

Message

From: Thomas Penny [/O=EXCHANGE/OU=ADMINGROUP1/CN=RECIPIENTS/CN=THOMASP]
Sent: 24/01/2011 09:54:16
To: Jones David M [/O=EXCHANGE/OU=ADMINGROUP1/CN=RECIPIENTS/CN=DJ]
CC: Prenovost Jean-Philippe [/O=EXCHANGE/OU=ADMINGROUP1/CN=RECIPIENTS/CN=BRAJPREV]
Subject: RE: Standard Witness Statement - HNG-X
Attachments: Horizon Witness Statement V 10.1.doc; HNGX Witness Statement V 10.1.doc

David

We have reviewed your re-drafted document.

I have attempted to use the one version to accommodate supporting both Horizon and HNG-X transaction records, as you suggested, but the differences in the processes and the documents we return are such that ensuring the correct information is included for the appropriate application is complicated. Bearing in mind others will also be using this standard document I needed to ensure it is obvious and easy to use. Hence I have reverted to two standards, one for each application.

I have accepted your previous comments in the document and now only those amendments we have made since are highlighted. Would you please be kind enough to review once more before I forward to the client?

Kind regards
Penny

Penny Thomas
Security Analyst, Customer Services

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From: Jones David M
Sent: 18 January 2011 10:40
To: Thomas Penny
Cc: Prenovost Jean-Philippe
Subject: RE: Standard Witness Statement - HNG-X

Penny

The way I redrafted the statement should work for the situation where the records straddle the two systems.....

Best wishes

David

David M Jones, Head of Legal
FUJITSU
Mob: GRO
E-mail: GRO

From: Thomas Penny
Sent: 18 January 2011 10:26
To: Jones David M
Cc: Prenovost Jean-Philippe
Subject: RE: Standard Witness Statement - HNG-X

David

It was my intention to forward this witness statement – which supports HNG-X counters, only - to the client for their comment. I note your comment about connectivity and will pursue with the client. V9, sent to you under cover of my 14 December note is still used for records written under the Horizon system.

Thank you, again, for your help.

Kind regards
Penny

Penny Thomas
Security Analyst, Customer Services

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From: Jones David M
Sent: 18 January 2011 09:57
To: Thomas Penny
Cc: Prenovost Jean-Philippe
Subject: RE: Standard Witness Statement - HNG-X

Penny

I am not sure if you were planning to but it may be sensible to agree the changes with the client in advance of having to use it.

There are also differences between Horizon and Horizon HNGX about the connectivity etc and I am not sure if the client would want these pointed out and dealt with? It will also be worth double checking internally with the team that your description of that connectivity for the Horizon System (i.e. both) still works.

Best wishes

David

David M Jones, Head of Legal
FUJITSU
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From: Thomas Penny
Sent: 18 January 2011 09:50
To: Jones David M
Cc: Prenovost Jean-Philippe
Subject: RE: Standard Witness Statement - HNG-X

David

Thank you for your response and I confirm that your suggested changes will be included.

Kind regards
Penny

Penny Thomas
Security Analyst, Customer Services

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From: Jones David M
Sent: 17 January 2011 15:55
To: Thomas Penny
Cc: Prenovost Jean-Philippe
Subject: RE: Standard Witness Statement - HNG-X
Importance: High

Penny

I have looked at the draft Statement template for you. Attached is a mark up.

In general terms text in documents for court should generally be justified – and in the case of Criminal statements with a right hand table ruling so that there can be no suggestion of words being added!

The main changes are to define the Horizon System to include HNGX and to use Fujitsu Services Limited in place of Fujitsu Services.

Please check the attached and confirm that you agree my changes?

Best wishes

David

David M Jones, Head of Legal

FUJITSU

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From: Thomas Penny
Sent: 14 January 2011 10:53
To: Jones David M
Cc: Prenovost Jean-Philippe
Subject: FW: Standard Witness Statement - HNG-X

David

I'm writing to ask whether any headway has been made on the standard witness statement; my concern is that as all outlets have migrated to HNG-X the first request for litigation support for an HNG-X outlet could appear at any time.

Kind regards
Penny

Penny Thomas
Security Analyst, Customer Services

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From: Thomas Penny
Sent: 14 December 2010 14:01
To: Jones David M; Williams Roger
Cc: Prenovost Jean-Philippe; Smith Jonathan; Wilkerson Guy; Jenkins Gareth GI
Subject: RE: Standard Witness Statement - HNG-X

David

Thank you for your note.

If your review of the document causes you concern then a meeting would be ideal for us to understand and discuss those concerns; if it looks pretty straightforward we can work remotely. Guy and Gareth should be a party to any comments/discussions we may have, please.

I'm grateful for your offer of help.

Kind regards
Penny

Penny Thomas
Security Analyst, Customer Services

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From: Jones David M
Sent: 14 December 2010 12:29
To: Williams Roger; Thomas Penny
Cc: Prenovost Jean-Philippe; Smith Jonathan
Subject: RE: Standard Witness Statement - HNG-X

Roger

I will pick this up.

Penny

You will remember that we met earlier to discuss the issues on West Byfleet. Roger is leaving Fujitsu and I am taking over in the new year as Head of Disputes. I am happy to work with you on putting in place some standard wording.

