

Friday, 28 July 2023

(10.00 am)

MR BLAKE: Good morning, sir. Can you see and hear me?

SIR WYN WILLIAMS: When I unmute myself I can confirm both.

MR BLAKE: Thank you very much, sir. This morning we're going to hear from Mr Jan Holmes, who is appearing remotely from abroad.

SIR WYN WILLIAMS: Yes.

MR BLAKE: Can Mr Holmes be sworn, please?

JAN ROBERT HOLMES (affirmed)

Questioned by MR BLAKE

MR BLAKE: Thank you very much, can you give your full name please.

A. Yes, it's Jan Robert Holmes.

Q. Thank you Mr Holmes. Thank you very much also for returning today. You appeared during our Phase 2 of this Inquiry and you gave a witness statement in Phase 2. I'm not going to bring it up on screen but, for the transcript, it's WITN04600100.

You have since then produced two further statements and I'm just going to take you to those. The first of them is dated 27 January

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Manager at ICL from 1997. There was a brief period where you went out of that role in 2000/2001, but you returned in 2001 and I think you stayed at ICL until 2008; is that correct?

A. Yes, that's correct.

Q. Thank you. I'm going to begin with a whistlestop tour of some of the documents that we looked at in Phase 2, just to refresh your memory of some early incidents relating to Horizon. Can we start by looking at FUJ00080690. This is a document that will be familiar to many people in this room, it's the report of the EPOSS PinICL Taskforce, of autumn -- which took place in autumn 1998. I think you'll recall that in the top right-hand corner it seems as though you refreshed your memory in some way or had cause to look at the document in May 2001 as well.

A. Yes.

Q. That's a document that you wrote. If we scroll down we can see your name there.

A. Yes, with David McDonnell as well.

Q. With David McDonnell. Absolutely. Let's look at page 7 of that report. As I say, the contents will be familiar, so we won't stay on

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2023. Do you have a copy of that in front of you?

A. Yes, it's on my screen.

Q. Thank you. For the purpose of the transcript it's WITN04600200.

If I could ask you to turn to the final page, page 8, is that your signature?

A. Yes, it is.

Q. Is that statement true to the best of your knowledge and belief?

A. Yes, it is.

Q. Then there is another statement, a third statement, dated 16 May 2023, that's

WITN0400300. Can I ask you to turn to the final page of that statement, please.

A. Yeah.

Q. That's page 14. Is that your signature at the end?

A. Yes, it is.

Q. Is that statement true to the best of your knowledge and belief?

A. Yes, it is.

Q. Mr Holmes, when you appeared in Phase 2 we went through your career history, so I'm not going to repeat that, save to say you were the Audit

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this document for a long time but let's just have a look at the first paragraph. It says there in the report:

"It is clear that senior members of the Taskforce are extremely concerned about the quality of code in the EPOSS product. Earlier this year the EPOSS code was re-engineered by Escher and the expectation is that the work carried out in Boston was to a high standard and of good quality. Since then many hundreds of PinICL fixes have been applied to the code and the fear is that code decay will, assuming it hasn't already, cause the product to become unstable. This presents a situation where there is no guarantee that a PinICL fix or additional functionality can be made without adversely affect another part of the system."

Then it goes on to say:

"... a more worrying concern from the Programme's perspective should be reliance on the EPOSS product for its current state as a basis for planning and delivery."

If we scroll down to the next paragraph, it says there:

"Lack of code reviews in the development and

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1 fix process has resulted in poor workmanship and
2 bad code."

3 If we go on to page 17, there is a section
4 that I think was written significantly by
5 Mr McDonnell. If we scroll down, it's a section
6 on existing code.

7 **A.** Yes.

8 **Q.** Just to refresh your memory, it says there:

9 "Although parts of the EPOSS code are well
10 written, significant sections are a combination
11 of poor technical design, bad programming and
12 ill thought out bug fixes."

13 If we scroll over the page, you'll remember
14 those comments:

15 "Whoever wrote this code clearly has no
16 understanding of elementary mathematics or the
17 most basic rules of programming."

18 Mr McDonnell's subsequent evidence to the
19 Inquiry was that the EPOSS Development team was,
20 in his words, like the Wild West and was the
21 joke of the building. I can't recall, did you
22 see Mr McDonnell's evidence on that?

23 **A.** Yes, I did.

24 **Q.** Yes. Another document that I will refresh your
25 memory with is the CSR+ development audit

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1 occasion to WITN04600104, that's the schedule of
2 corrective actions. We're now in May 2000 and,
3 if we look at page 9, it addresses the
4 recommendation to redesign and rewrite the EPOSS
5 system.

6 If we scroll over the page to page 10,
7 you'll recall that entry on 10 May 2000 which
8 says:

9 "As discussed this should be closed.

10 Effectively as a management team we have
11 accepted the ongoing cost of maintenance rather
12 than the cost of a rewrite. Rewrites of the
13 product will only be considered if we need to
14 reopen the code to introduce significant changes
15 in functionality. We will continue to monitor
16 the code quality based on product defects as we
17 progress through the final passes of testing and
18 the introduction of the modified CI4 codeset
19 into live usage in the network. PJ, can we make
20 sure that it is specifically covered in our
21 reviews of the B&TC cycles?"

22 That recommendation was closed. Thank you
23 that can come down.

24 **A.** Yeah.

25 **Q.** So just to recap the developments over that

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1 document, that's FUJ00079782. This is now in
2 October 1999. If we scroll down, we can see
3 that that again is a document written by
4 yourself.

5 **A.** Yeah.

6 **Q.** Can we turn to page 19 of that document, please.
7 There's a section there on the "Electronic Point
8 of Sale Service", the EPOSS. If we scroll over
9 the page, I'm just going to read that top part,
10 it says:

11 "The figures indicate that the problems
12 facing the EPOSS during the Taskforce period
13 have not diminished [we're now in late 1999].
14 Of greater concern are the non-EPOSS PinICLs
15 within the group suggesting that there are still
16 serious quality problems in this vital, customer
17 facing element of the system.

18 "The EPOSS Solutions Report made specific
19 recommendations to consider the redesign and
20 rewrite of EPOSS, in part or in whole, to
21 address the then known shortcomings. In light
22 of the continued evidence of poor product
23 quality these recommendations should be
24 reconsidered."

25 Then you'll remember I took you on the last

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1 period, we have the PinICL Taskforce document,
2 of which you were the author in 1998; the CSR
3 development audit of which you were the author
4 in 1999; and the Schedule of Corrective Actions,
5 where you are involved in that process, and
6 I think you were the author of that document in
7 May 2000; is that right?

8 **A.** Yes, that's correct.

9 **Q.** Now, we're looking today at the Cleveleys case.
10 In February 2000, so in between the CSR+ audit
11 and the closing of that recommendation, Horizon
12 was installed in the Post Office of Mrs Julie
13 Wolstenholme and her contract was terminated in
14 December of that year, still in 2000.

15 Looking at the documents you've just seen,
16 it's fair, isn't it, to say that you were aware
17 of at least fairly notable issues with at least
18 some important part of the Horizon System that
19 affected things like balancing, in the period
20 leading up to and including Mrs Wolstenholme's
21 brief period as a subpostmistress.

22 **A.** Well, yeah, I mean, the dates would suggest that
23 but the linkage between the two is not something
24 that I would have made.

25 Also, just to say that the number of defects

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1 that I'm reporting in the CSR audit report are
 2 simply numbers. They're not an analysis of what
 3 those defects were. So I can't say what areas
 4 of EPOSS were actually affected by those bugs.
 5 **Q.** But you have been told by, for example,
 6 Mr McDonnell that the code is of poor quality?
 7 **A.** Oh, yeah, yeah, yeah.
 8 **Q.** I think there was also reference to code decay
 9 and things like that with PinICL fixes?
 10 **A.** Well, in that context, what I was meaning was
 11 that the more you tinker with something, the
 12 more likely you are to introduce a problem, and
 13 that's the same with anything, whether it's
 14 software, a car, decorating. You know, if you
 15 fiddle about with stuff, it's likely to start
 16 going wrong, you know, which is the "do it right
 17 first time" principle.
 18 So yeah, that was a concern but that was, if
 19 you like, trying to raise a risk in people's
 20 minds that this could happen if we carry on --
 21 carried on working in that manner.
 22 **Q.** Absolutely. So you were aware that there were
 23 imperfections in the system and that there were
 24 attempts to fix those imperfections but attempts
 25 to fix the imperfections themselves could cause

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1 about non-EPOSS PinICLs", I mean, can they not
 2 be broadly applied, that they were concerns you
 3 had relating to the EPOSS product?
 4 **A.** Well, the EPOSS taskforce was looking at the
 5 baseline that was in place at the time, because
 6 we were looking at live defects there. The CSR+
 7 activity, unless I'm vastly mistaken, the
 8 development, the PinICLs were test PinICLs that
 9 were produced during testing cycles.
 10 Unless I've misunderstood my own report, you
 11 know, I don't know if those PinICLs that I'm
 12 counting there were live or whether they were
 13 the results of test.
 14 **Q.** So after 1998/1999 into 2000, you weren't
 15 concerned about the Horizon System?
 16 **A.** Well, only insofar as I'd identified all of
 17 these PinICLs and defects that were still
 18 arising a year after the Taskforce had tried
 19 to -- not put a stop to it, that would be
 20 virtually impossible, but to try to reduce the
 21 number to, you know, a manageable figure.
 22 **Q.** Well, let's move on and look at some specific
 23 instances that then crop up in 2000 and
 24 thereafter. On the screen at the moment we have
 25 FUJ00059075, and that is a KEL, a Known Error

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1 other problems?
 2 **A.** Well, yes, that essentially is what I meant by
 3 the "code decay" comment.
 4 **Q.** Yes. Can we now look at FUJ00059075, please?
 5 **A.** Can I just say something here? Again, I don't
 6 know whether I've got the timings and the
 7 baselines in my head correctly but CSR+ was
 8 a new revised baseline and, at that time,
 9 whatever was running at the outlets would have
 10 been a different baseline anyway. So whether
 11 they had the same defects and issues in them,
 12 I don't know. I wouldn't know.
 13 **Q.** You wouldn't know because you didn't make
 14 enquiries about the ongoing impact of changes to
 15 Horizon?
 16 **A.** No, because in conducting the audit, I was
 17 looking at the way the work was being done,
 18 right, and I was using numbers to demonstrate
 19 where there would seem to be still issues but
 20 I can't equate CSR+ development audit back to
 21 whatever baseline was in place at Cleveleys at
 22 that time.
 23 **Q.** So comments in late 1999 about "the figures
 24 indicate that problems facing EPOSS during the
 25 taskforce period have not diminished concerns

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1 Log. This is November 2000, or is raised by
 2 Anne Chambers in November 2000, so that is the
 3 time of a particular incident in
 4 Mrs Wolstenholme's case.
 5 If we look at -- that is described as
 6 follows, it says "Critical event on counter",
 7 and then it gives the message, and it says,
 8 "Sometimes a storm of these events occurs", and
 9 refers to another Known Error Log. If we look
 10 at the bottom, the final sentence under
 11 "Problem", it refers to another KEL and it says:
 12 "[It] is with development for problems
 13 balancing while these events are occurring."
 14 I'm going to take you to a couple more. If
 15 we look at FUJ00059141, this is the same Known
 16 Error Log but it says it's version 2. If we
 17 look at the problem there, it says:
 18 "Possibly caused by an outstanding lock on
 19 the run table, which is cleared subsequently
 20 when ClearDesk runs. The problem is known to
 21 have affected at least 129 counters."
 22 If we now look at FUJ00086680. This is
 23 a PEAK. It's one that we've looked at
 24 previously in this Inquiry. It's a "Master Call
 25 for Phantom Transactions". It begins on

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1 17 April 2001, and I'll just read you a few
 2 entries within that PEAK. If we look about
 3 halfway down, 14 April. It says, near the
 4 bottom of this page:
 5 "The system seems to lose transactions and
 6 PM is concerned that for every transaction that
 7 error he notices there is the probability that
 8 there are ones he misses, leading to
 9 discrepancies. The PM is at present finding the
 10 whole scenario very stressful and is suffering
 11 sleepless nights due to these problems. In the
 12 light of what has gone on the PM is prepared to
 13 break his contractual obligations with POCL and
 14 refuse to pay any more discrepancies and will
 15 take legal action if required."
 16 If we scroll down that page, it says:
 17 "As I was on the phone to the PM, he advised
 18 that three First Class stamps that were on the
 19 screen just 'dropped off'. PM had 3 First Class
 20 stamps, and other stamps for 30p. When the
 21 other stamps 30p went on, the First Class stamps
 22 disappeared. They have since put the 3 First
 23 Class stamps again. The first transaction (that
 24 disappeared) was put on as 2 First Class
 25 stamps", et cetera.

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1 A. Well, based on what I've seen just there, then
 2 yes. That's clear, isn't it?
 3 Q. Yes, combined, of course, with earlier concerns
 4 about the EPOSS system.
 5 I'm going to now take you to WITN04600202.
 6 We're now on 21 August 2003, and we are looking
 7 at the Cleveleys case. You, by that stage, had
 8 been contacted by Jim Cruise about the Cleveleys
 9 case, and --
 10 A. Yeah.
 11 Q. -- your answer to Mr Cruise is as follows in
 12 relation to what you call the easy stuff. You
 13 say:
 14 "1. We will have no record of any
 15 transaction data from Cleveleys dated before
 16 November 2000 in the central audit archive since
 17 this was automatically deleted 18 months from
 18 the date that it is written. So, if 30 November
 19 2000 was the last active day for the Counter
 20 that data would have been deleted on or about
 21 30 May 2002."

22 Then you say, second:
 23 "Similarly, there will be no Helpdesk logs
 24 since these are also deleted after 18 months."
 25 Now, that number 2, that was wrong, wasn't

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1 If we go to page 4, about halfway down, it
 2 says, 1 May 2001:
 3 "PM feels that the system is unreliable. PM
 4 cannot trust this system."
 5 If we go over the next page, 2 May:
 6 "PM called in because the screen has crashed
 7 during his balance -- he has got the blue stop
 8 screen error."
 9 If we go down towards the bottom of the
 10 page, 4 May, it says:
 11 "Ki Barnes has called in. I am unsure what
 12 to do with this call now. Romec have been to
 13 site and state that they have actually seen the
 14 phantom transactions, so it is not just the PM's
 15 word now. They have fitted suppressors to the
 16 kit but the PM is still having problems. As yet
 17 there has been no recurrence to the phantom
 18 transactions but there still may be problems",
 19 et cetera.
 20 Thank you, that can come down.
 21 Would you accept that post-rollout there
 22 were issues affecting balancing or transactions
 23 or counters of some subpostmasters in these
 24 kinds of logs and logs that you would have had
 25 access to?

14

1 it?
 2 A. Yeah, I mean, what I'm referring to there is the
 3 formal audit records that are maintained that
 4 were then stored on the audit system and deleted
 5 after 18 months. And, as you rightly say,
 6 subsequently, an -- what I referred to and what
 7 Jason Coyne referred to as an unregulated source
 8 of data was found and located. But they were
 9 not the formal audit data that would have been
 10 submitted, had it been requested to a court
 11 case. Personally, I wouldn't necessarily place
 12 reliance on it, since it wasn't formally
 13 captured in the audit record.
 14 Q. So you wouldn't place reliance on the Helpdesk
 15 logs that were, in fact, ultimately provided to
 16 the expert, Mr Coyne?
 17 A. Well, from -- I think from a legal perspective,
 18 we -- I wouldn't know where they came from. You
 19 know, they weren't captured at the point of
 20 origin, at the time to origin, and they weren't
 21 stored securely so they probably were the same
 22 as what was captured on the audit record.
 23 Q. Did you say weren't or were?
 24 A. No, they probably were the same, but I can't
 25 vouch for that.

