

**From:** Jarnail A Singh[IMCEAEX-  
\_O=MMS\_OU=EXCHANGE+20ADMINISTRATIVE+20GROUP+20+28FYDIBOHF23SPDLT+29  
\_CN=RECIPIENTS\_CN=JARNAIL+2EA+2ESINGH6CEADABD-67E9-4ECA-94F2-  
005716658847@C72A47.ingest.local]  
**Sent:** Tue 26/11/2013 1:54:52 PM (UTC)  
**To:** Rodric Williams [GRO]; Harvey  
Michael [GRO]  
**Cc:** Davidson James [GRO]; Newsome  
Pete [GRO]; Andy Holt [GRO]  
simon.clarke [GRO]  
**Subject:** RE: Expert on the Horizon System - Subject to Common Interest Privilege

Thanks Rodric.

Jarnail Singh | Criminal Lawyer



148 Old Street, LONDON, EC1V 9HQ



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Mobex:



**GRO**



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**From:** Rodric Williams  
**Sent:** 26 November 2013 13:35  
**To:** Harvey Michael  
**Cc:** Davidson James; Newsome Pete; Andy Holt; simon.clarke [GRO]; Jarnail A Singh  
**Subject:** RE: Expert on the Horizon System - Subject to Common Interest Privilege

Thanks Michael.

We will see you at Baker Street on Friday 29 November at 1030am.

Jarnail Singh, Andy Holt and I will be attending from POL, along with Simon Clarke from our external criminal law solicitors Cartwright King (all cc'ed).

As we have just discussed on the phone, the main focus of the meeting from our side is to progress obtaining independent expert evidence to support POL's criminal prosecutions. That said, I appreciate that from Fujitsu's perspective, a challenge to Horizon is a challenge to the system, however that challenge may be made (e.g. in the criminal or civil courts, through the Mediation Scheme, or in the media). We can therefore also touch on these wider issues if time permits, or arrange a follow up discussion if not.

We look forward to seeing you on Friday.  
Kind regards, Rodric

Rodric Williams | Litigation Lawyer

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**From:** Harvey Michael **GRO**  
**Sent:** 22 November 2013 16:32  
**To:** Rodric Williams  
**Cc:** Davidson James; Newsome Pete  
**Subject:** RE: Expert on the Horizon System - Subject to Common Interest Privilege

Rodric,

Great, shall we say 10.30am at our Lon22 offices (22 Baker Street). James and Pete will be attending too. If you can let me know who will be attending so I can notify reception. Should you want to meet at 148 instead then please let me know.

In addition, as promised, please find attached Fujitsu's view of the basis on which to instruct an expert to assist with the Mediation process. You will note that it aligns with the position previously agreed regarding the KPMG audit which was later subsumed by the Second Sight process.

In addition, it will be Fujitsu's position that we are allowing the expert to perform this audit solely for the purposes of facilitating the Mediation Process and therefore we will be reserving our rights with respect to the outcome the expert's audit, in particular the right to challenge the validity/accuracy of the expert's opinion. I suggest we document this as part of an agreed project initiation document to address our involvement with the Mediation Process.

Should 10.30am be inconvenient please let me know and we can find a more convenient time.

I hope you have a pleasant weekend.

Kind regards,

Michael Harvey

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**From:** Rodric Williams [GRO]  
**Sent:** 22 November 2013 14:58  
**To:** Harvey Michael  
**Subject:** RE: Expert on the Horizon System - Subject to Common Interest Privilege

Thanks Michael – next Friday 29 November 2013 works for us.  
I'm assuming we will come to you. What time are you thinking?  
Kind regards, Rodric

Rodric Williams | Litigation Lawyer

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**From:** Harvey Michael [GRO]  
**Sent:** 21 November 2013 09:02  
**To:** Rodric Williams  
**Subject:** RE: Expert on the Horizon System - Subject to Common Interest Privilege

Rodric,

I would like James Davidson to attend as he will be able to act as a conduit between the technical and commercial elements. He is part time now so only works Thursdays and Fridays, therefore ideally I would like the meeting on either 28<sup>th</sup> or 29<sup>th</sup>. Are you team available then?

Please note I have had my meeting with the legal team and will be sending our view of the expert terms of reference tomorrow for your review ahead of our meeting.

