

From: Lucy Bremner [GRO]
Sent: Fri 16/11/2018 4:14:23 PM (UTC)
To: "Matthew.Lenton" [GRO]
Cc: Jonathan Gribben [GRO], "Dave.Ibbett" [GRO],
<Dave.Ibbett [GRO], "Jason.Muir" [GRO], <Jason.Muir [GRO]
"pete.newsome" [GRO], <pete.newsome [GRO], Michael Wharton
<michael.wharton [GRO]
Subject: RE: Witness Statement re Pulling ARQ Data [WBDUK-AC.FID27032497]

Thanks for sorting this Matthew

Lucy Bremner
Associate
Womble Bond Dickinson (UK) LLP

d: [GRO]
m: [GRO]
t: [GRO]
e: [GRO]
Stay informed: sign up to our e-alerts



womblebonddickinson.com



From: Matthew.Lenton [GRO]
Sent: 16 November 2018 15:49
To: Lucy Bremner
Cc: Jonathan Gribben; Dave.Ibbett [GRO]; Jason.Muir [GRO]; pete.newsome [GRO]
Michael Wharton
Subject: RE: Witness Statement re Pulling ARQ Data [WBDUK-AC.FID27032497]

Lucy,

Attached is the scan of the witness statement signed by Andy Dunks, and the same in Word format.

Just to clarify, Andy just confirmed to me that the first retrieval was supplied to WBD on CD, and to Gareth by loading to a laptop; the second request was supplied to Gareth on a CD, but not to WBD. So factually the statement is correct in both cases.

Matthew Lenton
Post Office Account Document Manager
P&PS, Digital Technology Services

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

From: Lucy Bremner [GRO]
Sent: 16 November 2018 14:21
To: Lenton, Matthew [GRO]
Cc: Jonathan Gribben [GRO], Ibbett, Dave [GRO], Muir, Jason
<Jason.Muir [GRO], Newsome, Pete [GRO], Michael Wharton
[GRO]
Subject: RE: Witness Statement re Pulling ARQ Data [WBDUK-AC.FID27032497]

Matthew,

It needs to be signed and returned asap to me today as it has to be filed at court. Is it correct that a CD was produced in respect of Sandacre etc?

Thanks,

Lucy

Lucy Bremner

Associate

Womble Bond Dickinson (UK) LLP



Stay informed: sign up to our e-alerts



womblebonddickinson.com



From: Matthew.Lenton

GRO

Sent: 16 November 2018 14:08

To: Lucy Bremner

Cc: Jonathan Gribben; Dave.Ibbett

GRO

Jason.Muir

GRO

pete.newsome

GRO

Michael Wharton

Subject: RE: Witness Statement re Pulling ARQ Data [WBDUK-AC.FID27032497]

Lucy,

Section now reads as follows (and as attached)

1. A request was received on 3rd Oct 2018 and asked for information in connection with the Post Offices at Caddington, Spencefield, Newport and Fleckney. A further request was received on 29 October for information in connection with the Post Offices at Sandsacre, Cottingley, Lenzie, Barkham and Charlton. I undertook extractions of data held on the Horizon System and followed the procedure outlined above. I produced a CD containing the required data. No data was provided for Alan Bates as this information was too old to have been retained, and in the case of Mohammad Sabir, the issues related to the Cottingley branch and therefore the information provided was specifically in relation to this branch only.

Does it need to be signed today, or can that be done on Monday?

Matthew Lenton
Post Office Account Document Manager
P&PS, Digital Technology Services

Fujitsu
Lovelace Road, Bracknell, Berkshire, RG12 8SN

Phone: [REDACTED] GRO
Email: matthew.lenton@womblebond.com GRO
Web: <https://www.fujitsu.com/global/>

From: Lucy Bremner [REDACTED] GRO
Sent: 16 November 2018 13:42
To: Lenton, Matthew [REDACTED] GRO
Cc: Jonathan Gribben [REDACTED] GRO; Ibbett, Dave [REDACTED] GRO; Muir, Jason [REDACTED] GRO
[REDACTED] GRO Newsome, Pete [REDACTED] GRO Michael Wharton [REDACTED] GRO
Subject: RE: Witness Statement re Pulling ARQ Data [WBDUK-AC.FID27032497]

Hi Matthew,

That looks fine – can you add the following to your suggested paragraph:

No data was provided for Alan Bates as this information was too old and in the case of Mohammad Sabir, the issues related to the Cottingley branch and therefore information provided was specifically in relation to this branch.