16

1 Q. If number 2 was wrong, could you be sure that
 2 number 1 also wasn't wrong?
 3 A. Also wasn't wrong? Um, no number 1 was correct
 4 because the transaction data would have been
 5 deleted 18 months after it was written. So it
 6 wouldn't be there. And 2 -- as I said, 2 refers
 7 to the Helpdesk logs that were captured as part
 8 of the audit archive. They would have been
 9 deleted, as well, after 18 months. So --
 10 Q. But 2 was found?
 11 A. No, no, no.
 12 Q. Or an unregulated version of 2 was found?
 13 A. An unregulated set of records that were the
 14 Helpdesk logs were located after the event,
 15 after they were deleted from the audit archive.
 16 Q. Was an attempt made to look for the equivalent
 17 for number 1, so some sort of unregulated record
 18 of the transaction data?
 19 A. Not to my knowledge, no.
 20 Q. Might they have been available?
 21 A. Not -- I-- no, I don't think they would have
 22 been, based on my knowledge of the system and
 23 how it worked, no, I don't think they would have
 24 been.
 25 Q. Why is it that you were able to find unregulated

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1 between when all these problems were supposed to
 2 have occurred -- or when they occurred in 2000,
 3 and us getting involved through Jim Cruise's
 4 request for help. And it was linked, I think,
 5 to the production of Jason Coyne's expert
 6 report.
 7 Q. So if we look at the third paragraph that's
 8 currently on our screen, it says:
 9 "The County Court instructed the parties
 10 jointly to commission a report from an expert
 11 approved by the Court."
 12 Pausing there. Did you understand that the
 13 expert was jointly instructed?
 14 A. Well, only insofar as it's in Keith Baines'
 15 letter.
 16 Q. Did you understand the implications of that?
 17 Did you know what a jointly instructed expert
 18 was?
 19 A. No, because I just assumed, rather, that we
 20 would be involved in that decision who to
 21 appoint. But it would appear not.
 22 Q. It says there the expert was approved by the
 23 Court.
 24 A. Yeah. But the parties being presumably
 25 Mrs Wolstenholme and Post Office. We were not

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1 Helpdesk logs but no unregulated transaction
 2 data was produced? Was it looked for?
 3 A. No, they emanate from different sources. So
 4 I can only assume that the Helpdesk itself was
 5 maintaining records but they weren't passed to
 6 the audit archive system, and that was the part
 7 I was commenting on there. They weren't
 8 available in the audit archive. And, as I say,
 9 subsequently, Helpdesk records were found, but
 10 they were nothing to do with the audit archive.
 11 Q. Can we look at POL00095375, please. We're now
 12 on 5 February 2004 so quite some time after that
 13 initial contact in August 2003.
 14 A. Yeah.
 15 Q. This is a letter to Colin Lenton-Smith from
 16 Keith Baines at the Post Office. Did you see
 17 this letter at the time?
 18 A. Possibly.
 19 Q. Had you had any contact with the Post Office
 20 subsequent to that 21 August contact, in respect
 21 of this case?
 22 A. Well, I don't know. I mean, there are some
 23 documents that have got dates and the points of
 24 my involvement with the various people but
 25 I know there was a delay, or quite a delay

18

1 part of any kind of appointment there.
 2 Q. So did you not take it to have any real
 3 significance that the expert had been jointly
 4 commissioned?
 5 A. No, I didn't.
 6 Q. If we scroll down on that page, we'll see there:
 7 "I'm sure you'll understand, Post Office is
 8 concerned by these findings, not only in
 9 relation to this particular case, but also
 10 because of any precedent that this may set and
 11 that may be used by the Post Office's agents to
 12 support claims that the Horizon System is
 13 causing errors in their branch accounts."
 14 Was this the first occasion where you
 15 realised the potential implications of the
 16 Cleveleys case?
 17 A. No. I mean, I think we got -- how can I explain
 18 this? From Horizon's point of view, from my
 19 point of view, helping the Post Office resolve
 20 this was really just another piece of work
 21 coming down the line. I didn't have any
 22 personal buy-in to it. It was just a request
 23 for help to provide information.
 24 Q. So --
 25 A. Essentially, it was -- it started off by seeking

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1 any help to counter some of the opinions in the
 2 expert's report.
 3 Q. So you didn't take it in any way personally?
 4 A. No, no. It was work.
 5 Q. You didn't feel any kind of vested effort to win
 6 in this case?
 7 A. No, I didn't have any skin in it at all, so why
 8 would I? It was just a piece of work that we
 9 were asked to do by the Post Office. We didn't
 10 have any real background, other than the fact
 11 that the postmaster was in dispute and had
 12 confiscated the equipment and wouldn't return
 13 it. But, other than that, it was just
 14 responding to the request made to us by the Post
 15 Office.
 16 Q. Do you feel you maintained that neutral approach
 17 throughout the conduct of the case?
 18 A. That's an interesting one because, clearly, we
 19 didn't much like some of the comments and the
 20 attitude of the expert's report but that's his
 21 report. So all we could do was try to counter
 22 some of the claims with what we felt were
 23 reasonable counterarguments.
 24 Q. Is your evidence that you maintained your
 25 professional approach throughout?

21

1 comply with that duty."
 2 Were you aware at that time that an expert
 3 owes duties to the court?
 4 A. No, I hadn't seen that document at that time.
 5 Q. Irrespective of -- well, this document is in
 6 fact part of the opinion that you were provided
 7 with. If we scroll back you'll see that this is
 8 just part of the opinion. It's, effectively,
 9 the back page of the opinion. But, irrespective
 10 of the opinion itself, you were somebody who was
 11 providing statements in court proceedings. Were
 12 you aware that an expert owes duties to the
 13 court?
 14 A. No, no.
 15 Q. We see there, near the bottom it says, "Law
 16 Society 2003 Accredited Expert Witness", and it
 17 gives his accredited expert witness number.
 18 Can we now look at WITN04600302. So the
 19 expert report is dated 21 January -- or
 20 20 January, provided thereafter. By 11 February
 21 2002, you are carrying out some investigations
 22 in order to address what's written in that
 23 report; is that correct?
 24 A. Yeah, that's correct, yeah.
 25 Q. So we have correspondence here between somebody

23

1 A. Yes, I think I did.
 2 Q. Let's look at the actual witness -- the expert's
 3 report, it's WITN00210101. Now, we've been
 4 through the report, it's over the page. We've
 5 been through the various opinions with other
 6 witnesses. I think you've been provided with
 7 this as part of your preparation, so I'm not
 8 going to go into detail at this stage on the
 9 report itself. I just want to take you to
 10 page 5 of the report, and that is the CV of the
 11 expert that appeared as part of the report.
 12 I'll just read to you the first few paragraphs.
 13 He says there:
 14 "I confirm that I have made clear in my
 15 report those facts that are within my own
 16 knowledge and which I believe to be true, and
 17 that opinions I have expressed represent my true
 18 and complete professional opinion.
 19 "I have no known connection with any of the
 20 parties, witnesses or advisers involved in this
 21 case.
 22 "Under the requirements of the Civil
 23 Procedure Rules 1999, as amended in January 2002
 24 I confirm that I fully understand my duty to the
 25 court and I have complied and will continue to

22

1 called Mark Jones -- who was Mark Jones?
 2 A. I'm not sure I can remember. I think he was
 3 probably somebody who worked in customer
 4 services, but --
 5 Q. If we scroll down --
 6 A. -- I can't remember.
 7 Q. -- we can see Mark Jones, MSU team. Who was the
 8 MSU team?
 9 A. I don't know. Management Support Unit,
 10 possibly.
 11 Q. Let's have a look at that email. It says:
 12 "Richard asked me to provide some call
 13 analysis from 2000. All the FADs here are 6
 14 counter outlets -- Cleveleys comes out top (or
 15 bottom) depending on your view."
 16 Now, we see there that there are six
 17 outlets. You have Cleveleys. SD02 is software
 18 error, so that's the code that's been attributed
 19 by the Helpdesk for software errors and, on the
 20 analysis from Mr Jones that's come back soon
 21 after your receipt of that report, it seems as
 22 though Cleveleys has quite a high number, in
 23 fact the highest -- comes out at the top or at
 24 the bottom, depending on your viewpoint -- of
 25 those six counter outlets.

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1 I mean, this analysis is very much the point
 2 that Mr Coyne was making in his report, isn't
 3 it?
 4 **A.** Well, I guess so, yes.
 5 **Q.** So we're at February 2004. You knew at this
 6 stage, as we've been over the troubled history
 7 of the EPOSS product, you were aware of
 8 complaints by subpostmasters or you had access
 9 to those KELs and call logs that we have looked
 10 over and now you've received from Mr Jones of
 11 the Management Support Unit team figures that
 12 are entirely consistent with the report of Jason
 13 Coyne.
 14 Wasn't this, February 2004, the point to say
 15 there might actually be something in the
 16 subpostmistress's complaint?
 17 **A.** Yes, but remember we were just responding to the
 18 Post Office request for help. It's not our
 19 place. It was not our place, at least I wasn't
 20 aware it was my place, to start challenging on
 21 behalf of, you know, the postmaster or the
 22 postmistress, this information.
 23 **Q.** Because, as you've said, you were entirely
 24 professional and neutral throughout?
 25 **A.** Indeed, yes. Trying to be.

25

1 report was, in fact, received by you on
 2 6 February?
 3 **A.** Yeah.
 4 **Q.** Can we please have a look over the page. You've
 5 said:
 6 "On P5. I have asked for an analysis of HSH
 7 calls from 1 January 2000 to 20 November 2000
 8 for Cleveleys and 20 other 6 Counter Outlets
 9 chosen at random with full error code analysis.
 10 I should have this today/tomorrow ..."
 11 It seems by that stage, having received that
 12 information from Mark Jones, which showed
 13 Cleveleys at the top or the bottom of the list,
 14 you then commissioned further analysis of 20
 15 other six-counter outlets or 20 six-counter
 16 outlets.
 17 I'd like to look at that final paragraph as
 18 well. You say at the end of that:
 19 "Blue screens and system freezes have always
 20 been a problem and the stock HSH reply has
 21 always been to reboot."
 22 Did you acknowledge at that time in February
 23 that blue screens and system freezes had always
 24 been a problem?
 25 **A.** Well, isn't that what that sentence says?

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1 **Q.** I mean, you have the independent expert's report
 2 and now you see that Cleveleys is very much
 3 having problems with software errors. It was
 4 only one branch. It had obviously made calls
 5 about software errors. You didn't have the data
 6 because it had been deleted. How could you be
 7 confident that there was not a software issue in
 8 the branch?
 9 **A.** Well, I couldn't, could I?
 10 **Q.** Can we please look at WITN04600203. This is
 11 a document that you produced. I think we've
 12 seen a few of these kinds of documents. Are
 13 they documents that you kept yourself, notes of
 14 what was happening at the time?
 15 **A.** Yeah, this was an internal -- a document for
 16 internal consumption, just as an initial
 17 response to that report because, clearly, Post
 18 Office wanted us to make some kind of formal
 19 response so these were, if you like, my first
 20 drop down thoughts of what was going on.
 21 **Q.** If we scroll down, so you note there "Today,
 22 (12 February)", so as we to take it that these
 23 notes were written on 12 February?
 24 **A.** That's what that would imply, yes.
 25 **Q.** I think, if we look at the top, it says the

26

1 **Q.** Absolutely. So are those your words and your
 2 acknowledgement there, at that time, that blue
 3 screens and system freezes had always been
 4 a problem and the stock, as in the standard, the
 5 automatic, HSH reply had always been to reboot?
 6 **A.** That was my understanding at the time, yes.
 7 **Q.** Can we go to FUJ00121485. This is an early view
 8 that you have provided to Colin Lenton-Smith on
 9 18 February 2004. We can look at the
 10 attachment, that's FUJ00121486. So this is your
 11 early view response. We've seen this document
 12 already but if we scroll down to the second half
 13 of the page, it says:
 14 "On 6 February POA [that's Fujitsu's Post
 15 Office Account] received a copy of the Expert's
 16 report with a request from POL for an early
 17 response. POL are concerned that the Expert's
 18 opinion (that the system was at fault) might set
 19 a precedent against future POL prosecutions."
 20 So that's essentially that letter that we
 21 saw from the Post Office; is that right?
 22 **A.** Yeah, that was our understanding at the time.
 23 Or my understanding at the time.
 24 **Q.** If we scroll down to "'Reasonableness' of
 25 calls", it says there:

28

1 "[Post Office Account] are able to review
 2 an unregulated archive of records of the other
 3 installed 6 Counter Outlets over a comparable
 4 period. At the table below shows the output
 5 from that analysis."
 6 Now, sorry, could we just stick there for
 7 one moment on the previous page.
 8 So the unregulated archive are records of
 9 the other installed six-counter outlets over
 10 a comparable period. Do you remember what that
 11 exactly meant? Because that's quite -- it seems
 12 to be quite specifically worded, "the other
 13 installed 6 counter outlets".
 14 A. Yeah, now on an earlier document, I said
 15 I wanted an analysis of 20 six-counter outlets
 16 selected at random. So when this information
 17 came back, if you scroll down, you will see that
 18 there aren't 20 six-counter outlets in existence
 19 at that time.
 20 Q. Absolutely. Well, there aren't 20 in that
 21 table.
 22 A. No, but those are the six-counter outlets that
 23 were identified, I believe. So there weren't
 24 any dropped off the end. They were the
 25 six-counter outlets in existence at that point

29

1 A. So it appears.
 2 Q. Do you know why those original figures were
 3 excluded from this table?
 4 A. No, I've no idea. I mean, this second table on
 5 the right was also provided to me. So, you
 6 know, I'm just being fed information to try to
 7 put it together to form some kind of coherent
 8 response. To be fair, I didn't notice the
 9 disparity between the two lists. Well --
 10 Q. Is it possible that some were removed that
 11 didn't suit your case?
 12 A. Not by me.
 13 Q. We can take down the left-hand side now. Thank
 14 you very much. In this table, the one that has
 15 been provided that doesn't provide those other
 16 counters with the lower figures, in that table
 17 we still see Cleveleys with the second highest
 18 figure for "S", software issues.
 19 A. Yeah.
 20 Q. Again, I don't want to repeat all the things
 21 that I've already said about the history, the
 22 logs that were available, the table that you
 23 originally received, your knowledge of things
 24 like blue screen freezes, blue screen system
 25 freezes. Looking at this, software number 2,

31

1 in time.
 2 Q. Can we put that side by side with WITN04600302,
 3 please. Thank you very much. So that's the
 4 email you received from Mark Jones.
 5 A. Yes.
 6 Q. Let's look at the left-hand side. He is saying
 7 all the FADs here are six-counter outlets?
 8 A. Yeah.
 9 Q. Worlds End, where's Worlds End on the right-hand
 10 side?
 11 A. No, I can't see it.
 12 Q. Shoreham-by-Sea?
 13 A. No, can't see it.
 14 Q. Cookstown?
 15 A. Can't see it.
 16 Q. Halstead is there, in fact, on the right-hand
 17 side, so there is one that matches, although, on
 18 the left-hand side we have three SD02 codes but
 19 that has increased to seven on the right-hand
 20 side. Staines?
 21 A. No, I can't explain the discrepancy.
 22 Q. I mean, those previous six counter outlets that
 23 had been identified seem to largely have been
 24 excluded from this table, the ones that had low
 25 numbers for software errors?

30

1 the second worst in terms of numbers. Did this
 2 not give you pause for thought at this stage?
 3 A. No, because that wasn't what I was doing here.
 4 I wasn't, sort of, doing some kind of
 5 substantive test of the numbers and of errors.
 6 I was merely collating information to respond to
 7 the report. So whether that's an oversight on
 8 my part, okay, but I wasn't there analysing the
 9 figures themselves to understand what was going
 10 on beneath them. I was merely collating them to
 11 make a response.
 12 Q. Cleveleys seems to have distinguished between
 13 rollout and post-rollout, that's the difference
 14 between 1 and 2. Was there the same analysis
 15 for those other branches or was it just
 16 Cleveleys that the two differences were
 17 identified?
 18 A. No, it looks just like Cleveleys.
 19 Q. Even if we take the second, the lower figure,
 20 because it doesn't include the Horizon rollout,
 21 the subpostmistress still had cause to call the
 22 Helpdesk 85 times in that period.
 23 A. Mm-hm.
 24 Q. It's not beyond fantasy that Mrs Wolstenholme
 25 may have been experiencing software problems

32

1 with Horizon, is it?

