

From: Patrick Bourke[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7BA264A5565445F7AC8EF1D16B512067-PATRICK BOU]
Sent: Mon 07/10/2019 9:25:39 AM (UTC)
To: Mark Underwood [REDACTED] GRO; Angela Van-Den-Bogerd [REDACTED] GRO
 [REDACTED] GRO; Melanie Corfield [REDACTED] GRO
 andrew.parsons [REDACTED] GRO; Amy Prime [REDACTED] GRO
Cc: Karim Aziz [REDACTED] GRO; Ruth X Barker [REDACTED] GRO
Subject: RE: Letter to Freeths and Court - KEL disclosure [WBDUK-AC.FID26896945]

Mark, as you know, I sent this to both Ben Foat and Mark Davies on Friday. Neither has responded. If Ben is there, do you want to just ask him ?

From: Mark Underwood [REDACTED]
Sent: 07 October 2019 10:13
To: Patrick Bourke [REDACTED] GRO; Angela Van-Den-Bogerd [REDACTED] GRO
 [REDACTED] GRO; Melanie Corfield [REDACTED] GRO; andrew.parsons
 [REDACTED] GRO; Amy Prime [REDACTED] GRO
Cc: Karim Aziz [REDACTED] GRO; Ruth X Barker [REDACTED] GRO
Subject: RE: Letter to Freeths and Court - KEL disclosure [WBDUK-AC.FID26896945]

Hi, sorry to be a bore – but given the lines reference Fujitsu being at fault, could we take a belt and braces approach to sign off and make sure AI / someone at GE level signs off the response?

Thanks

Mark



Mark Underwood

Portfolio Director

Ground Floor
 20 Finsbury Street
 London EC2Y 9AQ

Mobile number: [REDACTED] GRO

ADVANCE NOTICE OF LEAVE: 30 SEPT – 4 OCT (INCLUSIVE)

From: Patrick Bourke
Sent: 07 October 2019 09:54
To: Angela Van-Den-Bogerd [REDACTED] GRO; Mark Underwood [REDACTED]
 [REDACTED] GRO; Melanie Corfield [REDACTED] GRO; andrew.parsons
 [REDACTED] GRO; Amy Prime [REDACTED] GRO
Cc: Karim Aziz [REDACTED] GRO; Ruth X Barker [REDACTED] GRO
Subject: RE: Letter to Freeths and Court - KEL disclosure [WBDUK-AC.FID26896945]

Hi Angela

Hope you had a good time. Yes, it is the final text for the time being and no, we haven't had to use it. Karim will let FJ's press outfit to have a heads up if we need to deploy it (which I imagine we will soon enough).

Patrick

From: Angela Van-Den-Bogerd
Sent: 07 October 2019 09:15

To: Patrick Bourke [REDACTED] **GRO** [REDACTED]; Mark Underwood [REDACTED] **GRO** [REDACTED]; Andrew.Parsons [REDACTED] **GRO** [REDACTED]; Melanie Corfield [REDACTED] **GRO** [REDACTED]; Amy Prime [REDACTED] **GRO** [REDACTED]

Subject: RE: Letter to Freeths and Court - KEL disclosure [WBDUK-AC.FID26896945]

Hi all

Just back from leave and catching up.

Patrick – is the text below our agreed final reactive statement? Have we had to use at all?

Andy – any response from Freeths or the Judge to the letters/emails you sent them last week?

Thanks,
Angela



Angela Van Den Bogerd
Business Improvement Director

1st Floor, Ty Brwydran,
Atlantic Close, Llansamlet
Swansea SA7 9FJ

GRO

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From: Patrick Bourke
Sent: 04 October 2019 17:51
To: Mark Underwood [REDACTED] **GRO** [REDACTED]; Melanie Corfield [REDACTED] **GRO** [REDACTED]; Andrew.Parsons [REDACTED] **GRO** [REDACTED]; Amy Prime [REDACTED] **GRO** [REDACTED]; Angela Van-Den-Bogerd [REDACTED] **GRO** [REDACTED]

Subject: RE: Letter to Freeths and Court - KEL disclosure [WBDUK-AC.FID26896945]

Now with the text:

REACTIVE LINES RE DISCLOSURE ISSUE – FUJITSU/ KELS - OCTOBER 4 2019

We take our continuing duty of disclosure extremely seriously.

The litigation is complex and involves claims which span a period of around two decades. The volume of disclosure is therefore very significant, with searches through 17 million documents to date. Horizon documents are held and supplied by Fujitsu and we have worked with a specialist disclosure consultancy to assist with this major disclosure exercise which involves more than 80 classes of documents. In excess of 500,000 documents have been provided by Post Office to date, with around half of these directly related to Horizon.

