

**From:** Jonathan Gribben [GRO]  
**To:** "pete.newsom" [GRO]  
**Cc:** "Matthew.Lenton" [GRO]; "Dave.Ibbett" [GRO]; Andrew Parsons [GRO]; "Emma Campbell-Danesh" [GRO]; Lucy Bremner [GRO]

**Subject:** RE: Horace and Peaks [WBDUK-AC.FID27032497]

**Date:** Mon, 20 Aug 2018 14:56:27 +0100

**Importance:** Normal

**Inline-Images:** image611c0b.PNG; imagec1df90.PNG; imagec521ba.PNG; imagedd9cee.PNG; image001.gif; image002.gif; image003.gif; image004.gif; image005.png; image006.gif; image007.jpg; image008.png; image009.png; image010.png; image011.png

---

Pete,

Thanks for this. Please would you arrange the Peak extraction ASAP? Robert has previously advised that he is only interested in the live Peaks, but we will ask him whether your comments below change his view.

Thanks

Jonny

**Jonathan Gribben**  
Managing Associate  
Womble Bond Dickinson (UK) LLP

d: [GRO]  
m: [GRO]  
t: [GRO]  
e: [GRO]

[Stay informed: sign up to our e-alerts](#)



womblebond Dickinson.com



---

**From:** pete.newsom [GRO] [mailto:[GRO]]  
**Sent:** 20 August 2018 14:46  
**To:** Jonathan Gribben  
**Cc:** Matthew.Lenton [GRO]; Dave.Ibbett [GRO]; Andrew Parsons; Lucy Bremner; Emma Campbell-Danesh  
**Subject:** RE: Horace and Peaks [WBDUK-AC.FID27032497]

Jonny

Answers below

We extracted the attached TCs for the court case back in April. WBD have asked us not to delete the data in Horace (I assume most of this has already gone!) can we run a report contiguous with the one attached and run one every month so we don't lose the data?

The TC data only exists for 120 days in the database but we still have the original file of data we extracted back in April. We're also securing the current data now so we can just about overlap with the data extract we have already provided. BTW, it's not **in HORIce** as such, it's in the Branch Database and its support copy (BRDB / BRSS), HORIce just provides the view onto the data. All this data will also exist in Audit, it's just a lot more difficult and time consuming to obtain that way. We intend to maintain this manual archive "just in case" for the time being.

Can you estimate how long it would take to produce an extract of live Peaks and how many man days that would be?

Approximately 5 man days (UL) to develop and test the export method, regardless of actual volume being exported. The data volume will be high, there are 222,000 entries in the system, so delivery may need to be on a suitable external disk. Could restrict it to live Peaks only (113,000) but this risks missing things like cloned Peaks development used to fix original error, release Peaks that deliver to live. Timetabling will be a problem due to the volume of work and the holiday period.

Hope these are useful.

Pete

Pete Newsome

Account Manager

DHL and Post Office Account, Fujitsu UK&I

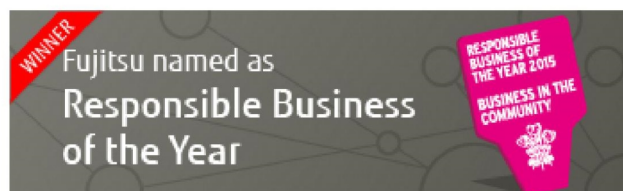
Tel: [GRO]

E-Mail: [GRO]

Web: <http://uk.fujitsu.com>

Web: [uk.fujitsu.com](http://uk.fujitsu.com)





Fujitsu is proud to partner with [Action for Children](#)

[I-CIO](#): Global Intelligence for the CIO. Fujitsu's online resource for ICT leaders

Sponsors of the 2015 Rugby World Cup



Please consider the environment - do you really need to print this email?

To meet with the new GDPR regulations we are reviewing our opt-in preferences. If you are happy to give opt-in consent to continue receiving relevant marketing communications please visit this [link](#) and simply enter your email

---

**From:** Jonathan Gribben <[GRO]>  
**Sent:** Monday, August 20, 2018 2:34 PM  
**To:** Newsome, Pete <[GRO]>  
**Cc:** Lenton, Matthew <[GRO]>; Ibbett, Dave <[GRO]>  
Andrew Parsons <[GRO]>; Lucy Bremner <[GRO]>; Emma  
Campbell-Danesh <[GRO]>  
**Subject:** RE: Horace and Peaks [WBDUK-AC.FID27032497]

Pete,

Just a reminder for you to send me the answers to these requests that you mentioned on last week's call.

Thanks

Jonny

**Jonathan Gribben**  
Managing Associate  
Womble Bond Dickinson (UK) LLP

d: [GRO]  
m: [GRO]  
t: [GRO]  
e: [GRO]

[Stay informed: sign up to our e-alerts](#)

[womblebond Dickinson.com](http://womblebond Dickinson.com)

WBD\_001164.000003



PROUD PARTNER



**From:** [pete.newsome](mailto:pete.newsome@wbd.co.uk) [GRO] [mailto: [GRO]  
**Sent:** 13 August 2018 13:28  
**To:** Jonathan Gribben  
**Cc:** [Matthew.Lentor](mailto:Matthew.Lentor@wbd.co.uk) [GRO] [Dave.Ibbett](mailto:Dave.Ibbett@wbd.co.uk) [GRO]; Andrew Parsons; Lucy Bremner; Emma Campbell-Danesh  
**Subject:** RE: Horace and Peaks [WBDUK-AC.FID27032497]

Jonny

I will find answers to your requests.

