

Electronic documents questionnaire

(Civil Procedure Rules Practice Direction 31B)

WARNING: Unless the court makes some other order, the answers given in this document may only be used for the purposes of the proceedings in which the document is produced unless it has been read to or by the court or referred to at a hearing which has been held in public or the Court gives permission or the party who has completed this questionnaire agrees.

Please read the notes at the end of this form before completing the questionnaire

Part 1 – Your disclosure

General Comment

The Claims in this litigation are very broad and the generic pleadings produced by the Claimants so far provide only limited details on those claims. This litigation therefore has the potential to touch on nearly all aspects of Post Office's business and the volume of disclosable documents may be enormous.

In this Electronic Disclosure Questionnaire, Post Office has sought to provide a holistic view of the documents and databases which appear, at this stage, to be potentially relevant to this litigation. It may be that a further or revised EDQ is required as the issues in dispute are further particularised and refined, and as more information becomes available.

Post Office does not believe that it would be reasonable or proportionate to disclose all the documents in all the sources identified below. It proposes, as has been agreed by the Claimants, that following exchange of the EDQs the parties discuss the purposes and topics for which further disclosure is sought and seeks to narrow the sources and / or filepaths from which disclosure is provided. The parties can then also discuss further search criteria, keywords that might be applied to those source documents so to filter down to those that are truly useful and additional technologies or analytics.

Note on Royal Mail: Post Office and Royal Mail have at all material times been two separate companies but up to 1 April 2012 Post Office was part of the Royal Mail Group and they had a number of shared IT systems. After 1 April 2012, the two companies were separated, with Post Office continuing to be owned by the UK Government and Royal Mail being privatised. Since then the IT systems have also been separated and Post Office has migrated to using its own systems. Where relevant, this point is identified below.

Extent of a reasonable search

Date range and custodians

1. What date range do you consider that your searches for Electronic Documents should cover ('the date range')?

In relation to documents which relate to individual Claimants (as per Question 6), disclosure to be limited to electronic and hard copy documents created between 6 months before the Claimant's first date of service with Post Office and (a) 6 months after the Claimant's last date of service, or (b) 6 December 2017 (whichever is earlier).

A number of the Claimants are currently acting as postmasters and thus documents continue to be generated in relation to them which may be relevant. However, a longstop date of 6 December 2017 has been selected for the practical purpose of having a cut-off date for extracting data from IT systems into a disclosure review platform. Post Office believes it is reasonable and proportionate (given the issues with extraction of data explained below) to set a longstop date.

Please see Appendix A to this Electronic Disclosure Questionnaire for the date ranges of each

Claimant.

In relation to "generic" documents, disclosure to be limited to electronic and hard copy documents created between 1 January 1999 and 6 December 2017.

Attachments to emails which do not fall within the above date ranges should be disclosed where the parent email falls within the date range.

2. Identify the custodians or creators of your Electronic Documents whose repositories of documents you consider should be searched.

Note - Include names of all those who may have or have had custody of disclosable documents, including secretaries, personal assistants, former employees and/or former participants. It may be helpful to identify different dates for particular custodians.

Please see Appendix B of this Electronic Disclosure Questionnaire for a list of Key Teams and Custodians.

As at 1 October 2017, Post Office had 4,965 contracted employees. These work from around 320 different offices and locations, with 461 of Post Office's employees either working from home or are field-based, meaning that they have no fixed office base. Consequently, Post Office will have potentially relevant documents spread amongst a significant number of people and different locations. The list of Key Teams and Custodians at Appendix B is limited to those teams and individuals who from the generic pleadings appear to be relevant to the issues in dispute. Post Office considers it reasonable and proportionate to limit its search to the custodians listed. This may change based on additional information, or if Claimants agree to limit scope and focus on specific custodians.

Communication

3. Which forms of electronic communication were in use during the date range (so far as is relevant to these proceedings)?

Note – Column D - State the geographical location (if known). Consider (at least) servers, desktop PCs, laptops, notebooks, handheld devices, PDA devices, off-site storage, removable storage media (for example, CD-ROMs, DVDs, USB drives, memory sticks) and databases.

Note – (i) email - Consider all types of e-mail system (for example, Outlook, Lotus Notes, web-based accounts), whether stored on personal computers, portable devices or in web-based accounts (for example, Yahoo, Hotmail, Gmail).

Note – (ii) Other - For example, instant messaging, voicemail, VOIP (Voice Over Internet Protocol), recorded telephone lines, text messaging, audio files, video files.

A	B	C	D	E
Communication	In use during the date range? (Yes/No)	Are you searching for relevant documents in this category? (Yes/No)	Where and on what type of software/ equipment/ media is this communication stored?	(a) Are back-ups or archives of this communication available; and (b) if so, are you searching the backups or archives?
i) E-mail	Yes	Yes	Until c.2012, Post Office employees used Lotus Notes.	A backup copy of the Lotus Notes database was taken as part of

A	B	C	D	E
			<p>Microsoft Exchange was introduced on the separation of Royal Mail and Post Office and when introduced, Post Office's employees' emails which were stored in Lotus Notes were transferred into Microsoft Exchange.</p>	<p>the migration exercise and it may be possible, though not straight forward, to identify and export data from this backup. Post Office does not believe it would be necessary to access this copy due to the transfer of data into Microsoft Exchange.</p> <p>When Microsoft Exchange was introduced Post Office also introduced email archiving - initially by Proofpoint and from February / March 2016 onwards by Mimecast.</p> <p>The emails stored in Proofpoint were transferred into Mimecast. These archives store all emails sent to or from a Post Office employee and emails cannot be removed from the archive (unless special permissions are granted to do so). It is understood that this archive will hold emails dating back to 2012 including for Post Office employees who no longer work for the business.</p>
<p>ii) Other (provide details for each type)</p>	<p>(a) Skype Instant Messaging (b) SMS (c) Voicemail (d) Recorded calls</p>	<p>(a) No (b) No (c) No (d) Yes</p>	<p>(a) to (c) – No (d) Databases identified in Question 5.</p>	<p>(a) Instant Messages would be held in each Custodian's "Conversation Folder" in Microsoft Exchange. There is no archiving. (b) – (d) The archiving of documents depends on the databases in which they are stored. A response to this question is therefore provided in Question 5.</p>

Electronic Documents

4. Apart from attachments to e-mails, which forms of Electronic Documents were created or stored by you during the date range?

Note – Column D - State the geographical location (if known). Consider (at least) servers, desktops and laptops.

Note – Electronic images - For example, .pdf, .tif, .jpg.

Note – Other - For example, PowerPoint or equivalent, specialist documents (such as CAD Drawings).

A	B	C	D	E
Document Type	In use during the date range? (Yes/No)	Are you searching for relevant documents in this category? (Yes/No)	Where and on what type of software/ equipment/ media are these documents?	(a) Are back-ups or archives of these documents available, and (b) if so, are you searching the back-ups or archives?
Please see Appendix C				

Databases of Electronic Documents

5. In the following table identify database systems, including document management systems, used by you during the date range and which may contain disclosable Electronic Documents.

A	B	C	D	E
Name	Brief description	Nature of data held	Are you disclosing documents held in this database? (Yes/No)	Proposals for provision of relevant documents to or access by other parties to this litigation
Please see Appendix D for the databases on which Electronic Documents are stored. Please see Appendix E for information on the databases held by third parties. For completeness, Appendix F contains information on the storage of hardcopy documents.				

Method of search

Key words

Note - Where Keyword Searches are used in order to identify irrelevant documents which are to be excluded from disclosure (for example a confidential name of a client or customer), a general description of the type of search may be given

6. Do you consider that Keyword Searches should be used as part of the process of determining which Electronic Documents you should disclose? Yes No

If Yes, please provide details of –

(1) the keywords used or to be used (by reference, if applicable, to individual custodians, creators, repositories, file types and/or date ranges); and

In relation to documents that specifically refer to a Claimant, Post Office proposes to apply the following key words to identify those documents:

(Claimant's First Name or Claimant's Last Name) AND (Branch Name or Branch Code or Company Name) or Mediation Case Number.

For example, a document which included the terms "Alan" or "Bates" and "Craig-y-don" or "461614" would be identified as a document which is relevant to Alan Bates, as would a document including the term "M137".

This is subject to the assumption that the number of documents deemed to be keyword responsive is not disproportionate or unreasonable. These keywords will be considered further after the data has been extracted, keywords applied and the results discussed with the Claimants' legal advisors.

As addressed in Womble Bond Dickinson's letter of 24 November 2017, Post Office proposes that following the exchange of EDQs, the parties discuss the other topics on which further disclosure is sought and then seek to agree appropriate key words for these topics.

(2) the extent to which the Keyword Searches have been or will be supplemented by a review of individual documents.

All documents and their family members deemed to be keyword responsive will be individually reviewed to determine their relevance (and to redact or remove any material that is legally privileged).

This is subject to the assumption that the number of documents deemed to be keyword responsive is not disproportionate or unreasonable to be individually reviewed. This will be determined after the data has been extracted, keywords applied and the results discussed with the Claimants' legal advisors.

Other types of automated searches

7. Do you consider that automated searches or automated techniques other than Keyword Searches (for example, concept searches or clustering) should be used as part of the process of determining which Electronic Documents you should disclose? Yes No

If Yes, please provide details of –

(1) the process(es) used or to be used (by reference, if applicable, to individual custodians, creators, repositories, file types and/or date ranges);

This will be reviewed once the potentially responsive material has been collected, indexed and an overview has been obtained as to whether keywords will be appropriate. Again, that review will include discussion with the Claimants' legal advisors.

(2) the extent to which the processes have been or will be supplemented by a review of individual documents; and

Documents identified as potentially relevant by any searches will be subject to a review.

(3) how the methodology of automated searches will be made available for consideration by other parties.

This is something that will be considered in due course once a view has been reached as to what searches or techniques are appropriate.

8. If the answer to Question 6 or 7 is 'Yes', state whether (a) attachments to e-mails (b) compressed files (c) embedded files and (d) imaged text will respond to your Keyword Searches or other automated search.

Yes, Post Office proposes that documents which would not be responsive are converted into an OCR document so as to be responsive to keywords.

Documents which cannot be converted to OCR (such as call recordings), will be subject to manual review. This is subject to the assumption that the number of documents is not disproportionate or unreasonable to be individually reviewed. This will be determined after the data has been extracted, keywords applied and discussion with the Claimants' legal advisors.

9. Are you using or intending to use computer software for other purposes in relation to disclosure? Yes No

If Yes, please provide details of the software, processes and methods to be used.

Subject to the issue of proportionality it is envisaged that having collected the data it will be indexed, non-searchable files containing text will be OCR'd and a fully searchable database of the material will be prepared – with any documents that cannot be included being identified.