At every stage of the disclosure process, we have sought to ensure that the claimants are provided with access to the documents required by the Court. We were, therefore, extremely disappointed recently to learn from our supplier, Fujitsu, that the information they had provided earlier in the litigation regarding the availability of older versions of some specific technical documents was inaccurate. We immediately notified the claimants and the Court of this and we are, of course, now making the appropriate further disclosure.

We are very sorry about this development and have apologised both to the Court and the Claimants, through their solicitors.

From: Patrick Bourke
Sent: 04 October 2019 17:48
To: Mark Underwood [REDACTED] GRO [REDACTED] Melanie Corfield
[REDACTED] GRO [REDACTED] andrew.parsons [REDACTED] GRO [REDACTED] Amy Prime
[REDACTED] GRO [REDACTED] Angela Van-Den-Bogerd [REDACTED] GRO [REDACTED]
Subject: RE: Letter to Freeths and Court - KEL disclosure [WBDUK-AC.FID26896945]

I've tweaked again very slightly – including the ref to the apology.

If ok, it's going to Mark D, Ben, Sherrill and I'll let press team have it.

Let me know soonest.

P

From: Mark Underwood [REDACTED]
Sent: 04 October 2019 17:27
To: Patrick Bourke [REDACTED] GRO [REDACTED] Melanie Corfield [REDACTED] GRO [REDACTED]
andrew.parsons [REDACTED] GRO [REDACTED] Amy Prime [REDACTED] GRO [REDACTED] Angela Van-Den-Bogerd
[REDACTED] GRO [REDACTED]
Subject: Re: Letter to Freeths and Court - KEL disclosure [WBDUK-AC.FID26896945]

Yep, happy with that.

In my previous note I attached an email that I sent last night to mark d and Ben - if you reply to that, that should be everyone.

Mark

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From: Patrick Bourke [REDACTED] **GRO**
Sent: Friday, October 4, 2019 5:24:35 PM
To: Mark Underwood [REDACTED] **GRO**; Melanie Corfield [REDACTED]; Amy Prime [REDACTED]
[REDACTED] **GRO** [REDACTED] andrew.parsons [REDACTED] **GRO** [REDACTED] Amy Prime [REDACTED]
[REDACTED] **GRO** [REDACTED] Angela Van-Den-Bogerd [REDACTED] **GRO** [REDACTED]
Subject: Re: Letter to Freeths and Court - KEL disclosure [WBDUK-AC.FID26896945]

Hi Mark

Thanks and massive thanks to Mel in particular. I'm happy with this except can we say 'to date' rather than 'thus far'?

Who needs to have it ?

P

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From: Mark Underwood [REDACTED] **GRO**
Sent: Friday, October 4, 2019 4:29:25 PM
To: Melanie Corfield [REDACTED] **GRO**; Patrick Bourke [REDACTED] **GRO**
andrew.parsons [REDACTED] **GRO** Amy Prime [REDACTED] **GRO** [REDACTED]; Angela Van-Den-Bogerd [REDACTED]
[REDACTED] **GRO**
Subject: RE: Letter to Freeths and Court - KEL disclosure [WBDUK-AC.FID26896945]

Hi Patrick,

Below is what I believe to be the final version. I have tweaked some of it. The most notable of which is changing the sequencing and the removal of the word "written". Having read the email attachments Andy has provided, I am not sure they ever explicitly gave written assurance – rather i) a call was held ii) it was written up by WBD iii) Fujitsu did not correct what they had said verbally.

I have removed

If you are happy with it, I would suggest replying to that attached email, for their final review?

Mark

REACTIVE LINES RE DISCLOSURE ISSUE – FUJITSU/ KELS - OCTOBER 4 2019

We take our continuing duty of disclosure extremely seriously.

The litigation is complex and involves claims which span a period of around two decades. The volume of disclosure is therefore very significant with searches through 17 million documents to date. Horizon documents are held and supplied by Fujitsu, with an information assurance process and we have worked with a specialist disclosure consultancy to assist with this significant disclosure exercise which involves more than 80 classes of documents. [tbc:
We are obtaining/ have obtained further [legal] assurances at the highest level from Fujitsu and we remain absolutely committed to our continuing duty of disclosure.] More than 500,000 documents have been provided by Post Office thus far so far during this litigation, with around half of these directly relating to Horizon.

