
From: ParkerSP [GRO]
Sent: Tue 06/02/2018 2:50:52 PM (UTC)
To: Matthew.Lenton [GRO]
Cc: pete.newsome [GRO]
Subject: RE: Legally Privileged: Known Error Log [BD-4A.FID26896945]

Hi Matthew,

True. The main issue we have here is not one of practicality, it's the exposure of Fujitsu proprietary information and the misinterpretation of the technical detail that we are trying to prevent. We're very happy to show and explain the relevant KELs.

Steve

From: Lenton, Matthew
Sent: Tuesday, February 6, 2018 12:53 PM
To: Parker, Steve [GRO]; Newsome, Pete [GRO]
Subject: RE: Legally Privileged: Known Error Log [BD-4A.FID26896945]

Steve, Pete,

I assume one of the things that they would like is to be able to search across the entire set of KELs. We have said that Jason can print KELs – is there any reason why he should not be able to print all of them... and instead of to paper, to PDF? In which case it would be simple enough to join them all together into one big PDF, which would then be searchable.

This may be obvious to you, or impractical, or not desirable, but I point it out because if I was them, that is what I would ask for... knowing we have the ability to print them immediately points to this way of getting it all electronically.

Matthew Lenton
Post Office Account Document Manager
Business & Application Services

Fujitsu
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Phone: [GRO]
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Web: <https://www.fujitsu.com/global/>

From: Parker, Steve
Sent: 06 February 2018 12:32
To: Amy Prime [GRO]
Cc: Lenton, Matthew [GRO]; Defence Legal (Chris Jay,) [GRO]
Andrew Parsons [GRO]; Newsome, Pete [GRO] >
Subject: RE: Legally Privileged: Known Error Log [BD-4A.FID26896945]

Amy,

Have to agree with Pete here. I have no alternatives to the information Pete has already relayed by email.

Regards

Steve Parker
Head of Shared Services BRA01
Application Management Services

AT&I Business & Application Services

Fujitsu

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Web: <http://uk.fujitsu.com>

From: Newsome, Pete

Sent: Tuesday, February 6, 2018 11:07 AM

To: Amy Prime [GRO]

Cc: Lenton, Matthew [GRO]; Defence Legal (Chris Jay,) [GRO]

Andrew Parsons [GRO]; Parker, Steve [GRO]

Subject: RE: Legally Privileged: Known Error Log [BD-4A.FID26896945]

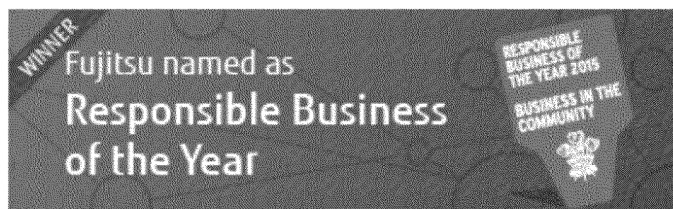
Amy

Steve Parker is the best contact but I think our position stands on the live system as per the email.

Regards

Pete

Pete Newsome
Account Manager
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Please consider the environment - do you really need to print this email?

From: Amy Prime [GRO]

Sent: Tuesday, February 6, 2018 10:04 AM

To: Newsome, Pete [GRO]

Cc: Lenton, Matthew [GRO]; Defence Legal (Chris Jay,) [GRO]

Andrew Parsons [GRO]

Subject: RE: Legally Privileged: Known Error Log [BD-4A.FID26896945]

Pete

We have relayed the below to Freeths and proposed that due to the technical nature of this that Jason Coyne and Elevate (who are the Claimants' e-disclosure provider and manage the extraction of documents from the Claimants' IT systems) discuss directly with Fujitsu a practical way to access the KEL that works for all parties.

Freeths would like to organise a call between Fujitsu, Jason Coyne and Elevate – would yourself and Matthew Lenton be the best people to join this call or is there someone else within Fujitsu who is better placed to answer questions on the KEL software?