2 **A.** Well, no, those figures suggest that that was
3 the case.

4 **Q.** If we scroll down, there's the comment about
5 Ms Elaine Tagg's statement. I wonder, actually,
6 if we could bring that on to screen. The
7 extract from Ms Tagg's statement in Mr Coyne's
8 report. That's WITN00210101. If that could be
9 bought alongside, that would be fantastic. So
10 it's the second, over the page on the left-hand
11 side, and it is that second -- the second half
12 of that page. Thank you. So on the right-hand
13 side, what you've said about the statement of
14 Ms Elaine Tagg is:

15 "Based on the analysis, and without
16 analysing each and every call record it would be
17 hard to dispute the opinion of the Expert."

18 On the left-hand side, it shows what the
19 expert was saying. He identified that Ms Elaine
20 Tagg had said that:

21 "Mrs Wolstenholme persisted in telephoning
22 the Horizon System Helpdesk in relation to any
23 problems which she had with the system
24 generally, these problems related to the use and
25 general operation of the system and were not

33

1 side, please, and enlarge -- thank you. If we
2 could scroll over to the next page, page 3. We
3 then get to the "Operator advice to 'Reboot'",
4 and the second paragraph there, you say:

5 "In this context the opinion of the Expert,
6 that 'this instruction treats the effect and not
7 the cause' is correct."

8 Again, it seems, at least in some respects
9 there, you are agreeing with Mr Coyne?

10 **A.** Well, yes, he is right. I mean, rebooting the
11 system might be the instruction that's given to
12 the postmaster and it does deal with the effect
13 and not the cause. So there should be further
14 work undertaken to try to understand what the
15 cause was, determine the root cause and find
16 a way of removing it.

17 **Q.** In this document, so in this initial response,
18 one thing you don't go as far as to say is your
19 admission that blue screens and freezes have
20 always been a problem. I don't think that's
21 contained in this document, is it?

22 **A.** Possibly not, no.

23 **Q.** If we scroll down to the final paragraph in this
24 document, about discrepancies, it says:

25 "This argument has been put forward by

35

1 technical problems ..."

2 Then Mr Coyne's opinion was:

3 "This, in my opinion is not a true
4 representation on the evidence that have had
5 access to."

6 It seems as though you agreed with Mr Coyne
7 in that respect, at least at that stage.

8 **A.** Well, insofar as I said based on the analysis,
9 either table, but without analysing each and
10 every call record, you know, it's hard to
11 dispute. It is.

12 **Q.** Because I think you're saying on the right-hand
13 side that, even if you take out the 15 that are
14 classified as advice and guidance and the 16
15 that are to do with the rollout, you still have
16 70 calls. So Mrs Tagg's statement in that
17 respect can't possibly be right in terms of them
18 not being technical problems; is that right?

19 **A.** Yeah, well, I guess so. I mean clearly there
20 were some problems there that Mrs Wolstenholme
21 was experiencing.

22 **Q.** There is at least some truth in Mr Coyne's
23 opinion in that respect?

24 **A.** Yes, I believe that's the case, yeah.

25 **Q.** Can we stay with the document on the right-hand

34

1 a number of PMs in the past when challenged and
2 prosecuted by POL for alleged fraudulent
3 behaviour and each time it has fallen when
4 confronted by transaction data that demonstrates
5 that the system was operating normally during
6 the disputed time period."

7 Was that the general view at Fujitsu? Is
8 that a view that was held by your colleagues:
9 that because it hadn't been proved in the past,
10 that in itself demonstrates that there isn't
11 a problem?

12 **A.** Yeah, that's fair enough. You could say that.

13 **Q.** Can we please now look at WITN04600304. We are
14 now on 17 February 2004, and this is an email
15 from Steve Parker. Can you help us with who
16 Steve Parker was?

17 **A.** No, I was looking at this myself the other day
18 and -- can you just scroll down to what was
19 presumably my request for help?

20 **Q.** Absolutely.

21 **A.** Right, well, that's not very helpful, is it?
22 Yeah. So, obviously, I sent him the expert
23 report and the call volume comparison.

24 **Q.** If we scroll up --

25 **A.** Yeah, you can --

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1 Q. -- the words in -- I'm slightly colourblind,
 2 I think I'd say purple --
 3 A. Blue.
 4 Q. -- blue -- are from Steve Parker; is that right?
 5 A. Yes, that's correct, yeah.
 6 Q. He said:
 7 "I have had a chance to read through this
 8 now. Here are a few thoughts you might like to
 9 develop."
 10 It's the "Worrying discrepancies" section
 11 that I'd like to look at. It says:
 12 "Must be the major issue. Counter systems
 13 cause discrepancies."
 14 I think he's stating that that is the
 15 argument that is put forward:
 16 "Answer has to be 'no way':
 17 "a) Almost all accounting errors in computer
 18 systems are caused by user error. GIGO
 19 principle."
 20 Did you understand that to be "garbage in
 21 garbage out" principle?
 22 A. Yes. Yes, I did, yeah.
 23 Q. Then it says systems are in place to resolve
 24 discrepancies, and then we have:
 25 "Yes, software errors can make such

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1 Q. Can we look at WITN04600305. This is a response
 2 from Richard Brunskill to yourself. So his
 3 response is in colour. Your original email is
 4 in black. I'm going to start with your words.
 5 You say there:
 6 "The Cleveleys situation has us a bit on the
 7 back foot and I'm having to bring in POL imposed
 8 SLAs as a form of justification for HSH advice
 9 being to reboot 9 times out of 10."
 10 Back foot: I mean, that sounds a bit like
 11 a competition, like you're getting
 12 out-manoeuvred. Was that your concern at the
 13 time?
 14 A. No, out-manoeuvre is wrong. I mean we had to go
 15 on the defensive and clearly HSH advice being to
 16 reboot nine times out of ten, on the face of it,
 17 looks unacceptable, so we have to understand why
 18 that is. And the argument was used that the
 19 purpose of the HSH is to get the postmasters up
 20 and running as quickly as possible and not
 21 interfere and not interrupt their business
 22 cycle.
 23 So sometimes the easy answer was to say
 24 reboot and then you're up and running again.
 25 The question that was raised by Mr Coyne was

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1 mistakes. However, the systems in place ensure
 2 that such errors are picked up and resolved. If
 3 this problem was caused by a software error, the
 4 same error would exist on all Horizon sites.
 5 17,000 [postmasters] are not complaining of
 6 misbalancing and discrepancies."
 7 I mean, that is nonsense, isn't it?
 8 A. I -- at the time, I thought that was rather glib
 9 and I don't think -- I don't think any of this
 10 was used in further correspondence between me
 11 and the Post Office.
 12 Q. I mean, it seems -- the impression that's given
 13 is that it's getting a little desperate to look
 14 for some sort of counterargument to what
 15 Mr Coyne is saying; would you accept that?
 16 A. Yeah, I mean, if I can remember who Steve Parker
 17 was and what role he played, what position he
 18 had, I might be able to put this more into
 19 context as to why that reply came back looking
 20 like it did. But I remember at the time, it
 21 wasn't -- I wasn't overly impressed with it and,
 22 you know, the comment at the end that, you know,
 23 it would exist on all Horizon sites 17,000, PMs
 24 are not complaining, I mean, that's -- well, I'm
 25 sorry, that's just silly.

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1 what happened to that after they rebooted? Did
 2 they do anything with it? Well, yes, they did
 3 because the presence of KELs where these things
 4 have been further investigated, suggests that
 5 work was done after the event to try to better
 6 understand what was going on. So it wasn't just
 7 the case of "Yeah, you've got a problem, reboot;
 8 next one, reboot; next one". It wasn't quite
 9 that straightforward and simple.
 10 Q. That's not actually the question I'm asking you.
 11 I'm asking you about that first sentence and the
 12 way that it's worded. You're saying you're on
 13 the back foot and then you're saying, "I'm
 14 having to bring POL imposed SLAs a form of
 15 justification". Now, it might be suggested that
 16 having to bring in the SLAs, it means you didn't
 17 otherwise have a good answer to why the advice
 18 was to reboot nine out of ten times.
 19 A. Yeah, well, that's a fair comment.
 20 Q. I mean, thinking back to your evidence earlier
 21 and about how you were professionally and coolly
 22 responding, only providing information, do you
 23 think by this stage you've lost a little bit of
 24 objectivity?
 25 A. I don't think so. I mean, you know, I'm trying

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1 to -- I say, justify. I mean if the advice is
 2 being given by the HSH to do that, they must be
 3 doing it that for a reason, and one of those
 4 reasons is SLAs that are imposed by POL to get
 5 the postmasters up and running a bit more
 6 quickly. Having us on the bit of a back foot is
 7 just a phrase, isn't it? I mean, we're trying
 8 to find ways of -- or I'm trying to find ways of
 9 justifying the advice but not necessarily just
 10 limiting it to that advice. You don't just do
 11 that and walk away.

12 Q. If we look at what Mr Brunskill has said, in
 13 response to question 1, your question was: "
 14 "Time to fault resolution from original call
 15 and how was fault resolution defined -- getting
 16 the Outlet back up or fully resolving the
 17 problem?"

18 So your question about the SLAs, was the SLA
 19 about getting the outlet up and running or was
 20 it about actually resolving the problem? We
 21 have there --

22 A. (Unclear).

23 Q. -- Mr Brunskill's response. He says:
 24 "Depends on the issue. Simple advice and
 25 guidance at the time ... centred around

41

1 about getting up and running again, essentially
 2 as quickly as possible.

3 A. That's correct, yeah.

4 Q. He says:
 5 "Hence the proliferation of reboots to solve
 6 known problems ..."

7 Proliferation, it's not a positive word.
 8 I mean, it's often used in the context of
 9 nuclear weapons, something you don't want to
 10 happen. Is your reading here that he is not
 11 being overly positive about the use of reboots
 12 to fix problems?

13 A. No, I didn't read that into his words. I just
 14 read it as a high number.

15 Q. Do you read it now, looking at it,
 16 "proliferation of reboots"? I mean --

17 A. No, I don't. I'm still just seeing as nine out
 18 of ten reboots being the solution from the
 19 Horizon System Helpdesk. I didn't see anything
 20 deeper in it than that.

21 Q. Can we look at WITN04600306. This is another
 22 response, here from David Cooke.

23 A. Yeah.

24 Q. Can I just ask you to have a read of that and
 25 what I want to understand is that second

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1 resolution in 5, 10, 30 or 45 minutes depending
 2 on the query. Blue screens or system freezes
 3 would generally have been coded as 'Software'
 4 and claimed under break fix SLTs, which,
 5 depending on which branches location, fall into
 6 the local, intermediate or remote category with
 7 anything from 4 to 24 hours to fix. I would
 8 expect a software call to be resolved by either
 9 a reboot, workaround or kit swap. The
 10 underlying issue is not subject to SLA -- this
 11 can be fixed as per release timetable, etc, the
 12 issues under the SLA is 'get the branch up and
 13 running again'. Hence the proliferation of
 14 reboots to solve known problems and get things
 15 going."

16 So what he's saying there is that the SLA is
 17 not about fixing the problem. It's about
 18 getting the branches up and running because it's
 19 about timing and speed of resolution. Do you
 20 accept that?

21 A. It's to do with timing to get the branch up and
 22 running again. The problem resolution is
 23 subject to other activities and other schedules.

24 Q. What he's saying there is that you can't rely on
 25 the SLA about resolution because the SLA is

42

1 paragraph. He says:
 2 "... any reboots that took place during
 3 a session would have wiped all EPOSS
 4 transactions."

5 Am I to read into this that there is
 6 a suggestion that reboots could wipe EPOSS
 7 transactions or not?

8 A. Well, that's what the words say, and David and
 9 James were both very knowledgeable members of
 10 the -- technical members of the team. So if --
 11 this is Dave Cooke, isn't it?

12 Q. Yes.

13 A. So if Dave says any reboots that took place
 14 during the session would have wiped all EPOSS
 15 transactions, I would take that as a truth.

16 Q. Is that potentially problematic?

17 A. I don't know because I don't know all the
 18 technical details that go behind the reboot and
 19 wiping old transactions and re-establishing
 20 transactions once they've been rebooted. As
 21 I said in my first -- in November, I'm not
 22 a technical person. So you're getting into
 23 levels of detail that I really can't answer.

24 Q. Well, I mean, these are emails to you from
 25 people providing you with information in which

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1 to respond to an expert -- a technical expert's
 2 report. At the time, did you feel you didn't
 3 have the technical expertise to respond to that
 4 expert report?
 5 **A.** No, because I did reply to it and --
 6 **Q.** Did you say to anybody "I just don't have the
 7 expertise to be able to address these matters"?
 8 **A.** No, I can reflect what people tell me.
 9 **Q.** I mean, we're in the context of litigation here,
 10 court proceedings, quite a serious matter, where
 11 witness statements are being provided and
 12 an expert has been jointly instructed,
 13 a response is being provided to that expert in
 14 the context of court proceedings. Do you feel
 15 you didn't have the expertise to be doing the
 16 job you were doing in that respect?
 17 **A.** Well, I felt comfortable at the time but, now
 18 you're challenging it, I'm not so sure I was.
 19 **Q.** Can we look at FUJ00121512, please. We're here
 20 now on 20 February 2004. This is the response
 21 to Keith Baines from Colin Lenton-Smith,
 22 attaching the appendix which is the response.
 23 **A.** Yeah.
 24 **Q.** If we turn over the page, please, thank you.
 25 "Horizon System Helpdesk".

45

1 about the speed at which we get up". It's not
 2 about resolving the -- the SLA itself is not
 3 about resolving the underlying dispute,
 4 technical issue --
 5 **A.** Is that what you mean by "fully"? So you
 6 fully -- if you fully resolve the call, you get
 7 them up and running and you solve the problem.
 8 In that case, no, the SLA isn't about fully
 9 doing that. It's about getting the outlet back
 10 up and running.
 11 **Q.** Do you think it was still appropriate, after
 12 having received Mr Brunskill's email, to be
 13 focusing in your response on the SLA, which was
 14 about quick fix?
 15 **A.** In response to the statement of nine out of ten,
 16 I can't think of any other way of doing it. You
 17 know, if the reboot advice is there and it's
 18 happening nine times out of ten or too many
 19 times to be acceptable to Mr Coyne, based on his
 20 knowledge and experience, we have to explain why
 21 that is operating like that, with that frequency
 22 of reboots, and the reason it was, was through
 23 the SLAs requiring that we get the post offices
 24 back up and running.
 25 **Q.** What Mr Brunskill is saying is that the

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1 Sorry to trouble you again, but could we
 2 bring onto screen WITN04600305 alongside this.
 3 Thank you very much.
 4 The first paragraph under "Horizon System
 5 Helpdesk", it says:
 6 "It operates under strict contractual
 7 Service Level Agreements covering aspects such
 8 as pick-up time, first time fix and time to
 9 close."
 10 Refreshing our memory from what Richard
 11 Brunskill said, I mean the essence of what he
 12 said was it's not really about the SLA. Do you
 13 think there was too much focus, in light of
 14 that, on the right-hand side in the response on
 15 the SLA?
 16 **A.** I'm not quite sure what you're getting at. The
 17 SLA exists and has to be met in our relationship
 18 with the Post Office.
 19 **Q.** Your request to Richard Brunskill was about "I'm
 20 having to bring in the SLA in order to defend
 21 ourselves. I effectively want to say that
 22 that's going to -- that that's also about
 23 getting the outlet back up and running fully",
 24 and Richards response to you is "It's not really
 25 about getting it up and running fully; it's

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1 underlying issue itself is not subject to the
 2 SLA.
 3 **A.** No, it's not. Because that will fall into
 4 a different sort of line of activity, which
 5 was -- I suppose putting all these problems into
 6 a bucket, looking at PinICLs and PEAKs, and then
 7 aligning them with releases where the work is
 8 done to fix the problem, or putting a workaround
 9 in place through a KEL.
 10 **Q.** The final sentence of Mr Brunskill's first
 11 paragraph, where he says "Hence the
 12 proliferation of reboots to solve known problems
 13 and get things going", does that in any way
 14 feature in the response?
 15 **A.** What in the response on the right?
 16 **Q.** Yes. So the kind of -- you know, his mention of
 17 proliferation of reboots, the mention of known
 18 problems. Does the words "known problems" even
 19 appear on the right-hand side?
 20 **A.** No, because on the right-hand side we're saying
 21 why we do the reboots:
 22 "... quick response to their call and, to
 23 the extent possible over the phone time,
 24 a timely ..."
 25 Sorry:

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1 "... a quick response to their call and, to
2 the extent possible over the phone, a timely
3 return to normal business operations", which is
4 what the SLA was trying to do.