We have sought strenuously At every stage of the disclosure process we have sought to ensure the claimants are provided with access to the documents required by the Court. We were extremely disappointed to recently learn from our supplier, Fujitsu, that a written assurance the information they had provided earlier in the litigation regarding the availability of older versions of some specific technical documents we had previously disclosed was inaccurate. We immediately notified the claimants and the Court of this and will of course be making appropriate disclosure as soon as possible [of the relevant 30 documents].

We are very sorry about this development and have apologised.



Mark Underwood

Portfolio Director

Ground Floor
20 Finsbury Street
London EC2Y 9AQ

Mobile number:

ADVANCE NOTICE OF LEAVE: 30 SEPT – 4 OCT (INCLUSIVE)

From: Melanie Corfield

Sent: 04 October 2019 15:20

To: Patrick Bourke ; Mark Underwood
andrew.parsons ; Amy Prime ; Angela Van-Den-Bogerd

Subject: Re: Letter to Freeths and Court - KEL disclosure [WBDUK-AC.FID26896945]

Sorry should have said subject to review of last line when we know position. Missing figure is 17m. And my name is Mel, not Nel.

Hate typing on phone....

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From: Melanie Corfield

Sent: Friday, October 4, 2019 3:16:29 PM

To: Patrick Bourke ; Mark Underwood
andrew.parsons ; Amy Prime ; Angela Van-Den-Bogerd

Subject: Re: Letter to Freeths and Court - KEL disclosure [WBDUK-AC.FID26896945]

This is final draft subject - with Andy's chance to review re last line. The missing figure is 17m. Sorry not at laptop atm.

Nel

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From: Patrick Bourke [REDACTED] **GRO**
Sent: Friday, October 4, 2019 3:00:57 PM
To: Mark Underwood [REDACTED] **GRO** Melanie Corfield
[REDACTED] **GRO**; andrew.parsons [REDACTED] **GRO** Amy Prime
[REDACTED] **GRO**; Angela Van-Den-Bogerd [REDACTED] **GRO**
Subject: Re: Letter to Freeths and Court - KEL disclosure [WBDUK-AC.FID26896945]

Hi everyone

Are we final ?

P

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From: Mark Underwood [REDACTED] **GRO**
Sent: Friday, October 4, 2019 12:25:20 PM
To: Melanie Corfield [REDACTED] **GRO** andrew.parsons [REDACTED] **GRO**; Patrick Bourke [REDACTED] **GRO**; Amy Prime [REDACTED] **GRO**; Angela Van-Den-Bogerd [REDACTED] **GRO**
Subject: Re: Letter to Freeths and Court - KEL disclosure [WBDUK-AC.FID26896945]

Yep, thanks Mel, I think Amy is currently establishing that fact.

Amy?

Mark

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From: Melanie Corfield [REDACTED] **GRO**
Sent: Friday, October 4, 2019 12:24:20 PM
To: andrew.parsons [REDACTED] **GRO** Patrick Bourke [REDACTED] **GRO**; Amy Prime [REDACTED] **GRO**; Mark Underwood [REDACTED] **GRO**; Angela Van-Den-Bogerd [REDACTED] **GRO**
Subject: RE: Letter to Freeths and Court - KEL disclosure [WBDUK-AC.FID26896945]

Thanks Andy. Below revised version for ease.

Mark U – grateful if you could confirm the total number of documents searched.

Thanks

Mel

REACTIVE LINES RE DISCLOSURE ISSUE – FUJITSU/ KELS - OCTOBER 4 2019

We take our continuing duty of disclosure extremely seriously. More than 500,000 documents have been provided by Post Office so far during this litigation, with around half of these directly relating to Horizon.

We have sought strenuously at every stage of the disclosure process to ensure the claimants are provided with access to the documents required by the Court. We were extremely disappointed to recently learn from our supplier, Fujitsu, that a written assurance they provided earlier in the litigation regarding the availability of older versions of some specific technical documents that we had previously disclosed was inaccurate. We immediately notified the claimants and the Court of this and are making appropriate disclosure [of the relevant 30 documents]. We are very sorry about this development and have apologised.

The litigation is complex and involves claims which span a period of around two decades. The volume of disclosure is therefore very significant with searches through [xxxxx million] documents to date. We have worked with a specialist disclosure consultancy to assist. Horizon documents are held and supplied by Fujitsu, with an information assurance process. [tbc: We are obtaining/ have obtained further [legal] assurances at the highest level from Fujitsu and we remain absolutely committed to our continuing duty of disclosure.]

