

From: Andy Holt[IMCEAEX-
_O=MMS_OU=EXCHANGE+20ADMINISTRATIVE+20GROUP+20+28FYDIBOHF23SPDLT+29
_CN=RECIPIENTS_CN=ANDY+2EHOLT1F932521-2F1A-4377-9268-
FD0FCF5C7371@C72A47.ingest.local]
Sent: Thur 10/07/2014 8:20:39 AM (UTC)
To: Jarnail Singh[GRO]; 'Parsons,
Andrew'[GRO]
Cc: Pheasant, Andrew[GRO]; Matthews,
Gavin[GRO]; Martin Smith[GRO]
Rodric Williams[GRO]; Chris
Aujard[GRO]; Belinda Crowe[GRO]
Jessica Madron[GRO]
Subject: RE: Expert [BD-4A.FID20472253]

All

- As discussed before there is overlap with the Deloitte work. Rod can we share the Deloitte report with Imperial College. I would also suggest we have a meeting with Julie and you to look at overlap with the requests from Imperial College.
- I want to make sure we are really clear on scope, having read the document I think this is growing again. In previous meetings we had agreement that the following scope would help us progress. i.e. our aim was to get assurance that the transaction data we used in prosecutions was a true reflection of what had happened in branch. I suggest we review the requirement again with consideration of the Deloitte work and therefore decide what we really need it to achieve. Martin, I will pick this up with you and Jarnail.
- I have concerns about ICL's estimate, although it looks very reasonable I am not sure they have understood the scale of this.

Regards
Andy

From: Jarnail Singh
Sent: 09 July 2014 11:40
To: 'Parsons, Andrew'
Cc: Pheasant, Andrew; Matthews, Gavin; Martin Smith; Andy Holt; Rodric Williams; Chris Aujard; Belinda Crowe; Jessica Madron
Subject: RE: Expert [BD-4A.FID20472253]

Andy

I agree with Martin. POL cannot be seen to be Cheery picking the information provided to the experts or withholding the information. Experts are independent and POL (or Fujitsu for that matter) cannot be seen to be trying to influence the experts.

Regards
Jarnail

Jarnail Singh | Criminal Lawyer



148 Old Street, LONDON, EC1V 9HQ



GRO

Postline: GRO



Mobex:



GRO



Post Office stories



@postofficenews



From: Martin Smith [REDACTED] GRO
Sent: 09 July 2014 10:34
To: 'Parsons, Andrew'; Jarnail Singh; Andy Holt; [REDACTED] GRO [REDACTED] Jessica Madron; Rodric Williams; Belinda Crowe
Cc: Pheasant, Andrew; Matthews, Gavin
Subject: RE: Expert [BD-4A.FID20472253]

Andy,

I would not advise that the experts be instructed to look at the old Horizon system. If the experts were to consider the old system, depending on their findings, disclosure issues could arise in historic cases. In any event cases now being investigated and considered for prosecution will involve Horizon on Line, which was rolled out during 2010.

In criminal law instructions and material provided to an expert must be listed in his/her report. The defence are entitled to know what material the expert has considered in order to reach his/her conclusion.

CK would not wish to vet information prior to sending it to ICL; it would be counter-productive to withhold information. The experts may well refer to such attempts and missing information in the report. This would devalue the report and make it easier for defendants to challenge.

I will explore with ICL the "fitness for purpose" heading. If there are any other points, please let me know and I will raise them at the same time.

Kind regards,

Martin.

Martin Smith

GRO

Direct: **GRO**

From: Parsons, Andrew [mailto:[REDACTED] GRO]
Sent: 09 July 2014 07:25
To: Jarnail Singh; Andy Holt; [REDACTED] GRO [REDACTED] Jessica Madron; Rodric Williams; Belinda Crowe
Cc: Martin Smith; Pheasant, Andrew; Matthews, Gavin
Subject: RE: Expert [BD-4A.FID20472253]

All

My thoughts...

A key question appears to be whether ICL look at old Horizon as well as Horizon Online. My guess is that POL won't be now looking to prosecute any old Horizon cases so we can focus on HOL. Martin / Jarnail?

As to access to the SS material, I can't see in principle any issue with this. Material going to SS has been largely vetted already. However, Martin / Jarnail – could you confirm whether an expert under criminal law has to disclose all material instructions / source material in their report? In the civil process, the general rule is that the expert must disclose to the Court and the other side pretty much everything they have considered in forming their opinion. If this applies equally to criminal procedure, then CK / POL may wish to vet any material before sending it to ICL.

We may want to explore what ICL intend to investigate under the "fitness for purpose" heading. This could be as simple as "does Horizon provide the necessary functionality?". Or, it could go wider into "Does Horizon provide a good user experience?". From handling IT disputes in the past, I know that determining the quality of user experience can be a very subjective question, that is difficult to answer.