5 **Q.** If you had mentioned in that response that
6 people were being told to reboot to solve known
7 problems, to get things going, do you think that
8 that would have undermined your case?

9 **A.** No, because the desire to reboot to get the
10 business up and running still exists, whether
11 it's a known fault or an unknown fault -- new
12 fault.

13 **Q.** Is there a reference to known faults on the
14 right-hand side?

15 **A.** I don't know. I don't think so.

16 **Q.** Can we keep the right-hand side on the screen,
17 please, and turn to page number 4 of that
18 document. We have there, I think for the first
19 time, this paragraph:

20 "It is worth noting that Fujitsu Services is
21 not aware of similar complaints or claims being
22 made from other Outlets in the above list, some
23 of which have higher call profiles than
24 Cleveleys."

25 Now, that's quite a carefully worded
49

1 "not all". But is it your evidence that, in
2 fact, this paragraph was inserted by somebody
3 else?

4 **A.** I honestly can't remember. I just don't know.
5 I know that Colin may well have tweaked some of
6 the content before he sent it off, because it
7 was going off in his name. Whether he put that
8 sentence in or not, I don't know. Whether I put
9 that sentence in, I can't remember.

10 **Q.** Does it sound like your kind of writing? Does
11 it sound like something that you would have
12 said?

13 **A.** I can't comment on that. I don't know.

14 **Q.** If we zoom out on this page, are you able to
15 assist us with where on this response the
16 acceptance of Mr Coyne's criticism of Elaine
17 Tagg's statement features? I mean, we read that
18 in your initial draft. Where is that now?

19 **A.** I don't know. It's not there.

20 **Q.** Did you remove it? Did somebody else remove it?

21 **A.** I can't remember and I don't know.

22 **Q.** I mean, you'll remember when we looked at it, it
23 was something that you felt that Mr Coyne was
24 right on. Do you remember removing comments
25 that were positive in favour of Mr Coyne?

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1 sentence. You are there referring only, it
2 seems, to the outlets in the above table; is
3 that right?

4 **A.** Yeah. Yes.

5 **Q.** Yes, because, of course, Fujitsu couldn't have
6 said that they are not aware of similar
7 complaints or claims being made by outlets in
8 the general, could they? You --

9 **A.** (Unclear).

10 **Q.** You couldn't have broadened it to outlets
11 because that wouldn't have been true, because
12 there were similar complaints or claims being
13 made from other outlets; is that right?

14 **A.** Presumably, yes.

15 **Q.** Do you remember wording this quite carefully in
16 that regard?

17 **A.** No, because I don't think I worded that
18 sentence. This is a letter from Colin
19 Lenton-Smith, isn't it?

20 **Q.** The letter is sent by Colin Lenton-Smith, it
21 includes what is called a response to expert's
22 opinion.

23 **A.** Yes.

24 **Q.** Most of the words have appeared in your initial
25 thoughts document, not all, and we'll come to
50

1 **A.** No, no, I don't think -- no. I wouldn't have
2 done that.

3 **Q.** Well, who would have?

4 **A.** I've no idea. I mean, this is 24 years ago.

5 **Q.** Well, you said --

6 **A.** Or --

7 **Q.** -- you're sure that you wouldn't have removed it
8 but, equally, you have no recollection because
9 it was 24 years ago.

10 **A.** I mean, I'm not sure whether I would have
11 removed it or not. I can't remember if I did.

12 **Q.** Can we look at page 5, please. We have there
13 the "Conclusion":

14 "The report presented by the Expert is based
15 on a simple analysis of HSH records and not
16 a detailed understanding of how the Horizon
17 System works, or even the prime objectives of
18 the Horizon System Helpdesk."

19 The criticism there is that it's a simple
20 analysis. Do you think that Mr Coyne had been
21 provided with enough information at that stage
22 to provide more of an analysis than he did?

23 **A.** I don't know. You'd have to ask the Post Office
24 that because they provided him with whatever
25 information they did.

52

1 Q. Well, he didn't have transaction data, we know
2 that much, don't we, because that had been
3 destroyed?
4 A. Destroyed.
5 Q. The Helpdesk original records had also, it's
6 your evidence, been destroyed, but another
7 version had been found.
8 A. Indeed, yeah, yeah.
9 Q. But that's all that you recall having been
10 provided by Fujitsu in respect of this case?
11 A. To POL, yeah.
12 Q. Well, to POL, sorry. Yes.
13 A. Yeah, and because we had no direct contact with
14 Jason Coyne, everything went through POL because
15 it was their relationship.
16 Q. We see in later documents reference to inviting
17 Mr Coyne to attend Fujitsu but, at this stage,
18 are you aware of any invitation having been made
19 to Mr Coyne to attend Fujitsu or to obtain
20 further documentation?
21 A. No. Not at this first cycle.
22 Q. We see there it says:
23 "Consequently the opinions expressed in the
24 report, whilst not always incorrect, do not
25 present the whole story and are presented from

53

1 we felt was a fairly well-presented rebuttal
2 and, as we'll see consequently, he just said it
3 didn't make any difference --
4 Q. As --
5 A. -- to his opinion.
6 Q. -- at 20 February 2004, is your evidence that
7 you were still maintaining your professional,
8 calm approach to this case?
9 A. Yes.

10 MR BLAKE: Sir, I think that might be an appropriate
11 time to take a 15-minute break. Could we come
12 back at 11.35?

13 SIR WYN WILLIAMS: Certainly. All right. 11.35.

14 MR BLAKE: Thank you very much.

15 (11.18 am)

(A short break)

17 (11.35 am)

18 MR BLAKE: Thank you very much, sir.

19 Mr Holmes, I'm just going to take you --
20 before the break you referred to the expert's
21 response, where his view stayed the same. Let's
22 look at that. That's FUJ00121535.

23 So we have here, this is the response from
24 Mr Coyne to Weightman Vizards and, if we look at
25 the final page -- sorry, the second page even,

55

1 a single perspective."
2 Mr Coyne was a joint expert. The parties
3 had agreed to rely on a joint expert. Your
4 criticism is that he presents from a single
5 perspective. How many experts would have been
6 enough.
7 A. Sorry, I don't understand what you're getting at
8 there. Um --
9 Q. Presented from -- what did you mean by
10 "presented from a single perspective"? Do you
11 mean he's only one man?
12 A. No, no, no, no, no. He had a view and he put it
13 forward. We didn't always agree with it.
14 Q. Well, "simple analysis", "single perspective".
15 He was a jointly appointed expert selected by
16 agreement between the Post Office and the
17 defendant in that case --
18 A. Yeah.
19 Q. -- liaising with the Post Office's own
20 solicitors. Do you think that that's a fair
21 criticism?
22 A. I think it's just a statement. It's not
23 a criticism, as such. It's just, you know, it's
24 a statement that that was how we felt at the
25 time about his report and we put together what

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1 he says things like:
2 "Defective equipment
3 "I am confident in my statement ...
4 "Worrying discrepancies ..."
5 We see the final sentence is there:
6 "In short to answer the question posed in
7 your letter, no my opinion, currently, remains
8 as stated in my original note."
9 We went through this morning your history of
10 the EPOSS problems, 1998, 1999, 2000. We went
11 through some error logs from the contemporaneous
12 period that Mrs Wolstenholme was having her
13 issues, referring to software problems affecting
14 transactions. We saw that first table that was
15 sent to you by Mark Jones in February, showing
16 that Cleveleys was at the top of the list or the
17 bottom of the list, depending on your
18 perspective. We saw Richard Brunskill's
19 comments about the proliferation of reboots. We
20 saw also you own agreement with important parts
21 of Mr Coyne's original report. Now we have
22 a further response from the jointly appointed
23 expert, where he has maintained his view.

24 Was now, 2 March 2004, not the time to say
25 "Enough is enough, we give in, put up the white

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1 flag"?

2 A. Sorry, is that a question?

3 Q. Yes. It started with the word "would".

4 A. Possibly, yes, but at the time we decided we'd

5 have one more pass around to see if we could

6 provide any kind of extra assistance that might

7 help him to change his mind. Things like, you

8 know, because we couldn't provide crashdumps on

9 failure, of the period in question, we could

10 invite him to Stevenage to see how they actually

11 worked and operated. But, I mean, he'd

12 obviously decided he'd turned his face against

13 the offer. It wasn't just a walk around, as

14 suggested, we were prepared to give him access

15 to systems so he could do further testing and

16 digging around that he wanted to do. So it

17 wasn't just a PR stunt to try to soften him up;

18 it was a serious attempt to offer him access to

19 parts of the system that normally we wouldn't

20 provide access to.

21 Q. Did you do your own vanes at that time of the

22 Known Error Logs, the PEAKs, the PinICLs,

23 looking at the time when Mrs Wolstenholme was

24 experiencing her problems, investigating other

25 branches to see if they were experiencing

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1 just put something into context here? At the

2 beginning of Horizon going in, this provision of

3 litigation support, prosecution support that we

4 were obliged to do, was absolutely in its

5 infancy and each case was unique, insofar as, if

6 it wasn't just providing them with audit data,

7 if it was other pieces of information, work or

8 whatever that they wanted, it was new every

9 time.

10 So we were learning all the time how to go

11 through this process with the Post Office. This

12 was the first time, to my knowledge, that we had

13 to interact, through the Post Office, with

14 an expert witness so when I say "influence"

15 I don't mean "Come on, Jason, change your mind",

16 it was more about giving him access to the

17 things that might help him change his mind or

18 change his opinion.

19 Q. Were you, by this stage, quite frustrated with

20 the situation?

21 A. This was disappointing. The response was

22 disappointing. Essentially, we put quite a lot

23 of work into preparing our response to his

24 report and it was pretty much dismissed as

25 having no effect on his opinion. So yes,

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1 similar problems --

2 A. No.

3 Q. -- looking at the kinds of KELs that we looked

4 at this morning?

5 A. No.

6 Q. Can we look at FUJ00121549. This is a day after

7 that reply was received. This is from you to

8 Colin Lenton-Smith attaching your initial

9 thoughts on Jason Coyne's reply.

10 A. Mm-hm.

11 Q. Your response is at FUJ00121550. Thank you.

12 The third paragraph there, you say:

13 "I have spoken to Jim Cruise ... and we both

14 feel that there is probably another opportunity

15 to influence Jason Coyne's opinion by inviting

16 him to Bracknell and providing him with access

17 to data, records and people who can deal with

18 his observations directly."

19 Did you really feel at that stage, so far

20 down the line, having everything in mind that

21 I've just been mentioning, did you really think

22 that it was proper to be trying to influence the

23 independent, jointly appointed expert's opinion

24 at that late stage?

25 A. Well, "influence" is a word. I mean, can we

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1 "disappointing" is a word, not frustrated, but

2 disappointing, and we wanted to try to find --

3 see if there was a way we could -- "influence"

4 is probably not the right word, you know, offer

5 him further evidence that might help him change

6 his opinion. That was all.

7 Q. Is "disappointing" as high as you would put it?

8 Were you still cool and professional?

9 A. *(The witness laughed)*. Yes, yes. We were.

10 Q. Can we look at FUJ00121557, please. I'll let

11 you have a moment with this particular email,

12 Mr Holmes?

13 A. Yeah, that's fine.

14 Q. 11 March 2004:

15 "Colin, I've done a bit more to this but if

16 I continue I fear I might call him a git or

17 something worse."

18 Still --

19 A. Well, it's like the other email --

20 Q. -- professional?

21 A. It's like the other email where I said I don't

22 want to piss the expert off. I mean, yeah,

23 disappointing, frustrating but, you know, it's

24 just business, isn't it?

25 Q. Is it? I mean, calling somebody a "git", I mean

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1 the impression that is given here is that you're
 2 taking it a little too personally. Do you
 3 disagree with that?
 4 A. I do. It's an internal email.
 5 Q. You originally agreed with some of the comments
 6 in Mr Coyne's report. We took you to those
 7 earlier.
 8 A. Yeah, that's --
 9 Q. Do you think taking this approach so far down
 10 the line, March 2004, was appropriate?
 11 A. What, you mean going back for another -- giving
 12 him the opportunity to come and visit locations
 13 and speak to people and dig into systems?
 14 Q. No, I mean calling an independently, jointly
 15 appointed expert in court proceedings, who has
 16 produced a report and a further report, some of
 17 which you in fact agreed with, calling him
 18 a "git"?
 19 A. Well, I've got nothing more to say to that.
 20 Q. Can we therefore turn to FUJ00121561, please.
 21 We're now at 12 March 2004. An email from
 22 yourself to Colin Lenton-Smith. You've said:
 23 "I've transferred the contentious statement
 24 from the paper to the email because it's not in
 25 our interests to piss the expert off. That said

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1 on to us to do. So if there was an issue of
 2 reputation on the system, brought through by
 3 Jason Coyne's report or his opinion, POL did
 4 very little to dispute or challenge it and it
 5 was all down to us. And if the system came
 6 under challenge through that, then obviously
 7 Post Office Account were potentially at risk of
 8 a reputational impact and we are on the back
 9 foot. There is nothing we can do about it.
 10 Q. Did you see this case as an important case in
 11 which to defend your reputation as a company?
 12 A. Well, obviously, anything is -- you know,
 13 anything to do with the reputation is
 14 an important one to defend but, as I said
 15 a couple of minutes earlier, these were early
 16 days, this was a learning curve, this was the
 17 first time thorough for this kind of work. We
 18 used to provide audit data, that's fairly
 19 straightforward, you know, take the request,
 20 provide a CD and a witness statement as to how
 21 it was stored and retrieved, et cetera. But
 22 this, where it's a bespoke, I suppose, piece of
 23 work, we're learning as we are going.
 24 Q. As time went on, of course, Fujitsu got more
 25 involved in cases and provided witness

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1 it has to be pointed out to Jim that his report
 2 is far from impartial and, in truth, we have
 3 a problem because there is little we can do to
 4 dispel some of his assertions other than say
 5 'rubbish'.
 6 Final sentence there:
 7 "POL have to decide what they want to see
 8 happening here. I understand the reputational
 9 aspects of the situation but I fear that POA
 10 [that's the Fujitsu Post Office Account] are on
 11 the back foot."
 12 There's again reference to "back foot". Did
 13 you still continue to see it as some sort of
 14 combat between yourselves and Mrs Wolstenholme?
 15 A. No, because, as I've explained before, we
 16 weren't involved directly with Mrs Wolstenholme.
 17 We were involved with Post Office Limited, POL,
 18 okay? So the arrangement between POL and
 19 Mrs Wolstenholme, and through Jason Coyne, was
 20 their relationship. We were just trying to help
 21 POL solve their problem.
 22 Q. Who were you on the back foot against?
 23 A. Well, yeah, because whether or not POL managed
 24 the expert, they did very little to refute or
 25 challenge the report. They just passed it all

