
From: Muir, Jason [/O=FUJITSU EXCHANGE ORGANIZATION/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BDC2EB2BC40846849C03D237942]
Sent: Wed 26/09/2018 1:10:44 PM (UTC)
To: Lenton, Matthew [GRO]; Denbali, Farzin [GRO]
Cc: Ibbett, Dave [GRO]
Subject: RE: Your witness statement - now v6 [WBDUK-AC.FID27032497]
Attachment: _E-MAIL_151998716(1)_25 Sep 18 Witness Statement of Torstein O Godeseth v6-Questions for Sec Ops-ML JM UPDATE.docx

Hi Matthew,

Please see attached latest version with my comments. Let me know if we need to talk through them.

Regards,

Jason Muir

Operational Security Manager

Post Office Account

Fujitsu

Mob: [GRO] or Internally [GRO]

Phone: [GRO] or Internally [GRO]

From: Lenton, Matthew

Sent: 26 September 2018 13:15

To: Muir, Jason <[GRO]>; Denbali, Farzin <[GRO]>

Cc: Ibbett, Dave <[GRO]>

Subject: RE: Your witness statement - now v6 [WBDUK-AC.FID27032497]

No idea why that was, please see this attachment.

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: Muir, Jason

Sent: 26 September 2018 12:48

To: Lenton, Matthew <[GRO]>; Denbali, Farzin <[GRO]>

Cc: Ibbett, Dave <[GRO]>

Subject: RE: Your witness statement - now v6 [WBDUK-AC.FID27032497]

Hi Matthew,

The document you attached to your email was blank?

Regards,

Jason Muir

Operational Security Manager

Post Office Account

Fujitsu

Mob: [GRO] or Internally [GRO]

Phone: [GRO] or Internally [GRO]

From: Lenton, Matthew

Sent: 26 September 2018 12:33

To: Muir, Jason <[GRO]>; Denbali, Farzin <[GRO]>

Cc: Ibbett, Dave <[GRO]>

Subject: RE: Your witness statement - now v6 [WBDUK-AC.FID27032497]

Jason, Farzin,

There are some questions for the Sec Ops team in Torstein's draft witness statement to which WBD are seeking answers today, please.

Please see questions at the following sections:

1. 7.13
2. 7.13.4
3. 7.14 – not sure it is quite clear what is being looked for here, but see Alan Holmes's comment on the same section. Are you able to provide examples of other queries that are resolved using ARQs, i.e. other than transaction data?
4. 11.3.2 – do you have the records in terms of numbers of such users as described in 11.3.1 (as that is what is being asked, rather than who they were)
5. 11.3.8 – do you know the reason for this change of policy in July 2015? Is this process documented in a Dimensions document so that we can just quote the reference?

Matthew Lenton

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

Fujitsu

Lovelace Road, Bracknell, Berkshire, RG12 8SN

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

From: Jonathan Gribben [GRO]

Sent: 26 September 2018 11:17

To: Godeseth, Torstein [GRO]

Cc: Lenton, Matthew [GRO]; Ibbett, Dave [GRO]; Andrew Parsons [GRO]

Subject: RE: Your witness statement - now v6 [WBDUK-AC.FID27032497]

Torstein,

Thank you for this. I'll review it ASAP.

Matthew/Dave – can you ensure that the questions to be addressed by others are addressed during the course of today please?

Kind regards

Jonny

Jonathan Gribben
Managing Associate
Womble Bond Dickinson (UK) LLP

d: **GRO**
m: **GRO**
t: **GRO**
e: **GRO**

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From: Torstein.O.Godeseth <[redacted]> **GRO**
Sent: 26 September 2018 11:13
To: Jonathan Gribben
Cc: Matthew.Lenton <[redacted]> **GRO**; Dave.Ibbett <[redacted]> **GRO**; Andrew Parsons
Subject: RE: Your witness statement - now v6 [WBDUK-AC.FID27032497]

Jonny,

I have now completed my pass through the document and attach a marked up version. There are clearly a number of questions for others to address.

I have a concern that whilst we talk about the use of BTs in Horizon Online I don't see any equivalent statement about Legacy Horizon; on this I would have to rely on others in any case as I was not working within Fujitsu at that time.

I will now go through the document yet again checking, but I think it makes sense to share it in its current state.

Regards etc
Torstein

From: Jonathan Gribben <[redacted]> **GRO**
Sent: Tuesday, September 25, 2018 4:21 PM
To: Godeseth, Torstein <[redacted]> **GRO**
Cc: Lenton, Matthew <[redacted]> **GRO**; Ibbett, Dave <[redacted]> **GRO**; Andrew Parsons <[redacted]> **GRO**
Subject: RE: Your witness statement - now v5 [WBDUK-AC.FID27032497]

Torstein,
Thank you for this. Re section 9, the Court will be determining the distinct issues set out below which means that I don't think we can change the definition of access from read only to ability to change (as they are distinct issues):-

- ▽ Were Post Office and/or Fujitsu able to access transaction data recorded by Horizon remotely (i.e. not from within a branch)?
- ▽ Did Post Office and/or Fujitsu have the ability/facility to: (i) insert, inject, edit or delete transaction data or data in branch accounts; (ii) implement fixes in Horizon that had the potential to affect transaction data or data in branch accounts; or (iii) rebuild branch transaction data:
 - at all;
 - without the knowledge of the Subpostmaster in question; and
 - without the consent of the Subpostmaster in question?

Let me know if you'd like a call to discuss.
Kind regards
Jonny

Jonathan Gribben
Managing Associate
Womble Bond Dickinson (UK) LLP

d: **GRO**
m: **GRO**
t: **GRO**
e: **GRO**

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From: Torstein.O.Godeseth; **GRO**
Sent: 25 September 2018 16:11
To: Jonathan Gribben
Cc: Matthew.Lentor; **GRO**
Subject: RE: Your witness statement [WBDUK-AC.FID27032497] - now v5

Jonny,
Please find attached where I have got to. I have been through sections 1-8 and I don't see any major problems in there. I have suggested changes in a few places – as much to fit my style as anything else.

I have another session now and so whilst I may get more done today I thought I would let you have this as a WIP. In any case I have most of tomorrow earmarked for this.

You'll see that I want to change the definition of 'access' to mean ability to change (as opposed to the current definition 'read-only') at the start of section 9. Could you agree this asap – I hope I have given you enough clues as to why.

Regards etc
Torstein

From: Jonathan Gribben <**GRO**>
Sent: Tuesday, September 25, 2018 12:48 PM
To: Godeseth, Torstein <**GRO**>

Cc: Newsome, Pete <[REDACTED]>; Lenton, Matthew <[REDACTED]>; Ibbett, Dave <[REDACTED]>; Andrew Parsons <[REDACTED]>; Lucy Bremner <[REDACTED]>

Subject: Your witness statement [WBDUK-AC.FID27032497]

Torstein,
Further to our exchange of emails earlier today please find attached an updated version of your statement. You'll see that it contains some comments and questions for you in bold square brackets and some of the comments added by your colleagues.

I'd be grateful if you'd review the draft in full and fill in the gaps as soon as possible. Will you be able to get it back to me today please?

Kind regards

Jonny

Jonathan Gribben
Managing Associate
Womble Bond Dickinson (UK) LLP

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

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