Many thanks
Amy

Amy Prime

Solicitor
Womble Bond Dickinson (UK) LLP

d: [REDACTED]
m: [REDACTED]
t: [REDACTED]
e: [REDACTED]

GRO

GRO



womblebond Dickinson.com



From: [pete.newsom@GRO](#)
Sent: 31 January 2018 11:07
To: Andrew Parsons; Amy Prime
Cc: [Matthew.Lenton@GRO](#); [Legal.Defence@GRO](#)
Subject: RE: Legally Privileged: Known Error Log [BD-4A.FID26896945]

Andy

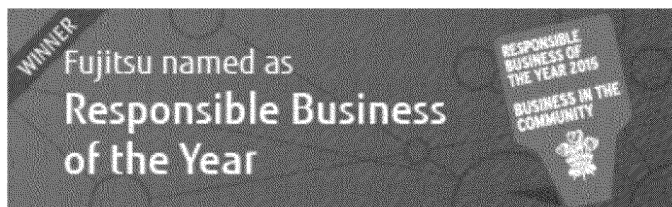
We have answered your questions below in green.

Thanks

Pete

Pete Newsome
Account Manager
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Please consider the environment - do you really need to print this email?

From: Andrew Parsons [GRO]
Sent: Wednesday, January 31, 2018 7:38 AM
To: Newsome, Pete [GRO]; Amy Prime [GRO]
Cc: Lenton, Matthew [GRO]; Defence Legal (Chris Jay,) [GRO]
Subject: RE: Legally Privileged: Known Error Log [BD-4A.FID26896945]

Pete

This makes sense and I can understand your concerns.

Just to clarify a few points:

1. Are you saying that there is no way to mass export data from the KEL (without having to write bespoke code to add this functionality)? We currently have no way of exporting whilst keeping the data integrity and ensuring the security of the system, we could never say there is no way as there are standard ways of extracting data etc.
2. Even if the data could be exported, would it be in a proprietary format that could not be meaningfully understood without the KEL software? Probably too strong more like, some of the meaning and context could be lost in the printed version leading to incorrect conclusions being drawn.
3. Is there any way to access the KEL from outside of FJ (eg. could we give Jason Coyne credentials so that he could login through a web portal?). I appreciate that you may not want to offer this, but I'm looking to understand whether it is technically possible. Technically possible but against Fujitsu's corporate security policy so not possible in its current state.
4. You would however be willing for Jason Coyne to come back on site and look at / print more KELs? Yes no problem, we offered this to him at the last visit.
5. Is there any other reasonable way to provide access to the KEL? I want to make sure that we have exhausted all possibilities. None we can think of.

Thanks
A

Andrew Parsons
Partner
Womble Bond Dickinson (UK) LLP

d: [GRO]
m: [GRO]
t: [GRO]
e: [GRO]



From: [pete.newsome](#) GRO
Sent: 30 January 2018 15:53
To: Amy Prime
Cc: [Matthew.Lenton](#) GRO; [Andrew Parsons](#); [Legal.Defence](#) GRO
Subject: RE: Legally Privileged: Known Error Log [BD-4A.FID26896945]

Amy, we have major concerns about the release of the KEL software. These are outlined below but the overriding one is the release into the public domain by virtue of their becoming Court records of our confidential information which comprises Fujitsu corporate trade secrets and highly sensitive IPR and know-how which could then get into the hands of our competitors.

For these reasons we are not amenable to releasing the KEL software to Freeth's.

We would prefer for a solution to be found and for this to be addressed in another way than release of KEL software, particularly as the request does not seem to bear any direct relationship to the Plaintiff's case. We therefore propose a further visit for Freeth's IT expert to view KELs and print any that have some relevance to the case. We suggest that before these are released to the court Freeth's show the link to any of the cases in consideration.