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1 statements in respect of quite a number of
 2 cases. Were you involved in that?
 3 A. No, no. This essentially, I think, was my last
 4 sort of stab at this, because from about 2005
 5 onwards, I started migrating to different
 6 aspects of work away from litigation support.
 7 And if you go back to the very original email
 8 from Pete Sewell to me, the original request was
 9 sent into security and he asked if I could take
 10 it up, you know, take up the work because,
 11 presumably, they were busy. I don't know. So
 12 I did.
 13 Q. So if this was all a bit difficult for you and
 14 for your department, because you weren't used to
 15 this kind of thing, do you think it was then --
 16 A. No, that's --
 17 Q. -- appropriate --
 18 A. That's not what I said. I didn't say it was
 19 difficult. I just said it was novel and new.
 20 Q. Do you think that Fujitsu and people within
 21 Fujitsu were sufficiently qualified to continue
 22 to be involved in court proceedings after this?
 23 A. Well, interesting one. I mean, this started off
 24 as being -- asking for help to refute a report
 25 from an expert witness. Yes, and I felt that we

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1 were able to do that, and we made our attempt
 2 and failed.
 3 **Q.** If we scroll down on this page, there's the
 4 draft email to Jim Cruise that was written by
 5 yourself.
 6 **A.** Yeah.
 7 **Q.** If we look at the penultimate paragraph, or just
 8 above that actually, it says:
 9 "... the next step is to make available to
 10 him the people, data and resources at Post
 11 Office Account and allow him to address his
 12 doubts to the true experts and practitioners.
 13 "In conclusion it has to be said that his
 14 analysis of the situation is at best selective
 15 and at worst simply wrong, and his conclusions
 16 partial."
 17 Do you regret calling Mr Coyne's conclusions
 18 "partial"?
 19 **A.** Well, that was my opinion at the time.
 20 **Q.** I think you saw some of Mr Coyne's evidence
 21 yesterday. Looking back, do you still continue
 22 to view him as partial?
 23 **A.** Yeah, well, you're applying hindsight now. This
 24 was written in 2004. That was my view at the
 25 time. Whether my view has changed now, based on

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1 approved by the court."
 2 I wouldn't bring it up but, for the
 3 transcript, it's POL00022840.
 4 Considering that, considering the evidence
 5 that you saw yesterday -- or the day before
 6 yesterday, in fact, of Mr Coyne, do you regret
 7 the kinds of allegations that are made in these
 8 emails to the Post Office, or in your internal
 9 emails, the words used, "git", for example,
 10 looking back now on what you have heard and what
 11 you heard in Phase 2 of this Inquiry?
 12 **A.** Well, yeah, some of those comments may have been
 13 misplaced and inappropriate. But, as I said,
 14 that was the situation in 2004. We're now in
 15 2023 with different information available. So,
 16 you know, your opinion can change.
 17 **Q.** But, of course, you did agree with some of his
 18 original opinion, and you --
 19 **A.** Yes --
 20 **Q.** -- had background from your earlier involvement
 21 in the EPOSS matters in those various issues
 22 that were going on within Fujitsu?
 23 **A.** Yes, that's correct.
 24 **Q.** Can we look at FUJ00121724, please. Now, we're
 25 going to come back to this email because it's

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1 what I saw yesterday or the situation as it's
 2 gone on, is -- it's what it is now. But that's
 3 what it was then.
 4 **Q.** What is it now?
 5 **A.** I don't know. Maybe we got it wrong.
 6 **Q.** I can read to you an extract from the *Bates*
 7 litigation. It's the Horizon Issues judgment
 8 number 6. I can bring it on to screen, if you
 9 like, but I'll just read you an extract from
 10 paragraph 800. This is Mr Justice Fraser, he
 11 says:
 12 "I consider Mr Coyne to have been a helpful
 13 and constructive witness ..."
 14 This is in the *Bates* litigation, not in the
 15 *Cleveleys* case, of course.
 16 "... and I find the suggestions made to him
 17 that he was biased to the claimants and not
 18 independent are criticisms that are not
 19 justified. He and his small number of
 20 assistants had done a great amount of
 21 investigation into the very numerous PEAKs and
 22 the smaller number of KELs and he had embarked
 23 upon a careful and sensible exercise necessary
 24 for him to reach conclusions on the Horizon
 25 Issues as drafted and agreed by the parties and

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1 dated 20 August 2004, so I'm taking it slightly
 2 out of sequence in time. But I just want to
 3 take you to number 2 there, which references the
 4 Shobnall Road, case. It says there that:
 5 "Shobnall Road has come back. Bill has
 6 apparently been asked to provide a Witness
 7 Statement to the effect that nothing contained
 8 in the HSH calls over the period in question
 9 could have caused, or be described as, a system
 10 malfunction. I'm attaching a brief analysis of
 11 the HSH transcripts that I did in April.
 12 Comments made by engineers that 'keyboards can
 13 cause phantom transactions' do not help the Post
 14 Office's position. I suspect that we cannot
 15 make the statement required and when [Post
 16 Office] read the transcripts in detail they may
 17 well think that they could not submit them
 18 anyway."
 19 The reason I'm taking this to you now is
 20 there is reference to you being involved in
 21 analysing the transcripts in April from Shobnall
 22 Road. So this is around the same time as those
 23 emails I've taken you to, where you are accusing
 24 Mr Coyne of being partial. You were, it seems,
 25 reading the transcripts in the Shobnall Road

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1 case. Do you remember doing that?

2 **A.** No, I don't. I don't.

3 **Q.** Well, I can take you to the analysis of the

4 transcripts. I think it's FUJ00121725.

5 Is this the analysis that you were doing in

6 April 2004 in the Shobnall Road case?

7 **A.** Well, it looks like it but I don't remember it.

8 **Q.** Okay, I'll read you a few extracts from it.

9 If we start with 6 January 2003, it says:

10 "[Postmaster]: failing to register

11 transactions. Freezing when scanning. Phantoms

12 when unfreezing. 7 January SSC could not

13 recreate the problem as described by [the

14 postmaster]. 2 [Known Error Logs] referenced.

15 HSH then asked about lighting as could cause

16 interference. PM also using an RF baby

17 machinery and local cab firm had been operating

18 and setting off burglar alarms. PM also stated

19 suffering from power surges. Call closed and

20 raising new call as environmental but no

21 evidence of new call."

22 If we scroll down to the substantive entry

23 on the 12 December 2002, it says:

24 "New screen and cable fitted ... and both

25 engineers saying problem is NOT monitor.

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1 agree with what Mr Coyne has to say"?

2 **A.** With hindsight, possibly, yes. But we still --

3 I still felt it was worth having another go.

4 Post Office didn't. They didn't offer the

5 response to Mr Coyne, so that was the end of it.

6 **Q.** Can we turn to FUJ00121637, please. We're now

7 moving to June 2004, 7 June. It's an email from

8 yourself to Colin Lenton-Smith. I'm going to

9 read to you a few extracts:

10 "POL are still taking advice as to how best

11 to deal with this and Mandy's view/belief was

12 the safest way to manage this is to throw money

13 at it and get a confidentiality agreement

14 signed. She is not happy with the 'Expert's' as

15 she considers it to be not well balanced and

16 wants, if possible, to keep it out of the public

17 domain. This is unlikely to happen if it goes

18 to Court."

19 The next paragraph, the final sentence:

20 "The liability question is removed and it's

21 then just about 'how much to go away and keep

22 your mouth shut'.

23 "One concern I have is that while they've

24 been dickering about waiting for guidance from

25 their agents, the trial date has been set and

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1 Phantom transactions and not registering real

2 transactions. Certain products not registering

3 at all. HSH advise 'keyboard can cause phantom

4 transactions as well but as she has been having

5 so many problems with figures disappearing then

6 the keyboard and base unit will be swapped'."

7 An entry on 6 December 2002:

8 "PM: screen not responding and keyboard will

9 not work. Also system freezing and then

10 releasing itself. Later HSH suggested rebooting

11 but did not resolve the problem.

12 "HSH records shows 'Replaced screen due to

13 phantom transactions/calibration problems."

14 This was your analysis in April 2004. At

15 the risk of repeating myself, is now not the

16 time to say maybe Mr Coyne's report is not so

17 wrong after all?

18 I mean, we have there a subpostmaster

19 experiencing issues with transactions, they are

20 referred to by Fujitsu as "phantom

21 transactions". We've seen the earlier Known

22 Error Log from years before that referring to

23 phantom transactions. You were no doubt aware

24 of the description of phantom transactions. Is

25 April 2004 the time to say, "Maybe we should

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1 it's now too late for them to enter a Witness

2 Statement that might further repudiate the

3 Expert's original report. This means that their

4 Council [I think that means counsel with an 'S']

5 might have to have thorough briefing, by us,

6 before going to Court."

7 By 7 June 2004, do you think that you, by

8 that stage, had lost all objectivity in respect

9 of this matter?

10 **A.** What makes you say that?

11 **Q.** Well, for example, the history of EPOSS; error

12 logs that we saw; the table that was sent to

13 you; Richard Brunskill's comments; your

14 agreement --

15 **A.** No, I know all that but what makes you say had

16 I lost all objectivity?

17 **Q.** Looking at the final paragraph, you are still

18 trying to further repudiate the expert's

19 original report and that is a report that, in

20 some respects at least, you originally agreed

21 with. Why are you persisting in June 2004 to

22 try to fight this matter?

23 **A.** I'm not. This is an internal mail to Colin

24 saying it's now too late for them, POL, to enter

25 a witness statement that might further repudiate

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1 the expert's original report, if they chose to
 2 do it. But if they didn't, and they didn't,
 3 then it's a different end game, isn't it?
 4 **Q.** The impression given by that email though is
 5 that you're quite frustrated that you're not
 6 going to be able to defend yourselves?
 7 **A.** No, that's not so. That's your interpretation.
 8 That's not what was meant by that.
 9 **Q.** I'm giving you an opportunity to say whatever
 10 you like on that. What's your interpretation of
 11 this email?
 12 **A.** Just that if they wanted to further repudiate,
 13 which they decided not to, then it's getting
 14 very late, the trial date has been set, for them
 15 to answer a witness statement that might further
 16 repudiate the expert's original report. That's
 17 all.
 18 **Q.** The final sentence:
 19 "Do we need to involve Masons at this
 20 stage?"
 21 Masons being Fujitsu's lawyers, is it?
 22 **A.** Yes, that's correct.
 23 **Q.** Why were you wondering whether you needed to
 24 involve your own lawyers at that stage?
 25 **A.** It was -- well, simply because it was getting up

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1 content is accurate but "opinion is crap"?
 2 **A.** Well, that's a contemporaneous record of the
 3 conversation I had with Mandy Talbot on the
 4 phone, so it must have come out of that
 5 conversation.
 6 **Q.** Do you think those were her words or your words?
 7 **A.** I can't remember.
 8 **Q.** Can we look at FUJ00121668, please. 30 July
 9 2004, we have an email from yourself to Colin
 10 Lenton-Smith. You've:
 11 "... spoken to Keith Baines who alluded to
 12 a number of other calls that he was going to
 13 have to make on the case but didn't pass any
 14 details on ... He said that Dave Smith would be
 15 speaking to Ian on the subject -- it seems Dave
 16 believes 'we' (not sure whether that's the Royal
 17 we or just us) have conceded what 'we' should
 18 not have done and POL are now in a difficult
 19 position. Given our late involvement by POL
 20 I trust he's not trying to park it all on us."
 21 At this stage, July 2004, was there
 22 something of a blame game going on in relation
 23 to this case?
 24 **A.** Well, no, it's just that, in that conversation
 25 with Keith, obviously, you know, he said Dave

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1 to a court situation and it was a question that
 2 I was asking Colin as the Commercial Manager, do
 3 we need to involve Masons at this stage?
 4 Nothing more or less than that.
 5 **Q.** Can we look at WITN04600309, please. Is this
 6 your note?
 7 **A.** Yeah, this is my daybook.
 8 **Q.** Can you assist us with the date in the top
 9 left-hand corner? Is this the same date, is
 10 this 7 June 2004? The middle number could be
 11 a 5 could be a 6. Perhaps we could zoom in on
 12 that if possible.
 13 I think that's a 6. Is that 7 June, the
 14 same date?
 15 **A.** It looks like a 6, yeah.
 16 **Q.** The final entry on that page is:
 17 "Fear that throwing money at the problem is
 18 the only way to deal with it:
 19 "[Either] admit [the] report.
 20 "Concede [the] content is accurate (it is
 21 but opinion is crap).
 22 "Liability is removed
 23 "Question 'how much to keep your mouth
 24 shut!'"
 25 What do you mean here in brackets, that the

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1 Smith and we saw that slide that Dave Smith
 2 produced in the session this morning, with Jason
 3 Coyne, who showed him the slide that Dave Smith
 4 had produced. Again, I don't know who "we", is,
 5 I don't know if it's "we" POA or "we" POL and
 6 POA have conceded what we should not have done,
 7 and I'm not sure what we did concede, and now
 8 POL are in a difficult position. So, you know,
 9 so my concern there was well, is he now trying
 10 to park the blame on us or is he sort of saying
 11 that, you know, we've got to find a way of
 12 managing this?
 13 And my comment about "given our late
 14 involvement", bear in mind that we didn't get
 15 involved in this until -- was it February 2004?
 16 And the issues were all happening in 2000/2001.
 17 You know, I just wanted to be certain that he
 18 wasn't going to try and push this all onto us
 19 and say we've done a bad job because I didn't
 20 think we did.
 21 **Q.** Was there pressure in that respect? Did you
 22 feel pressure coming from POL that you may
 23 not -- that you may be blamed in this case?
 24 **A.** Well, no, I mean, the words there are the words
 25 that came from that conversation with Keith. My

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1 feeling, my understanding, my belief and my
2 concern but seeing as I didn't know who "we"
3 were, was it POA, was it POA and POL, or was it
4 POL -- yeah. So, you know, I was just concerned
5 that we were -- he was going to try and say it's
6 all our fault.

7 **Q.** Moving to August 2004, can we look at
8 WITN04600310, please. Is this also a note that
9 you made?

10 **A.** Yeah, it was a case conference call that was
11 held in August and I just making handwritten
12 notes of the progress of the meeting.

13 **Q.** Now "SL" is POL's counsel. So when there are
14 references to "SL", it seems that is to Stephan
15 Lewinski?

16 **A.** Again, incorrectly spelt, so I apologise for
17 that but yes.

18 **Q.** His advice is recorded there. If we look at the
19 final two sentences of his advice, it says:

20 "[Had] if goes to dispute likely to find
21 that computer system let [Julie Wolstenholme]
22 down."

23 Was it your understanding that counsel's
24 advice was that, if it went to court, the court
25 was likely to find that the computer had let the

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1 conference call and I was there, I think,
2 probably because of my involvement in it up to
3 that point.

4 **Q.** If you disagreed with something would you have
5 felt free to say so?

6 **A.** Yes, but I would have been out of my depth
7 talking to, you know, the legal guys.

8 **Q.** If we look at page 4, it says, I think it's
9 "Status of 2nd report". That's the second
10 report that you had written?

11 **A.** Yes.

12 **Q.** "Not forwarded to Mr Coyne."

13 **A.** Correct.

14 **Q.** "KB and I need to get our act together. KB
15 agreed."

16 Now, that second report was the one that
17 offered, I think, for Mr Coyne to attend
18 Fujitsu?

19 **A.** Yes, that's correct.

20 **Q.** Do you recall why it wasn't forwarded to
21 Mr Coyne?

22 **A.** No, no. I'm not sure I found out about it until
23 really quite late after the event. But it
24 wasn't forwarded to Coyne. I don't know why.
25 POL must have had a view that it wouldn't have

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1 subpostmistress down?

2 **A.** That's what you can read into that. That was
3 his opinion.

4 **Q.** Can we look page 3, please. We have halfway
5 down that page another opinion from the Post
6 Office's counsel. It's recorded as saying:

7 "Cannot say that there were no glitches.

8 Will be candid about that but what did we do to
9 help it."

10 So the focus seems to be not on the fact
11 that there were no errors but now it's turning
12 to the Helpdesk and assistance that was provided
13 to Mrs Wolstenholme. Do you recall that?

14 **A.** Well, that's what that looks like.

15 **Q.** At this meeting, did you feel able to talk
16 freely?