Thanks,

Lucy

Lucy Bremner
Associate
Womble Bond Dickinson (UK) LLP

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

[Stay informed: sign up to our e-alerts](#)



womblebond.com



From: [Matthew.Lenton@womblebond.com](mailto:matthew.lenton@womblebond.com) [REDACTED] GRO
Sent: 16 November 2018 13:37
To: Lucy Bremner
Cc: Jonathan Gribben; [Dave.Ibbett@womblebond.com](mailto:dave.ibbett@womblebond.com) [REDACTED] GRO; [Jason.Muir@womblebond.com](mailto:jason.muir@womblebond.com) [REDACTED] GRO; pete.newsome@womblebond.com [REDACTED] GRO; Michael Wharton
Subject: RE: Witness Statement re Pulling ARQ Data [WBDUK-AC.FID27032497]

Lucy,

Apologies, to include the second request suggest insertion of the following highlighted sentence:

7. A request was received on 3rd Oct 2018 and asked for information in connection with the Post Offices at Caddington, Spencefield, Newport and Fleckney. A further request was received on 29 October for information in connection with the Post Offices at Sandsacre, Cottingley, Lenzie, Barkham and Charlton. I undertook extractions of

data held on the Horizon System and followed the procedure outlined above. I produced a CD containing the required data.

Nothing was provided for Craig-y-Don (Bates) as it was too old. In the case of Sabir, the issues all related to Cottingley, so nothing was provided for Crossflats.

Request 1:

Caddington (Latif)
Spencefield (Patney)
Newport (Burke)
Fleckney (Tank)

Request 2:

Sandsacre (Stockdale)
Cottingley (Sabir)
Lenzie (Dar)
Barkham (Stubbs)
Charlton (Abdulla)

Matthew Lenton

Post Office Account Document Manager
P&PS, Digital Technology Services

Fujitsu

Lovelace Road, Bracknell, Berkshire, RG12 8SN

Phone:

GRO

Email:

Web: <https://www.fujitsu.com/global/>

From: Lucy Bremner

GRO

Sent: 16 November 2018 12:38

To: Lenton, Matthew

Cc: Jonathan Gribben

GRO

Ibbett, Dave

GRO

; Muir, Jason

GRO

Newsome, Pete

GRO

Michael Wharton

GRO

Subject: RE: Witness Statement re Pulling ARQ Data [WBDUK-AC.FID27032497]

Hi Matthew,

If the below is going to take too long to collate, please can you get Andy to sign the draft as sent below and return that to me and we can follow up with the other information next week.

Thanks for your other emails.

Kind regards,

Lucy

Lucy Bremner

Associate

Womble Bond Dickinson (UK) LLP

d:
m:
t:
e:

GRO

Stay informed: sign up to our e-alerts



womblebond dickinson.com



From: Lucy Bremner
Sent: 16 November 2018 11:29
To: 'Matthew.Lenton' [GRO]
Cc: Jonathan Gribben; Dave.Ibbett [GRO]; Jason.Muir [GRO]; pete.newsome [GRO]
Michael Wharton [GRO]
Subject: RE: Witness Statement re Pulling ARQ Data [WBDUK-AC.FID27032497]
Importance: High

Matthew,

I attach an updated witness statement from Andy Dunks, which we have put into our house style and removed some of the background sections on Horizon. I note we also asked for this to cover the ARQ data extracted for the lead claimants (Bates, Stubbs etc.) and this has not been covered in the attached. Please can wording be added ASAP to deal with this.