In addition, it is proposed that a litigation review database (kCura Relativity) will be used to maximise the efficiency of the review exercise.

Potential problems with the extent of search and accessibility of Electronic Documents

Note - See Practice Direction 31B, which refers to the following matters which may be relevant: (a) the number of documents involved; (b) the nature and complexity of the proceedings; (c) the ease and expense of retrieval of any particular document; (d) the availability of documents or contents of documents from other sources; and (e) the significance of any document which is likely to be located during the search.

10. Do any of the sources and/or documents identified in this Electronic Documents Questionnaire raise questions about the reasonableness of the search which ought to be taken into account? Yes No

If Yes, please give details.

(a) Sharepoint

Post Office has already engaged a third party e-disclosure provider to forensically extract and preserve potentially relevant documents from SharePoint. This was a considerable project requiring input from ComputaCenter (Post Office's IT supplier that manages access to SharePoint), as well as internal input from Post Office's data and information security teams, IT team and owners of the SharePoint sites. During this extraction a number of issues were encountered and these may re-occur during future extractions.

- Due to the security permissions being setting up in a granular manner (enabling access to one area of SharePoint does not enable access to other areas) there were and may be further issues creating a user account for the third party e-disclosure provider which enables an appropriate level of access for documents to be forensically extracted.
- Once access to SharePoint was obtained, Nuix (the collection tool) was unable to communicate with SharePoint.
- The above matters have now been resolved but similar difficulties may be faced with further extractions from SharePoint.

(b) Transaction and event data:

As addressed in Womble Bond Dickinson's letter of 22 November 2017 (a copy of which is enclosed at Appendix G), Post Office has been informed by Fujitsu that there are a vast number of fields available in the Horizon database which hosts the transaction and event data and that over time these fields have changed. Post Office therefore proposes it would be reasonable and proportionate that the data is filtered so that it only includes those fields which relate to transactions and events which would affect a branch's accounts.

To disclose the unfiltered data would require it to be extracted in a .txt format (rather than in .xlsx which can be read by Excel) and converted into a readable format. Further, the unfiltered data would be between 10GB and 1000B of data per branch per month depending on the size of the branch and the activity in that branch during the month. This compares to the 1 MB of data per month in the filtered format. The hosting of 400 months of unfiltered data by Post Office's third party e-discovery partner would cost between £100,000 and £1 million per a month.

The Claimants have not yet responded on this proposal and it will therefore be discussed between the parties following exchange of the EDQs.

(c) Proprietary databases:

A number of the databases used by Post Office are proprietary databases which require specialist software to review the data in an intelligible format. These databases are often not set up for mass extraction of data and where it is not possible to extract documents in their native format, then it is proposed that the documents are (where possible) exported to commonly used software such as Excel. Further, responsibility for these proprietary databases during the relevant period has been passed between companies and Post Office is reliant on the third parties for the transfer of this data between systems and the assistance of third parties to access this data.

(d) Other:

It is not anticipated that there will be other problems but until the extraction of documents begins it is impossible to guarantee this.

11. Are any documents which may be disclosable encrypted, password-protected or for other reasons difficult to access, or do you have any reason to believe that they may be? Yes No

If Yes, please state which of the categories identified at Questions 3, 4 and 5 above are affected, and your proposals for making them accessible.

Note - For example, back-ups, archives, off-site or outsourced document storage, documents created by former employees, documents stored in other jurisdictions, documents in foreign languages.

Please see Appendix C. A number of the documents contain coding information that, while often intelligible from the text, would need to be viewed in its native program to see the intended format.

12. Are you aware of any other points in relation to disclosure of your Electronic Documents which require discussion between the parties? Yes No

If Yes, please give details.

As addressed above, there is a need to agree search terms, filtering of transaction and event data, process for exchanging documents and the extent of disclosure which is to be provided in relation to "generic documents". These matters shall be discussed between the parties following exchange of EDQs.

Preservation of Electronic Documents

13. Do you have a document retention policy? Yes No

If Yes, please give details

The majority of the Post Office's documents are retained for a period of 7 years, however the specific document retention policies depend on the type of document and team. Please see Question 5 for further information.

When an employee ceases to be an employee of Post Office, their laptops are re-distributed within the business. Their emails would remain stored in Mimecast (as explained further in Question 3) and documents stored in SharePoint.

14. Have you given an instruction to preserve Electronic Documents? Yes No

If Yes, when did you do so?

Yes, 20 April 2016 and 12 May 2017.

Inspection

15. Subject to re-consideration after receiving the responses of other parties to this Electronic Documents Questionnaire, (a) in what format and (b) on what media do you intend to provide to other parties copies of disclosed documents which are or will be available in electronic form?

Please see Appendix H which sets out the Post Office's proposals made to the Claimants on 14 November 2017. This matter will be discussed between the parties following the exchange of EDQs.

16. Subject to re-consideration after receiving the responses of other parties to this Electronic Documents Questionnaire, do you intend to provide other parties with Disclosure Data electronically?

If Yes, in what format and on what media?

See Question 15, above. The format and media / method of delivery will be agreed with the other party and could involve USB stick or hard drive or sftp transfer - depending on volumes and what is agreed.

17. Insofar as you have available or will have available searchable OCR versions of Electronic Documents, do you intend to provide the searchable OCR version to other parties? Yes No

Note - There is no requirement that you should obtain OCR versions of documents, and this question is directed only to OCR versions which you have available or expect to have available to you. If you do provide OCR versions to another party, they will be provided by you on an 'as is' basis, with no assurance to the other party that the OCR versions are complete or accurate. You may wish to exclude provision of OCR versions of documents which have been redacted.

If No, why not?

N/A

Part 2 - The disclosure of other parties

The extent and content of their search

18. Do you at this stage have any proposals about the date ranges which should be searched by other parties to the proceedings? Yes No

If Yes, please provide details.

Same as Question 1.

19. Do you at this stage have any proposals about the custodians or creators whose repositories of documents should be searched for disclosable documents by other parties to the proceedings? Yes No

If Yes, please provide details.

Note - Include names of all those who may have or have had custody of disclosable documents, including secretaries, personal assistants, former employees and/or former participants. It may be helpful to identify different dates for particular custodians.

As raised with the Claimants on 30 May 2017, Post Office proposes that the following custodians should be within scope for searching:

- (a) Claimants;
- (b) Claimant's accountants / financial advisors;
- (c) Claimant's previous lawyers;
- (d) Claimant's insolvency practitioners (where applicable);
- (e) Claimant's estate agents (where Claimant is seeking to claim loss of investment)
- (f) HMRC / Claimant's tax advisors;
- (g) Claimant's medical advisors (where Claimant is seeking to claim personal injury);
- (h) other business advisors;
- (i) Claimant's branch managers or assistants; and
- (j) Claimant's family member (where Claimant is seeking to claim for losses caused to them).

20. Do you consider that the other party(ies) should disclose all available Metadata attaching to any documents? Yes No

If Yes, please provide details of the documents or categories of documents.

Note - 'Metadata' is information about the document or file which is recorded in the computer, such as the date and time of creation or modification of a word-processing file, or the author and the date and time of sending of an e-mail. The question is directed to the more extensive Metadata which may be relevant where for example authenticity is disputed.

Disclosure is sought of all available files in their native format together with a load file indexing that material and holding the key metadata fields – in the same way as is contemplated for disclosure by Post Office as outlined in our response to Question 15 above.

Proposals for the method to be adopted for their searches

21. Do you at this stage have any proposals about the Keyword Searches, or other automated searches, which should be applied by other parties to their document sets? Yes No

If Yes, please provide details.

As stated at Question 12 above, this is something that will need to be discussed and agreed in due course.

Inspection

22. Subject to re-consideration after receiving the responses of other parties to this Electronic Documents Questionnaire, (a) in what format and (b) on what media do you wish to receive copies of disclosed documents which are or will be available in electronic form?

(a) The format in which the documents were created.

(b) The media / method of delivery will be agreed with the other party and could involve USB stick or hard drive or sftp transfer - depending on volumes and what is agreed.

23. Subject to re-consideration after receiving the responses of other parties to this Electronic Documents Questionnaire, do you wish to receive Disclosure Data electronically? Yes No

If Yes, in what format and on what media?

See response to Question 22 above.

STATEMENT OF TRUTH

The Defendant believes that the facts stated in the answers to this Electronic Documents Questionnaire are true.

I am duly authorised by the Defendant to sign this statement.

Full name: Andrew Paul Parsons

Name of legal representative's firm: Womble Bond Dickinson

Signed:

GRO

Position or office held:
(if signing on behalf of firm or company)

Partner

Date: 6 December 2017

Claim No: HQ16X01238 and HQ17X02637

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

THE POST OFFICE GROUP LITIGATION

B E T W E E N:

ALAN BATES & OTHERS

Claimant

AND

POST OFFICE LIMITED

Defendant

APPENDIX A

Please refer to the spreadsheets provided with the EDQ to Freeths on 6
December 2017

Appendix B

Post Office's proposals for Post Office's Key Custodians

No.	Team	Team Summary	Key Custodians	Date on which commenced role	Date on which ceased role
1.	Agent Accounting Team	Handles shortfalls in the branches of current postmasters. Team of approx. 10.	Dawn Phillips (Team Leader – Agent Accounting and Santander Banking)	November 2016, held other similar roles for Post Office since 15 April 2013	Current
2.			Dawn Wall (Team Leader – Agent Accounting and Cash Control, Personal Banking & Stock)	06 June 1994	Current (changed role in November 2016)
3.			Team inbox: <div style="border: 1px dashed black; padding: 2px; display: inline-block;">GRO</div>		
4.	Former Agent Debt	Handles shortfalls in the branches of former postmasters. Team of approx. 5.	Michelle Stevens (Team Leader)	05 February 1996	Current
5.			Jenny Smith	04 July 1994	Current
6.			Team inbox: <div style="border: 1px dashed black; padding: 2px; display: inline-block;">GRO</div>		
7.	NT Programme and Policy	Team responsible for developing the strategy and policies relating to Network Transformation and the associated contracts. Part of wider NT team of approx. 600 individuals. Approx. 10 members of this team.	Peter Johnson (Head of Policy and Strategy Network Transformation)	January 2016, held other similar roles for Post Office since February 1986	Current
8.			Samantha Benton (Network Transformation Policy Manager)	April 2013	Current
9.	Contract and Policy	Team responsible for	Paul Inwood (Contracts and Policy Development)	1 April 2010, held various	Current