Finally, I think the structure proposed by ICL really highlights the deficiencies in SS' approach.

Kind regards
Andy

Andrew Parsons
Senior Associate
for and on behalf of Bond Dickinson LLP

Bond Dickinson

Direct: [REDACTED]
Mobile: [REDACTED]
Fax: [REDACTED] **GRO**

Follow Bond Dickinson:



www.bonddickinson.com

From: Jarnail Singh [mailto:[REDACTED]]
Sent: 08 July 2014 16:19
To: Andy Holt; Chris Aujard; Jessica Madron; Rodric Williams; Parsons, Andrew; Belinda Crowe
Cc: Martin Smith
Subject: RE: Expert

Andy
Thanks.

It is perhaps inevitable Imperial college London's experts would wish to speak to Fujitsu directly . Please let me have the name and contact of the person who will be designated by Fujitsu to speak to the experts.

I am keen to avoid further delay. The proposed report represents good value for money and would be extremely useful for POL purposes. Sooner we can demonstrate the system works the better.

Regards
Jarnail

Jarnail Singh | Criminal Lawyer



148 Old Street, LONDON, EC1V 9HQ



Postline:



Mobex:



Post Office stories



[@postofficenews](#)



From: Andy Holt
Sent: 08 July 2014 12:46
To: Jarnail Singh; Jessica Madron; Rodric Williams; Parsons, Andrew; Belinda Crowe
Cc: Martin Smith
Subject: RE: Expert

Belinda/Andy, some of the requests relate to the Second Sights study (which would include MP cases, spot reviews etc). Are we ok to share this information?

Jarnail, I will share this document with both Fujitsu and within IT so that we assess what ICL are requesting.

Regards

Andy

From: Jarnail Singh
Sent: 04 July 2014 13:38
To: Chris Aujard; Jessica Madron; Rodric Williams; Andy Holt; Parsons, Andrew
Cc: Martin Smith
Subject: FW: Expert

Dear All

Please find attached the initial review prepared by professor Kramer and Dr Dulay of London imperial college consultants.

The initial review contains a proposal which is through and outlines the steps the steps to be taken and documentation to be considered. There is a proposed work plan on page 4. As you will see it is estimated that it will take 50 hours consultant days by Professor Kramer and Dr Dulay to complete the work.

Before we proceed with the next step, may I ascertain whether there is any views or observations or questions on the attached documents.

regards

Jarnail Singh | Criminal Lawyer



148 Old Street, LONDON, EC1V 9HQ



GRO

Postline: **GRO**



Mobex:



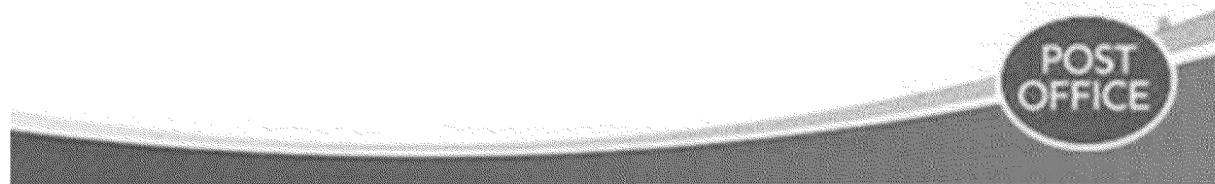
GRO



Post Office stories



@postofficenews



This email and any attachments are confidential and intended for the addressee only. If you are not the named recipient, you must not use, disclose, reproduce, copy or distribute the contents of this communication. If you have received this in error, please contact the sender by reply email and then delete this email from your system. Any views or opinions expressed within this email are solely those of the sender, unless otherwise specifically stated.

POST OFFICE LIMITED is registered in England and Wales no 2154540. Registered Office: 148 OLD STREET, LONDON EC1V 9HQ.

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. martin.smith **GRO** only is authorised to access this e-mail and any attachments. If you are not martin.smith **GRO**, please notify andrew.parson **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.

Any files attached to this e-mail will have been checked by us with virus detection software before transmission. Bond Dickinson 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 Bond Dickinson LLP, is neither given nor endorsed by it.

This email is sent for and on behalf of Bond Dickinson LLP which is a limited liability partnership registered in England and Wales under number OC317661. Our registered office is St Ann's Wharf, 112 Quayside, Newcastle Upon Tyne, NE1 3DX, 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.

Bond Dickinson LLP is authorised and regulated by the Solicitors Regulation Authority.

This email and any attachments are confidential and intended for the addressee only. If you are not the named recipient, you must not use, disclose, reproduce, copy or distribute the contents of this communication. If you have received this in error, please contact the sender by reply email and then delete this email from your system. Any views or opinions expressed within this email are solely those of the sender, unless otherwise specifically stated.

POST OFFICE LIMITED is registered in England and Wales no 2154540. Registered Office: 148 OLD STREET, LONDON EC1V 9HQ.