Kind regards,

Lucy

From: Matthew.Lenton [GRO]
Sent: 15 November 2018 14:35
To: Michael Wharton
Cc: Lucy Bremner; Jonathan Gribben; Dave.Ibbett [GRO]; Jason.Muir [GRO]; pete.newsome [GRO]
Subject: RE: Witness Statement re Pulling ARQ Data [WBDUK-AC.FID27032497]

Michael

The witness name is Andy Dunks, office address is:
Fujitsu, Lovelace Road, Bracknell, Berkshire, RG12 8SN

Matthew Lenton
Post Office Account Document Manager
P&PS, Digital Technology Services

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

From: Michael Wharton [GRO]
Sent: 15 November 2018 14:25
To: Lenton, Matthew <[GRO]>
Cc: Lucy Bremner [GRO]; Jonathan Gribben [GRO]; Ibbett, Dave [GRO]; Muir, Jason [GRO]; Newsome, Pete [GRO]
Subject: RE: Witness Statement re Pulling ARQ Data [WBDUK-AC.FID27032497]

Matthew

Thank you for this. Please could you confirm:

- Whose name this statement should be made in.
- Their Fujitsu office address.

Kind regards

Michael

Michael Wharton

Solicitor

Womble Bond Dickinson (UK) LLP

d: [GRO]
m: [GRO]
t: [GRO]
e: michael.wharton [GRO]

Stay informed: sign up to our e-alerts



womblebond Dickinson.com



From: Matthew.Lenton [GRO]
Sent: 14 November 2018 15:23
To: Lucy Bremner
Cc: Dave.Ibbett [GRO]; Jonathan Gribben; Jason.Muir [GRO] pete.newsome [GRO]
Subject: RE: Witness Statement re Pulling ARQ Data [WBDUK-AC.FID27032497]

Lucy,

Please see the attached statement, which uses the standard form of words that our security team normally use when providing ARQs to Post Office.

Matthew Lenton

Post Office Account Document Manager
P&PS, Digital Technology Services

Fujitsu

Lovelace Road, Bracknell, Berkshire, RG12 8SN
Phone: [GRO]
Email: [GRO]
Web: <https://www.fujitsu.com/global/>

From: Lenton, Matthew
Sent: 09 November 2018 10:33
To: 'Lucy Bremner' [GRO]
Cc: Ibbett, Dave [GRO]; Jonathan Gribben [GRO]; Muir, Jason [GRO]; Newsome, Pete [GRO]
Subject: RE: Witness Statement re Pulling ARQ Data [WBDUK-AC.FID27032497]

Lucy,

The person who actually retrieved the data below has been on leave this week, but returns next week.

Matthew Lenton
Post Office Account Document Manager
P&PS, Digital Technology Services

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

From: Lucy Bremner [REDACTED] **GRO**
Sent: 07 November 2018 13:23
To: Muir, Jason <[REDACTED] **GRO**>
Cc: Jay, Christopher [REDACTED] **GRO**; Jonathan Gribben [REDACTED] **GRO**; Lenton, Matthew [REDACTED] **GRO**
Subject: RE: Witness Statement re Pulling ARQ Data [WBDUK-AC.FID27032497]

Hi Jason,

Matthew Lenton (copied) provided us with a CD of ARQ data relating to the following Subpostmasters:

1. Anup Patny – Spencefield – Fad: 515217
2. Adrees Latif – Caddington – Fad: 0561347
3. Angela Burke – Newport (note: she alleges she was a Branch Assistant at Newport and that her husband, Chris Burke, was the Subpostmaster (he is not a claimant)) – Fad: 216321
4. Jayesh Tank – Fleckney – Fad: 197217

Data on Setpal Singh was not provided as it was too old. This has been loaded onto our High Q site. Let me know if you need access to this or whether Matthew can provide you with the material.

We are chasing down the information on the lead claimants.