We use a custom developed solution utilising software developed and owned by Fujitsu that allows us to record support knowledge into a structure known as a KEL (Known Error Log). KELs record support knowledge generated by the analysis of incident tickets originating from live and test services, the symptoms seen, actions taken and outcomes expected. They can also be used pre-emptively to record general support knowledge not related to a specific incident. The system recording and presenting the KEL information is developed in-house by Fujitsu for internal use only and is hosted within a Fujitsu data centre and accessed by a Fujitsu internal network. KELs are created by Support Executives working at all levels via a web interface using both fixed and free format fields and utilising a mark-up language to provide information formatting.

After initial creation the content of the KEL evolves over time. KEL information is crowd sourced from any support executive working on the Horizon system who encounters the symptoms described. As the understanding of the underlying problem changes, the information on the KEL is revised and enhanced frequently. KEL content may also change radically as a particular root case is eradicated and a new problem presents the same symptoms as seen during a previous incarnation of the KEL.

Care must be taken when trying to use KEL information outside the Fujitsu support group environment. The content of the KEL is proprietary to the Horizon system Proprietary in the sense that the language is often specific acronyms and shorthand language easily understood by those in the Horizon technical and business community within Fujitsu but may have different meanings when interpreted by outside readers, e.g. Network is used to mean both the physical connectivity and as a proper noun to describe all the Post Office branches, the internal user would understand which is correct due to the context not immediately assume there was a problem in connectivity.) and uses nomenclature and language which, while superficially familiar to the layman, is open to misinterpretation without the context of in-depth knowledge of the Horizon system. KELs may also contain information which is Fujitsu confidential about how the service is designed, operated and secured. By "confidential" is meant that if this knowledge is in the public domain it would:

1. Give our competitors insight in to how Fujitsu manage complex accounts which is potentially our IPR
2. Give information useful to our competitors on bidding against Fujitsu in any Post Office contracts
3. Expose information which could compromise either the Physical or IT Security of the system

The KEL system was designed for individual usage via its web based interface and not for the mass export of information, however there is a print option within each KEL. A printed version may not necessarily stand alone.

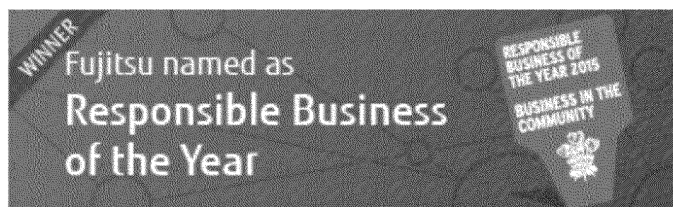
Some of the additional context gained from following the linkages to associated information is lost once the KEL is printed.

I look forward to discussing this further with you.

Regards

Pete

Pete Newsome
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From: Amy Prime [REDACTED] GRO
Sent: Wednesday, January 17, 2018 1:56 PM
To: Newsome, Pete
Cc: Lenton, Matthew [REDACTED] GRO; Andrew Parsons [REDACTED] GRO, Defence Legal (Chris Jay), [REDACTED] GRO
Subject: Legally Privileged: Known Error Log [BD-4A.FID26896945]

Pete

Freeths have asked if it is possible to provide Jason Coyne with all of the KEL entries (current and historic). They have not yet provided an explanation as to why all of them are required (and we will be querying this) but it would be of assistance if you could clarify the technical limitations of extracting the KEL.

My current understanding is that the KEL is hosted on proprietary software so the entries would only be in a readable format if you have a copy of the software, otherwise it is necessary for screenshots / printouts of each entry to be provided by FJ. Further, each entry comprises of multiple tabs (i.e. 1 KEL entry may require 4 or 5 screenshots to be provided) so producing the screenshots is a labour intensive task.

Please could you confirm:

1. the above is correct and any other limitations you can foresee in providing the KEL to Jason Coyne;
2. an estimated time to produce screenshots of all KEL entries;
3. what software the KEL requires and who owns this software; and
4. whether it would be possible for either Freeths or Jason Coyne to obtain a copy of this software and the KEL

to be transferred to them.

If it would be easier to discuss the above, please feel free to call.

Kind regards
Amy

Amy Prime
Solicitor
Womble Bond Dickinson (UK) LLP

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m: **GRO**
t: **GRO**
e: **GRO**



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