From: Andrew Parsons [REDACTED] **GRO**
Sent: 04 October 2019 12:13
To: Melanie Corfield [REDACTED] **GRO** Patrick Bourke [REDACTED] **GRO** Amy Prime [REDACTED] **GRO** Mark Underwood [REDACTED] **GRO** Angela Van-Den-Bogerd [REDACTED] **GRO**
Subject: RE: Letter to Freeths and Court - KEL disclosure [WBDUK-AC.FID26896945]

Mel – one suggested change – please change documents are "owned by FJ" to "held by FJ" – some of the docs are owned by PO even though they are in FJ's possession.

The last sentence is likely to depend on the final approach taken to FJ – in which there is an active parallel conversation with Rod about this.

A

Andrew Parsons
Partner
Womble Bond Dickinson (UK) LLP

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

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From: Melanie Corfield [REDACTED] **GRO**
Sent: 04 October 2019 11:42

To: Patrick Bourke [REDACTED] **GRO** ; Amy Prime [REDACTED] **GRO** ; Mark Underwood [REDACTED]
 [REDACTED] **GRO** ; Andrew Parsons [REDACTED] **GRO** ; Angela Van-Den-Bogerd [REDACTED]
 [REDACTED] **GRO**

Subject: RE: Letter to Freeths and Court - KEL disclosure [WBDUK-AC.FID26896945]

Yes agreed – thanks. Have changed the last line (below).

Also I think we need a Q and A on nature of docs and suggest below (apologies if I am misunderstanding these KEL docs though). If we are (likely) asked about potential legal action against FJ I think we will use our standard line - we are not discussing the detail of continuing live litigation.

Mel

Q. Do the new documents relate to bugs in Horizon and provide new information about these?

A. The documents are previous versions of documents already disclosed relating to error and fixes in Horizon. [If further questioning – as this ongoing litigation and a matter for the Court we cannot discuss in further detail]

REACTIVE LINES RE DISCLOSURE ISSUE – FUJITSU/ KELS - OCTOBER 4 2019

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The litigation is complex and involves claims which span a period of around two decades. The volume of disclosure is therefore very significant with searches through [xxxxxmillion] documents to date. We have worked with a specialist disclosure consultancy to assist. Horizon documents are [REDACTED] owned and supplied by Fujitsu, with an information assurance process. We are obtaining/ have obtained further [legal] assurances at the highest level from Fujitsu at the highest level we remain absolutely committed to our continuing duty of disclosure

From: Patrick Bourke

Sent: 04 October 2019 11:32

To: Melanie Corfield [REDACTED] **GRO** ; Amy Prime [REDACTED] **GRO** ; Mark Underwood [REDACTED]
 [REDACTED] **GRO** ; andrew.parsons [REDACTED] **GRO** ; Angela Van-Den-Bogerd [REDACTED]
 [REDACTED] **GRO**

Subject: Re: Letter to Freeths and Court - KEL disclosure [WBDUK-AC.FID26896945]

Thanks Mel - looks good I think.

Just one point - an investigation is necessarily backwards looking - is there something we can say or indeed should about seeking assurances at the highest levels about the forward looking piece. It's a fine balance, I know.

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From: Melanie Corfield [REDACTED] GRO
Sent: Friday, October 4, 2019 11:18:09 AM
To: Patrick Bourke [REDACTED] GRO [REDACTED] Amy Prime [REDACTED] GRO [REDACTED] Mark Underwood [REDACTED]
[REDACTED] GRO [REDACTED] andrew.parsons [REDACTED] GRO [REDACTED] Angela Van-Den-Bogerd
[REDACTED] GRO [REDACTED]
Subject: RE: Letter to Freeths and Court - KEL disclosure [WBDUK-AC.FID26896945]

Here's suggested lines. I am slightly worried about the last line re undertaking investigation with FJ because it might imply concern re accuracy of their information more generally. We will of course need to review in any event, depending on reaction from Freeths and Judge Fraser.

Mel

REACTIVE LINES RE DISCLOSURE ISSUE – FUJITSU/ KELS - OCTOBER 4 2019

We take our continuing duty of disclosure extremely seriously. More than 500,000 documents have been provided by Post Office so far during this litigation, with around half of these directly relating to Horizon.

We have sought strenuously at every stage of the disclosure process to ensure the claimants are provided with access to the documents required by the Court. We were extremely disappointed to recently learn from our supplier, Fujitsu, that a written assurance they provided earlier in the litigation regarding the availability of older versions of some specific technical documents that we had previously disclosed was inaccurate. We immediately notified the claimants and the Court of this and are making appropriate disclosure [of the relevant 30 documents]. We are very sorry about this development and have apologised.

