

Message

**From:** Rodric Williams [REDACTED] **GRO**  
**Sent:** 01/10/2018 15:23:11  
**To:** Andrew Parsons [REDACTED] **GRO**  
**Subject:** RE: Post Office Group Action: Horizon Issues Witness Statements

We could also follow the process being now used for CIT admissibility, on a WPSATC basis at first?

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**From:** Andrew Parsons [REDACTED] **GRO**  
**Sent:** 01 October 2018 16:18  
**To:** Rodric Williams <[REDACTED] **GRO**>  
**Subject:** RE: Post Office Group Action: Horizon Issues Witness Statements

I think that might be the plan... at least to float some of the problems with Fraser so he can start to think on them.

A

**Andrew Parsons**  
Partner  
Womble Bond Dickinson (UK) LLP

**GRO**

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**From:** Rodric Williams [REDACTED] **GRO**  
**Sent:** 01 October 2018 11:09  
**To:** Andrew Parsons  
**Subject:** RE: Post Office Group Action: Horizon Issues Witness Statements

Without having opened a single statement, I wondered if we are again in strike out territory.

Much like Common Issues admissibility, the Judge spelled out for Green during a CMC what the Horizon Issues would and would not cover, labouring the point (along the lines of, "let me be very clear in case it wasn't last time...").

One to flag on 10.10.18?

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**From:** Andrew Parsons [REDACTED] **GRO**  
**Sent:** 01 October 2018 15:58  
**To:** Rodric Williams <[REDACTED] **GRO**>  
**Subject:** RE: Post Office Group Action: Horizon Issues Witness Statements

IH caveats his statement by saying that he is only giving factual evidence, but I'm not sure that is good enough.

I've got Counsel looking at whether we should lodge a complaint (strike out?) re their evidence:

1. The 6 individual statements are arguably not permitted because Fraser said no individual complaints.
2. MacLachlan is potentially an abuse of process because he is close to re-opening points from Misra. Plus your point below re is this expert evidence?

3. Henderson – expert evidence again?
4. That just leaves Rolls which is very vague.

A

**Andrew Parsons**

Partner

Womble Bond Dickinson (UK) LLP

# GRO

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**From:** Rodric Williams [REDACTED] **GRO**

**Sent:** 01 October 2018 10:49

**To:** Andrew Parsons

**Subject:** RE: Post Office Group Action: Horizon Issues Witness Statements [WBDUK-AC.FID27032497]

Which on reflection leads me to this – in what capacity is he giving his evidence (even if admissible)? They only have permission for one “expert”.....

The same goes for MacLachlan.....

**From:** Rodric Williams

**Sent:** 01 October 2018 14:04

**To:** Andrew Parsons <[REDACTED] GRO

**Subject:** FW: Post Office Group Action: Horizon Issues Witness Statements [WBDUK-AC.FID27032497]

Well, there's some ghe giving his evidence ood news - we get to XXM Ian Henderson!

**From:** Rodric Williams

**Sent:** 01 October 2018 14:01

**To:** 'Emma Campbell-Danesh' <[REDACTED] GRO>

**Subject:** RE: Post Office Group Action: Horizon Issues Witness Statements [WBDUK-AC.FID27032497]

Thanks Emma.

I need a high level summary of the evidence in toto (i.e. one document, with bullet points on each statement). I'd also like a view of the extent to which it complies with the Judge's direction on admissibility.

Thanks, Rod

**From:** Emma Campbell-Danesh [REDACTED] **GRO**

**Sent:** 01 October 2018 12:32

**To:** Rodric Williams <[REDACTED]

Mark Underwood [REDACTED] **GRO**

**Cc:** Jonathan Gribben [REDACTED]

; Andrew Parsons <[REDACTED]

**GRO** }; Lucy

Bremner <----- GRO ----->

**Subject:** FW: Post Office Group Action: Horizon Issues Witness Statements [WBDUK-AC.FID27032497]

Rodric, Mark

Please find attached the following Claimants' witness statements and a few brief bullet points about what each statement covers:

1. Richard Roll

- Previously Fujitsu IT Product Specialist
- Discusses software issues causing financial discrepancies at branch level
- Discusses coding problems in the Horizon system
- Discusses remote access and correcting errors without SMPRs being aware

2. Charles McLachlan

- Expert on Misra prosecution
- Discusses 'Calendar Square' bug
- Discusses remote access

3. Ian Henderson

- Director at Second Sight
- Similar to what was in their reports
- Refers to detailed reports produced by Second Sight (2013-2015)
- Discusses remote access
- Discrepancies regarding ATMs
- Foreign currency transactions flawed
- Camelot 'out of sync' with Horizon causing high-value debit and credit TCs

4. Angela Burke

- Discusses 'Disconnected Session' that has caused shortfall
- Had to trace customer to provide evidence of the transaction
- Told by NBSC Nationwide problem with Horizon

5. Akash Patny

- Father is Postmaster
- Discusses national system outage on 9 May 2016
- NBSC advised re-adjusting figures due to £17,000 shortfall
- Technical processing errors for Moneygram

6. Anup Patny

- Suspended SMPR
- System outage on 9 May 2016
- Suggests incorrect instructions from NBSC

7. Adrees Latif

- Errors transferring data
- Camelot transaction correction issues
- Shortfalls and Horizon 'crashing'/technical issues
- Issues accessing transaction data and identifying shortfalls

## 8. Jayesh Tank

- Power failure causing transaction issue
- Defect not detected and corrected after the power outage
- Label transaction issues

9. Setpal Singh

- Phantom transaction of £1 million relating to stamps whilst branch was closed
- Shortfalls where items 'doubled up' on a regular basis
- Remote access to rectify issues

For your information, Please also find attached our final signed witness statements:

1. Witness Statement of Torstein Godeseth and Exhibit
2. Witness Statement of William Memberg
3. Witness Statement of Dawn Phillips
4. Witness Statement of David Johnson

An email will follow later to you both with some further comments and points we need instructions on, but I thought I should get this across to you first so you have an opportunity to review them.

Many thanks,

Emma

**Emma Campbell-Danesh**  
Solicitor  
Womble Bond Dickinson (UK) LLP



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