

Message

From: Paul Loraine [GRO]
Sent: 14/08/2017 12:36:29
To: Rodric Williams [GRO]
CC: Gavin Matthews [GRO]; Andrew Parsons [GRO]
Subject: RE: Horizon cases [BD-4A.FID26610170]

Hi Rod,

I'm back at work now.

Thanks for sending this on. I will take the GT queries forward with Kath and Shirley in the first instance.

I will also be in touch asap with an update on the list of issues in Miles' email below.

Kind regards,

Paul

Paul Loraine
Associate
Bond Dickinson LLP

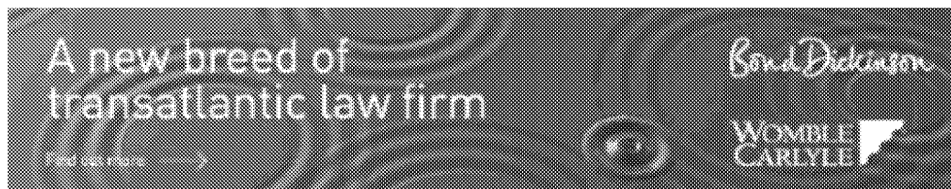
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From: Rodric Williams [GRO]
Sent: 04 August 2017 15:04
To: Paul Loraine
Cc: Gavin Matthews; Andrew Parsons
Subject: FW: Horizon cases

Hi – please see further email from CCRC below, attaching the list of questions that GT would like us to address.

Can you please take this forward? A quick read suggests that Kath and Shirley could help with a lot of this....

Kind regards, Rod

From: TrentM [GRO]
Sent: 04 August 2017 14:55

To: Rodric Williams <[redacted] GRO>
Subject: FW: Horizon cases

Dear Rodric,

Further to my email yesterday, Grant Thornton have now sent me their written questions (see attached).

Please feel free to call me if it might help to discuss.

Kind regards,

Miles

Miles Trent
Case Review Manager
Criminal Cases Review Commission
Tel: [redacted] GRO

Dear Rodric,

Many thanks for hosting the meeting at your offices last week. I think it went well, and that Helen and Alison from Grant Thornton found it to be useful. They have informed me that they will now be better able to focus any remaining questions that they have regarding the data which might be available. I expect to receive written questions from them in the next few days, which I can then forward on to you. In view of that, I don't think I need to try and respond to your below queries regarding what GT might have meant by 'reconciliation reports' and 'ATM source documents'. I propose that we wait to see what they produce in writing.

Regarding the other matters in your email, firstly, many thanks for the attachments, I confirm safe receipt. I have raised an action to send a new S17 notice to you covering the 'Particulars' and 'Defence' documents. This will go out to you in the next 1 or 2 weeks, once we have got to grips with our new IT system! In terms of the outstanding issues referred to below:

Misra transaction logs – Noted, many thanks. We will access via the data room.

Known Error Log – We note the description at paragraph 50(4) of the defence, and also your previous description by email dated 13 November 2016. Taken together, I think these answer most of Amanda's original questions about the KEL. However, can I please ask:

1. Paragraph 50(4) of the defence refers to the KEL as a "document" in the singular, am I right in thinking it exists as a single document rather than multiple different logs?
2. In terms of scale, in your email of 13/11/2016 you referred to "thousands of entries" and "voluminous entries" in the KEL, is it possible to say how many pages the document runs to?
3. In your email of 13/11/2016 you stated: "We have asked Fujitsu for some random examples of these entries, and will provide these to you in due course". I don't think we have received any examples to date. I would be grateful if we could see some sample pages, as this would give us a clearer idea of the kind of information the KEL contains, and whether further analysis of the document is likely to be of any relevance to our review. _

Explanation on the transaction logs – Noted, thank you for pursuing.

Broughton / McDonald – I have checked with my colleague, Anona, who is overseeing that case, and she confirms that that is the document we are searching for.

Branch trading statements and opening hours re Misra – thanks, we will wait to hear.

Updated tracker – thanks, noted. We also note that S25 CAA is invoked.

Rubina Shaheen hard copy documents – thanks, we will wait to hear.

Thanks very much for your help. No doubt we will be in touch again soon.