Regards

Pete

Pete Newsome

Account Manager

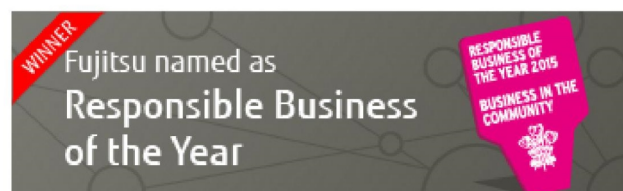
DHL and Post Office Account, Fujitsu UK&I

Tel: [GRO]

E-Mail: [GRO]

Web: <http://uk.fujitsu.com>

Web: [uk.fujitsu.com](http://uk.fujitsu.com)



Fujitsu is proud to partner with [Action for Children](http://www.actionforchildren.org.uk)

[I-CIO](#): Global Intelligence for the CIO. Fujitsu's online resource for ICT leaders

Sponsors of the 2015 Rugby World Cup





To meet with the new GDPR regulations we are reviewing our opt-in preferences. If you are happy to give opt-in consent to continue receiving relevant marketing communications please visit this [link](#) and simply enter your email

---

**From:** Jonathan Gribben <[GRO]>  
**Sent:** Monday, August 13, 2018 1:07 PM  
**To:** Newsome, Pete <[GRO]>  
**Cc:** Lenton, Matthew <[GRO]>; Ibbett, Dave <[GRO]>  
Andrew Parsons <[GRO]>; Lucy Bremner <[GRO]>; Emma  
Campbell-Danesh <[GRO]>  
**Subject:** Horace and Peaks [WBDUK-AC.FID27032497]

Pete,

Would it be possible to place a litigation hold on the data relating to Transaction Corrections in Horace (i.e. extract it periodically and save it in order to build up a record of TC data that covers more than six months)?

In terms of Peaks, we have informed Coyne and Robert that there are 220,000 entries going back 18 years. Robert confirmed that they are only interested in live Peaks and was interested in the filter you described during last week's call. I've discussed the fact that there is no way of exporting any supporting evidence with Andy and we think that the live entries alone will be sufficient (although it may be that the experts will make requests for supporting evidence in relation to specific entries). Please would you let me know how long exporting the live Peak entries would take and how much it would cost?

Kind regards

Jonny

**Jonathan Gribben**  
Managing Associate  
Womble Bond Dickinson (UK) LLP

d: [GRO]  
m:  
t:  
e:

[Stay informed: sign up to our e-alerts](#)



[womblebond dickinson.com](http://womblebond dickinson.com)





**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. [pete.newsome](#) [GRO] only is authorised to access this e-mail and any attachments. If you are not [pete.newsome](#) [GRO], please notify [jonathan.gribben](#) [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. Information about how we use personal data is in our [Privacy Policy](#) on our website.

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

This email is sent by Womble Bond Dickinson (UK) LLP which is a limited liability partnership registered in England and Wales under number OC317661. Our registered office is 4 More London Riverside, London, SE1 2AU, 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.

Womble Bond Dickinson (UK) LLP is a member of Womble Bond Dickinson (International) Limited, which consists of independent and autonomous law firms providing services in the US, the UK, and elsewhere around the world. Each Womble Bond Dickinson entity is a separate legal entity and is not responsible for the acts or omissions of, nor can bind or obligate, another Womble Bond Dickinson entity. Womble Bond Dickinson (International) Limited does not practice law. Please see [www.womblebond Dickinson.com/legal](http://www.womblebond Dickinson.com/legal) notices for further details.

Womble Bond Dickinson (UK) LLP is authorised and regulated by the Solicitors Regulation Authority.

Unless otherwise stated, this email has been sent from Fujitsu Services Limited (registered in England No 96056); Fujitsu EMEA PLC (registered in England No 2216100) both with registered offices at: 22 Baker Street, London W1U 3BW; PFU (EMEA) Limited, (registered in England No 1578652) and Fujitsu Laboratories of Europe Limited (registered in England No. 4153469) both with registered offices at: Hayes Park Central, Hayes End Road, Hayes, Middlesex, UB4 8FE.

This email is only for the use of its intended recipient. Its contents are subject to a duty of confidence and may be privileged. Fujitsu does not guarantee that this email has not been intercepted and amended or that it is virus-free.

Unless otherwise stated, this email has been sent from Fujitsu Services Limited (registered in England No 96056); Fujitsu EMEA PLC (registered in England No 2216100) both with registered offices at: 22 Baker Street, London W1U 3BW; PFU (EMEA) Limited, (registered in England No 1578652) and Fujitsu Laboratories of Europe Limited (registered in England No. 4153469) both with registered offices at: Hayes Park Central, Hayes End Road, Hayes, Middlesex, UB4 8FE.

This email is only for the use of its intended recipient. Its contents are subject to a duty of confidence and may be privileged. Fujitsu does not guarantee that this email has not been intercepted and amended or that it is virus-free.