The litigation is complex and involves claims which span a period of around two decades. The volume of disclosure is therefore very significant with searches through [xxxxxmillion] documents to date. We have worked with a specialist disclosure consultancy to assist. Horizon documents are owned and supplied by Fujitsu, with an information assurance process. We have undertaken an investigation with Fujitsu and we remain absolutely committed to our continuing duty of disclosure

From: Patrick Bourke
Sent: 04 October 2019 09:11
To: Amy Prime [REDACTED] GRO [REDACTED] Mark Underwood [REDACTED] GRO [REDACTED];
andrew.parsons [REDACTED] GRO [REDACTED] Angela Van-Den-Bogerd [REDACTED] GRO [REDACTED]
[REDACTED] GRO [REDACTED] Melanie Corfield [REDACTED] GRO [REDACTED]
Subject: Re: Letter to Freeths and Court - KEL disclosure [WBDUK-AC.FID26896945]

Mark

We spoke and I have since spoken to Mel (copied) who is happy to help craft a sensible, slightly more specific, line should this become public.

What we need is a plain English explanation from WBD of our approach to disclosure and how this met or exceeded the requirements of Court rules, and some guidance on how far we can go in pointing at failure at the FJ end. We would also benefit from an ability to say what we are doing to ensure that this does not happen again (which needs to be persuasive) and why we think this is an isolated instance.

Can we get this ASAP pls ? I'm out of action until 1030 but Mel is on standby right now.

P

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From: Amy Prime [REDACTED] **GRO**
Sent: Friday, October 4, 2019 8:24:11 AM
To: Mark Underwood [REDACTED] **GRO**; andrew.parsons [REDACTED] **GRO**,
Patrick Bourke [REDACTED] **GRO**; Angela Van-Den-Bogerd [REDACTED] **GRO**
GRO
Subject: RE: Letter to Freeths and Court - KEL disclosure [WBDUK-AC.FID26896945]

Mark

There have been a number of letters sent by WBD which explain the approach taken to disclosure. Please find attached the explanatory letters for each of the stages of disclosure, along with letters from October 18 and January 19 which responded to the Claimants' concerns on the disclosure provided by Post Office.

If there is anything in particular which you are looking for, please let me know.

Many thanks
Amy

Amy Prime

Associate
Womble Bond Dickinson (UK) LLP

d: [REDACTED]
m: [REDACTED]
t: [REDACTED]
e: [REDACTED]

GRO

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From: Mark Underwood [REDACTED] **GRO**
Sent: 03 October 2019 22:27
To: Andrew Parsons [REDACTED] **GRO** Patrick Bourke [REDACTED] **GRO**; Angela Van-Den-Bogerd [REDACTED] **GRO**
Cc: Amy Prime [REDACTED] **GRO**
Subject: FW: Letter to Freeths and Court - KEL disclosure [WBDUK-AC.FID26896945]

Thanks Andy,

Angela & Patrick, please find attached the letter which was sent to the Court today, along with the letter that it referenced and which was sent to Freeths.

Amy (copied) is sending a copy of a letter which was sent to Freeths in January and which sets out the approach we have taken to disclosure along with all of the checks and balances.

Patrick – are you free at all tomorrow for me to give you (and Mel) a call tomorrow morning?

Mark



Mark Underwood

Portfolio Director

Ground Floor
20 Finsbury Street
London EC2Y 9AQ

Mobile number: [REDACTED] **GRO**

ADVANCE NOTICE OF LEAVE: 30 SEPT – 4 OCT (INCLUSIVE)

From: Andrew Parsons [REDACTED] **GRO**
Sent: 03 October 2019 21:25
To: Mark Underwood [REDACTED] **GRO**
Subject: Fwd: Letter to Freeths and Court - KEL disclosure [WBDUK-AC.FID26896945]

Letters attached.

From: Amy Prime
Sent: Thursday, 3 October, 14:24
Subject: Letter to Freeths and Court - KEL disclosure [WBDUK-AC.FID26896945]
To: Rodric Williams, Emanuel, Catherine, Lerner, Alex
Cc: Andrew Parsons, Tom Beezer, Lucy Bremner

All

Please find attached the letters as sent to Freeths and the Court today.

Kind regards
Amy

Amy Prime

Associate

Womble Bond Dickinson (UK) LLP

d:

m:

t:

e:

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Andrew Parsons

Partner

Womble Bond Dickinson (UK) LLP

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