No.	Team	Team Summary	Key Custodians	Date on which commenced role	Date on which ceased role
10.	Development	developing contracts and policies which cover the lifecycle of a postmaster. Team of approx. 12.	Manager)	similar roles with Post Office since 1 April 1986	
			Stewart Barclay (Postmaster Contracts Policy Advisor)	1 January 2003, held various similar roles for Post Office since 07 February 1986	Current
11.	Scheduling & Admin	Team responsible for the training of postmasters. Team of approx. 12.	Lee Heil (Team Leader)	August 2008	Current
12.			Donna Squires (Admin Advisor)	2003	Current
13.			Paul O'Leary (Team Leader)	June 2012	Current
14.			Sandra McBride	6 April 1986	September 2017
15.			Sue Richardson (Network Operations Support Manager)	5 December 1988	December 2017
16.			Jackie Newton (Head of Learning)	28 August 1984	Current
17.			Team inbox: network.support.admin@ GRO		
18.	Contracts	Team manages the contractual relationship between Post Office and postmasters. Team of approx. 40.	John Breeden (Head of Agency Contracts Deployment, previously Agent Contracts Deployment Manager North)	1 April 2005, held similar roles with Post Office since 6 January 1997	Current
19.			Craig Tuthill (Head of Agency Contracts Deployment)	04 February 1980	31 March 2017
20.			Lin Norbury (Agent Contracts Deployment Manager South)	13 August 1971	31 July 2017
21.			Keith Bridges (Agent Contracts Deployment	1 August 2017	Current

No.	Team	Team Summary	Key Custodians	Date on which commenced role	Date on which ceased role
22.			Manager North)		
			10 Contract Advisors	Various between 1999 and 2017	Various between 1999 and 2017
23.	NBSC	Team responsible for the main helpline contacted by postmasters. Team of approx. 100 individuals.	Kendra Dickinson (Senior Service and Performance Manager)	February 2016, been employed by Post Office since c.1986 with various similar roles	Current
24.			Gayle Peacock (Head of Branch Customer Services)	November 2015, been employed by Post Office in various roles since November 2001	Current
25.			Dean Whitehead (Workforce Manager)	February 2014	Current
26.			Nigel Davies (Training and Quality Manager)	February 2014	Current
27.			5 Team Leaders	Various	Various
28.	Branch Support Services (2006 to 2016)	Worked alongside Contract Advisors and NBSC.	Andrew Kenny	29 April 2002	Current
29.			Anne Allaker (Change and Improvement Manager, Branch and Customer Support)	29 July 1991	April 2017
30.			Team inbox: branch.support.team@postoffice.gro and branch.support.services.team@postoffice.gro		
31.	Security Operations	Team handles security issues and investigations into fraudulent activity. Team of approx. 20.	Sharron Logan	July 2007	Current
32.			Helen Dickinson	2000	Current
33.			John Scott	22 February 1993	30 September 2016

No.	Team	Team Summary	Key Custodians	Date on which commenced role	Date on which ceased role
34.			Amy Quirk (Head of Security Operations and Intelligence)	12 January 2015	4 April 2017
35.			Mark Raymond (Head of Security Operations)	April 2017, employed by Post Office in other similar roles since January 2016	Current
36.			Chris Knight	April 2004	Current
37.	Support Services Resolution	Assists postmasters and Post Office to resolve issues which have arisen in branches. Team of approx. 10.	Kath Alexander (SSRT and Mediation Case Review Manager)	August 2013, employed by Post Office in other roles since June 1983	Current
38.			Shirley Hailstones (SSRT and Mediation Case Review Manager)	September 2013, employed by Post Office in other roles since June 1988	Current
39.			8 SSRT Advisors	Various	Various
40.			Team inbox: support.services.resolution@GRO		
41.	Cash Management, Fraud Analysis and Branch Standards	Team handles branch requests for cash and carries out fraud and branch standards analysis.	Andrew Keighley (Retail Cash Manager)	November 1983	Current
42.			Doug Brown (Senior Retail Cash Manager)	January 1985	Current
43.			Rebecca Porch (Team Manager)	October 2002	Current
44.			Kelly Bloodworth (Team Manager)	August 2016	Current
45.			Kim Abbotts (Head of Fraud Analysis and Branch Standards)	April 2017, employed by Post Office in other similar roles since March	Current

No.	Team	Team Summary	Key Custodians	Date on which commenced role	Date on which ceased role
				1987	
46.			Sally Smith (Head of Financial Crime)	October 2016, employed by Post Office in other similar roles since September 2011	Current
47.	Financial Services Centre	The individuals named are Team Leaders for the areas within the Financial Services Centre which may relate to the Group Action.	Alison Bolsover (Debt Recovery Manager)	29 April 1985	Current
48.			Lorraine Garvey (FSC Enquires Manager)	05 March 2001	31 December 2016
49.			Paul Smith (Ops Support Manager)	24 June 1996	Current
50.		The Financial Services Centre is made up of approx. 100 people.	Gillian Hoyland (Ops Support Manager)	24 February 1986	Current
51.			Tracey Mather (Cheques & Moneygram Team Leader)	26 January 1987	Current
52.			Allison Walton (Lottery & Cards Team Manager)	12 June 1995	Current
53.			Kay Wilson (Settlement Manager)	20 January 1997	Current
54.			Jackie Whitman (Settlements Team Leader)	01 August 1994	Current
55.		Tracy Middleton (Automated Payment Enquires Manager & Stock Team Leader)	11 January 1988	Current	
56.		Carol King (Accounts Payable Team Leader)	24 March 1986	Current	
			Mark Wood (Risk & Compliance Manager, Moneygram Team)	TBC	Current
57.	Agent Application Processing	Team manages the application process from initial applications, interviews	Sarah Rimmer (Agent Application Manger)	May 2004	May 2017
58.			Sheinaze Aboobaqar (Agent Application Manger)	May 2017	Current

No.	Team	Team Summary	Key Custodians	Date on which commenced role	Date on which ceased role
		and issuing of contracts. Team of approx. 15.			
59.	Network Operations	Team assist to arrange further training for postmasters and broader support which may be required.	Colette McAteer (Network Operations Support Manager)	04 September 2000	Current
60.			Theresa Raybould (Team Leader)	09 April 2001	March 2017
61.			John B Jenkinson (Agent Services Manager)	TBC	TBC
62.	IT		Dave King (Senior Technical Security Assurance Manager)	1996	Current
63.			Paula Jenner (Head of IT Service for Finance and Operations)	21 June 1993	Current
64.	HR		Naomi McKay (Support Service Team Manager, previously HR Advisor)	10 March 2014	Current
65.			Chris Howard (Agency Remuneration Development Manager)	07 July 1980	Current
66.	Recruitment	Work alongside the Agent Application Team.	Jo Stammers	09 February 2004	Current
67.			Hector Campbell	17 December 1979	31 July 2017
68.			Tracey Wilkes (Centre Manager)	06 November 1995	Current
69.	Sales Capability, Branch Standards & Network Conformance	Provide postmasters with sale support and analysis of sales. Team of approx. 45.	Craig Perrins (Head)	15 August 2005	Current
70.			Team inbox		
71.	Relationship Manager	Worked alongside the Contract Advisors to resolve	Andrew Winn	22 November 1996	30 June 2016

No.	Team	Team Summary	Key Custodians	Date on which commenced role	Date on which ceased role
		branch issues.			
72.	Mediation Scheme	Team set up to manage the Mediation Scheme.	Mark Underwood (Head of Portfolio: Legal, Risk & Governance)	April 2017, joined Post Office in September 2014	Current
73.			Patrick Bourke (Corporate Affairs Director)	April 2017, joined Post Office in September 2014	Current
74.			Angela Van den Bogerd (People & Change Director)	01 April 1985	Current
75.			Tom Wechsler (Government and Payments Services Director)	April 2007, joined Post Office in September 2014	Current
76.			Belinda Crowe (Complaint Review & Mediation Scheme Programme Director)	01 January 2014	31 March 2015
77.			David Oliver (Complaint Review & Mediation Scheme Programme Manager)	TBC	November 2014
78.	<i>Legal (documents relating to these custodians will not be extracted due to privilege)</i>		Jarnail Singh	18 December 1989	06 March 2015
79.			Rodric Williams	20 August 2012	Current
80.			Jane Mcleod (Group Legal, Risk & Governance Director)	TBC	Current
81.	Group Communications, Brand & Corporate Affairs: Communications Delivery	Responsible for communications with branches.	Jonathan Knox (Production & Channels Manager, Internal Communications)	26 June 2006	Current
82.			Mark Horne (Production Advisor, Internal Communications & Engagement)	15 September 1998	Current

APPENDIX C
Electronic Documents

Document Type	In use during date range?	Are you searching for relevant documents in this category?	Where and on what type of software / equipment / media are these documents?	(a) Are back-ups or archives of these documents available, and (b) if so, are you searching the back-ups and archives?
Microsoft Word	Yes	Yes - depending on agreement between Post Office and Claimants on data sources and filetypes to be searched for disclosure.	Documents which are stored in the locations identified in Question 5.	The archiving of documents depends on the databases in which they are stored. A response is therefore provided in Question 5.
Microsoft Excel	Yes	Yes - depending on agreement between Post Office and Claimants on data sources and filetypes to be searched for disclosure.	As above	As above
Microsoft PowerPoint Presentation	Yes	Yes - depending on agreement between Post Office and Claimants on data sources and filetypes to be searched for disclosure.	As above	As above
Microsoft Access Database	Yes	Yes - depending on agreement between Post Office and Claimants on data sources and filetypes to be searched for disclosure.	As above	As above
Microsoft Project	Yes	Yes - depending on agreement between Post Office and	As above	As above

		Claimants on data sources and filetypes to be searched for disclosure.		
Microsoft MapPoint	Yes	No - Would require a copy of MS MapPoint to review these documents which was discontinued in 2014.	As above	As above
Microsoft Publisher	Yes	Yes - depending on agreement between Post Office and Claimants on data sources and filetypes to be searched for disclosure.	As above	As above
Microsoft Works Documents	Yes	Yes - depending on agreement between Post Office and Claimants on data sources and filetypes to be searched for disclosure.	As above	As above
Microsoft XPS Document	Yes	Yes - depending on agreement between Post Office and Claimants on data sources and filetypes to be searched for disclosure.	As above	As above
CompuServe GIF Portable Network Graphics Format JPEG Post Script	Yes	No - From a review of the documents which have been extracted from Post Office to date, documents of this type have predominately been attachments to emails which contain image files of the email footer (i.e. Post Office's logo).	As above	As above.
Calendar items Including: Microsoft Outlook Schedule, Microsoft Outlook Appointment, iCalendar Entry, vCalendar	Yes	Yes - depending on agreement between Post Office and Claimants on data sources and filetypes to be searched for disclosure.	As above	As above

