

From: Amy Prime [GRO]
To: Michael Wharton [GRO]
Subject: FW: Legally Privileged - Fujitsu documents [BD-4A.FID26896945]
Date: Fri, 1 Dec 2017 09:03:28 +0000
Importance: Normal
Attachments: _DISPUTERESOLUTION_37589099(1)_Schedule_to_EDQ.nrl;
_SPREADSHEET_37461815(1)_Schedule_3_Index_-_2017-11-10.nrl
Inline-Images: image001.png; image002.png; image003.png; imagefda6a3.PNG; image78d3a4.PNG;
imagee77113.PNG

Thanks Michael – looks good.

I have made a couple of comments and attached is the Schedule 3 index which I refer to.

Thanks

Amy

Amy Prime
Solicitor
Womble Bond Dickinson (UK) LLP

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m:
t:
e:

GRO



womblebond Dickinson.com



From: Michael Wharton
Sent: 01 December 2017 08:47
To: Amy Prime
Subject: RE: Legally Privileged - Fujitsu documents [BD-4A.FID26896945]

Amy

See attached – Andy asked me to agree a draft with you for him to review before we send to Fujitsu.

Let me know what you think.

Thanks

Michael

Michael Wharton

Solicitor
Womble Bond Dickinson (UK) LLP

d:
m:
t:
e:

GRO



womblebond Dickinson.com



From: Amy Prime
Sent: 30 November 2017 15:02
To: Michael Wharton
Subject: RE: Legally Privileged - Fujitsu documents [BD-4A.FID26896945]

Michael

Agree – if we can insert date ranges in the comment box that would also be helpful.

Thanks

Amy

Amy Prime

Solicitor
Womble Bond Dickinson (UK) LLP

d:
m:
t:
e:

GRO



womblebond Dickinson.com



From: Michael Wharton
Sent: 30 November 2017 14:19
To: Amy Prime
Subject: RE: Legally Privileged - Fujitsu documents [BD-4A.FID26896945]

Amy

Andy asked me to check in with you about how to present the schedule for the EDQ following our call with Fujitsu. He said to keep it high level (1/2 pages max) not least because we're going further than strictly necessary in providing this information, but also because we don't have full details yet anyway.

I was thinking about a basic table along these lines:

Location of documents	Description	Comments
eg Dimensions, KEL, Sharepoint, etc.	Briefly explain what types of documents are stored in that location and in what format.	Brief details of any significant limitations on our ability to disclose/the proportionality of disclosing all of the documents.

What do you think?

Thanks

Michael

Michael Wharton

Solicitor
Womble Bond Dickinson (UK) LLP



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From: Amy Prime
Sent: 29 November 2017 19:53
To: Andrew Parsons; Michael Wharton
Subject: FW: Legally Privileged - Fujitsu documents [BD-4A.FID26896945]

Both

I have put a call in our diaries to speak with FJ tomorrow at 10:30am. I may be able to join some of this call but not all of it.

The purpose of the call is to discuss with FJ them providing a list of locations in which they hold documents which are potentially relevant to the Group Action and also to provide a heads up on any issues there may be with extracting these from these locations. It would also be helpful if FJ could provide a list of 4 or 5 individuals who have contact with the POL IT team who we could list in the EDQ as FJ's key custodians. This list of documents and custodians would then be inserted as a Schedule to the EDQ.

The current documents / locations I am aware of are:

Technical documents in Dimensions

Known Error Log (do not know what database/software hosts this)

Peaks System (do not know what database/software hosts this)

HSD call logs before June 2014 (note – we are aware of issues with extracting them due to Windows 2003 issues due to be hosted in Powehelp)

Transaction and event data in the Data Centre

Counter logs which had held on the Horizon terminals

SharePoint

Emails (assume Outlook)

Michael – please could you join this call with Andy and then going forward liaise with FJ to produce the schedule of documents to be included in the EDQ. The EDQ is going to Rod on Monday evening so it would be good to have the list from FJ by Monday lunchtime. If you read through paragraphs 42, 134 – 152 and 165 -170 of the attached witness statement you will get a good overview of the current knowledge.

Thank you both

Amy

Amy Prime

Solicitor

Womble Bond Dickinson (UK) LLP

d:
m:
t:
e:

GRO



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From: Defence Legal (Chris Jay) [<mailto:> **GRO**]

Sent: 29 November 2017 09:18

To: Amy Prime; Lenton Matthew; Newsome Pete

Cc: Michael Wharton; Andrew Parsons; Mark Underwood [**GRO**]

Subject: RE: Legally Privileged - Fujitsu documents [BD-4A.FID26896945]

Amy,

11.00 am tomorrow is confirmed.

Look forward to receiving the MI.

Kind regards,

Chris

From: Amy Prime [mailto:GRO]
Sent: 28 November 2017 14:50
To: Defence Legal (Chris Jay) GRO Lenton Matthew
GRO Newsome Pete GRO
Cc: Michael Wharton GRO Andrew Parsons GRO
GRO Mark Underwood GRO GRO
Subject: Legally Privileged - Fujitsu documents [BD-4A.FID26896945]

Chris, Matthew, Pete

Post Office are required to inform the Court of the location in which potentially relevant documents are located. "Relevant document" is a very broad term and will encompass pretty much all dealings which Fujitsu have had with Post Office in relation to Horizon and HNG-X spanning emails (both with POL and internally), documents stored in Dimension, Transaction and Event data, HSD logs, Peaks system and any other document produced by Fujitsu which relates to Horizon. I appreciate that this may be a large volume of documents.

So as we can understand the documents held by Fujitsu and where they are stored, it would be helpful if we could have call. Would you be available at 11am on Thursday?

Kind regards

Amy

Amy Prime
Solicitor
Womble Bond Dickinson (UK) LLP

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