Kind regards,

Miles

Miles Trent
Case Review Manager
Criminal Cases Review Commission
Tel: **GRO**

From: Rodric Williams **GRO**
Sent: 26 July 2017 16:31
To: TrentM
Subject: PRIVATE & CONFIDENTIAL - Post Office Limited

Dear Miles,

Further to our previous correspondence and in advance of our meeting at our London office on Friday, I wanted to update you on our progress on the various outstanding issues discussed below. Thank you for your patience while we have been working through these.

I also take this opportunity to provide a copy of Post Office's Generic Defence and Counterclaim to the Group Action as requested in your 20 July 2017 email. I also attach for ease of reference the Generic Particulars of Claim (without appendices) to which the Defence responded. I would be grateful if you could please provide us with a notice under s.17 of the Criminal Appeal Act 1995 formally seeking these documents.

Outstanding issues

- **Misra transaction logs** – We asked Fujitsu to conduct another search of their records and I am pleased to report that this located the data for November 2006-February 2007 period. The data has been sent to Millnet and uploaded onto the data room for your review. Please treat this email as formal notice under s.25 of the Criminal Appeal Act 1995 that this material should not be disclosed without our prior consent.
- **Known Error Log** – Paragraph 50(4) of Post Office's Defence deals with the Known Error Log. In light of the explanation contained there, I would be grateful if you could confirm whether or not you still require responses to Amanda's original questions on the KEL.
- **Explanations on the transaction logs** – having filed our Defence, we are now in a position to put your queries to Fujitsu and will pursue a response as soon as possible.
- **Broughton / McDonald**. You asked me to trace a particular document titled "**Multi-use Form – Broughton - Temp Giving Notice – office closure 001**." For the sake of clarity, I understand the document you are searching for is the document at the bottom of page 6 in the attached Word document called "Electronic Field Cabinet Extract Broughton" alongside the date 27/7/09. If that is not the case, please let me know. You may recall we were experiencing a technical issue preventing access to the relevant EFC and unfortunately this issue has not yet been resolved. The IT team is still trying to access the documents (as at 12 July 2017 they were apparently "close"). We will of course let you have this document if we are able to access it.
- **Horizon demonstration** – we look forward to seeing you at 10am at Finsbury Dials on Friday. I will give you a call in advance of Friday to discuss the plan for the day.

I note your further queries contained in your email to me at 16:21 on 21 July 2017. My initial responses are:

- Could you please confirm what Grant Thornton are referring to by "reconciliation reports" (point 1) and "ATM source documents" (point 5) so we can take this forward. In respect of the latter, if these are the physical documents we provided to the CCRC during the May 2016 visit to Post Office's London office, we can arrange for those documents to be uploaded to the data room if helpful.
- We are investigating points 2 and 4 in relation to Ms Misra. I believe that you have been provided with all available Branch Trading Statements but we will double check.
- On point 3, I attach the attachments to the Rose Report (all Excel Spreadsheets).

Document Collation update

I attach an updated tracker document. There are a few headline points to flag:

- The seven security files referred to in my email of 26 April 2017 (Banks/Felstead, Hamilton, Hedges, Henderson, Patel, Robinson, Wilson) should be available for your review on the data room.
- We have located a Post Office legal file and a brief to counsel both relating to Damian Owen. These files will be made available on the data room by Millnet.
- Millnet will also release: (a) Post Office electronic documents for Owen, Joshi, Shaheen, Parekh and Warren; and (b) RMG electronic files for Warren, Holmes, Parekh, Shaheen, Hedges and Owen.

Again, as regards the above data, please treat this email as formal notice under s.25 of the Criminal Appeal Act 1995 that this material should not be disclosed without our prior consent.

In terms of next steps, I am conscious we need to confirm the availability or otherwise of hard copy documents relating to Mrs Rubina Shaheen. We are also in the process of double checking that all electronic data held by Cartwright King has been provided to you, including any relevant documents relating to Cartwright King's file review processes. Again, I'll keep you informed of the results of this review.

Please let me know if you have any questions. Otherwise, I will be in touch with updates on the above points as soon as I am able.

Kind regards, Rodric

Rodric Williams

Head of Legal - Dispute Resolution & Brand
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