Kind regards,

Lucy

Lucy Bremner
Associate
Womble Bond Dickinson (UK) LLP

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

[Stay informed: sign up to our e-alerts](#)

womblebond Dickinson.com





From: Jonathan Gribben
Sent: 06 November 2018 16:21
To: Jason.Muir [GRO]
Cc: Dave.Ibbett [GRO]; Christopher.Jay [GRO]; Lucy Bremner
Subject: RE: Witness Statement re Pulling ARQ Data [WBDUK-AC.FID27032497]

Hi Jason,
Many thanks. Lucy will send you this information.
Kind regards
Jonny

Jonathan Gribben
Managing Associate
Womble Bond Dickinson (UK) LLP

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

[Stay informed: sign up to our e-alerts](#)



womblebond dickinson.com



From: Jason.Muir [GRO]
Sent: 06 November 2018 14:17
To: Jonathan Gribben
Cc: Dave.Ibbett [GRO]; Christopher.Jay [GRO]; Lucy Bremner
Subject: FW: Witness Statement re Pulling ARQ Data [WBDUK-AC.FID27032497]

Hi Jonathan,

We can supply witness statements but I need to be clear on exactly which set of data it relates to.

I need to know the FAD codes, date range(s) of the data and when and to who it was supplied to please.

I need this level of detail so it can be included in the witness statements.

Regards,

Jason Muir

Operational Security Manager

Post Office Account

Fujitsu

Mob: [GRO] or Internally [GRO]

From: Ibbett, Dave

Sent: 06 November 2018 14:10

To: Muir, Jason <[GRO]>

Subject: FW: Witness Statement re Pulling ARQ Data [WBDUK-AC.FID27032497]

From: Jonathan Gribben <[GRO]>

Sent: 06 November 2018 13:50

To: Ibbett, Dave <[GRO]>

Cc: Newsome, Pete <[GRO]>, Jay, Christopher <[GRO]>, Lucy Bremner <[GRO]>

Subject: Witness Statement re Pulling ARQ Data [WBDUK-AC.FID27032497]

Dave,

As you may recall, Torstein described the process by which audit data is retrieved in paragraphs 30 to 33 of his first witness statement (attached).

We need a witness statement from the person or persons that retrieved the ARQ Data in relation to the Lead Claimants (Bates, Stubbs etc.) and the Subpostmaster Evidence (Singh, Tank, Burke etc.) so that they can confirm that none of the integrity checks described by Torstein revealed any issues when the ARQ Data was pulled. Can you let me know who can speak to this please? It is very unlikely that they will be called as a witness at the trial due to the brevity of their statement.

Feel free to give me a call to discuss.

Kind regards
Jonny

Jonathan Gribben
Managing Associate
Womble Bond Dickinson (UK) LLP

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

[Stay informed: sign up to our e-alerts](#)



womblebond Dickinson.com



Please consider the environment! Do you need to print this email?

The information in this e-mail and any attachments is confidential and may be legally privileged and protected by law. ~~dave.ibbetts~~ ~~GRO~~ is only authorised to access this e-mail and any attachments. If you are not ~~dave.ibbetts~~ ~~GRO~~, please notify ~~jonathan.gribbert~~ ~~GRO~~ as soon as possible and delete any copies. Unauthorised use, dissemination, distribution, publication or copying of this communication or attachments is prohibited and may be unlawful. Information about how we use personal data is in our [Privacy Policy](#) on our website.

Any files attached to this e-mail will have been checked by us with virus detection software before transmission. Womble Bond Dickinson (UK) LLP accepts no liability for any loss or damage which may be caused by software viruses and you should carry out your own virus checks before opening any attachment.

Content of this email which does not relate to the official business of Womble Bond Dickinson (UK) LLP, is neither given nor endorsed by it.

This email is sent by Womble Bond Dickinson (UK) LLP which is a limited liability partnership registered in England and Wales under number OC317661. Our registered office is 4 More London Riverside, London, SE1 2AU, where a list of members' names is open to inspection. We use the term partner to refer to a member of the LLP, or an employee or consultant who is of equivalent standing. Our VAT registration number is GB123393627.

Womble Bond Dickinson (UK) LLP is a member of Womble Bond Dickinson (International) Limited, which consists of independent and autonomous law firms providing services in the US, the UK, and elsewhere around the world. Each Womble Bond Dickinson entity is a separate legal entity and is not responsible for the acts or omissions of, nor can bind or obligate, another Womble Bond Dickinson entity. Womble Bond Dickinson (International) Limited does not practice law. Please see www.womblebond Dickinson.com/legal notices for further details.

