

**From:** Amy Prime [mailto:  
GRO]  
**To:** Simon Henderson [mailto:  
GRO]  
**Cc:** Lucy Bremner [mailto:  
GRO]; Jonathan Gribben  
[mailto:  
Andrew Parsons [mailto:  
GRO]

**Subject:** RE: Letter to Freeths - KEL and PEAKs [WBDUK-AC.FID27032497]

**Date:** Mon, 18 Feb 2019 17:26:31 +0000

**Importance:** Normal

**Inline-Images:** image001.png; image002.png; image003.png; image5d017d.PNG; image5e311a.PNG;  
imagef28c89.PNG

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Simon

I will check with FJ.

Many thanks

Amy

**Amy Prime**  
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**From:** Simon Henderson [mailto:  
GRO]  
**Sent:** 18 February 2019 17:06  
**To:** Amy Prime  
**Cc:** Lucy Bremner; Jonathan Gribben; Andrew Parsons  
**Subject:** RE: Letter to Freeths - KEL and PEAKs [WBDUK-AC.FID27032497]

Amy

Final thought: I think the answer to this is obvious but presumably FJ do not know how many irretrievable KELs there are i.e. there is no record of the number of them?

Simon

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**From:** Amy Prime [mailto:  
GRO]  
**Sent:** 18 February 2019 16:37

**To:** Simon Henderson [mailto:  
GRO]  
**Cc:** Lucy Bremner [mailto:  
GRO]; Jonathan Gribben [mailto:  
GRO]  
Andrew Parsons [mailto:  
GRO]  
**Subject:** RE: Letter to Freeths - KEL and PEAKs [WBDUK-AC.FID27032497]

Simon

Thanks, we will add this to the Parker 3 list and amend the letter as suggested.

Many thanks

Amy

**Amy Prime**

Solicitor  
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**From:** Simon Henderson [mailto:  
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**Sent:** 18 February 2019 16:19  
**To:** Amy Prime  
**Cc:** Lucy Bremner; Jonathan Gribben; Andrew Parsons  
**Subject:** RE: Letter to Freeths - KEL and PEAKs [WBDUK-AC.FID27032497]

OK but we are still left with the problem that Parker 2 has not explained this. I think this needs to be added to the list of things which should be dealt with in Parker 3.

I think as well that your letter should make it clear that the non-retrievable KELs are in addition to those referred to in Parker 2.

Best

Simon

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**From:** Amy Prime [mailto:  
GRO]  
**Sent:** 18 February 2019 15:45

**To:** Simon Henderson [REDACTED] **GRO**  
**Cc:** Lucy Bremner [REDACTED] **GRO** Jonathan Gribben [REDACTED] **GRO** [REDACTED];  
Andrew Parsons [REDACTED] **GRO**  
**Subject:** RE: Letter to Freeths - KEL and PEAKs [WBDUK-AC.FID27032497]

Simon

The 1,491 deleted KELs referred to in Parker 2 are the retrievable, deleted KELS which have been disclosed. This figure does not include the non-retrievable deleted KELs. The position in our letter of 17 Jan 19 should therefore be consistent with the disclosure of documents referred to by Parker in his statement.

Whilst the existence of these non-retrievable deleted KELS will be new to Freeths, we have not withheld any documents from disclosure (since there is nothing to provide) and the documents which they have access to would be the same no matter when they were informed about this.

Kind regards

Amy

**Amy Prime**

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**From:** Simon Henderson [mailto:[REDACTED] **GRO**]  
**Sent:** 18 February 2019 13:52  
**To:** Amy Prime  
**Cc:** Lucy Bremner; Jonathan Gribben; Andrew Parsons  
**Subject:** RE: Letter to Freeths - KEL and PEAKs [WBDUK-AC.FID27032497]

Amy

The drafting of the letter is fine.

However, if I have understood this properly we are now telling Freeths for the first time that there is a further category of KELs namely those that were deleted and are non-retrievable. This is likely to cover, as I understand the evidence, the period 2000-2008. Is that right? If so, that is obviously a significant amount of the time covered by Horizon. In WBD's letter dated 17/1/19 reference is made to paras 61.6 and 61.9 of Parker 2. Here he says that there are 113 deactivated Legacy Horizon KELs and 1,491 deleted KELs. In arriving at these figures, has he included those KELs which we now know are non-retrievable? If so, then I

think it might be worth confirming this in this letter. If not, however, it will follow that we are now telling them about the existence of entirely new KELs and we need to consider how best to present this. The impression given by 10.2 of the 17/1 letter is that we were providing all 1,491 deleted KELs referred to in Parker 2 61.9.

I think this should be bottomed out before this letter is sent.

Best

Simon

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**From:** Amy Prime [mailto: [REDACTED] GRO]  
**Sent:** 18 February 2019 11:19  
**To:** Simon Henderson [REDACTED] GRO  
**Cc:** Lucy Bremner [REDACTED] GRO; Jonathan Gribben [REDACTED] GRO  
Andrew Parsons [REDACTED] GRO  
**Subject:** Letter to Freeths - KEL and PEAKs [WBDUK-AC.FID27032497]

Dear Simon

In Coyne 2, there are a number of references to Peaks and KELs which have not been disclosed. FJ have looked into these for us and provided confirmation as to whether they can locate the documents and if so, provided us with a copy of them. Please find attached a draft letter to Freeths which gives disclosure of these documents.

#### Peaks

FJ have managed to locate some of the Peaks referred to by Coyne in an archive of PinICL (the predecessor to PEAK). Matthew (FJ) has confirmed:

There are two Access databases that contain some details of archived PinICLs.

Our [FJ's] understanding is that they appear to be incomplete both in terms of a) not containing all of the original information that was stored against those PinICL details that they do contain, and b) not containing between them all of the PinICLs that existed.

#### KEL

Matthew has also confirmed (see attached email) that there are different types of deleted KELs: (1) non-retrievable and (2) deleted but saved. We have given disclosure of the Category (2) documents on 17 January 2019, and the KELs not disclosed but referred to by Coyne are believed to fall within category (1) and therefore we cannot give disclosure of these.

Any comments on the letter would be welcomed.

Kind regards

Amy

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