From: Amy Prime GRO

To: "Matthew.Lenton GRO

Cc: "pete.newsome GRO

"Legal.Defence GRO

"Lucy Bremner GRO

Subject: RE: KEL Index [WBDUK-AC.FID26896945]

Date: Fri, 4 Jan 2019 11:38:12 +0000

Importance: Normal

Inline-Images: image001.png; image002.png; image003.png; image9af511.PNG; image5aa07b.PNG;

image23c86b.PNG

Hi Matthew

Apologies for chasing, but are you able to confirm that my understanding below on the contents of the KEL indexes is correct?

Kind regards

Amy

Amy Prime

Solicitor

Womble Bond Dickinson (UK) LLP



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From: Amy Prime

Sent: 19 December 2018 13:53
To: 'Matthew.Lenton(____GRO

Cc: pete.newsome GRO Jonathan Gribben; Lucy Bremner

Subject: RE: KEL Index [WBDUK-AC.FID26896945]

Hi Matthew

Please could I check that the below wording accurately reflects your explanation?

1.1.1 The index named "Historc_Kels.xlsx" contains KEL entries which relate to Horizon.

- 1.1.2 The index named "Active Kels.xlsx" contains KEL entries which relate to Horizon Online.
- 1.1.3 Both of these indexes contain those KEL entries which as at the date of the index were "live". The consequence of this is that the indexes do not contain the deactivated KEL entries (as explained at paragraph 61.6 of Mr Parker's witness statement), or the deleted KEL entries (as explained at paragraph 61.9 of Mr Parker's witness statement).
- 1.1.4 The KELs which were extracted and disclosed in March 2018 contained those entries listed in both indexes, plus the deactivated entries. [But not the deleted KEL entries].

| Kind | regards |
|------|---------|
|------|---------|

Amy

| From: Matthew.Lenton GRO [mailto GRO |
|---|
| Sent: 12 December 2018 16:30 |
| To: Amy Prime |
| Cc: pete.newsome GRO Legal.Defence GRO ; Jonathan Gribben; Lucy Bremner Subject: RE: KEL Index [WBDUK-AC.FID26896945] |
| Subject: RE: REL Index [WBDOK-AC.FID20090945] |
| |
| |
| Hello Amy, |
| ,-,· |
| |

I think the question is why does "Historic_Kels.xlsx" + "Active_Kels.xlsx" not equal the KEL extract of 21-Mar-2018, the difference being in "KELs not in Index.xlsx".

The answer is that "Historic_Kels.xlsx" is Horizon only and contains no post 2010 HNG-X KELs, while "Active Kels.xlsx" only includes live, i.e. no deprecated or deleted KELs.

The KEL extract of March 2018 contains both Horizon and HNG-X KELs, both deprecated and non-deprecated, but didn't contain fully deleted KELs.

The fully deleted KELs were in the second extract that we provided on 05-Nov-2018.

I have asked the SSC team for the list of KEL entries which have been produced from 19 March 2018 to date.

Matthew Lenton

Post Office Account Document Manager

P&PS, Digital Technology Services

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|---|
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| |
| From: Amy Prime [mailtd GRO] |
| Sent: 12 December 2018 10:42 To: Lenton, Matthew GRO |
| Cc: Newsome, Pete GRO >: Defence Legal (Chris Jay.) |
| GRO ; Jonathan Gribben ← GRO ; Lucy Bremner |
| GRO |
| Subject: KEL Index [WBDUK-AC.FID26896945] |
| |
| |
| Hi Matthew |
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| |
| I hope you are well. |
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| |
| Back in January of this year you provided us with two indexes of the KEL, an historic and active index (both attached). We have noticed that there are a number of KEL entries which were in the KEL extraction, but not contained within |
| either of these indexes – a list of these KEL entries is also attached. |
| |
| |
| From a brief review, the KEL entries which are not in either of these indexes have a wide date range between 1999 |
| and 2018 so I don't think the entries were generated after the indexes were produced. Please could you have a look into whether there is a reason that the extract contained more KEL entries then were listed in the indexes? |
| This whether there is a reason that the extract contained more REL entries then were listed in the indexes? |
| |
| Separately, would you be able to provide us with a list of KEL entries which have been produced from 19 March 2018 |
| to date? |
| |
| |
| Kind regards |
| Amy |
| Zuny |
| |
| Amy Prime |
| Solicitor |

Womble Bond Dickinson (UK) LLP



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