Extensible Markup Language (XML)	Yes	Yes - depending on agreement between Post Office and Claimants on data sources and filetypes to be searched for disclosure.	As above	As above.
MHTML				
Plain text (UTF-8 encoded Text)				
Ini Style Configuration File		Note – these files typically contain coding information that, while often intelligible from the text, would need to be viewed in its native program to see the intended format. This may require proprietary software.		
Microsoft OLE2 File				
HTML Documents	Yes	Yes - depending on agreement between Post Office and Claimants on data sources and filetypes to be searched for disclosure.	As above	As above
Microsoft Outlook Email	Yes	Yes - depending on agreement between Post Office and Claimants on data sources and filetypes to be searched for disclosure.	As above	As above
Microsoft Outlook Contact	Yes	No	As above	As above.
Microsoft Outlook Sticky Note	Yes	Yes - depending on agreement between Post Office and Claimants on data sources and filetypes to be searched for disclosure.	As above	As above
Rich Text Format	Yes	Yes - depending on agreement between Post Office and Claimants on data sources and filetypes to be searched for disclosure.	As above	As above.
Windows Bitmap Graphic	Yes	No	As above	As above

Media files Including: Windows Sound, Windows Media Audio and Video files, MPEG Audio and Video files, QuickTime Multimedia File, Resource Interchange File Format, Microsoft Advanced Systems Format Multimedia Fil	Yes	Yes - depending on agreement between Post Office and Claimants on data sources and filetypes to be searched for disclosure.	As above	As above
Microsoft Windows Metafile	Yes	Yes - depending on agreement between Post Office and Claimants on data sources and filetypes to be searched for disclosure.	As above	As above
Microsoft Visio	Yes	Yes - depending on agreement between Post Office and Claimants on data sources and filetypes to be searched for disclosure.	As above	As Above.
Internet Mail Message	Yes	Yes - depending on agreement between Post Office and Claimants on data sources and filetypes to be searched for disclosure.	As above	As above
Open Office	Yes	Yes - depending on agreement between Post Office and Claimants on data sources and filetypes to be searched for disclosure.	As above	As above
Lotus Documents	Yes	Yes - depending on agreement between Post Office and Claimants on data sources and filetypes to be searched for disclosure.	As above	As above

APPENDIX D

Databases of Electronic Documents

POST OFFICE'S DATABASES

Name	Brief description	Nature of data held	Are you disclosing documents held in this database (Yes/No)	Proposals for provision of relevant documents to or access by other parties to this litigation
Lotus Notes and Microsoft Exchange	<p>Microsoft Exchange is Post Office's principal email software used by all employees. Microsoft Exchange was introduced by Post Office in c.2012.</p> <p>Prior to Microsoft Exchange, Post Office employees within Royal Mail used Lotus Notes.</p> <p>Please see Question 3 for an explanation of archiving.</p> <p>It is anticipated that an average user can be expected to send and receive 31,000 emails a year. Extracting the accounts of all the Key Custodians for one year would therefore capture around 2,511,000 emails (plus attachments).</p>	As set out in Question 4.	Yes – subject to reasonable and proportionate search parameters being agreed between the parties following exchange of EDQs.	<p>Make available in native format (.msg file).</p> <p>Where documents have redacted, documents to be made available in PDF or tiff format.</p>
SharePoint	<p>Web-based Microsoft platform on which documents are held in shared workspaces. SharePoint was introduced by Post Office in 2012 and holds records dating back to then. If a document is deleted from SharePoint then these documents are potentially restorable for approximately 60 days, following which they are permanently deleted.</p>	As set out in Question 4.	Yes - the workspaces to be considered for disclosure are to be discussed and will need to be agreed between the parties following exchange of EDQs.	Either make available in native format or where it is not possible to extract documents in their native format, then export to an alternative form as appropriate.

	<p>The entirety of SharePoint is approx. 1.5 TB of data and a list of the workspaces within Post Office's SharePoint is enclosed at the end of this Appendix.</p>			
E-Filing Cabinets	<p>From around 2004 to the introduction of SharePoint, Post Office used E-Filing Cabinets within Lotus Notes for the storage of electronic documents.</p> <p>The E-Filing Cabinets were on a server hosted by Royal Mail. Following Post Office's separation from Royal Mail on 1 April 2012, access to the E-Filing Cabinets was lost.</p> <p>On 28 June 2017, Royal Mail provided Post Office with a copy of the E-Filing Cabinets. However, this copy is not complete with, for example, some attachments to emails and files embedded in other documents having been lost.</p>	As set out in Question 4	Yes – to the extent possible, and subject to reasonable and proportionate search parameters being agreed between the parties following exchange of EDQs.	Either make available in native format or where it is not possible to extract documents in their native format, then export to an alternative form as appropriate.
Laptops and One Drive	<p>Since March 2016, Post Office has used a cloud based platform called One Drive. One Drive synchronises with the documents held in the "My Documents" folder for a user. If a document is deleted from either the "My Documents" folder or from One Drive then these documents are potentially restorable for approximately 60 days, following which they are permanently deleted.</p> <p>Prior to One Drive, Post Office's employees stored their documents in shared network locations on a windows servers. When Post Office transitioned</p>	As set out in Question 4.	Yes – to the extent possible, subject to reasonable and proportionate search parameters being agreed between the parties following exchange of EDQs.	Either make available in native format or where it is not possible to extract documents in their native format, then export to an alternative form as appropriate.

	<p>from the shared network locations to One Drive, each employee was responsible for transferring their documents into One Drive. Post Office still has the servers which hold the shared network locations (including for Post Office employees who have left the business) and will be kept by Post Office for the next 7 years.</p> <p>There is 25 TBs of data stored in the shared network locations.</p>			
Network Drives	<p>Alongside SharePoint some teams use shared networks drives.</p> <p>For example:</p> <p>(i) the Security and Legal teams store documents in the L: Drive. In July 2015, the data was collected from these drives and amounts to 201,187 documents.</p> <p>(ii) the Remuneration and Application teams store documents in the T: Drive.</p> <p>(iii) NBSC store documents in the N:Drive.</p>	As set out in Question 4.	Yes - subject to reasonable and proportionate search parameters being agreed between the parties following exchange of EDQs.	Either make available in native format or where it is not possible to extract documents in their native format, then export to an alternative form as appropriate.
Horizon	<p>Transaction and event data Transaction data is the line-by-line record of each transaction processed in a branch. Event data records events on Horizon such as logging on and off, printing certain reports, etc. In Horizon Online (i.e. since 2010) this data is input on terminals in a branch and then transmitted to and stored in central data centres.</p> <p>Transaction and event data is held in the</p>	As set out in Question 4.	<p>Transaction and event data To retrieve all transaction and event data for all of the Claimants will be a considerable undertaking. Fujitsu have informed Post Office that to extract one month of data for a branch takes 1 ½ hours. To extract a years' worth of data for all Claimants would take approx. 10,000 man hours. This is a technical limitation on the system.</p>	Either make available in native format or where it is not possible to extract documents in their native format, then export to an alternative form as appropriate.

<p>central data centres for a period of seven years. After 7 years, the data is usually deleted at regular intervals. In October 2014, as part of the Mediation Scheme, Post Office instructed Fujitsu to stop deleting transaction and event data. Post Office understand that Fujitsu currently holds transaction and event data for all branches dating back to October 2007.</p> <p>Counter logs Post Office understand from its discussions with Fujitsu that there are a number of logs held on the terminals and not stored in the data centre. The two which may, depending on the circumstances, be of relevance are:</p> <ul style="list-style-type: none"> • The "postofficecounterlog" which contains data concerning interactions between the terminal and the PINpad, rateboard and printer; information messages from the Counter Business Application (e.g. identifying button presses and messages which appear on the terminal screen); and the building of reference data for use by the Horizon application. • The "messagelog" which contains information about messages sent from the counter to the data centre and the responses received from the data centre. <p>The logs are held on a terminal for a period of 30 days, following which they are overwritten. Fujitsu can extract the</p>		<p>Disclosure of transaction and event data will be given, but will need to focussed to particular Claimants and dates in order to be provided in a timely manner.</p> <p>Counter logs No.</p> <p>On 28 September 2017, Womble Bond Dickinson made proposals to Freeths on the preservation of the relevant counter logs. This proposal explained that to extract the logs for all Claimants who are live postmasters (approx. 140) would take around 280 hours every month (since process would need to be run every 30 days due to the over writing of the data). This would be unreasonable and disproportionate.</p> <p>Post Office therefore proposed that if a Claimant believes they have experienced a technical issue with Horizon, and if the NBSC and HSD have been unable to resolve the issue to the satisfaction of the Claimant, they may request the counter log from Fujitsu.</p>	
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	<p>logs from a terminal through a manual process which takes approximately two hours.</p> <p>There are other logs on the terminal, such as a log which shows how much memory is in use and logs which relate to the windows operating system. However, Post Office does not believe that these are relevant.</p>			
POLSAP	<p>POLSAP is a database which records financial information and accounting ledgers. It has been in use since 2005.</p> <p>Data in POL SAP which is more than 7 years old is archived. Post Office understands that no data should have been deleted from this archive.</p> <p>In March 2018, Post Office will stop using POLSAP and move to Core Finance and steps have been taken to preserve POLSAP when it is taken offline.</p> <p>As at July 2017, POLSAP contained 6.5 TB of live data and 17.7 TB of archived data.</p>	As set out in Question 4.	<p>Yes</p> <p>POLSAP is a database provided on licence by SAP. To extract data, reports must be run to produce information in a format that can be understood and interpreted.</p> <p>Following exchange of EDQs the parties can discuss the reports to be run.</p>	<p>Either make available in native format or where it is not possible to extract documents in their native format, then export to an alternative form as appropriate.</p> <p>Alternatively, it may be that the Claimant can inspect POLSAP on site at Post Office.</p>
Core Finance	<p>Database within which the Financial Services Centre records financial information – similar to POLSAP.</p> <p>From around 1 September 2014 certain teams began using Core Finance instead of POLSAP. Core Finance does not archive data and all data should be available on the system.</p> <p>As at September 2017, Core Finance</p>	As set out in Question 4.	<p>Yes</p> <p>Similar to POLSAP, to extract data from Core Finance, reports must be run to produce information in a format that can be understood and interpreted.</p> <p>Following exchange of EDQs the parties can discuss the reports to be run.</p>	<p>Either make available in native format or where it is not possible to extract documents in their native format, then export to an alternative form as appropriate.</p> <p>Alternatively, it may be that the Claimant can inspect Core Finance on site at Post Office.</p>