Kind regards,

Michael

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**From:** Rodric Williams [GRO]  
**Sent:** 20 November 2013 18:38  
**To:** Harvey Michael  
**Subject:** FW: Expert on the Horizon System - Subject to Common Interest Privilege

Hi Michael – any thoughts on a new date?  
Kind regards, Rodric

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**From:** Rodric Williams  
**Sent:** 08 November 2013 15:37  
**To:** 'Harvey Michael'  
**Cc:** Newsome Pete; Davidson James  
**Subject:** RE: Expert on the Horizon System - Subject to Common Interest Privilege

Hi Michael,

Unfortunately we have a problem with 21 and 22 November. Can we do the following week?

I note your point about the draft scope, and it would be helpful if you could give us a sense of the issues you have in advance of the meeting if at all possible.

Finally, thank you for making yourself aware of what's going on with the Mediation Scheme. Andy Holt and I should be able to give you an update of how that is progressing when we meet.

I hope you have a productive week on your MBA!

Kind regards, Rodric

Rodric Williams | Litigation Lawyer



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**From:** Harvey Michael | **GRO**  
**Sent:** 06 November 2013 16:12  
**To:** Rodric Williams  
**Cc:** Newsome Pete; Davidson James  
**Subject:** RE: Expert on the Horizon System - Subject to Common Interest Privilege

Rodric,

Thank you for your email.

Unfortunately I am not available on Friday and next week I am away studying for an MBA so I am not in the office. Therefore, unfortunately it will need to be w/c 18<sup>th</sup> that we meet. I would like James Davidson and Pete Newsome to attend with me so could we do either 21<sup>st</sup> or 22<sup>nd</sup> November?

We have/are reviewing the Expert Terms of Reference and we have some concerns regarding the tone and scope of the terms. A representative from the Fujitsu legal team has also asked to review it and I am meeting him on 19<sup>th</sup> to go through his views and so by having the meeting 21/22 Nov I hope to have the comprehensive Fujitsu view so we can make best use of everyone's time.

I am also aware that Fujitsu's Pete Newsome and Post Office's Andy Holt are in dialogue regarding the type of issue, volume and data requirements that are relevant to Fujitsu's input into the Mediation Process. I have engaged with Pete to ensure that these needs are fed into me and James so that the scope of the expert's role is put into context within Fujitsu.

I hope either of these days work with your (and your team's availabilities).

Kind regards,

Michael


**Michael Harvey**  
Commercial Director

**Fujitsu**  
22 Baker Street, London W1U 3BW  
Mob:   
Email:   
Web: <http://uk.fujitsu.com>



Please consider the environment - do you really need to print this email?

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**From:** Rodric Williams   
**Sent:** 06 November 2013 14:55  
**To:** Harvey Michael  
**Subject:** FW: Expert on the Horizon System - Subject to Common Interest Privilege

Michael,

Further to my email below, in addition to me, my colleagues Jarnail Singh (in-house criminal law solicitor) and Andy Holt (POL IT) will attend the meeting, along with Simon Clarke from Cartwright King (our external criminal law solicitors).

The proposed agenda is:

1. Recap of Horizon/Second Sight situation.
2. Purpose of instructing independent experts.
  - a. Disclosure provisions
  - b. Independence
  - c. Firewall between POL/FSL and experts.
3. Role of independent experts.
4. Suitability of proposed experts from Imperial.

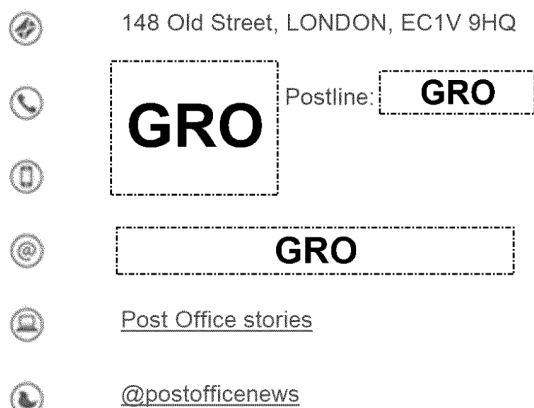
5. Scope.
6. AOB.

It is probably a bit late for a meeting this week, but please let me know if we could still do something say on Friday, or if not, how next week looks.