What is the best way to do this? Can we do it remotely or shall I plan to visit Bracknell. Who needs to be involved?

Best wishes

David

David M Jones, Head of Legal
UK Private Sector Division

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From: Williams Roger
Sent: 13 December 2010 12:53
To: Jones David M
Subject: FW: Standard Witness Statement - HNG-X Outlet

David,

I know that you have a particular interest in this area (!) having provided guidance to the team on the West Byfleet case. As I am probably not going to have time to get involved, would you be able to pick this up? I have to admit that it has slipped off my radar since October, so I am happy to accept responsibility for the critical path delay. But I don't think there is really any particular deadline involved.

It probably needs someone to sit down with one of our experts to go through the Horizon system in detail to make sure that we have captured it fully, and, just as importantly, explained it in a way that Magistrates or a jury will understand. So we could get external lawyers involved if necessary. Chris Breen from Pinsent Masons recently gave some general guidance to the team about giving evidence.

Best regards
Roger

Roger Q Williams

Legal Department
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From: Prenovost Jean-Philippe
Sent: 13 December 2010 09:41
To: Williams Roger
Subject: RE: Standard Witness Statement - HNG-X Outlet

Hi Roger,

Do you think you'll get a chance to review this before the holiday period?

Please let me know as the account is chasing.

Thanks in advance.

Kind regards

JP

From: Prenovost Jean-Philippe
Sent: 21 October 2010 11:59
To: Williams Roger
Subject: RE: Standard Witness Statement - HNG-X Outlet

Hi Roger,

I now have more clarity around the timescales and it would appear as though there are no claims as such on the horizon but the team wants to be in a position to agree a standard approach with PO to create certainty and comfort around the litigation support obligations.

In summary, there are no firm timescales but if you could look at it as soon as convenient for you when you do become available, it would allow the team to move forward in this process.

Thanks in advance.

JP

From: Williams Roger
Sent: 20 October 2010 16:08
To: Prenovost Jean-Philippe
Cc: Maguire Dermot
Subject: FW: Standard Witness Statement - HNG-X Outlet

Hi JP.

The whole team is immersed in the NHS matter at present -- we have a deadline of 29th to submit our claim in the arbitration. But we could pick this up after that, assuming that there is no urgency.

The draft witness statement is a witness statement under the Criminal Justice Act to support a criminal prosecution, so would need input from a criminal lawyer. As it happens, I do have criminal law experience in the distant past

(coincidentally, as a prosecution lawyer with the Post Office!). And I suspect that Dermot has a hidden criminal past too.

But let me know the timescales.

Best regards

Roger

Roger Q Williams
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From: Prenovost Jean-Philippe
Sent: 20 October 2010 14:29
To: Williams Roger
Subject: FW: Standard Witness Statement - HNG-X Outlet

Hi Roger,

Following the litigation presentation a few weeks back, we reached the conclusion that the Post Office team would benefit from having access to litigation expertise with a view to avoiding risks inherent in the litigation process and in our interactions with the Post Office litigation team.

I'm certainly happy to act as the intermediary to manage engagement but I would like to officially open up channels of communication on this account (perhaps with Katherine?) starting with a review of this standard witness statement which is used to support Post Office litigation as explained below.

Let me know if this is workable.

Thanks

JP

From: Thomas Penny
Sent: 20 October 2010 12:00
To: Prenovost Jean-Philippe
Subject: RE: Standard Witness Statement - HNG-X Outlet

JP

We provide a litigation support service to POL. The basic deliverable is transaction data which the investigator uses to identify exactly what transactions have been recorded at an outlet. Once we have returned such ARQ (audit record query) transaction data and if the investigator wants to introduce that data into court, then they will request a witness statement. We have a 'standard' return which accommodates the specific detail of the ARQ request.

Let me know if you need more.

Kind regards

Penny

Penny Thomas
Security Analyst, Customer Services

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From: Prenovost Jean-Philippe
Sent: 20 October 2010 11:51
To: Thomas Penny
Subject: RE: Standard Witness Statement - HNG-X Outlet

Hi Penny,

Could you please provide me with a brief paragraph explaining when this is used and I will involve the litigation team as discussed.

Thanks

JP

From: Thomas Penny
Sent: 20 October 2010 11:49
To: Wilkerson Guy; Prenovost Jean-Philippe
Subject: FW: Standard Witness Statement - HNG-X Outlet

Guy / JP

Have some comments from Tom – would you please be kind enough to provide your comments.

Many thanks
Penny

Penny Thomas
Security Analyst, Customer Services

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From: Thomas Penny
Sent: 06 October 2010 08:25

To: Wilkerson Guy
Subject: FW: Standard Witness Statement - HNG-X Outlet

Guy

Could I please nudge you for your comments?

Kind regards
Penny

Penny Thomas
Security Analyst, Customer Services

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From: Thomas Penny
Sent: 16 September 2010 16:11
To: Lillywhite Tom; Wilkerson Guy; Prenovost Jean-Philippe
Subject: Standard Witness Statement - HNG-X Outlet

All

In preparation for litigation support of an HNG-X outlet I have prepared the attached standard witness statement.

Could you please review and let me have any comments you may have?

Kind regards
Penny

Penny Thomas
Security Analyst, Customer Services

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