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**From:** Alisdair Cameron [REDACTED] **GRO**  
**Sent:** Wed 20/03/2019 9:19:18 AM (UTC)  
**To:** Rodric Williams [REDACTED] **GRO**; Jane MacLeod [REDACTED] **GRO**  
**Subject:** RE: Update on Horizon Issues Trial - Post Office Group Litigation - SUBJECT TO LEGAL PRIVILEGE - DO NOT FORWARD

Thank you Rod. In the following para I think that you have exactly summed up what we are "losing" on.

The cross-examination was aimed at, and was largely successful at demonstrating:

- a variety of incidents with Horizon, both in its software and the transaction records it generates, which:
  - impact branch accounts;
  - paint a picture of a system susceptible to failures, even if they are isolated and ultimately resolved; and
  - are consistent with the errors experienced by the Claimants.
- Post Office's reliance on Horizon is overstated and blinkered, leading to an improper presumption of postmaster fault and liability for branch losses.
- Post Office has access to far better information from Horizon about branch accounting issues, which it is better placed to use but does not share with, or actively withholds from, postmasters.
- Post Office has overstated the improvements made to Horizon over the years, which it has been slow to roll out and implemented purely to save costs.

And which I would expect to continue to lose on.

My questions are

- We have always felt that even if the above was true it didn't mean that the system generated the losses complained of. Can we really demonstrate that?
- I wouldn't disagree on some aspects of this – indeed a lot of our strategy is to rectify some of the cultural underpinnings that still exist. So are we fighting all these points or accepting some but making the point above?

Al



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**From:** Rodric Williams [REDACTED] **GRO**  
**Sent:** 20 March 2019 08:40  
**To:** Alisdair Cameron [REDACTED] **GRO**; Debbie.K Smith [REDACTED] **GRO**; Jane MacLeod [REDACTED] **GRO**; Mark R Davies [REDACTED] **GRO**; Mohinder Kang [REDACTED]

GRO >; Owen Woodley < GRO >; Rob Houghton  
GRO  
Cc: Angela Van-Den-Bogerd GRO Stuart Nesbit  
< GRO >; Patrick Bourke < GRO >; Thomas P Moran  
< GRO >; Melanie Corfield GRO >; Nick Beal  
GRO Catherine Hamilton < GRO >; Julie Thomas  
GRO >; Ben Foad < GRO >

**Subject:** Update on Horizon Issues Trial - Post Office Group Litigation - SUBJECT TO LEGAL PRIVILEGE - DO NOT FORWARD

**Post Office Group Litigation - SUBJECT TO LEGAL PRIVILEGE - DO NOT FORWARD**

All,

On Monday and Tuesday the Claimants' counsel team cross-examined Angela van den Bogerd, Dawn Phillips, Tracy Mather and Paul Smith from Post Office, with Angela's cross-examination by the Claimants' QC Patrick Green occupying just over a day and a half of the two days.

The cross-examination was aimed at, and was largely successful at demonstrating:

- a variety of incidents with Horizon, both in its software and the transaction records it generates, which:
  - impact branch accounts;
  - paint a picture of a system susceptible to failures, even if they are isolated and ultimately resolved; and
  - are consistent with the errors experienced by the Claimants.
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- Post Office has access to far better information from Horizon about branch accounting issues, which it is better placed to use but does not share with, or actively withholds from, postmasters.
- Post Office has overstated the improvements made to Horizon over the years, which it has been slow to roll out and implemented purely to save costs.

Through the cross-examination, the Judge has challenged on a number of occasions the content of the Post Office witnesses' statements (e.g. where the witness has provided information collated with the assistance of other Post Office personnel, or has corrected or clarified the evidence). He has also taken issue with Post Office's document disclosure, in particular where redactions have been made. When considered in the context of the Common Issues Judgment, these challenges suggest he could be equally critical of Post Office's evidence when giving judgment on the Horizon Issues.

The Claimants will today cross-examine the final Post Office employee, Dave Johnson, before starting their cross-examination of the four witnesses Post Office has called from Fujitsu. The Claimants are required to complete their cross-examination by the end of Thursday.

Kind regards, Rod



**Rodric Williams**

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