

To: Jonathan Gribben [GRO] Newsome, Pete [GRO]
Cc: Defence Legal (Chris Jay,) [GRO] Lucy Bremner [GRO]
From: Godeseth, Torstein [/o=Fujitsu Exchange Organization/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=73367f867463422895a411e49bd]
Sent: Fri 7/13/2018 3:11:49 PM (UTC)
Subject: RE: Dr Worden's Foundations Report [WBDUK-AC.FID27032497]
[qij.Quantitative Approach to Horizon Bugs Final.docx](#)
[qij. DOC 150212853\(1\) Foundation Report v1tg.docx](#)

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Gareth and I have looked through the two documents and have added in comments.

I look forward to the session that Dave Ibbett is setting up for us to discuss further.

Regards etc
Torstein

From: Jonathan Gribben <[GRO]>
Sent: Wednesday, July 4, 2018 8:52 AM
To: Newsome, Pete [GRO]
Cc: Defence Legal (Chris Jay,) [GRO]; Godeseth, Torstein [GRO] Lucy Bremner [GRO]
Subject: FW: Dr Worden's Foundations Report [WBDUK-AC.FID27032497]

Pete,

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Further to my email below, Robert is very keen to get some feedback on his report which sets out some of the key lines of argument that he intends to use in his expert's report as part of the Group Litigation (**Foundations Report**) and his short note summarising two quantitative approaches to the core issue of the Horizon trial (i.e. have Subpostmasters been held liable for losses caused by bugs in Horizon) that he has identified (**Quantitative Approach**). Both documents are attached.

Are Torstein and Gareth able to review the documents and provide some feedback early next week? The feedback can be in writing or in a conference call.

Please feel free to give me a call if there is anything you'd like to discuss – I'm on [GRO]
Kind regards
Jonny

Jonathan Gribben
Managing Associate
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From: Jonathan Gribben [GRO]
Sent: 14 June 2018 19:29
To: Legal.Defence [GRO] pete.newsome [GRO]
Cc: Mark Underwood1; Catherine Hamilton; Rodric Williams; Andrew Parsons
Subject: Update following 5 June CMC [WBDUK-AC.FID27032497]

Chris, Pete,

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The purpose of this email is to update you following the CMC on 5 June. An unsealed copy of the Order is attached. The key points that Post Office would like Fujitsu's assistance with are set out in the table below, with a note on their current status.

| Order | Current Status |
|--|---|
| Post Office to use reasonable endeavours to arrange for the parties' IT experts to be given two days access to inspect the Peak and TFS systems at Bracknell. | Pete Newsome is currently arranging this. Pete's view is that the inspection is likely to take one day only and he would prefer not to tie up resource for two days. Pete's preference is to offer one day initially with an agreement to provide another day if required. |
| By 4pm on 26 June the parties' IT experts are to produce a list of error codes used in the Known Error Log and/or in the Peak System or equivalent (Error Codes List) so that Fujitsu can provide descriptions of what those error codes mean. | This flows from the fact that Fujitsu does not keep a list of error codes. |
| By 4pm on 26 June the parties' IT experts must compile a list of information that either one or both of them considers they require in order properly to opine on the Horizon Issues. | The Order does not provide for what is to be done with this list, but Post Office has already agreed to use reasonable and proportionate endeavours to provide some document references and information to the Claimants' expert – Pete Newsome is overseeing this. The key dates are: (1) document references to be provided by 4pm on 17 July; and (2) information to be provided by 4pm on 14 August. However, from a tactical perspective it will assist Post Office to provide the references and information in tranches periodically (e.g. once a week). That should also assist with the management of the exercise. |
| By 4pm on 14 September 2018 each party shall file and serve witness statements of any witness of fact whose generic evidence (in distinction to Claimant-specific evidence) they wish to rely upon for the purposes of determining the Horizon Issues. Post Office also has the right to serve responsive witness evidence by 4pm on 16 October. | No decision has been made on the identity of Post Office's witnesses, but it is likely that Post Office will request factual evidence from a Fujitsu employee or employees. |

As you will see from this table there is a lot going on at the moment and we anticipate that Mr Coyne will make further information requests as he prepares his report, which is due on 28 September. Post Office's expert (Robert Worden) may also make some requests, although they will be fewer (if any) and more focused.

There is also another round of disclosure underway that we have asked for your help with – Amy Prime has already contacted Pete and Matthew about that.

In addition, Dr Worden has produced a report which sets out some of the key lines of argument that he intends to use in his expert's report which focuses on the functionality, business uses and architecture of accounting systems, the checks built into such systems,

the business applications in Horizon and the architecture of the original Horizon system and HNG (**Foundations Report**). The Foundations Report is not written for the Court, but large parts of it will be used in Robert's expert's report. He and Post Office would like Fujitsu to provide comments on it from a technical perspective and we think that is best done by Torstein and Gareth. We'd appreciate your thoughts on that. Please note that the Foundations Report is privileged and, therefore, once we send it to you please do not forward it to anyone without our prior written agreement.

Andy has already had a conversation with Garry Stewart about additional resources and it might be useful for us to set up a meeting in London or Bracknell to discuss this and the above in more detail with you both and Garry. Please let me know if you think that this would be useful and, if so, when you're free during the weeks commencing 25 June and 2 July. In the meantime, I have spoken to Pete and he is going to check Gareth Jenkins' availability to assist for one or two days per week.

Please feel free to give me a call if there is anything you'd like to discuss

Kind regards

Jonny

Jonathan Gribben

Managing Associate

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