

Message

From: Andrew Parsons [/O=EXCHANGE-ORG/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=AD9ED344815E47E4AAA3C0E7E1740919-ANDREW PARS]
Sent: 19/09/2017 09:56:40
To: pete.newsone@[GRO]; Legal.Defence@[GRO]; Michael.Harvey@[GRO]; Torstein.O.Godeseth@[GRO]
CC: Rodric Williams [rodric.williams@[GRO]]; Elisa Lukas [/o=Exchange-Org/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f3b6e101da614ce09447519b332f50d1-Elisa Lukas]; Victoria Brooks [/o=Exchange-Org/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7a2f6b0bed844154a96f5e671bcc4253-Victoria Br]
Subject: RE: Post Office Group Litigation - legally privileged [BD-4A.FID26896945]

Perfect.

Thanks
A

Andrew Parsons
Partner
Bond Dickinson LLP

Bond Dickinson

Direct: [GRO]
Mobile: [GRO]
Office: [GRO]

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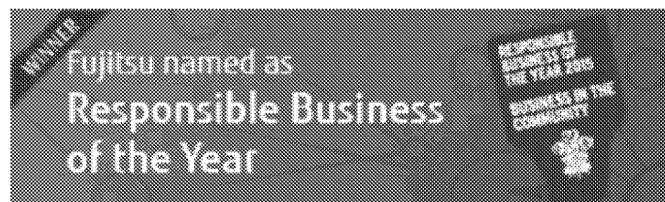
From: pete.newsone@[GRO]
Sent: 19/09/2017 10:55
To: Andrew Parsons; Legal.Defence@[GRO]; Michael.Harvey@[GRO]; Torstein.O.Godeseth@[GRO]
Cc: Rodric Williams; Elisa Lukas; Victoria Brooks
Subject: RE: Post Office Group Litigation - legally privileged [BD-4A.FID26896945]

Andrew

Shall you and I talk directly? I can give you a call this pm.

Pete

Pete Newsome
Account Manager
Post Office Account, Fujitsu UK&I
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From: Andrew Parsons [mailto:Andrew.Parsons@[GRO]]
Sent: Tuesday, September 19, 2017 10:06 AM
To: Newsome, Pete <[pete.newsome@\[GRO\]](mailto:pete.newsome@[GRO])>; Defence Legal (Chris Jay,) <[Legal.Defence@\[GRO\]](mailto:Legal.Defence@[GRO])>;
Harvey, Michael <[Michael.Harvey@\[GRO\]](mailto:Michael.Harvey@[GRO])>; Godeseth, Torstein <[Torstein.O.Godeseth@\[GRO\]](mailto:Torstein.O.Godeseth@[GRO])>
Cc: Rodric Williams <[rodric.williams@\[GRO\]](mailto:rodric.williams@[GRO])>; Elisa Lukas <[Elisa.Lukas@\[GRO\]](mailto:Elisa.Lukas@[GRO])>; Victoria Brooks
<[Victoria.Brooks@\[GRO\]](mailto:Victoria.Brooks@[GRO])>
Subject: RE: Post Office Group Litigation - legally privileged [BD-4A.FID26896945]

Would it be possible to have an initial call today to at least get the conversation started?

Andrew Parsons
Partner
Bond Dickinson LLP

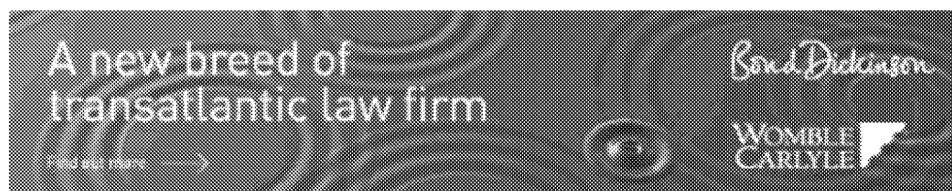
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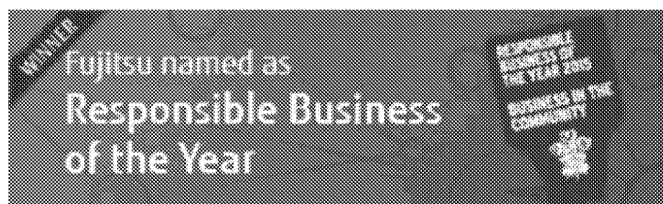
From: pete.newsome@GRO
Sent: 19/09/2017 09:53
To: Andrew Parsons; Legal.Defence@GRO; Michael.Harvey@GRO
Torstein.O.Godeseth@GRO
Cc: Rodric Williams; Elisa Lukas; Victoria Brooks
Subject: RE: Post Office Group Litigation - legally privileged [BD-4A.FID26896945]

