

Message

From: Andrew Parsons [GRO]
Sent: 16/04/2019 07:08:52
To: robert worden [GRO]; Jonathan Gribben [GRO]
CC: 'Chris Emery' [GRO]
Subject: RE: New approach to evidence

Robert

We'll chase down the evolution of this request and what happened to it. The reality is that he had all the Peaks and could have done the search himself.

As to the request for ARQ data on each Claimant – they didn't even ask for this in relation to their 6 witnesses who gave evidence of a "bug" in Horizon. We voluntarily disclosed the ARQ data.

A

Andrew Parsons

Partner
Womble Bond Dickinson (UK) LLP

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

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From: robert worden [GRO]
Sent: 15 April 2019 19:57
To: Andrew Parsons [GRO]; Jonathan Gribben [GRO]
Cc: 'Chris Emery' [GRO]
Subject: FW: New approach to evidence

Andy, all -

Whinge from Coyne, fyi.

Robert

From: Jason Coyne [GRO]
Sent: Monday, April 15, 2019 7:54 PM
To: robert worden [GRO]; Siobhan Forster [GRO]
Cc: Chris Emery [GRO]; James Hartley [GRO]; Imogen Randall

GRO

Subject: Re: New approach to evidence

Dear Robert,

Thank you for your email.

On the original plan, my involvement in the Horizon trial should have been finished. My time is now focused on other projects.

It's frustrating that you adopt such a position now. Both you and I identified the potential importance of these very same documents on the day of our meeting at Fujitsu (our WP emails from 28th June are a helpful reminder) but ultimately you would not join me in requesting copies from the Defendant. This was recorded in my open email of 20th July 2018 (attached – see viii) and was part of the protracted process to finally obtain these documents, albeit without your support.

As you say, we have an ongoing obligation to the court and I continue to be open minded to all methods. Care does need to be taken as I have found these documents are used at various different points within Horizon's life time, none provide full coverage. Further, I do not agree that they were used as consistently as you may first suggest.

I understand that Siobhan has made contact today and that we have a Skype meeting scheduled tomorrow, I look forward to discussing further then.

Kind regards,

Jason Coyne Senior Partner



Tel
Fax

GRO

Head Office: Unit 5 Lockside Office Park, Lockside Road, Preston, PR2 2YS
Other Locations: London, Paris, Dubai & Singapore

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From: robert worden [GRO]
Date: Wednesday, 10 April 2019 at 16:40
To: Jason Coyne [GRO] >, Siobhan Forster [GRO]
Cc: Chris Emery [GRO], "andrew.parsons@ [GRO] [GRO]
[GRO], "jonathan.gribben@ [GRO] [GRO]
Subject: New approach to evidence

Dear Jason -

Since attending parts of the trial, it has occurred to me that the experts can take a much more focussed approach to the evidence, which would complement our previous work, and might be of considerable assistance to the court. The rationale for this more focussed approach is as follows:

1. Whenever Fujitsu made any authorised remote access to branch accounts, they raised an OCP, OCR or MSC whose text included (with high probability) the 6-digit FAD codes of the branch or branches involved. It is therefore possible to search all OCPs, OCRs and MSCs, finding all those which mention any claimant FAD code, during that claimant's period of tenure. This search gives about 100 OCPs or OCRs, and about 100 MSCs. It is therefore possible to assess expert issues 12 and 13, as they impact the claimants, by examining this small document set.
2. For the three bugs acknowledged by PO which impacted branch accounts (Receipts/ payments mismatch, Callendar Square and Suspense Account) there are Peaks mentioning the FAD codes of the majority of the branches affected (sometimes the FAD code is embedded in a 12-digit node id). I infer that if some bug impacts the accounts of any branch, then with high probability, there is a Peak related to the bug which mentions that branch's FAD code. Typically the Peak will also mention sums of money, which may help to assess the financial impact on the branch.
3. It is therefore possible to search all Peaks, looking for Peaks which mention any claimant's FAD code during that claimant's period of tenure. This search yields about 2100 Peaks. This comparatively small document set can give the experts (and the court) a very good handle on Horizon Issue 1, as it has impacted the claimants.

I am, frankly, kicking myself for not having thought of this before now. But having thought of it now, it is clearly my expert duty (a) to share the idea with you, so you can investigate it as you wish; (b) immediately to inform the court of the approach; and (c) to discuss the approach with you, as soon as possible, and (d) to write a very short report summarising my findings.

However awkward this may be, it seems to me that it may be of considerable assistance to the court, allowing the court (as much as it wishes to) to focus directly on a small set of evidence which is very pertinent to the Horizon issues as they impact the claimants - particularly issues 1, 12 and 13.

While I am sure it is straightforward for you to identify these documents by your own searches, I will nevertheless share with you the results of my searches, as work in progress on a WP basis.

May see you tomorrow? In any case, ring any time you'd like to discuss.

With Best Wishes

Robert