	contained 1 TB of data.			
HRSAP	<p>Database within which information is held on Post Office's employees, postmasters and assistants.</p> <p>Records date back to 2003 when HRSAP was introduced. HRSAP does not archive data and all data should be available on the system.</p> <p>HRSAP is due to be replaced in February 2018. Post Office is putting in place measures to ensure that this data is preserved.</p>	As set out in Question 4.	<p>Yes</p> <p>HRSAP is a database provided on licence by SAP. To extract data, reports must be run to produce information in a format that can be understood and interpreted.</p> <p>Following exchange of EDQs, the parties can discuss the reports to be run.</p>	Either make available in native format or where it is not possible to extract documents in their native format, then export to an alternative form as appropriate.
Remedy	<p>Call centre software used for logging calls to the NBSC between 2000 and 2014. When Post Office switched from Remedy to Dynamics the majority of call logs from Remedy were loaded into an Access database.</p> <p>The logs describe briefly the nature of the question and the answer given.</p>	As set out in Question 4.	Yes – subject to reasonable and proportionate search parameters being agreed between the parties following exchange of EDQs.	Either make available in native format or where it is not possible to extract documents in their native format, then export to an alternative form as appropriate.
Dynamics	<p>Call centre software used for logging calls to the NBSC between 2014 to present.</p> <p>The logs describe briefly the nature of the question, the answer given and where appropriate refer to an article in the Knowledge Base.</p> <p>Between 2014 and 3 November 2017 the NBSC have been recording calls for training and monitoring purposes. Call recordings are deleted after 3 months (save where copied into SharePoint).</p>	As set out in Question 4.	Yes – subject to reasonable and proportionate search parameters being agreed between the parties following exchange of EDQs.	Either make available in native format or where it is not possible to extract documents in their native format, then export to an alternative form as appropriate.

	<p>Post Office is in the process of changing the call recording provider and as such the recordings were temporarily suspended on 4 November 2017.</p> <p>Since 2014, Dynamics has also been used by the training team to keep records of postmaster's training. The previous records were stored in a no longer active Access database which has been exported into Excel for preservation.</p>			
Knowledge Base	Stores the articles referred to by the NBSC's advisors. There are currently approx. 5,000 articles within Knowledge Base. Historic articles have not been archived. This database is run from SharePoint.	As set out in Question 4.	Yes – subject to reasonable and proportionate search parameters being agreed between the parties following exchange of EDQs.	Either make available in native format or where it is not possible to extract documents in their native format, then export to an alternative form as appropriate.
Credence	Management information tool that provides, for example, the value, dates and times of transactions. Credence was introduced in c.2009 and provides access to the previous 24 months of data.	As set out in Question 4.	No - Credence processes data which is held in other databases, for example the transaction and event data available through Horizon, data from HRSAP, etc.	N/A
HORice	Tool used by Security team during investigations. HORice provides access to previous 6 months of transaction and event data.	As per Question 4.	No - Horizon feeds certain transaction and event data into HORice.	N/A
iMAP	Database which contains branch information used by the Network Design and Analysis team.	As per Question 4.	Yes – subject to reasonable and proportionate search parameters being agreed between the parties following exchange of EDQs.	Either make available in native format or where it is not possible to extract documents in their native format, then export to an alternative form as appropriate.
Network Reinvention Database	Includes dates of service of Post Office's agents.	As per Question 4.	Yes – subject to reasonable and proportionate search parameters being agreed between the parties	Either make available in native format or where it is not possible to extract documents in their native format, then

			following exchange of EDQs.	export to an alternative form as appropriate.
Huddle	Huddle is a project management and document storage platform that was used throughout the Complaint Review and Mediation Scheme.	As per Question 4.	Yes – subject to reasonable and proportionate search parameters being agreed between the parties following exchange of EDQs.	Make available in native format.
EASE / Knowledge Centre	<p>Prior to 2010, records of training were held in the E-Filing Cabinets.</p> <p>After 2010, the training team and audit teams combined to make the field team. Their records were then held on a platform called EASE. EASE is also used to store policy documents. Post Office is due to replace EASE with Knowledge Centre. In anticipation of the replacement of EASE, most documents have been moved to the new platform.</p>	As per Question 4.	Yes – subject to reasonable and proportionate search parameters being agreed between the parties following exchange of EDQs.	Either make available in native format or where it is not possible to extract documents in their native format, then export to an alternative form as appropriate.
Success Factors and Tortora LMS	<p>Success Factors is a cloud based management platform provided by SAP used by the Post Office Learning Academy. It is an online portal to provide training and resources to postmasters. Success Factors was introduced at the end of 2016.</p> <p>Similarly, Tortora is an online learning management system used the training team.</p>	As per Question 4.	Yes – subject to reasonable and proportionate search parameters being agreed between the parties following exchange of EDQs.	Either make available in native format or where it is not possible to extract documents in their native format, then export to an alternative form as appropriate.
Combat	Web-based platform used by the Sale Capability, Branch Standards and Network Conformance Team.	As per Question 4.	Yes – subject to reasonable and proportionate search parameters being agreed between the parties following exchange of EDQs.	Either make available in native format or where it is not possible to extract documents in their native format, then export to an alternative form as appropriate.

LIST OF SHAREPOINT WORKSPACES

Size (in MB)	Url	Title
6	https://poluk.sharepoint.com/sites/app_catalog	POL APP CATALOG
2163	https://poluk.sharepoint.com/sites/A908	NTProjects
272	https://poluk.sharepoint.com/sites/A1098	Glasgow Team Site
1	https://poluk.sharepoint.com/sites/Area1Team51	Area 1 Team
556	https://poluk.sharepoint.com/sites/Robotics	Robotics
17	https://poluk.sharepoint.com/sites/SampleTeam	Sample Team
1	https://poluk.sharepoint.com/sites/121s	121's
1	https://poluk.sharepoint.com/sites/Area7Team57	Area 7 Team
70840	https://poluk.sharepoint.com/sites/A853	HRSC Bolton
1001	https://poluk.sharepoint.com/portals/Post-Office	Post Office
1	https://poluk.sharepoint.com/sites/Area3Team80	Area 3 Team
31096	https://poluk.sharepoint.com/sites/POA006	Network & Sales
1	https://poluk.sharepoint.com/portals/CIO	CIO
149	https://poluk.sharepoint.com/sites/Training	Training
82	https://poluk.sharepoint.com/sites/BOVendorManagement	BO Vendor Management
2	https://poluk.sharepoint.com/sites/K2Demo	K2 Demo

1777	https://poluk.sharepoint.com/sites/Pathfinder	Pathfinder
2000	https://poluk.sharepoint.com/sites/POLIntegrationCentreofExcellenceTeam	POL Integration Centre of Excellence Team
8	https://poluk.sharepoint.com/sites/ProcurementSystemsImprovement	Procurement Systems Improvement
1	https://poluk.sharepoint.com/sites/Objectives	Objectives
1	https://poluk.sharepoint.com/sites/Area7Team14	Area 7 Team
1	https://poluk.sharepoint.com/sites/Area1Team36	Area 1 Team
509	https://poluk.sharepoint.com/sites/Workflow	Workflow
1	https://poluk.sharepoint.com/sites/Area5Team14	Area 5 Team
17	https://poluk.sharepoint.com/sites/Fit&Proper	Fit & Proper
95837	https://poluk.sharepoint.com/sites/A674	Property Projects Team
1	https://poluk.sharepoint.com/sites/Area7Team69	Area 7 Team
1	https://poluk.sharepoint.com/sites/Area8Team47	Area 8 Team
1	https://poluk.sharepoint.com/sites/TheWildWest	The Wild West!
160	https://poluk.sharepoint.com/sites/A1288	Newcastle CVIT Team Site
5	https://poluk.sharepoint.com/sites/IT Portfolio Office	IT Portfolio Office
14379	https://poluk.sharepoint.com/sites/A1069	Information Services Chesterfield
1	https://poluk.sharepoint.com/sites/Area9Team79	Area 9 Team
367	https://poluk.sharepoint.com/sites/A1139	MS Payout Implimentation
2	https://poluk.sharepoint.com/sites/FAandGovernance	Financial Accounting and Governance

5	https://poluk.sharepoint.com/sites/K2	K2 Home
695	https://poluk.sharepoint.com/sites/A999GPTest	Gareth Payne Alerting Test
1	https://poluk.sharepoint.com/sites/BOResourcing	BO Resourcing
1	https://poluk.sharepoint.com/sites/Area10Team69	Area 10 Team
2	https://poluk.sharepoint.com/sites/BOFLMGTPROD	BOFLMGTPROD
665	https://poluk.sharepoint.com/sites/POA005	Survey Central
11	https://poluk.sharepoint.com/sites/FraudAnalsisTeam	Fraud Analsis Team
1	https://poluk.sharepoint.com/sites/RVP	RVP
1	https://poluk.sharepoint.com/sites/OnePostOffice13	One Post Office
1	https://poluk.sharepoint.com/sites/BusinessandITCommsDiscussion	Business and IT Comms Discussion
1	https://poluk.sharepoint.com/sites/TelcoHackathon	Telco Hackathon
1	https://poluk.sharepoint.com/sites/DMBDeliveryLeadTeam	DMB Delivery Lead Team
247	https://poluk.sharepoint.com/sites/DBSIdentityChecksS4-023-00	DBS Identity Checks (S4-023-00)
108	https://poluk.sharepoint.com/sites/POMSHR	POMS HR
1	https://poluk.sharepoint.com/sites/FraudAnalyticsteam	Fraud Analytics team
1	https://poluk.sharepoint.com/sites/TechnicalBOTStream	Technical BOT Stream
1	https://poluk.sharepoint.com/sites/DynamicsCRM	Dynamics CRM (TDC)
15517	https://poluk.sharepoint.com/sites/POLNMSP1	POLNMSP1
96187	https://poluk.sharepoint.com/sites/ResolveRepository	Resolve Repository