17 **A.** Yeah, I mean, there's a couple of entries with
18 my initials against it.

19 **Q.** Yes. I mean, if we look at the first page, it's
20 a discussion that involves yourself, POL
21 commercial, POL Legal, Weightman Vizards,
22 Masons -- so that's your own solicitors, is it?

23 **A.** Yeah, yeah.

24 **Q.** POL Commercial -- sorry, POL counsel there.

25 **A.** Yeah, so, I mean, essentially, it was a POL case

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1 made any difference, so they ain't gonna do it.

2 **Q.** This was August 2004, where you were part of the
3 meeting with the Post Office and the legal team.
4 Was that a decision that you were part of?

5 **A.** Sorry, what decision: not to forward the report?

6 **Q.** Yes. Certainly it reads as though you were part
7 of the decision-making process in that respect?

8 **A.** No, that's how you're reading it but I wasn't
9 part of that decision-making process. That was
10 a POL decision on their own.

11 **Q.** Did you respond, when you were told that it
12 wasn't forwarded to Mr Coyne?

13 **A.** No, no, we were just disappointed.

14 **Q.** It says:

15 "[Keith Baines] and I need to get our act
16 together."

17 What did you mean by that?

18 **A.** Well, I think there was some outstanding
19 documents that we needed to get sorted out and
20 it was just -- it's just a phrase, isn't it?

21 "We need to get our act together". Keith
22 agreed. And there's an email following it,
23 where there's a list of items that I said
24 I would be producing, which I did, and I think
25 Keith had a similar list.

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1 Q. Can we now look at WITN04600215, please.
 2 16 August, we have an email from yourself to
 3 Bill Mitchell. And you say:
 4 "Bill,
 5 "Just a quick note to let you know that
 6 Mrs Wolstenholme finally accepted an increased
 7 offer from the [Post Office] to settle her case.
 8 Equipment will be returned as part of the Court
 9 Order and she will have a confidentiality clause
 10 associated with her settlement. However, she
 11 was still going to call a host of other PMs as
 12 part of her case so I guess the 'issue of poor
 13 systems and inadequate levels of support'
 14 argument could well be rolled out again."
 15 In that meeting that you had with counsel,
 16 the advice from counsel was that, if you get
 17 into a dispute, it is likely to be found that
 18 the system let Mrs Wolstenholme down. Also,
 19 advice from counsel was that you cannot say that
 20 there were no glitches. Did you still think
 21 that the issue of poor systems and inadequate
 22 levels of support argument was just a silly
 23 argument that it was being rolled out?
 24 A. No, I was just advising Bill that I think we
 25 could see that one again.

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1 Q. Can we look at FUJ00121724, please. This is the
 2 document we looked at earlier and I said I'd
 3 return to it, so we're now at 20 August and it's
 4 to Colin Lenton-Smith and Bill Mitchell. We've
 5 looked at the Shobnall Road issue but let's look
 6 at Cleveleys now. It says:
 7 "Although Cleveleys may appear to be closed
 8 it could be construed that POL bought off
 9 Mrs Wolstenholme rather than defend their
 10 system. Even if a gagging order is placed on
 11 the woman, she apparently has a gaggle of
 12 postmasters lined up to support her case and
 13 they will be well aware of what the final
 14 outcome was."
 15 Do you think, looking at that now, that that
 16 was an appropriate stance to have taken?
 17 A. Well, the words may be unfortunate but no,
 18 I think it's to be expected, isn't it?
 19 Q. Reference to a "gaggle of postmasters", I mean,
 20 do you regret what appears to be effectively
 21 a demonisation of subpostmasters in this regard?
 22 A. Well, I think "demonisation" is a bit of
 23 a strong word. I could have said, you know,
 24 a "collection of postmasters", a "gaggle of
 25 postmasters", I don't know what the collective

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1 Q. Did you, at that stage, think that there might
 2 be something in that argument?
 3 A. I can't say that I did, to be honest. I don't
 4 think I put too much into it.
 5 Q. I mean, the expression "rolled out" suggests
 6 that -- I mean, it's a line that's rolled out
 7 time and time again but not something with
 8 substance in it. Is that a fair analysis of
 9 what is said earlier or is that unfair?
 10 A. No, again, I think that's your interpretation.
 11 All I'm saying is that it's quite possible that
 12 the issue of poor systems and inadequate levels
 13 of support could well be rolled out in future
 14 cases --
 15 Q. Did you a view --
 16 A. -- because it's --
 17 Q. -- as to those who were rolling it out in cases?
 18 A. When you say "did I have a view", do you mean
 19 did I have an opinion of the postmasters?
 20 Q. Absolutely. Did you have an opinion as to the
 21 type of person who rolled out that argument?
 22 A. No, not at all. It's just an obvious thing to
 23 do. If a case has been won using that argument,
 24 then future cases could well use the same
 25 argument in order to try and secure a victory.

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1 term is for them but she apparently was going to
 2 circulate through a number of postmasters the
 3 outcome of the court case and it was, you know,
 4 I guess inevitably that the -- they would use it
 5 to their benefit.
 6 Q. What could possibly be wrong with subpostmasters
 7 using success in a court case to their benefit?
 8 A. Nothing.
 9 Q. So why the critical words and why such
 10 an attempt to prevent that from happening?
 11 A. Sorry, where was I attempting to stop that
 12 happening?
 13 Q. Well, the continued effort to defend and respond
 14 to Mr Coyne's independent report over months may
 15 be said to be a continued effort to try to
 16 prevent a negative outcome that could be shared
 17 with a "gaggle of postmasters". Do you agree
 18 with that?
 19 A. No, I don't. No, I mean, the two things are
 20 separates. I mean, in trying -- in refuting or
 21 in arguing against the -- Jason Coyne's report,
 22 that was one part of our support to the Post
 23 Office. That's been and gone to now. This is
 24 after the event.
 25 Q. Do you not think that that reference there shows

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1 concern on your part that Mrs Wolstenholme would
2 share what was a successful court case on her
3 part with other subpostmasters and that that
4 would cause you some sort of problem in the
5 future?

6 **A.** I don't think so. I mean, it just says what it
7 says. Even if a gagging order is placed --
8 because don't forget, as far as I was aware,
9 I was talking to Mandy Talbot, she said that she
10 would want to get a gagging order. So I'm
11 saying I don't know what the outcome was but
12 even if it was in place, it's highly unlikely
13 that it would stop her or stop others trying to
14 find out what the outcome was and how that was
15 achieved.

16 **Q.** "Even if a gagging order is placed on the
17 woman", do you not think that the words used
18 were derogatory at that time, showed a sense of
19 frustration?

20 **A.** No, no.

21 **Q.** Is there anything that you would like to raise
22 with the chair before I finish?

23 **A.** Well, no. I did mention earlier about the fact
24 that this was a -- this was a unique situation
25 that we found ourselves in, that I found myself

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1 was their work. If they don't want to do
2 anything with it, then it's up to them, it's not
3 up to us.

4 **SIR WYN WILLIAMS:** No, I follow that. I just
5 wondered whether, because it was a specific
6 suggestion that had been made, no doubt made by
7 you but having no doubt considered it with
8 others, whether you would have liked to have
9 known the reason why they didn't do it. But
10 there we are.

11 **A.** Yeah, perhaps natural curiosity didn't get the
12 better of me that time.

13 **SIR WYN WILLIAMS:** Fine. Okay.

14 **MR BLAKE:** Sir, do you have any other questions,
15 otherwise we have some on behalf of Core
16 Participants?

17 **SIR WYN WILLIAMS:** No, they can fire away.

18 **MR BLAKE:** Thank you very much.

19 **A.** That's a bit of an unfortunate phrase!

20 **SIR WYN WILLIAMS:** There we are. Even chairs of
21 inquiries have to occasionally choose their
22 words carefully, Mr Holmes.

23 **Questioned by MR JACOBS**

24 **MR JACOBS:** Thank you.

25 Good afternoon, Mr Holmes, I represent 157

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1 in and we were having to learn how to do this
2 and to pick up how to do this as we went along.
3 It was the first time I'd been involved with
4 an expert witness as such.

5 POL had asked us to challenge the report,
6 which we did. All right, perhaps we took of the
7 challenge one step too far by offering him site
8 visits, and what have you, but there comes
9 a point when you want to see something reach
10 a natural conclusion and the second -- the offer
11 to host him and let him have access to people
12 and systems, was probably the last toss of the
13 die. The fact that Post Office didn't forward
14 that report to him was their choice and then we
15 take the next step which is going to court.

16 You know, as I said at the start, it's
17 a job. We had a job of work to do and we did
18 that work.

19 **SIR WYN WILLIAMS:** Did you ever discover why Post
20 Office decided against making the offer that you
21 thought that they should?

22 **A.** No, no sir, I didn't.

23 **SIR WYN WILLIAMS:** All right, thank you.

24 **A.** At one level, it didn't seem important. They
25 chose not to do it. It was their report. It

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1 subpostmasters. I have couple of questions for
2 you. Could we go to document FUJ00121486,
3 please. We'll just wait for it to come up on
4 the screen. If we scroll down to just before
5 the paragraph beginning "The Expert's Opinion",
6 so that's right. So the paragraph that begins
7 "On 6th February". So it says:

8 "On 6th February POA received a copy of the
9 Expert's report with a request from POL for
10 an early response."

11 Then:

12 "POL are concerned that the Expert's opinion
13 (that the system was at fault) might set
14 a precedent against future POL prosecutions."

15 Now, this is a draft response that you sent
16 to Mr Lenton-Smith in February 2004, in relation
17 to a letter that he'd received from Mr Baines.
18 Do you recall that?

19 **A.** Yeah, yes, I do.

20 **Q.** Mr --

21 **A.** Sorry, I'm looking to the side. I'm looking at
22 my laptop to find some documents, which I think,
23 or a daybook scan, where that concern was raised
24 in a conversation.

25 **Q.** Well, I'm going to ask you about that a bit

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1 later. Mr Blake put the same point to you from
 2 another document and you said that that was your
 3 understanding at the time; is that right?
 4 **A.** Yeah.
 5 **Q.** If we could now go to your witness statement, at
 6 paragraph 10 and your statement is WITN04600200.
 7 **A.** Is this my third or second witness statement?
 8 **Q.** I think it's your second witness statement.
 9 It's your second witness statement, yes.
 10 **A.** Right. Let me just get there. Yeah.
 11 **Q.** Paragraph 10, please, which is -- I've got
 12 page 76 but I think it's page 4 of 10?
 13 **A.** Yes, that's correct, I've got it.
 14 **Q.** We'll just scroll down to 10. So you say that
 15 you were exasperated with the Post Office and
 16 their handling of this issue and their handling
 17 of the expert witness and lack of communication.
 18 Then you say here:
 19 "[Post Office Limited], specifically Jim
 20 Cruise and Mandy Talbot, had both verbally
 21 expressed concerns about precedent should the
 22 Expert's report become common knowledge and had
 23 asked for our assistance in challenging it."
 24 Now, what I want to ask you is what did Jim
 25 Cruise and Mandy Talbot verbally express about
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1 would be, as I've said in another email, rolled
 2 out time and again by postmasters who were
 3 suffering the same sort of issue.
 4 **Q.** You see, our clients' take on this evidence, and
 5 I suggest that this must be right, is that Post
 6 Office didn't want subpostmasters to use this
 7 material in court because it might lead to them
 8 being acquitted. That's really what this is
 9 about, isn't it?
 10 **A.** Well, I think that's what I've just said but
 11 you've probably put it much better than I can.
 12 **Q.** Thank you very much.
 13 So our clients also say, and I wanted your
 14 comment on this, that really what the Post
 15 Office were doing was they were, in 2004, trying
 16 to cover up evidence of defects in the Horizon
 17 System. Do you accept that?
 18 **A.** I can't really answer to that one. I don't --
 19 **Q.** Well --
 20 **A.** I don't know what their motive -- motivation was
 21 to handling the case. I just know what we did
 22 to try to assist them in what they were asking
 23 us to do.
 24 **MR JACOBS:** I'm just going to ask if I have any more
 25 questions to ask.

1 precedent? You haven't said what it was that
 2 they said.
 3 **A.** Well, that would have been in phone
 4 conversations. I'm just looking at -- just bear
 5 with me a minute. Well, you've seen the day
 6 book scan from the phone call with Mandy Talbot
 7 in June. No, I mean these concerns would have
 8 been expressed in phone conversations and also
 9 in Keith Baines's letter. Obviously I've got
 10 a record of Mandy Talbot's phone conversation
 11 but not Jim's, where that concern was expressed.
 12 So in a -- my recordkeeping is not as good as it
 13 usually is.
 14 **Q.** Well, of course, this was a long time ago but
 15 you say in your statement that they both
 16 verbally expressed concerns and I really wanted
 17 to ask you whether you remember what it was that
 18 they said, what specific concerns they expressed
 19 about precedent.
 20 **A.** Well, no, I suspect what I'm talking about there
 21 is the fact that if the -- if the report --
 22 well, which it did, of course -- if the report
 23 resulted in a positive outcome for the
 24 postmaster, then I think they were concerned
 25 that this issue of poor systems and poor support
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1 No, that's it. Thank you very much.
 2 **MR BLAKE:** Mr Moloney or Mr Henry.
 3 **Questions by MR MOLONEY**
 4 **MR MOLONEY:** I've just two things to ask you about,
 5 please, Mr Holmes.
 6 **A.** Yeah.
 7 **Q.** Firstly, when you prepared your response to
 8 Mr Coyne's report or indeed your response to his
 9 reply, did you check PinICLs or KELs relating to
 10 Cleveleys?
 11 **A.** No.
 12 **Q.** You're sure about that?
 13 **A.** Yeah. I mean, I didn't get down to the
 14 technical level of looking at individual
 15 PinICLs, PEAKs or KELs.
 16 **Q.** Right.
 17 **A.** The discussion was a slightly higher level of
 18 just, you know, the principle of whatever it
 19 was -- I can't remember now, so far back.
 20 **Q.** Could we, just to clarify that, just have a look
 21 at WITN04600206. This is the first page. This
 22 is "Fujitsu Services Post Office Account
 23 Response to the Expert's Reply to Fujitsu
 24 Services Submission"?
 25 **A.** Yes, so this is our second report.

1 Q. Yes, and under the "Horizon System Helpdesk", if
2 we scroll down slightly to the second
3 subparagraph, we can see that:
4 "His statement that the HSH was not
5 interested in getting to the 'bottom of the
6 continual occurrence' is flawed given that one
7 of the calls that he specifically referenced was
8 closed using a Known Error Log. The presence of
9 a KEL clearly indicates that problems were
10 investigated and workarounds provided pending
11 a permanent fix through a system upgrade."

12 So does that in any way affect your answer
13 that you didn't look at PEAKs or KELs in
14 relation to Cleveleys or PinICLs?
15 A. No, what I suspect may have happened there and
16 I can only surmise that that was the case, is
17 that I may well have had conversations with
18 interested parties about the response that he'd
19 made and the question of HSH not interested in
20 getting to the bottom of the continual
21 occurrence was probably challenged by somebody,
22 one somebody I was talking to, and saying "Well,
23 no, that's not true because we have KELs", which
24 means that we do look at the problem to try to
25 come up with a quick solution for future use,

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1 Then at 2:
2 "Introduce formal Root Cause Analysis into
3 Problem and Complaints management as a matter of
4 course. This is already being addressed within
5 [Customer Service]."

6 Then, at page 7 of the document, we see
7 4.1.2, "Problem Root Cause Analysis":

8 "CS/PRD/021 also introduces the concept of
9 Root Cause Analysis for problems although again,
10 no guidance or examples are provided. No
11 evidence of completed [Root Cause Analyses]
12 could be identified.

13 "It is recommended that RCA guidance is
14 provided, either in CS/PRD/021 or in
15 a standalone procedure."

16 So by November 2001, around the time of or
17 just after, even, the Cleveleys relevant event,
18 there was sufficient concern to note that
19 there'd been no evidence of any RCAs completed
20 for any problems addressed so far.