Womble Bond Dickinson (UK) LLP is authorised and regulated by the Solicitors Regulation Authority.

Unless otherwise stated, this email has been sent from Fujitsu Services Limited (registered in England No 96056); Fujitsu EMEA PLC (registered in England No 2216100) both with registered offices at: 22 Baker Street, London W1U 3BW; PFU (EMEA) Limited, (registered in England No 1578652) and Fujitsu Laboratories of Europe Limited (registered in England No. 4153469) both with registered offices at: Hayes Park Central, Hayes End Road, Hayes, Middlesex, UB4 8FE.

This email is only for the use of its intended recipient. Its contents are subject to a duty of confidence and may be privileged. Fujitsu does not guarantee that this email has not been intercepted and amended or that it is virus-free.

Unless otherwise stated, this email has been sent from Fujitsu Services Limited (registered in England No 96056); Fujitsu EMEA PLC (registered in England No 2216100) both with registered offices at: 22 Baker Street, London W1U 3BW; PFU (EMEA) Limited, (registered in England No 1578652) and Fujitsu Laboratories of Europe Limited (registered in England No. 4153469) both with registered offices at: Hayes Park Central, Hayes End Road, Hayes, Middlesex, UB4 8FE.

This email is only for the use of its intended recipient. Its contents are subject to a duty of confidence and may be privileged. Fujitsu does not guarantee that this email has not been intercepted and amended or that it is virus-free.

Unless otherwise stated, this email has been sent from Fujitsu Services Limited (registered in England No 96056); Fujitsu EMEA PLC (registered in England No 2216100) both with registered offices at: 22 Baker Street, London W1U 3BW; PFU (EMEA) Limited, (registered in England No 1578652) and Fujitsu Laboratories of Europe Limited (registered in England No. 4153469) both with registered offices at: Hayes Park Central, Hayes End Road, Hayes, Middlesex, UB4 8FE.

This email is only for the use of its intended recipient. Its contents are subject to a duty of confidence and may be privileged. Fujitsu does not guarantee that this email has not been intercepted and amended or that it is virus-free.

Unless otherwise stated, this email has been sent from Fujitsu Services Limited (registered in England No 96056); Fujitsu EMEA PLC (registered in England No 2216100) both with registered offices at: 22 Baker Street, London W1U 3BW; PFU (EMEA) Limited, (registered in England No 1578652) and Fujitsu Laboratories of Europe Limited (registered in England No. 4153469) both with registered offices at: Hayes Park Central, Hayes End Road, Hayes, Middlesex, UB4 8FE.

This email is only for the use of its intended recipient. Its contents are subject to a duty of confidence and may be privileged. Fujitsu does not guarantee that this email has not been intercepted and amended or that it is virus-free.

Unless otherwise stated, this email has been sent from Fujitsu Services Limited (registered in England No 96056); Fujitsu EMEA PLC (registered in England No 2216100) both with registered offices at: 22 Baker Street, London W1U 3BW; PFU (EMEA) Limited, (registered in England No 1578652) and Fujitsu

Laboratories of Europe Limited (registered in England No. 4153469) both with registered offices at: Hayes Park Central, Hayes End Road, Hayes, Middlesex, UB4 8FE.

This email is only for the use of its intended recipient. Its contents are subject to a duty of confidence and may be privileged. Fujitsu does not guarantee that this email has not been intercepted and amended or that it is virus-free.

Unless otherwise stated, this email has been sent from Fujitsu Services Limited (registered in England No 96056); Fujitsu EMEA PLC (registered in England No 2216100) both with registered offices at: 22 Baker Street, London W1U 3BW; PFU (EMEA) Limited, (registered in England No 1578652) and Fujitsu Laboratories of Europe Limited (registered in England No. 4153469) both with registered offices at: Hayes Park Central, Hayes End Road, Hayes, Middlesex, UB4 8FE.

This email is only for the use of its intended recipient. Its contents are subject to a duty of confidence and may be privileged. Fujitsu does not guarantee that this email has not been intercepted and amended or that it is virus-free.