

Message

From: Rodric Williams [GRO]
on behalf of Rodric Williams [GRO]
Sent: 10/06/2019 00:52:37
To: Alisdair Cameron [GRO]; Rob Houghton [GRO] Mark R Davies [GRO]; Ben Foat [GRO]
CC: Catherine Hamilton [GRO]; Mark Underwood [GRO]; Angela Van-Den-Bogerd [GRO]; Melanie Corfield [GRO]; Watts, Alan [GRO]; Massey, Kirsten [GRO]; Henderson, Tom [GRO]
Subject: Re: Update on Horizon Issues Trial - Post Office Group Litigation - SUBJECT TO LEGAL PRIVILEGE - DO NOT FORWARD

All,

The cross - examination of the Claimants' expert Mr Coyne concluded on Friday, focusing on the Horizon "bugs" referred to in his reports.

The cross examination sought to demonstrate that the documents Mr Coyne referred to in his reports either did not disclose bugs at all, or showed Horizon's counter measures working to address any lasting financial impact they may have had on branch accounts.

In this respect the cross examination seemed successful, leading to Mr Coyne being asked (including by the Managing Judge) how many bugs he had actually identified which had had a lasting financial impact on branch accounts (bearing in mind Mr Coyne had agreed with Post Office's expert Dr Worden there to be between 12 and 29).

Mr Coyne's evidence on this seemed confused, ranging from 13 to 22 bugs. We will portray this evidence as unconvincing (especially in the context of a system which has processed billions of transactions and millions of branch accounts over c.20 years), and supportive of the overall themes of Mr Coyne's cross examination that his reports lacked balance (in that they only referred to negative aspects of Horizon, ignoring the positives), and were not supported by the documents he referenced to justify his opinions.

Mr Coyne was then re-examined by the Claimants' counsel Patrick Green QC, whose questions sought to show that Mr Coyne had not been provided with full and timely access to relevant documentation, and that Post Office's recusal application had interfered with Mr Coyne's preparation for his cross examination.

Although this seems designed more to justify any shortcomings in Mr Coyne's evidence than to bolster it, it reflects criticisms of Post Office which the Managing Judge has been sympathetic towards, and might therefore lead him to be more positive towards Mr Coyne's evidence.

The trial will continue on Tuesday 11 June 2019 when Mr Green QC begins cross examining Post Office's expert Dr Worden, and seeks to undermine his opinions just as effectively as our counsel sought to undermine Mr Coyne's.

Kind regards, Rod

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From: Rodric Williams
Sent: Friday, June 7, 2019 1:54:31 AM
To: Alisdair Cameron; Rob Houghton; Mark R Davies; Ben Foat
Cc: Catherine Hamilton; Mark Underwood [GRO]; Angela Van-Den-Bogerd; Melanie Corfield; Watts, Alan; Massey, Kirsten; Henderson, Tom
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Post Office Group Litigation - SUBJECT TO LEGAL PRIVILEGE - DO NOT FORWARD

All,

The Claimants' IT expert Jason Coyne was cross-examined today on the issues of "remote access" (i.e. the ability for Fujitsu to alter branch transaction data from outside the branch premises) and Horizon audits.

Evidence helpful to Post Office's case today included Mr Coyne accepting that:

- he was not aware of any instance where transaction data had been remotely deleted or edited;
- although there were instances where Fujitsu had remotely made insertions into transaction data, these were very rare, only done where necessary, and carried out with great care;
- contrary to how they were portrayed in his reports, post-2011 audit reports on Horizon did not:
 - o identify deficiencies in Horizon's control environment, but rather made only recommendations to enhance or improve it; or
 - o show that Post Office failed to act on audit recommendations.

Mr Coyne became increasingly reluctant to making even plain concessions as the day proceeded (e.g. that Horizon service audits more specifically addressed Horizon than Post Office's financial audits). This made for slow going at times and ultimately led to the Managing Judge reminding Mr Coyne to answer the questions he was being asked rather than try to debate the issues.

Mr Coyne's cross-examination will continue into tomorrow afternoon, after which he will be re-examined by the Claimants' counsel Patrick Green QC for c.45 minutes before the Court concludes its business for the week.

Kind regards, Rod



2017 Winner of the Global Postal Award for Customer
Experience

Rodric Williams

Head of Legal - Dispute Resolution & Brand
20 Finsbury Street
London EC2Y 9AQ

T: **GRO**

E: **GRO**