif font, enclosed within a dashed rectangular border.

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One Essex Court, London
Temple
London EC4Y 9AR
United Kingdom

Tel GRO
clerks GRO

One Essex Court, Singapore
Maxwell Chambers #02-15
32 Maxwell Road
Singapore 069115

Tel GRO
singapore GRO

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