21 A. Well, yes, that's what's in the report, so that
22 must have been what was found.

23 Q. You're the originator of this report, Mr Holmes?

24 A. Yeah, yeah.

25 Q. Was this not consistent with the analysis of

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1 pending an update or a reissue of software at
2 a later release date.

3 Q. The second issue concerns that, as it were,
4 getting to the bottom of things and root cause
5 analysis. Could we look at --

6 A. Yeah.

7 Q. -- document POL00089802. This, as you can see,
8 is an "Audit of Customer Service Support
9 Processes", and we can see that the originator
10 is yourself, Mr Holmes?

11 A. Yes, yes.

12 Q. It's 1 November 2001, and if we could please go
13 to paragraph 3.1, at page 3 -- thank you very
14 much -- which reads that:

15 "The overall opinion formed is that the
16 management of Incidents, Problems and Complaints
17 and Alerts ... has reached a level of maturity
18 where consistency now the norm ..."

19 But if we see that, further down:

20 "There are a number of relatively minor
21 issues that, while not impairing the current
22 management of incidents and problems could, if
23 accepted and addressed improve the performance
24 of this part of [Customer Service]. They are
25 ..."

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1 Mr Coyne?

2 A. Well, yes, I suppose it is. I mean, yeah.

3 Q. Was that reflected in your response to the
4 report of Mr Coyne?

5 A. I -- well, you can show me the response but
6 I guess what you're saying is that, although
7 we'd found this in an audit in 2001, it wasn't
8 reflected back in our response to him.
9 I suppose, in my defence, there is an awful lot
10 going on in different streams. So, yes, this
11 would have been found at the time of the audit
12 but it doesn't stick in the forefront of my mind
13 when I'm looking at other things going on. Now,
14 that may sound like a poor excuse, I know, but
15 that's the way it is.

16 Q. Shall we just look at your response, just to
17 assist you, which is FUJ00121504. Towards the
18 bottom of page 1, if we could, please. There we
19 see in terms of the Helpdesk:

20 "The HSH represents the 1st line of support
21 to postmasters. It operates under strict
22 Service Level Agreements covering aspects such
23 as pick-up time, first time fix and time to
24 close. These measures are imposed by Post
25 Office Limited and are designed to ensure that

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1 PMs receive a quick response to their call and,
2 to the extent possible over the phone, a timely
3 return to normal business operations.

4 Depending on the nature of the call the HSH,
5 operator would work with the PM to solve the
6 problem and return the Outlet to normal
7 operation as soon as possible, in line with the
8 prevailing SLAs. If this could not be achieved
9 the call would be escalated up the support
10 channel to 2nd, 3rd or 4th line depending on the
11 severity of the problem. Again, the primary
12 objective is to return the Outlet to normal
13 operation as soon as possible and rebooting the
14 counter often meets that objective. This does
15 not mean that the problem was closed at that
16 point in time, as a detailed scrutiny of overall
17 problem management in the Post Office Account
18 would reveal."

19 Then we see into "Transaction Handling on
20 Reboot".

21 That's a fairly generic statement about the
22 purpose of HSH, isn't it, Mr Holmes?

23 **A.** Yes, it is, yeah.

24 **Q.** Did you take any steps to investigate whether
25 there'd been any root cause analysis in respect

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1 clearly, Mr Holmes?

2 **A.** Yes, I can now. Yeah.

3 **Q.** You can. What does it say? It's a PEAK
4 incident management system. So what does that
5 mean?

6 **A.** Well, PEAK was the system where all incidents
7 were logged.

8 **Q.** You were, you say, not involved at that level?

9 **A.** I was on this one because this was an issue that
10 affected our ability to produce audit data
11 request -- request sort of thingy-bob -- what's
12 the word -- SQL type query statements because
13 there was no Attribute Grammar catalogue
14 available for the TMS journal. So we weren't
15 able to look at a request coming in from outside
16 and say "Well, in order to satisfy that we need
17 to get this piece of information, this piece of
18 information, that piece of information, and
19 stick it together as a query type statement".
20 So that was just identifying the absence of
21 a piece of technical documentation.

22 **Q.** Did this feature, this problem, that you have
23 just referred to, in the original report that
24 you wrote with Mr McDonnell?

25 **A.** No, I don't think it did. I don't think it did.

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1 of problems at Cleveleys?

2 **A.** No.

3 **Q.** Why not?

4 **A.** Because that wasn't really the objective of what
5 I was trying to do with this response.

6 **Q.** Did you have skin in the game here, as you said,
7 Mr Holmes?

8 **A.** Yeah, I'd been asked to do something and I was
9 doing it to, at that time, the best of -- what
10 I felt was the best of my ability. Of course,
11 21 years later, it's very easy to criticise and
12 come back and say "Well, you didn't do that very
13 well, did you?" And the answer is, no,
14 I didn't, I can see that and I could have done
15 more but, at that time, I felt that was what was
16 required.

17 **MR MOLONEY:** Thank you, Mr Holmes.

18 **Questioned by MR HENRY**

19 **MR HENRY:** Good afternoon, Mr Holmes. Edward Henry,
20 representing a number of subpostmasters,
21 including Ms Tracy Felstead.

22 Mr Holmes, could I just ask you, and it's in
23 relation to a question that you have been asked
24 by my learned friend just now, could I ask you
25 to go to FUJ00075674, please. Can you see that

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1 **Q.** But would you agree that it would again be
2 symptomatic of a financial accounting system
3 that was unfit for purpose?

4 **A.** No. No, this -- all this was, was just saying
5 we didn't have any record descriptions that
6 would allow us to search through the records to
7 pull audit data off. Nothing to do with what
8 the system itself was doing.

9 **Q.** But it's very, very important, isn't it, in
10 order to analyse root cause analysis of problems
11 in the system and, also, the recording and
12 retention of data must be fundamental to
13 a financial accounting system that works?

14 **A.** Well, I agree with you, and the TMS journals
15 were there in the audit archive and were
16 complete and valid and accurate. What we didn't
17 have was the means to get into them to pull the
18 information out that was required on request.
19 That was all. I'm trying to think of
20 a parallel.

21 **Q.** Well, I suppose the parallel could be, it could
22 be like, yeah, you've got all of the stuff, like
23 the hieroglyphs but until you've got the Rosetta
24 Stone, you don't know what the hieroglyphs are
25 because you can't access them.

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1 A. Absolutely right.
 2 Q. Right. So let's just go to the first entry
 3 there, 1 July:
 4 "The ability to interrogate TMS journals is
 5 an integral element of the Audit Solution that
 6 we supply to POCL. The interrogations are
 7 achieved using R-Query and constructing SQL type
 8 query statements. The structure of the TMS
 9 records is complex and uses Attribute Grammar to
 10 establish identities for the record attributes.
 11 There is currently no definitive catalogue of
 12 the Attribute Grammar used in the Horizon
 13 solution ['solution' perhaps should have been
 14 put in inverted commas] which makes the
 15 construction of an R-Query statement to meet
 16 a customer's business enquiry difficult, time
 17 consuming and very 'hit and miss'.
 18 Were those your words?
 19 A. Yes.
 20 Q. "Hit and miss".
 21 You are still in control of this issue in
 22 September 2001, are you not?
 23 A. Yes.
 24 Q. Because we go to the 12 September 2001 at 11.05.
 25 The call record has been assigned to the team

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1 Q. That's 21 June.
 2 A. Yeah, because on 19 January, there's
 3 a document in PVCS, with a reference at version
 4 0.4, that is an up-to-date Attribute Grammar
 5 catalogue. So in other words, they had produced
 6 the document that was missing when the PinICL
 7 was first raised. So that was passed back to me
 8 as the originator to close it, which I did.
 9 Q. But this was a serious problem and it wasn't
 10 closed until 2004?
 11 A. Why do you say it's a serious problem, Mr Henry?
 12 The absence of a catalogue that describes the
 13 records for audit to build SQL queries was
 14 an inconvenience and a problem and a nuisance
 15 but it wasn't a serious error.
 16 Q. There is currently no -- you agree with me it
 17 was like the hieroglyphs before the discovering
 18 of the Rosetta Stone:
 19 "There is currently no definitive catalogue
 20 of the Attribute Grammar used in the Horizon
 21 solution which makes the construction of
 22 an R-Query statement to meet a customer's
 23 business enquiry difficult ..."
 24 Your words, "difficult".
 25 A. Yeah.

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1 member Jan Holmes, correct? So you're still in
 2 control of this in September 2001, correct?
 3 A. Where does it say that?
 4 Q. Go to 12 September 2001, which is at page 3 of 4
 5 in the internal numbering, 11.05.
 6 A. Yeah, I can see it.
 7 Q. You're still in control of this 21 June 2004?
 8 A. Well, it's been passed back to me because as
 9 I was the originator. So it's been sent back to
 10 me and it says:
 11 "This has been identified as a requirement
 12 for Network Banking and has been included in the
 13 NWB Performance Improvements document. It has
 14 not been transferred to the SDS but the PinICL
 15 remains open pending the delivery of such
 16 a catalogue as part of B13."
 17 So what was happening there was the
 18 production of this catalogue had been put on the
 19 back burner, and -- until a later release of
 20 Horizon was made.
 21 Q. But it's still -- if we go to the last entry but
 22 one, 21 June 2004, there's an entry:
 23 "The call record has been assigned to the
 24 Team Member: Jan Holmes."
 25 A. Yes, that's right.

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1 Q. "... time consuming and very 'hit and miss'."
 2 That's a serious problem, Mr Holmes.
 3 A. In your opinion, possibly. But it was just one
 4 of a number of things that we were dealing with.
 5 Q. That's a serious --
 6 A. We could --
 7 Q. -- problem, Mr Holmes, even if it is one of
 8 number of things you may be dealing with
 9 because, as you accepted on the last occasion
 10 you gave evidence before the Inquiry, the Post
 11 Office was entirely dependent on Horizon data
 12 for its prosecution of subpostmasters. You
 13 agreed with that?
 14 A. Yes, that's right.
 15 Q. Right, okay.
 16 A. So all the absence of the Attribute Grammar
 17 catalogue did was just made our life slightly
 18 more difficult when we were pulling the audit
 19 data. The audit data was there. It just --
 20 Q. The audit data has to be picked out impartially,
 21 independently, comprehensively and fully. It
 22 can't be picked out on a hit and miss basis.
 23 Surely you agree with that?
 24 A. Exactly, that's why the PinICL was raised.
 25 Q. Yes. Right.

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1 Now, that is not closed until 2004, is it?
 2 **A.** That's correct, yeah.
 3 **Q.** Right. Ms Felstead was convicted in 2002. So
 4 I now move on to her case. You were asked about
 5 this on the last occasion, and I was asking
 6 about Tracy Felstead when I was questioning you
 7 on the last occasion. Would you like to go to
 8 the transcript of that? Shall we go to it?
 9 It's INQ00001019.

10 Can I just do a quick whistlestop tour
 11 through this transcript. Could we go internal
 12 numbering, please, to 5 of 83, page 20 of the
 13 transcript, line 7. This is when Mr Beer is
 14 questioning Mr McDonnell, and it's page 20.
 15 Yes. Thank you. Line 7. This was about the
 16 EPOS System being the joke of the building.
 17 Then he said:

18 "Yes, I think everybody knew, specifically
 19 the test team who, when I spoke to those guys,
 20 they would make it very clear that the quality
 21 of the code that was being deliver was to such
 22 a bad, poor level that they're wasting their
 23 time testing it, because they knew that it was
 24 just broken. They were going to end up raising
 25 lots of PinICLs from it. So they'd give a very

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1 agree with Mr Holmes that that was a concern?"
 2 Because he was being taken to your concerns,
 3 Mr Holmes, and the answer was:

4 "I do and, in fact, within this document
 5 there's a very good example of that when, during
 6 the Taskforce, which was supposed to be all
 7 about getting the quality under control, they
 8 took away of sum of the resource to force in
 9 extra functionality for, I think it was
 10 balancing and something else. There's three
 11 parts to it. It's referred to in the document
 12 somewhere. But it was a sizeable piece of
 13 development work which was being developed on
 14 the fly and shoe-horned into the code right in
 15 the middle of the Taskforce initiative, where we
 16 were trying to stabilise the product, and that's
 17 a typical example of not understanding the
 18 problem of where we were at the time and
 19 continuing with the same bad behaviour, in my
 20 view.

21 **"Question:** Those two concerns that
 22 Mr Holmes mentions and which you agree with, in
 23 your view, would they have had any impact on the
 24 integrity of the system, how it operated or how
 25 it was operated by subpostmasters?

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1 frank and very honest opinion about the ability
 2 of some of the guys, not all of them -- some of
 3 them were good -- in the team, and the quality
 4 of the product that that team was producing. It
 5 was a standing joke in the building."

6 Mr Beer said:

7 "You say in your statement it was known up
 8 to the highest level, including Fujitsu Japan,
 9 because they sent over three coders to perform
 10 an audit."

11 Mr McDonnell confirms that he can't remember
 12 what date that actually was.

13 Could we go to page 31, please. At page 31,
 14 I'm sorry I don't see the numbering on this.
 15 I'm so sorry. I was meaning page 31 of the
 16 actual transcript. It's internal page 8.
 17 That's entirely my fault. Internal page 8 of
 18 83. Thank you. So is that page 8 of 83. Thank
 19 you very much. Page 31, lines 1 to 25, and this
 20 is:

21 "... he says there was a concern which he
 22 considered to be the greater of the two concerns
 23 which relate to the impact of continual changes
 24 to existing code to fix problems and/or to
 25 insert new functionality into the code. Do you

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1 **"Answer:** Yes, it would. It would result in
 2 functional errors, bugs, spurious behaviour."
 3 Internal -- forgive me, I just go to the top
 4 of page 32:

5 "Was that the view held by you and others at
 6 ICL Pathway at the time?

7 **"Answer:** Yes, it was. I think it was
 8 a belief that was pervasive throughout the
 9 building."

10 Of course, Mr Holmes, you being the
 11 co-author of the report, it would have been
 12 a view that you trenchantly shared together with
 13 your co-author, wouldn't it?

14 **A.** I would have shared it with him, yes.

15 **Q.** Trenchantly, I'm sure. You're not backward in
 16 coming forward, Mr Holmes. You're the co-author
 17 of that report.

18 **A.** Well, all right, if you want to use that term,
 19 feel free.

20 **Q.** Well, Mr Holmes, it's not a secret that when you
 21 wished to express an opinion, you express
 22 an opinion with a certain degree of confidence
 23 and, shall we say, vigour?

24 **A.** No, "trenchantly" is not a term that I would
 25 normally use. That's all.

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1 Q. I see. Confidence, then. Unequivocal in your
2 view?

3 A. No, I agreed with the report. It was a joint
4 report. So I was, you know, happy to concur
5 with him.

6 Q. Page 11, internal, please.

7 MR BLAKE: Sir, I'm sorry to interrupt, Mr Henry.
8 In terms of timing, I just want to make sure
9 because we're certainly not going to use up this
10 afternoon's session. The question is, whether
11 we take a short break now or at some appropriate
12 point before Mr Henry continues or whether
13 Mr Henry considers he will be finished shortly.
14 If not, there's no problem at all.

15 SIR WYN WILLIAMS: Well, Mr Blake, I was beginning
16 to wonder. I'm not really keen, Mr Henry, on
17 going back to the points that you're focusing on
18 at the moment, unless they are really laying the
19 ground for some important point in relation to
20 this morning's evidence.

21 MR HENRY: Well, they are, sir, but I can take them
22 a lot more quickly.

23 SIR WYN WILLIAMS: Yes, I would prefer to complete
24 the evidence without a further break, if I can
25 put it in that way and I think we ought to be

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1 cease no later than 1.30.

2 MR HENRY: So be it, sir.

3 SIR WYN WILLIAMS: Fine.

4 (12.53 pm)

5 (A short break)

6 (1.11 pm)

7 MR BLAKE: Thank you, sir. We can see and hear you.
8 Can you see and hear us?

9 SIR WYN WILLIAMS: Yes, I can, thank you.

10 MR HENRY: May I begin, sir?

11 SIR WYN WILLIAMS: Of course, yes.

12 MR HENRY: Thank you, sir.
13 Mr Holmes, the report that you co-authored
14 with Mr McDonnell, I asked you on a previous
15 occasion why you retrieved it on 14 May 2001.
16 Do you recall me asking you that question?