1	https://poluk.sharepoint.com/sites/SeanL-FS&TLRG&POMS	Sean L - FS&T, LRG & POMS
1	https://poluk.sharepoint.com/sites/Area10Team42	Area 10 Team
1	https://poluk.sharepoint.com/sites/StaffHub994b9	K2 Dev Team
51	https://poluk.sharepoint.com/sites/ARTProject	ART Project
1	https://poluk.sharepoint.com/sites/TEST19	TEST
1	https://poluk.sharepoint.com/sites/TeamTony86	Team Tony
5240	https://poluk.sharepoint.com/sites/Property Finance Team	Property Finance Team
9136	https://poluk.sharepoint.com/sites/SCPlanningPerformance&Change	Planning Performance & Change
1	https://poluk.sharepoint.com/sites/Star	Star
6	https://poluk.sharepoint.com/sites/PCE	PCE
382	https://poluk.sharepoint.com/sites/Project Panther	Project Panther
2	https://poluk.sharepoint.com/sites/Pensions	Pensions
1	https://poluk.sharepoint.com/portals/FSAM-North	FSAM North
8	https://poluk.sharepoint.com/sites/IPA	IPA
1	https://poluk.sharepoint.com/sites/Area3Team89	Area 3 Team
1	https://poluk.sharepoint.com/sites/KennyLamontNorth	Kenny Lamont North
1	https://poluk.sharepoint.com/sites/ClosedProjects	Closed Projects
1	https://poluk.sharepoint.com/sites/FRESEngagement	FRES Engagement
1	https://poluk.sharepoint.com/sites/OnePostOffice66	One Post Office

1	https://poluk.sharepoint.com/sites/POLGE	POL GE
1	https://poluk.sharepoint.com/sites/workflow.admin	Workflow
2	https://poluk.sharepoint.com/sites/OfficeSpace	Office Space
1	https://poluk.sharepoint.com/portals/hub	PointPublishing Hub Site
1	https://poluk.sharepoint.com/sites/CustomerExperience	Customer Experience
2	https://poluk.sharepoint.com/sites/RoystonHouse	Royston House
8	https://poluk.sharepoint.com/sites/SecurityPO	Security@PO
3	https://poluk.sharepoint.com/sites/RemoteDesktopSupport	Remote Desktop Support
2	https://poluk.sharepoint.com/sites/NetworkPartnershipsTeam	The Hive
1	https://poluk.sharepoint.com/sites/OnePostOffice41	One Post Office
1	https://poluk.sharepoint.com/sites/TransactionSimplificationSDT1	Transaction Simplification SDT1
1	https://poluk.sharepoint.com/sites/BOTStakeholderMgnt	BOT Stakeholder Mgnt
1	https://poluk.sharepoint.com/sites/BSTDataTeam	BST Data Team
70949	https://poluk.sharepoint.com/sites/A1012	Customer Driven Enquiries
294	https://poluk.sharepoint.com/sites/A1010	Strategy and Change Team
1	https://poluk.sharepoint.com/sites/NDProgramme77	ND Programme
206	https://poluk.sharepoint.com/sites/C4Grads	C4 Grads
5	https://poluk.sharepoint.com/sites/POLEnterpriseArchitects	POL Enterprise Architects
2	https://poluk.sharepoint.com/sites/MainsDevelopmentAdvisors	Mains Development Advisors

1067	https://poluk.sharepoint.com/sites/A489	POL NT Database Project
1	https://poluk.sharepoint.com/sites/Area5Team93	Area 5 Team
1	https://poluk.sharepoint.com/sites/staffordcasestudy	stafford case study
23	https://poluk.sharepoint.com/sites/RetailLeadTeam	Retail Lead Team
47779	https://poluk.sharepoint.com/sites/A1011	Client Settlement
1	https://poluk.sharepoint.com/sites/OurUnitLaunch	Our Unit Launch
1	https://poluk.sharepoint.com/sites/Area9Team44	Area 9 Team
1	https://poluk.sharepoint.com/sites/Area9Team47	Area 9 Team
1	https://poluk.sharepoint.com/sites/POLGeneral	POL General
1	https://poluk.sharepoint.com/sites/Area6Team55	Area 6 Team
1	https://poluk.sharepoint.com/sites/wc04September2017	wc 04 September 2017
18	https://poluk.sharepoint.com/sites/TeamTony97	Team Tony
56	https://poluk.sharepoint.com/	intranet
49362	https://poluk.sharepoint.com/sites/A1014	Debt Recovery
1	https://poluk.sharepoint.com/sites/Area10Team21	Area 10 Team
1	https://poluk.sharepoint.com/sites/ITApprentices	IT Apprentices
379038	https://poluk.sharepoint.com/sites/postoffice	the hub
8727	https://poluk.sharepoint.com/sites/A092	National Storage & Distribution Centre Swindon
79	https://poluk-my.sharepoint.com/	

1	https://poluk.sharepoint.com/sites/LRGPurchaseOrders	LRG Purchase Orders
1	https://poluk.sharepoint.com/sites/Area6Team19	Area 6 Team
14	https://poluk.sharepoint.com/sites/ChangeManagementSystems	Change Management Systems
938	https://poluk.sharepoint.com/sites/POLDev	POL Development Site
573	https://poluk.sharepoint.com/sites/Identityservicesstrategy504	Identity services strategy
3	https://poluk.sharepoint.com/sites/ITSecurity&OperationsLeadershipteam	IT Security & Operations Leadership team
1	https://poluk.sharepoint.com/sites/Area1Team89	Area 1 Team
1	https://poluk.sharepoint.com/sites/Area2Team94	Area 2 Team
3614	https://poluk.sharepoint.com/sites/Extranet	Post Office Extranet
1	https://poluk.sharepoint.com/sites/Area1Team69	Area 1 Team
10	https://poluk.sharepoint.com/sites/RiskLeadershipForum	Risk Leadership Forum
14	https://poluk.sharepoint.com/portals/community	Community
9	https://poluk.sharepoint.com/sites/MainsSalesManagers	Mains Sales Managers
115	https://poluk.sharepoint.com/sites/CRMTablets	CRM+ Tablets
1	https://poluk.sharepoint.com/sites/Area5Team23	Area 5 Team
1180	https://poluk.sharepoint.com/sites/BIM	BIM
1360	https://poluk.sharepoint.com/sites/BackOfficeTransformation	BOT ARCHIVED
27	https://poluk.sharepoint.com/search	
1	https://poluk.sharepoint.com/portals/personal/darrenjones1	darren.jones1

32	https://poluk.sharepoint.com/sites/Swansea CVIT Shared	Swansea CVIT Shared
1	https://poluk.sharepoint.com/sites/test107	test
1	https://poluk.sharepoint.com/sites/Team5	Team 5
74	https://poluk.sharepoint.com/sites/CIOPeople	CIO People
51	https://poluk.sharepoint.com/sites/ManagementInformation	BOT Management Info
1	https://poluk.sharepoint.com/sites/Area9Team57	Area 9 Team
1	https://poluk.sharepoint.com/sites/Area2Team83	Area 2 Team
1	https://poluk.sharepoint.com/sites/thehub	the hub
110	https://poluk.sharepoint.com/sites/A796	North - Sales Capability Managers
2	https://poluk.sharepoint.com/sites/K2UAT	K2UAT
7573	https://poluk.sharepoint.com/sites/A1028	POL Core Finance
1974	https://poluk.sharepoint.com/sites/A1207	London East Cash Centre
1	https://poluk.sharepoint.com/sites/OnePostOffice71	One Post Office
42	https://poluk.sharepoint.com/sites/Prism	Prism
2	https://poluk.sharepoint.com/sites/one	one
58	https://poluk.sharepoint.com/sites/Products	Products
2	https://poluk.sharepoint.com/sites/BDC	BDC
27029	https://poluk.sharepoint.com/sites/A1013	Open Item Enquiries
10	https://poluk.sharepoint.com/sites/JoinersMoversLeavers	Joiners Movers & Leavers

58	https://poluk.sharepoint.com/sites/A1068	Business Information Management
1	https://poluk.sharepoint.com/sites/Area4Team2	Area 4 Team
1	https://poluk.sharepoint.com/portals/personal/syedmraza	syed.m.raza
1	https://poluk.sharepoint.com/sites/BIM-MasterDataTeam	BIM - Master Data Team
28	https://poluk.sharepoint.com/sites/Identity	Identity
10	https://poluk.sharepoint.com/sites/Postmaster Remuneration and Policy Team	Postmaster Remuneration and Policy Team
146	https://poluk.sharepoint.com/sites/P6	P6
1	https://poluk.sharepoint.com/sites/Area6Team15	Area 6 Team
1	https://poluk.sharepoint.com/sites/ATM	ATM
1	https://poluk.sharepoint.com/sites/Workduties	Work duties
1	https://poluk.sharepoint.com/sites/CommunicationsDelivery	Communications Delivery
1	https://poluk.sharepoint.com/sites/DigitalCheckandSend-POL-Accenture-Gemalto	Digital Check and Send - POL/Accenture/Gemalto
1	https://poluk.sharepoint.com/portals/personal/maximlathwaite	maxim.lathwaite
3	https://poluk.sharepoint.com/sites/eDiscovery	Millnet EDiscovery
18	https://poluk.sharepoint.com/sites/RoysAreadailyReport	Roy's Area daily Report
1	https://poluk.sharepoint.com/sites/Vetting-StrategicSolution	Vetting- Strategic Solution
1	https://poluk.sharepoint.com/sites/Panther	Panther
1	https://poluk.sharepoint.com/sites/StaffDutyCover	Staff Duty Cover
5	https://poluk.sharepoint.com/sites/DesignAuthority	Design Authority

1	https://poluk.sharepoint.com/sites/Agencybranch	Agency branch
86	https://poluk.sharepoint.com/sites/Securitytransformation	Security transformation
10	https://poluk.sharepoint.com/sites/ATMWorkingGroup	ATM Working Group
1	https://poluk.sharepoint.com/sites/NDProgramme63	ND Programme
1	https://poluk.sharepoint.com/portals/personal/michaelarlington	michael.arlington
1	https://poluk.sharepoint.com/sites/ND	ND
232	https://poluk.sharepoint.com/sites/A979	OD Team Site
17	https://poluk.sharepoint.com/sites/ProductManagersDevelopment	Product Managers Development
2	https://poluk.sharepoint.com/sites/BOFLMGTDDEV	BOFLMGTDDEV
1	https://poluk.sharepoint.com/sites/Area4Team15	Area 4 Team
4849	https://poluk.sharepoint.com/sites/NDStrategy	ND Strategy
11833	https://poluk.sharepoint.com/sites/A654	Network Design & Analysis Team
5226	https://poluk.sharepoint.com/sites/BTTP Training Design Team	Learning Design Team - Projects
1	https://poluk.sharepoint.com/sites/test	test
323	https://poluk.sharepoint.com/sites/Measurement & Reporting Key Database	Measurement & Reporting Key Database
1	https://poluk.sharepoint.com/sites/TeamRhi	Team Rhi
1005	https://poluk.sharepoint.com/sites/Drop & Go Project	Drop & Go
1	https://poluk.sharepoint.com/sites/TEST66	TEST
6	https://poluk.sharepoint.com/sites/SSKProcurement	SSK Procurement

1	https://poluk.sharepoint.com/portals/personal/alinalingard	alina.lingard
22865	https://poluk.sharepoint.com/sites/A997	Supply Chain Operations Team Drives
1469	https://poluk.sharepoint.com/sites/A044	Network Gateway
1	https://poluk.sharepoint.com/sites/Area4Team98	Area 4 Team
1	https://poluk.sharepoint.com/sites/NetworkSolutions	Network Solutions
1	https://poluk.sharepoint.com/sites/Chesterfield	Chesterfield
1	https://poluk.sharepoint.com/sites/rotherham	rotherham
106	https://poluk.sharepoint.com/sites/LondonDailyReports	London Daily Reports
1	https://poluk.sharepoint.com/sites/Area2Team76	Area 2 Team
6036	https://poluk.sharepoint.com/sites/A1071	Physical Security Sharepoint Site
1	https://poluk.sharepoint.com/sites/Area6Team78	Area 6 Team
1	https://poluk.sharepoint.com/sites/TEST752	TEST
11	https://poluk.sharepoint.com/sites/skms_dev	SKMS Development

APPENDIX E

Third Party Electronic Documents

A range of third parties provide support and services to Post Office and may hold documents which are relevant to this litigation. Whilst many of these documents are not within Post Office's control and therefore do not fall to be disclosed by it, in the interests of assisting the Claimant and the Court, Post Office sets out below a high level overview of these documents.

