

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

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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

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**From:** pete.newsome [REDACTED] [GRO] [mailto: [REDACTED] [GRO]]  
**Sent:** 20 August 2018 14:46  
**To:** Jonathan Gribben  
**Cc:** Matthew.Lenton [REDACTED] [GRO]; Dave.Ibbett [REDACTED] [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

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[GRO]>  
**Sent:** Monday, August 20, 2018 2:34 PM  
**To:** Newsome, Pete <[REDACTED]  
[GRO]>  
**Cc:** Lenton, Matthew <[REDACTED]  
[GRO]>; Ibbett, Dave <[REDACTED]  
[GRO]>; Andrew Parsons <[REDACTED]  
[GRO]>; Lucy Bremner <[REDACTED]  
[GRO]>; Emma Campbell-Danesh <[REDACTED]  
[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

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**From:** [pete.newsome](#) [GRO] [mailto:[pete.newsome](#) [GRO]]  
**Sent:** 13 August 2018 13:28  
**To:** Jonathan Gribben  
**Cc:** [Matthew.Lentor](#) [GRO], [Dave.Ibbett](#) [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

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**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 <[\[GRO\]](#)>; 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

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