Thanks for your help, Rodric

Rodric Williams | Litigation Lawyer

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**From:** Rodric Williams  
**Sent:** 27 October 2013 15:38  
**To:** 'Harvey Michael'  
**Subject:** RE: Expert on the Horizon System - Subject to Common Interest Privilege

Thanks Michael.

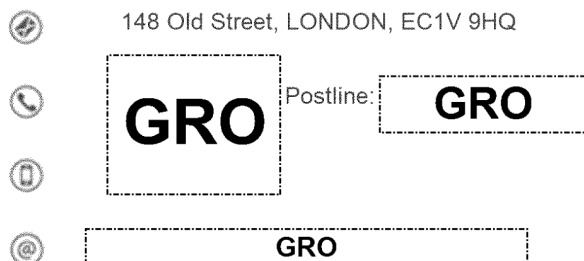
I am pulling together availability etc, and will circulate this so you can pick it up from your end when you get back to the office w/c 4 November.

I hope you have a good week.

Kind regards, Rodric

Rodric Williams | Litigation Lawyer

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**From:** Harvey Michael [REDACTED] GRO  
**Sent:** 24 October 2013 12:16  
**To:** Rodric Williams  
**Subject:** RE: Expert on the Horizon System - Subject to Common Interest Privilege

Rodric,

Thank you for sending this through. I will have a chat with the team and get back to you.

I am out of the office next week so maybe we can try and arrange a meeting sometime for w/c 4<sup>th</sup> November.

Kind regards,

Michael

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**From:** Rodric Williams [REDACTED] GRO  
**Sent:** 23 October 2013 19:17  
**To:** Harvey Michael  
**Subject:** Expert on the Horizon System - Subject to Common Interest Privilege

Michael,

Thank you for your time on the phone last week.

As we discussed, Post Office Limited is considering appointing an expert to prepare a report on the integrity of the Horizon Online system. I attach the Draft Scope of the work which the expert may be asked to undertake, along with the CVs of two potentially suitable experts, Professor Jeffrey Kramer and Dr. Naranker Dulay, both from the Department of Computing at Imperial College London.

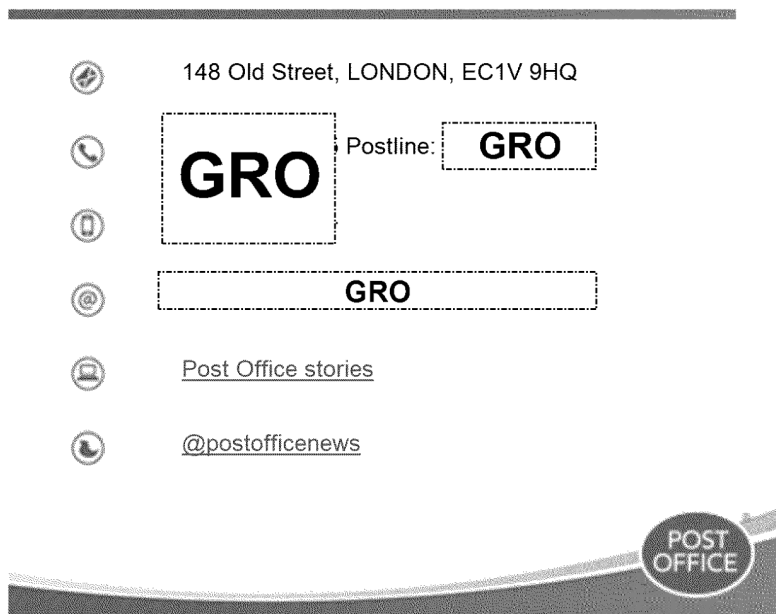
In order to progress this, it seems sensible to have a meeting to discuss how Fujitsu can work with Post Office Limited to achieve the aims set out in the Draft Scope. This meeting would be attended by a member of the law firm we use to prosecute alleged criminal conduct.

If you agree, could you please let me know when we could meet (ideally as soon as possible), and whether you think it would be useful to have a technical person from Post Office at the meeting. I can then look to fix attendees, agenda etc.

We also discussed the possibility of us sharing with you the advice we have received on the evidence which Gareth Jenkins has previously provided in support of Post Office Limited criminal prosecutions. I hope to be able to provide you with a substantive response on that request very shortly.

I look forward to hearing from you. Thanks for your support.  
Kind regards, Rodric

Rodric Williams | Litigation Lawyer



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