It should be noted that to assess whether documents held by third parties fall within Post Office's control will not be a straightforward task, It will require a close reading of the relevant contractual documents between Post Office and the relevant Third Party and precise identification of the documents or information in question. Post Office considers that this assessment is best done retrospectively, after a document or class of documents has been identified as being needed for this litigation. It may also be the case that some third parties (eg. Fujitsu) would be willing to voluntarily disclose some documents regardless of whose control they are under. It is therefore most cost effective and constructive to deal with issues of control on an iterative basis.

Third Party	Brief description of documents and information	Nature of information held	Are these documents within the scope of disclosure?	Proposals for provision of relevant documents to or access by other parties to this litigation
Products and Services	<p>Post Office offers in excess of 100 products and services to customers (eg. Lottery, DVLA, bill payments, etc.).</p> <p>Some of these products and services have their own bespoke databases of information within Post Office.</p> <p>Furthermore, most of these products and services are provided by third parties and re-sold by Post Office. The third party product / service suppliers (known as "Clients" within Post Office) may hold information about related customer transactions in their own IT systems.</p>	<p>Various but likely to include all commonly used file types (eg. Word, pdf, etc.), communication methods (eg. email, phone, etc,) and file storage (eg. Sharepoint, shared drives, etc.).</p> <p>It may also include various customised and proprietary databases.</p>	<p>No</p> <p>The Generic pleadings do not refer to any specific product or service and Post Office therefore considers that these documents are currently outside the scope of disclosure.</p> <p>If, as this litigation progresses, issues are raised in relation to specific products or services, a further EDQ may be filed providing more detail on these databases and the documents held by relevant third parties.</p>	<p>N/A</p>

<p>IT Support Partners</p>	<p>Post Office has had numerous IT support partners between 1999 and present. This includes Accenture, ATOS CompuCenter and Fujitsu. Each may hold information relating to Horizon and other relevant IT systems.</p> <p>Due to the central role of Horizon in this litigation, more detailed information on the documents held by Fujitsu is set out below.</p>	<p>Various</p>	<p>Save for Fujitsu, no.</p> <p>It is expected that the majority of the information held by these support partners will be mirrored inside Post Office on emails held by Key Custodians or in Post Office's databases.</p> <p>If, as this litigation progresses, issues are raised in relation to specific areas supported by a third party IT support partner, a further EDQ may be filed providing more detail on the documents held by that third party.</p> <p>In relation to documents held by Fujitsu, disclosure of these documents can be discussed following exchange of EDQs.</p>	<p>N/A</p>
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FUJITSU DOCUMENTS

Fujitsu provides a range of IT services to Post Office in relation to the Horizon system throughout the relevant period. As a result, there are a significant number of documents within Fujitsu's possession which may be relevant. Below is a high level overview of:

- the locations of documents held by Fujitsu that are potentially relevant to the Claim;
- the types of document held by Fujitsu that are potentially relevant to the Claim; and
- comments regarding the ease and proportionality of disclosure of the documents.

This information has been provided by Fujitsu to Post Office.

Document type / Database	Nature of data held	Comments
Known Error Log (KEL)	The KEL is a proprietary database with approximately 4,000 entries containing information which is used by Fujitsu to explain how to deal with or work around minor issues that can sometimes arise in Horizon and Horizon Online for which (often because of their triviality) system-wide fixes have not been developed and implemented.	<p>The KEL only contains the current database entries and is constantly updated and so the current version will not necessarily reflect the version that was in place at the relevant time. The previous entries / versions of the current entries are no longer available.</p> <p>The KEL cannot be easily downloaded as it is stored on a database. Even then, unless one has the necessary database software, reading the data in the KEL is difficult. The alternative is to manually copy or print each entry, but this would produce poorly formatted material and would take significant effort.</p> <p>In light of this, the Claimant's IT expert has inspected the KEL at Fujitsu's offices.</p>
Dimensions	Dimensions is a configuration management system in which Fujitsu keeps a library of the key technical documents relating to Horizon and Horizon Online. The documents range from high level designs to detailed designs of the system and its code, along with documents that describe hardware that is used in the system. A full index of these documents has been provided to the Claimant's solicitors.	<p>The documents are formatted in various formats including Word, PDF, Excel, PowerPoint, Visio and in a zipped format. Most documents can be extracted from Dimensions.</p> <p>A small number of older (pre-2001) documents that are believed to be non-Fujitsu documents were received in hardcopy and not scanned in. It may be possible to locate the hardcopies in archives or it may be that another party is better placed to provide these documents if relevant.</p>

Peak System	If Fujitsu identifies an issue in Horizon or Horizon Online that requires a programmatic fix then it is logged in its database, the Peak System, and labelled as a 'Peak'.	If Fujitsu identifies an issue in Horizon that requires a programmatic fix then it is logged in its database, the Peak System, and labelled as a 'Peak'.
TFS and Powerhelp	<p>Post Office and its agents have access to a help desk called Horizon Service Desk (HSD) to manage technical issues with Horizon – HSD was provided by Fujitsu prior to June 2014 (and has been provided by ATOS since that date).</p> <p>Between 2001 and September 2009, Fujitsu used Powerhelp to log calls. From September 2009 onwards, Fujitsu used Triole for Service (TFS), a proprietary database, to log calls made to HSD.</p>	TFS call logs date back to September 2009. These call logs could be extracted from TFS into an Excel document. Powerhelp may contain call logs for the period between 2001 and September 2009, however, Fujitsu has advised that the Powerhelp servers are still stored but they do not currently have the means to access them; they would have to recreate a ring fenced network running Windows 2003 (the redundant software on which Powerhelp was run).
SharePoint and shared drives Projectweb	<p>SharePoint has been used by Fujitsu since c.2008 to store and share documents it produces relating to Post Office .</p> <p>Shared drives are also used for a similar purpose.</p> <p>Prior to 2008, Fujitsu used a self-built system, Project Web, for this purpose. This system is still available in a read-only format, although access to the system is by temporary arrangement because it is a legacy system.</p>	<p>As explained in relation to the extraction of documents from Post Office's SharePoint, similar issues may be encountered when extracting documents from Fujitsu's SharePoint.</p> <p>Documents stored in SharePoint, shared drives and ProjectWeb are generally regarded as uncontrolled, working documentation that is not held in a completely formalised structure, in contrast to the Dimensions depository.</p>
Emails	The vast majority of Fujitsu's internal communications take place via email.	<p>Fujitsu does not operate a formal email archiving policy or system. Therefore, to the extent that any emails are not stored in other accessible locations, availability will be limited to those held in individual users' email accounts. As users have a storage limit on their accounts, emails are routinely deleted from the user's own email account but may be subsequently stored in locally held .pst files.</p> <p>On average, between 250 to 400 people at Fujitsu work on Post Office's account at one time. Consequently, there have been thousands of people at Fujitsu who have worked on Horizon over the 17 years since the system was developed.</p>
Local computers	It is possible that Fujitsu staff will have also stored relevant documents locally on their individual Fujitsu PCs or local storage devices. It is believed that most users will also	

	have saved any such documents into another networked repository (even if only via email).	
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APPENDIX F
Hardcopy documents

Name	Brief description	Nature of data held	Are you disclosing documents held in this database (Yes/No)	Proposals for provision of relevant documents to or access by other parties to this litigation
<p>Hard copy documents</p> <p>Several teams are still paper-based or regularly use paper records and for the sake of completeness we have listed below.</p>	<p>Former Agent Debt</p>	<p>The Former Agent Debt team in FSC is an example of a team that is primarily paper-based. Documents for current postmasters are stored at Post Office's Chesterfield office and documents relating to former postmasters are archived by Box-It (formerly Iron Mountain) at Post Office's Chesterfield office. These files are organised by an account reference that ties to POL SAP.</p>	<p>Yes</p>	<p>OCR documents.</p>
	<p>Current Agent debt</p>	<p>Limited hard copy documents stored at Post Office's Chesterfield office. Majority of documents would be a duplication of documents stored in SharePoint or Core Finance.</p>	<p>Yes</p>	<p>OCR documents.</p>
	<p>Contract Advisors</p>	<p>The Contract Advisors team keep electronic records in</p>	<p>Yes</p>	<p>OCR documents.</p>

Name	Brief description	Nature of data held	Are you disclosing documents held in this database (Yes/No)	Proposals for provision of relevant documents to or access by other parties to this litigation
		<p>Lotus Notes, SharePoint and One Drive but also hard copy files. Current postmaster files are kept at Post Office's Chesterfield offices. These files are organised by branch. Former postmaster files are stored off-site. If a Postmaster's file has been closed and archived for a period of more than 6 years, the file may be securely destroyed. This process is now on hold.</p>		
	Security	<p>The Security team maintains electronic files but also hard copy files, referred to internally as "Green Jackets". These files are primarily stored in Chesterfield but would also be circulated amongst Post Office's Legal or Fraud teams, or to external legal advisers so may be stored in other locations.</p>	Yes	OCR documents.
	Branch records	<p>Postmasters are required as part of branch process to run certain reports every month and retain a paper copy. Once an agent's contract terminates, Post Office will typically remove this documentation from the branch and store it off-site</p>	Yes	OCR documents.