17 A. Yes, I believe you did, yes.

18 Q. Sorry, sir. I can't hear you.

19 A. I'm unmuted. Yeah, I think you did.

20 Q. I'm afraid we've lost the sound.

21 A. No, I am unmuted.

22 SIR WYN WILLIAMS: I can hear Mr Holmes, so it's
23 a problem in the hall, by the sound of it.

24 MR HENRY: Yes.

25 A. Can you hear me now?

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1 able to do it.

2 MR HENRY: So be it, sir.

3 THE WITNESS: Okay, hang on, sorry? Can I say
4 something? I would like a break.

5 SIR WYN WILLIAMS: Do you mean a short break?

6 THE WITNESS: Yeah, just a natural break to go to
7 the loo, that's all.

8 SIR WYN WILLIAMS: Of course. Of course, you must
9 have that. Right.

10 MR HENRY: Could we have a break now, then, sir, to
11 accommodate Mr Holmes, perhaps?

12 SIR WYN WILLIAMS: Yes. We will break off for what
13 I will call a loo break. We'll bring us back at
14 1.00.

15 MR HENRY: Sir, could I ask for a little bit more
16 time than that? Just a little bit more.
17 Because I did have some material and, in
18 response to your request for, as it were,
19 speeding things along, I would just like to have
20 a little bit more time to make things more
21 concise.

22 SIR WYN WILLIAMS: Right. Well, what I'm going to
23 do is say this: we're going to break until 1.10.

24 MR HENRY: Thank you, sir.

25 SIR WYN WILLIAMS: But then the questioning will

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1 Q. Oh, I can hear you now, Mr Holmes. Thank you.
2 Did you give an answer, because we didn't hear
3 it?

4 A. I gave an answer to the question you just asked
5 which was, yes, I do recall you asking the
6 question in November.

7 Q. Yes, and your answer was that it was a sort of
8 an administrative catch-up?

9 A. To the best of my memory, yes.

10 Q. Yes. Now, can I just ask you please, at the
11 time, had you been asked to assist in the
12 prosecution of Ms Tracy Felstead to the best of
13 your knowledge and belief?

14 A. No, which -- what was the name of the outlet she
15 was associated with?

16 Q. Camberwell Green.

17 A. Right. Now, I do believe I did a witness
18 statement for Camberwell Green but with no
19 knowledge of who was involved.

20 Q. You certainly did make a witness statement for
21 Camberwell Green and I'm sure that's right
22 because you do not mention Ms Felstead's name.
23 You were asked to consider data between
24 12 October 2000 and 1 March 2001.

25 A. When you say "consider", do you mean review it,

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1 analyse it or extract it?

2 **Q.** Shall we go to your witness statement --

3 **A.** Yeah, let's do that.

4 **Q.** -- that will probably be the best thing to do.

5 **A.** I can't get my hands on it immediately here. So

6 yeah.

7 **Q.** Don't worry because we can have it put up on the

8 screen.

9 **A.** Okay.

10 **Q.** It's WITN04600217. I wonder if you could put

11 that up.

12 Now you, sir, are not a technical person.

13 **A.** No.

14 **Q.** You have said that on more than one occasion.

15 **A.** Yeah.

16 **Q.** Right. This is not signed, but you have

17 mentioned that you were asked to make a witness

18 statement. Did you eventually sign a witness

19 statement?

20 **A.** I don't know.

21 **Q.** I suppose that would be the natural presumption

22 of going to the trouble of writing a draft

23 witness statement, a draft witness statement, of

24 course, which has been amended, as we can see.

25 **A.** Well, I was going to say, this is still in draft

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1 copy of this, in the sense that all I've got is

2 a copy that you've got, which is in a draft

3 form, and I can't -- unless I can see one that

4 I've signed, I don't know what to say.

5 **Q.** Well, I'm not going to be asking you about any

6 of the bits that have been amended. So all I am

7 going to be asking you about is your direct

8 knowledge of the contents of this statement.

9 **A.** Okay.

10 **Q.** Now --

11 **SIR WYN WILLIAMS:** Before we go any further,

12 Mr Henry, will we be able to establish today

13 whether or not Mr Holmes actually made a signed

14 witness statement?

15 **MR HENRY:** I'm afraid, given the effluxion of time,

16 sir, unless there's something that I have not

17 yet detected, I am afraid I can't answer that

18 question.

19 **SIR WYN WILLIAMS:** So, I mean, obviously I will

20 defer to your view as to whether you pursue this

21 at the moment but I'm not quite sure what I will

22 get in terms of my investigation from

23 an examination of a draft which may never have

24 become more than a draft, if I can put it in

25 that way.

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1 form, isn't it?

2 **Q.** Yes. I mean, were you in the habit, as you

3 were, for example, in the Cleveleys case, of

4 making witness statements?

5 **A.** I made a few over the years, yes.

6 **Q.** In fact, I think in some of the documents that

7 you very kindly produced, you were remarking

8 about the fact that you were being asked to make

9 a few about various locations at one point and

10 that -- I'm not sure of the exact words -- but

11 that it was a bit of an imposition; do you

12 recall?

13 **A.** Well, they take time to produce, but it's part

14 and parcel of the job, isn't it?

15 **Q.** Yes, it is. You presumably read the declaration

16 that it was going to be, once signed, true to

17 the best of your knowledge and belief, and you

18 would make it knowing that if it were to be

19 tendered in evidence you would be liable to

20 prosecution if you had wilfully stated in it

21 anything which you knew to be false or did not

22 believe to be true. So, obviously, you realised

23 it was a matter of some solemnity and

24 importance.

25 **A.** I'm just concerned that I don't have a final

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1 **MR HENRY:** Could I go to some subsidiary documents,

2 then, if I may. Could we go -- we'll come back

3 to this, but I want to be quite fair to you,

4 Mr Holmes. Could we go to WITN04600216. This

5 is a "Pathway Change Control Notice (CCN) --

6 Sheet". It's a document that you produced,

7 Mr Holmes. It came from your garage or wherever

8 you were keeping these documents.

9 The date is 10 January 2002 and it was again

10 under the umbrella of the Camberwell Green Post

11 Office case. Could we go, please, to page 4 of

12 5. Do you remember on the last occasion,

13 Mr Holmes -- and I can give the precise

14 reference if you would wish to go to it, but let

15 me ask the question first -- that I put to you

16 that at Ms Felstead's trial, a request had been

17 made by ICL Fujitsu for £20,000 for unused

18 material, and do you see the figure there?

19 **A.** Yes, I do.

20 **Q.** It's remarkably similar, isn't it, to the

21 £20,000 in relation to a Camberwell Green case.

22 Do you agree?

23 **A.** Well, yeah, the numbers are roughly the same but

24 I have no knowledge of this at all.

25 **Q.** But these are your documents that you produced

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1 to the Inquiry. You obviously kept them for
2 a reason.

3 **A.** I didn't produce the CCN. That's not my
4 document that I'm looking at now.

5 **Q.** Right. I'm very sorry, I thought these were
6 documents that were actually produced by you as
7 a result of being requested to produce them by
8 the Inquiry.

9 **A.** Can you scroll this one on screen up to the top,
10 and let's have a look at what it is. Right this
11 is a Change Control Note which is raised by us
12 in response to a change request that is raised
13 by the Post Office, which we then raise a change
14 proposal that effectively establishes the work
15 within Post Office Account. And the CCN is the
16 Change Control Note that goes back to the Post
17 Office to say, "This is what we're going to do
18 and this is how much it's going to cost".

19 I have nothing to do with that. In fact,
20 you can see the CCN was raised by Graham Hooper,
21 who was a Security Manager at that time.

22 **Q.** I see. Nevertheless, in relation to Camberwell
23 Green, because this is what we understand and
24 that's the description of the document as to its
25 provenance, in relation to the Camberwell Green

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1 **A.** Yes.

2 **Q.** Could we go to, please, if we may, to the
3 conclusion of the witness statement, please, or
4 page 4 of 5. Forgive me, page 4 of 5. Could
5 I ask you, please, to scroll down. I do
6 apologise.

7 You're dealing here with Horizon System
8 Helpdesk calls, Tivoli event logs, non-polling
9 reports. So far as you are aware, was this
10 information that was being supplied to you --
11 you not being a technical person -- that this
12 was information being supplied to you by
13 somebody else?

14 **A.** I don't know, or these might have been audit
15 data that we'd extracted and then had a look at.
16 So I can't tell you, if the Horizon System
17 Helpdesk calls data, the 21 calls, were
18 extracted from the audit solution and then
19 I looked at it or whether it was given to me by
20 somebody else.

21 **Q.** I mean, obviously, a witness statement in
22 a civil case can often be an amalgam of
23 information that is relayed to one by other
24 people and that it is sometimes even constructed
25 by the solicitor on behalf of the witness, but

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1 case, it's remarkably close, is it not, to the
2 £20,000 that I put out to you on the last
3 occasion?

4 **A.** Yeah, but I -- you can't expect me to comment on
5 something that I had no part in the production
6 of. Yes, the numbers are nearly the same but so
7 what?

8 **Q.** Could I just again -- I appreciate that you do
9 not refer to Ms Felstead by name in your witness
10 statement but could we go back to that draft
11 witness statement, please, and that's
12 WITN04600217. Again, just the introduction:
13 "I have been employed by ICL Pathway for
14 5 years ... employed as the Quality and Audit
15 manager responsible for Quality and Audit
16 Management and the User Authority for the Audit
17 Solution from where the Audit Data is sourced.
18 I have working knowledge of the computer system
19 known as Horizon, which is the computer supplied
20 by ICL Pathway Limited and used by Post Office
21 Limited in Post Office Outlets. I am authorised
22 by ICL Pathway Limited to undertake extractions
23 and analyses of audit that held on the Horizon
24 System."

25 Is all of that completely accurate?

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1 this was a statement that was intended for
2 submission in a criminal case. Do you follow?

3 **A.** Well, actually, if you go back to the previous
4 page, I'm putting my hand up there and saying:
5 "On various dates and at various times
6 between 14 January and 25 January I analysed
7 audit data for transactions and activities
8 undertaken by Camberwell Green Post Office
9 during the period 12 October 2000 to 1 March
10 2001 (the Material Period).

11 **Q.** Yes.

12 **A.** I have to assume that what follows, Horizon
13 System Helpdesk, Tivoli event logs, non-polling
14 reports, were pulled from the audit archive.
15 I mean, I can't remember, 21 years on.

16 **Q.** Of course. So, in other words, you were,
17 although not a technical person, you were
18 analysing the data. Was anybody there to assist
19 you, given the fact that you weren't a technical
20 person, in making an assessment of the data?

21 **A.** I can't remember whether there was or not, to be
22 honest with you.

23 **Q.** I see. Then could we go to the next page,
24 please, and the "Conclusion"?

25 **A.** Can I just stop you there, Mr Henry?

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1 Q. Of course, of course.
 2 A. I'm looking at a version of this document, which
 3 is version 1, which has the changes in the same
 4 way that you've got on yours, but I've also got
 5 another -- oh, I must be imagining it.
 6 I thought there was something there about time.
 7 No, right. Forget it, sorry. I beg your
 8 pardon.
 9 Q. Don't worry, Mr Holmes.
 10 Your "Conclusion":
 11 "There are no reasonable grounds for
 12 believing that the information stored on the
 13 Horizon system would be inaccurate because of
 14 improper use of computer terminal. During the
 15 Material Time the Horizon system was operating
 16 properly at the Camberwell Green Post Office
 17 Outlet or if not, any respect in which it was
 18 not operating properly or was out of operation
 19 was not such as to affect the production of
 20 audit records or accuracy of their contents."
 21 A. Mm-hm.
 22 Q. Now, sir, are those your words or were they
 23 effectively a rubric that you had been provided
 24 with?
 25 A. I can't recall. I cannot recall.

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1 quality, unstable and vulnerable to code decay.
 2 You were aware of all these things?
 3 A. I accept that one, yeah.
 4 Q. Yeah. So, again, I ask you, do you think that
 5 this is a fair reflection of that which was
 6 known at that stage by you but also Fujitsu?
 7 A. Yes. I do.
 8 Q. I suggest to you, Mr Holmes, that that can't be
 9 right.
 10 A. Well, all right, fine. If you believe that to
 11 be incorrect, perhaps you can enlighten me as to
 12 how you arrive at that --
 13 **SIR WYN WILLIAMS:** Hang on now, hang on.
 14 First of all, it's 1.30 and, secondly, this
 15 session was supposed to be about Cleveleys and
 16 the relevance -- sorry, the evidence relating to
 17 Cleveleys. We're now going off on a completely
 18 different tangent in circumstances about which
 19 I am uncomfortable, when it is not even known
 20 whether or not an actual witness statement was
 21 made.
 22 **MR HENRY:** So be it, sir. The reason why I have
 23 been asking this is because it appears to be in
 24 lock step with Cleveleys in, as it were,
 25 a defence of the Horizon System, and Ms Felstead

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1 Q. Do you think they fairly reflect the knowledge,
 2 your personal knowledge, that learned counsel to
 3 the Inquiry was exploring with you this morning,
 4 about bugs, errors and defects which were
 5 apparent at this time?
 6 A. Sorry, can you repeat that?
 7 Q. Do you think that this fairly reflects the
 8 knowledge, your personal knowledge, of bugs,
 9 errors and defects that were apparent at this
 10 time?
 11 A. Well, I guess it must do because those did exist
 12 at that time, we all know that now. We didn't
 13 necessarily know it at the time.
 14 Q. Well, you were aware, were you not, of
 15 difficulties in retrieving data and difficulties
 16 with, as it were, obtaining the information that
 17 was required for these prosecutions, correct?
 18 A. Yeah, well, that wasn't because the data didn't
 19 exist or it was invalid or corrupt. It was
 20 because we didn't have an Attribute Grammar
 21 catalogue to help us build the SQL statements.
 22 Q. You were aware of balancing errors that had been
 23 drawn to your attention at the time?
 24 A. If you say so.
 25 Q. You were aware that the EPOSS code was of poor

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1 was suspended in February 2001, so --
 2 **SIR WYN WILLIAMS:** I understand how it could be
 3 extremely relevant to Ms Felstead's case but not
 4 the Cleveleys case and I want to be clear in my
 5 mind as to where we are day by day, so to speak.
 6 **MR HENRY:** I see, sir. I'm very, very grateful to
 7 Counsel to the Inquiry, who understood from our
 8 representations that we were trying to, as it
 9 were, draw a parallel with Cleveleys, in that
 10 this being a defence of the Horizon System at or
 11 about the same time. But that is my apology, in
 12 its old-fashioned sense, to the Inquiry.
 13 **SIR WYN WILLIAMS:** That's fine. That's fine. And
 14 if there comes a point in time when there is
 15 reasonable grounds to suspect -- I think I put
 16 it as low as that -- that a witness statement
 17 was made in Ms Felstead's case, I'm not saying
 18 I won't return to that paragraph, Mr Henry. But
 19 not at the moment.
 20 **MR HENRY:** So be it, sir.
 21 Mr Holmes, thank you very much.
 22 **SIR WYN WILLIAMS:** Thank you, Mr Holmes, for giving
 23 evidence for a second time and for giving in
 24 total now three witness statements to the
 25 Inquiry.

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1 That concludes the Inquiry's business for
 2 today. We're now going to embark upon
 3 a vacation period, where no doubt many of the
 4 people involved in the Inquiry, if not all of
 5 them, will be taking a well-earned break.
 6 I wish everyone a good holiday, if they're
 7 having one and I will see you all on
 8 5 September. Thank you.

9 **THE WITNESS:** Thank you, Sir Wyn.

10 **(1.34 pm)**

11 **(The hearing adjourned until 5 September 2023)**

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1	I N D E X	
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