

Message

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**From:** Thomas Penny [/O=EXCHANGE/OU=ADMINGROUP1/CN=RECIPIENTS/CN=THOMASP]  
**Sent:** 14/12/2010 14:26:26  
**To:** Jones David M [/O=EXCHANGE/OU=ADMINGROUP1/CN=RECIPIENTS/CN=DJ]  
**CC:** Prenovost Jean-Philippe [/O=EXCHANGE/OU=ADMINGROUP1/CN=RECIPIENTS/CN=BRAJPREV]; Smith Jonathan [/O=EXCHANGE/OU=ADMINGROUP1/CN=RECIPIENTS/CN=SMITHJ4]; Wilkerson Guy [/O=EXCHANGE/OU=ADMINGROUP1/CN=RECIPIENTS/CN=WILKERSONG]; Jenkins Gareth GI [/O=EXCHANGE/OU=ADMINGROUP1/CN=RECIPIENTS/CN=GARETH.JENKINS]; Williams Roger [/O=EXCHANGE/OU=ADMINGROUP1/CN=RECIPIENTS/CN=WILLIAMSRO]  
**Subject:** RE: Standard Witness Statement - HNG-X  
**Attachments:** HNGX Txn Data Witness Statement V 10.doc; Penny's Standard Fujitsu V9 Nov 09.doc

David

Please find attached the draft witness statement for HNG-X which was modelled on the Standard V9 Nov 09. The original of V9 was reviewed and agreed with POL; some minor changes have been implemented without further review.

Kind regards

Penny

Penny Thomas

Security Analyst, Customer Services

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From: Jones David M  
Sent: 14 December 2010 14:03  
To: Thomas Penny  
Cc: Prenovost Jean-Philippe; Smith Jonathan; Wilkerson Guy; Jenkins Gareth GI; Williams Roger  
Subject: RE: Standard Witness Statement - HNG-X

Penny

Thanks. Please can you send me the latest draft so I can be certain I am reviewing the right starting point?

Has this or an earlier version been reviewed and approved by Post Office?

Best wishes

David

David M Jones, Head of Legal  
UK Private Sector Division

FUJITSU

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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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**GRO**

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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**GRO**

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  
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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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