Name	Brief description	Nature of data held	Are you disclosing documents held in this database (Yes/No)	Proposals for provision of relevant documents to or access by other parties to this litigation
		<p>with Box-It or Iron Mountain. Destruction of files within these facility has been placed on hold. Claimants who are current postmasters will hold these records within their branches.</p> <p>Some of the reports are not printed on A4 sheets but on till rolls which are several feet. long. Each branch will have generated reports each month, potentially generating dozens of boxes of paper over the course of several years. Following exchange of EDQs the parties will discuss the reasonableness and proportionality of disclosing these documents.</p>		
	Mediation Scheme	Hard copy documents are stored in the cash centre in Swansea and Post Office's Finsbury Dials office.	Yes	OCR documents.

Claim No: HQ16X01238 and HQ17X02637

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

THE POST OFFICE GROUP LITIGATION

B E T W E E N:

ALAN BATES & OTHERS

Claimant

AND

POST OFFICE LIMITED

Defendant

APPENDIX G

womblebonddickinson.com



22 November 2017

Womble Bond Dickinson (UK) LLP

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Third letter

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By post and email

Our ref:
AP6/AP6/364065.1369
Your ref:
JXH/1684/2113618/1

Email: james.hartley@freeths.com **GRO**

Dear Sirs

**The Post Office Group Action
Disclosure of Transaction and Event Data**

We refer to paragraph 4(a)(iv) of the CMC Order which concerns the disclosure of the transaction and event data (the Data). We write to provide Post Office's proposals on the format in which this data is disclosed.

We have been informed by Fujitsu that there are a vast number of fields available in the database which hosts the Data and that over time these fields have changed. When Fujitsu extract the Data it is usually filtered so that it only includes those fields which relate to transactions and events which would affect a branch's accounts. At Schedule 1 is an example of the Data and the fields which are extracted through running this report, along with an explanation of the fields.

To disclose the unfiltered Data would require it to be extracted in a .txt format (rather than in .xlsx which can be read by Excel) and converted into a readable format. Further, the unfiltered Data would be between 10GB and 100GB of data per month depending on the size of the branch and the activity in that branch during the month. This compares to the 1MB of data per month in the filtered format. The hosting of 400 months of unfiltered Data by our third party e-discovery partner would cost between £100,000 and £1million per a month. Post Office therefore proposes that it would be reasonable and proportionate to only provide the Data in the filtered format as set out in Schedule 1. As you will see, this filtered data is still extensive and will provide the information necessary for the purposes of this litigation.

Further, the extraction of the Data is a time-consuming process and to ensure that the Data is extracted and disclosed by 19 January 2018 it would be appreciated if when informing us of your Potential Lead Claimants you could also confirm the months of Data which you would like disclosed.

If you have any queries on the filtering of the Data or would like to discuss this proposal please let us know by 4pm on 25 November 2017.

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Yours faithfully

Womble Bond Dickinson

Womble Bond Dickinson (UK) LLP

SCHEDULE 1

TRANSACTION DATA – EXAMPLE

Id	User	SU	Date	Time	SessionId	TxnId	Mode	Reversal	ProductNo	Qty	SaleValue
1	JMA001	AA	01-Jun-2010	08:26:19	44-179714-1-2151364-1	44-179714-1-2151364-3	SC		1	-1	-4.07
1	JMA001	AA	01-Jun-2010	08:27:51	44-179714-1-2151375-1	44-179714-1-2151375-2	SC		4925	-1	-100
1	JMA001	AA	01-Jun-2010	08:29:16	44-179714-1-2151375-1	44-179714-1-2151382-1	SC		134	1	10

EntryMethod	PAN	EPAN	CN	Barcode	Sortcode	Account Number
3	633641VjCTEJ2396	AQBIAH8GCokdjIRkIAIrsyKsQNs=				
2			BT Payment Card	8944000011849265424		

Field	Summary
ID	This is the unique identifier for the node / counter in the branch on which the transaction was undertaken.
User	ID of the branch user who undertook the transaction.
SU	The stock unit in which the transaction was undertaken.

Field	Summary
Date & Time	Date and time of the transaction.
SessionId	Each session is given a sequential number and all transactions undertaken in the same session are given the same ID so as to group transactions into sessions.
TxnId	This shows the unique identifier for individual transactions.
Mode	Defines the state/mode in which the counter PC was operating at the time of the transaction.
Reversal	Indicates if the transaction was reversed
ProductNo	The product number indicates which product was being transacted.
Qty	The number (quantity) of a specific product in the transaction.
SaleValue	The value of the transaction undertaken.
EntryMethod	Specifies how a transaction was entered by a clerk at a counter.
PAN	The Primary Account Number (which includes the Issuer Identification Number). This is a series of up to 19 digits on a card used to identify a particular card, customer account or relationship.
EPAN	Encrypted Primary Account Number.
CN	Additional Information (i.e. use of the pay station, NS&I investment accounts, special delivery).
Barcode	References which relate to additional information (i.e. tracking barcode for Special Delivery mail items).
Sortcode	Customer's bank/building society sort code for the account used for the transaction.
Account Number	Customer's bank/building society account number used for the transaction.

EVENT DATA

Groupld	Id	User	Date	Time	stockUnit	reportingEventld	eventDetailMsg
166539	1	GJE001	02/01/2013	16:42:02	AA	21	Declare CURRENCY Total 1000.00 For SU AA Till 1

Field	Summary
Groupld	FAD Code of the branch in which the event occurred.
Id	This is the unique identifier for the node / counter in the branch on which the transaction was undertaken.
User	ID of the branch user who undertook the event.
Date & Time	Date and time of the event.
Stock Unit	Stock unit in which the event took place.
reportingEventID	The identification number of the report that has been produced.
eventDetailMsg	Explanation of the event.

Claim No: HQ16X01238 and HQ17X02637

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

THE POST OFFICE GROUP LITIGATION

B E T W E E N:

ALAN BATES & OTHERS

Claimant

AND

POST OFFICE LIMITED

Defendant

APPENDIX H

wombledonddickinson.com



14 November 2017

For the Attention of Mr J Hartley
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By email only

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DX: GRO
Direct: GRO

Our ref:
AP6/AP6/364065.1369
Your ref:
JXH/1684/2117463/1/MA

Dear Sirs

The Post Office Group Action Proposals for the Exchange of Electronic Data

We write in advance of the disclosure under paragraphs 4 and 13 of the CMC Order to provide Post Office's proposals on how documents should be exchanged. Our objective is to try to streamline the practical steps involved in disclosing documents for the benefit of both parties. These proposals are not intended to be exhaustive; there may be certain categories of documents that do not fit with the structure we have proposed below.

We welcome your comments on these proposals.

1. Disclosure List

It is proposed that each party maintains a Disclosure List of the documents which they have disclosed in an Excel spreadsheet. The Disclosure List would contain all of the documents which have been disclosed and we suggest that they should be organised in the following manner:

- The documents are sorted into chronological order, with any attachments listed directly below their parent. The documents for each Claimant are grouped together and any "generic" documents (disclosed by Post Office) should be grouped separately.
- The list should contain, unless impracticable, the fields set out below.

Field	Details	Example Format
Disclosure Date	Since disclosure will take place in a staged manner, the list would include the date on which disclosure of that document was provided.	DD/MM/YYYY
Claimant No.	Claimant's number as per the Claim Form. Where Post Office discloses documents which relate to more than one Claimant then we propose that these are marked "Generic".	19

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4A_37409605_2

Field	Details	Example Format
Disclosure ID	See below for more details.	
Disclosure Attached To	This ensures that families of documents can be identified. The Disclosure Attached To number for a family document is inherited from the Disclosure Number of the parent document.	
Sort Date	The sort date is used to ensure that families of documents are kept together on the list. For emails with attachments, the date of the parent would be pushed down to the attachment to ensure that these remain together on the list. For parent documents this is the primary date of the document. For child documents, this the date of the parent document.	DD/MM/YY HH:MM
Document Date	The primary date of a document is typically the best date that we are able to ascribe to the document when it is processed. Typically, this would be the date on which it was last modified and, in the case of an email, this would simply be the date the email was sent or received. In circumstances where this meta data is not available (either due to the extraction process or being a scanned hardcopy document) then it should be brought to the other parties attention that this is an estimated date.	DD/MM/YY HH:MM
Document Subject / Title	This information is intended to contain the meta data value extracted from the document subject or title.	
File Name	This information is intended to contain the meta date value extracted from the file name.	
Document Type	This field should be based on the file signature.	Microsoft Word Document
Author	The name of the person who sent or created the document.	
Recipient/s	The name of the person(s) who received the document.	
CC	The name of the person(s) who were copied in on the document.	
MD5 Hash Value	The 32 digit hash value generated for the purpose of de-duplication.	
Redacted	Confirmation of whether a document has been redacted.	Yes / No

2. Document Reference Numbers

- 2.1 Post Office proposes that every document is assigned a unique Disclosure ID. This should be a sequential number prefixed by the disclosing party's ID. For example, we intend to use POL-00000001.
- 2.2 For the Claimants' disclosure, it is important that the exact disclosing Claimant is known. It would not be workable for the Claimants' disclosure to be collated together and given on behalf of the group. Each Claimant should give their own disclosure, even if this means disclosing duplicate copies of documents across multiple Claimants. This is important because:
- 2.2.1 Our client will need to use the documents in cross-examination and can only do so effectively if it knows which documents relate to or were sourced from which Claimants.
- 2.2.2 Our client has alleged that a number of the Claimants have acted dishonestly and documents in their possession (or the absence of documents in their possession) may be probative on this question.
- 2.2.3 Our client may wish to draw inferences where a particular Claimant has not preserved relevant documents.
- 2.3 We therefore suggest that the Claimants use the following convention: C-001-0000001. "C" for Claimant. The second number is a particular Claimant's claim number on a claim form. The final long number is a sequential unique identification number.

3. Format of Exchange

3.1 Electronic documents

It is proposed that these documents be exchanged in their native format, with the exception of those which have been redacted, along with the metadata set out above.

3.2 Hard copy documents

It is proposed that hard copy documents be scanned as a PDF image and be scanned as black and white, or if colour is required to understand the documents (plans / graphs / photos) then should be scanned in colour. Further, OCR should be used to make the PDFs text searchable and they should be manually coded with the information set out above.

3.3 Redacted documents

It is proposed that redactions are marked with a black box and documents which have been redacted will be exchanged in PDF format.

4. Method of exchange

Post Office proposes that the data should be exchanged by way of a Data Exchange File in a .dat file format. The documents should be provided to the other party for inspection on an appropriate disk of medium which is encrypted.

We would welcome your thoughts on the above proposals. If it would be convenient to arrange a call to discuss these proposals please could you confirm a convenient time. Moreover, if you have already engaged an e-disclosure support partner, it may be worth them talking directly to Advanced Discovery, our e-disclosure support partner.

Yours faithfully

Womble Bond Dickinson (UK) LLP

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