Andrew

Torstein is on leave until Thursday. Can we arrange a call then?

Pete

Pete Newsome
Account Manager
Post Office Account, Fujitsu UK&I
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From: Andrew Parsons [<mailto:Andrew.Parsons@GRO>]
Sent: Tuesday, September 19, 2017 9:47 AM
To: Defence Legal (Chris Jay,) <Legal.Defence@GRO>; Harvey, Michael <Michael.Harvey@GRO>
Newsome, Pete <pete.newsome@GRO>; Godeseth, Torstein <Torstein.O.Godeseth@GRO>
Cc: Rodric Williams <rodric.williams@GRO>; Elisa Lukas <Elisa.Lukas@GRO>; Victoria Brooks
<Victoria.Brooks@GRO>
Subject: RE: Post Office Group Litigation - legally privileged [BD-4A.FID26896945]

All

Have you had a chance to look at the diaries to see if there is a slot to discuss the below?

Kind regards
Andy

Andrew Parsons
Partner
Bond Dickinson LLP

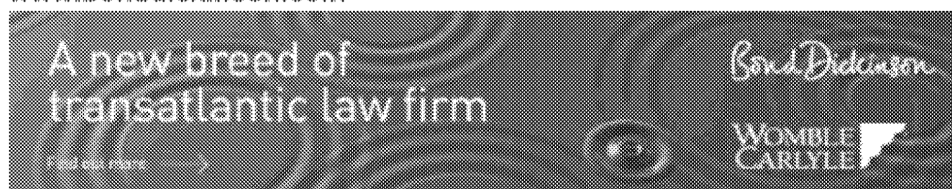
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From: Andrew Parsons

Sent: 18 September 2017 08:10

To: Legal.Defence@[GRO]; Michael.Harvey@[GRO]; 'pete.newsom@[GRO]'; Godeseth Torstein (torstein.o.godeseth@[GRO])

Cc: 'Rodric Williams'; Lukas, Elisa (Elisa.Lukas@[GRO]); Victoria Brooks

Subject: Post Office Group Litigation - legally privileged [BD-4A.FID26896945]

All

Hope everyone had good weekends.

Do you have availability for a call sometime later today or tomorrow to discuss preparations for the Case Management Conference scheduled for 19 October? We can do any time after midday today and any time after 1pm tomorrow.

The points we'd like to pick up are:

1. **Known Error Log** – Freeths are pressing hard for access to the KEL and are threatening to get a Court Order. We'd like to discuss whether, and if so how, we could give Freeths' IT expert access to the KEL.
2. **Preservation of Counter Logs** – Freeths are pushing for branch terminals and / or counter logs to be preserved. We think we have a proposal that might solve this issue which would involve a hopefully small number of Counter Logs being copied. However, we will need Fujitsu's help with this.
3. **Access to documents** – At the CMC there is likely to be a fierce argument about getting access to documents, in particular documents about "Horizon's IT architecture". We understand that Fujitsu holds lots of technical documents that describe Horizon and would like to discuss if there is a sensible way to disclose some of these documents to Freeths.

As background information, I've set out below a rough timetable of steps between now and the CMC just so that you have the key milestones in mind.

- 20 September – Freeths to serve their Generic Reply to Post Office's defence (though this date may slip to 25 September).
- 27 September – BD to write to Freeths setting out proposals for the CMC.
- 9 October – Both parties to file proposals with the Court (along with a witness statement explaining those proposals)
- 19 October - CMC

Kind regards
Andy

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