

To: Warham, Wendy[GRO] Shillito, Ben[GRO] Bansal, Steve
(BRA01)[GRO]
From: Lenton, Matthew[O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC80A555D42F40D1BEB2963D4E002499-LENTON, MAT]
Sent: Fri 3/13/2020 1:43:16 PM (UTC)
Subject: RE: 5000 KEL's Legal and Confidential
RE: Peaks / Kels which have not been disclosed but referred to by Coyne [WBDUK-AC.FID27032497]
RE: KELs - query [WBDUK-AC.FID27032497]

PRIVILEGED AND CONFIDENTIAL

Further to my earlier email below.

KEL disclosures were in three main sets as described below, the difference between pre-trial and post-trial disclosures being 1 + 2 - 3 = 4452, which I assume is what is being referred by "5000 KELs".

1. 21-Mar-2018: 8388 KELs uploaded to WBD as "KELComplete.zip"

This contained KELs from both Horizon and HNG-X and was the most recent version of each KEL that we had available in the database, although it included KELs that were both "live" (in the case of HNG-X KELs only, there are no live Horizon KELs) and "deactivated" (can apply to HNG-X, and applies to all Horizon). We explained that all the KELs identified as being Horizon KELs were obsolete, since any that were carried over into HNG-X were migrated and thus became HNG-X KELs. This set did not include "Deleted" KELs.

2. 06-Nov-2018: 1491 KELs emailed to WBD as "KELDeleted.7z".

These were KELs that were "deleted", rather than "deprecated", and thus did not show up on the original search for "all KELs" that was done to produce the above set.

Please see the attached email for the full explanation of the categories of KELs, and which types were provided in which of the above two sets: *RE: Peaks / Kels which have not been disclosed but referred to by Coyne [WBDUK-AC.FID27032497].msg* - see the email in that chain from Amy Prime on 13-Feb-2019 containing my answers to her questions in which it states that issue 1) above of 21 March contained KELs in categories 3 and 5, while issue 2) above of 06 Nov contained KELs in category 2b.

Note that the issue of, and the explanation around, set 2 came about because Coyne referred to KELs that had not been in set 1. I see there is an incorrect sentence in category 2a in the email, where I think I am trying to say that none of the KELs that Coyne referred to that were not available in set 1 were found to be present in set 2, in other words they all fell into the fully deleted category 2a. References to KELs that we were never able to provide would come from Peaks, and indeed that would be the only evidence that they ever existed.

3. 07-Oct-2019: 14331 KELs uploaded to WBD as "KELVersions.zip"

It had already been noted and made clear to WBD in the email referred to above that there are "Deprecated" KELs that had not been provided. I don't think we know whether that detail was passed on to Freeth's or not at that time. The issue that led to the disclosure of this revised set seems to originate with an email from WBD where they were checking the veracity of the EDQ that was submitted in 2017 and which contained the statement that previous entries of KELs were not available and which we then confirmed was incorrect (see email *RE: KELs - query* attached). This then resulted in the KELs that were supplied in sets 1 and 2 above being effectively re-queried with a specially written script in order to extract all of the previous versions of these KELs that were still retrievable, and this was disclosed as one set. Any de-duplication was done by WBD, so a large proportion of what we provided had already been sent, the point was to ensure it was complete, and we were asked to provide evidence that it was, hence all of the detail that is in the letter from WBD to Freeths that I sent earlier today. Note that although the set was extracted in Oct 2019, this extract was cut off at 13-Dec-2018 so as to match the cut off of what they already had, noting that following the above disclosures we had also updated them with small numbers of **new** KELs that had been created since the first disclosure.

Effectively then set 3 was not selected by date, but was to include deprecated versions of all KELs that had already been provided. Do you still require analysis of what dates of KELs were thus affected? I think I am right in saying that since all of the **additional** KELs that were provided were deprecated then they were all HNG-X related. Perhaps that needs to be definitively confirmed.

Matthew Lenton
Document Manager
Post Office Account

Fujitsu
Lovelace Road, Bracknell, Berkshire, RG12 8SN
Phone: [REDACTED]
Email: matthew.lenton@fujitsu.com [REDACTED]
Web: <https://www.fujitsu.com/global/>

From: Lenton, Matthew
Sent: Friday, March 13, 2020 10:51 AM
To: Warham, Wendy <[REDACTED]>; Shillito, Ben <[REDACTED]>; Bansal, Steve (BRA01) <[REDACTED]>
Subject: RE: 5000 KEL's Legal and Confidential

PRIVILEGED AND CONFIDENTIAL

Hi,
To clarify, the "after the trial" disclosure refers to the KELs that were disclosed to WBD and via them to Freeths in October 2019.

What we actually did was to provide everything that we had previously provided as well as files that we had not previously provided. This is shown in the attached email
RE KELs - query [WBDUK-AC.FID26896945].msg which refers to 14,331 files being uploaded to WBD's Hi Q site, and explains what they were.

Also attached are the two letters between Freeths and WBD on the subject.

1. *(Freeths 11-Oct-2019) Letter to WBD - Undisclosed KELs (002) (002).pdf*
2. *_LETTER_158468589(2)_Letter to Freeths LLP (KELs disclosure) (003)FujitsuComments (002).DOCX*

I thought I would send you this pending me finding further information relating to the questions below.

Matthew Lenton
Document Manager
Post Office Account

Fujitsu
Lovelace Road, Bracknell, Berkshire, RG12 8SN
Phone: [REDACTED]
Email: matthew.lenton@fujitsu.com [REDACTED]
Web: <https://www.fujitsu.com/global/>

From: Warham, Wendy <[REDACTED]>
Sent: Thursday, March 12, 2020 4:35 PM
To: Lenton, Matthew <[REDACTED]>; Shillito, Ben <[REDACTED]>; Bansal, Steve (BRA01) <[REDACTED]>
Subject: 5000 KEL's Legal and Confidential

Hi
The 5000 KEL's that we disclosed after the trial Do we have

A date range
What made us look for them
Can we do a date range in a graph format please

I know that's a big ask and one we have just talked through that we need

Wendy