

**From:** Rob Houghton <[REDACTED] GRO>  
**To:** Andrew Parsons <[REDACTED] GRO>  
**Cc:** Rodric Williams <[REDACTED] GRO>, Mark Underwood1  
[REDACTED] GRO, Jane MacLeod

**Subject:** RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

**Date:** Mon, 17 Jul 2017 11:03:23 +0000

**Importance:** Normal

**Inline-Images:** image001.jpg; image002.png; image003.png; image004.png; image005.png;  
image006.png; image007.png

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Response in >>>>

Read through it all. Two comments - on this statement...

(1) All IT systems experience software coding errors or bugs which require fixes to be developed and implemented. For a system of Horizon's scale, Post Office would characterise the number of errors or bugs in Horizon requiring fixes as relatively low. In any event, as is noted in paragraph [53 and 54XX] below, there are robust measures in place for their detection, correction and remediation.

Can we say they are relatively low? Where did this come from? Not sure I could say this without further data. **THIS IS FJ's LANGUAGE AND THEY WERE HAPPY WITH IT.**

**>>> Can they defend it? If so – do we need to assign to FJ; the bit I am concerned about is “Post Office would characterise the number of errors or bugs in Horizon requiring fixes as relatively low...” I wouldn't/ couldn't !**

2. As to paragraph 27, it is admitted that, although ~~Horizon was not designed to have this functionality~~ **this would not usually be classified as "functionality"**, there was a highly theoretical possibility that certain Fujitsu personnel could abuse their privileged user rights to circumvent the protections in the system as designed so as to edit or delete branch transaction data as described in paragraph [57(4)XX] above.

I don't think it needs the phrase “ although Horizon was not designed to have this functionality” – its not functionality – admin access is available in every system globally. I would state – In common with all systems that have administration access .... (which is all). **Rob – I can see the force of this argument. We've discussed this before with Tony. Although from a technical point of view admin access is not functionality, we decided that this argument would be overly technical and semantic in the eyes of the judge. Is the amended language above better?**

**>>> Suggest this.....**

**>>> As to paragraph 27, it is admitted that, although ~~Horizon was not designed to have this functionality~~ **this would not usually be classified as "functionality"**, in common with other computer systems and not designed as part of Horizon functionality, there ~~was~~ **is** a highly theoretical possibility that certain Fujitsu personnel could**

abuse their privileged user rights to circumvent the protections in the system as designed so as to edit or delete branch transaction data as described in paragraph [57(4)XX] above

R

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**From:** Andrew Parsons [[mailto:](#) GRO]  
**Sent:** 14 July 2017 14:39  
**To:** Mark Underwood1; Jane MacLeod; Angela Van-Den-Bogerd; Mark R Davies; Stuart Nesbit; Patrick Bourke; Rob Houghton; Rodric Williams; Thomas P Moran; Tom Wechsler; Mark Ellis; Melanie Corfield  
**Cc:** Kevin Morgan; Amy Prime  
**Subject:** RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

All

Thanks to all those who have commented so far. We're locking down the Defence at **9am on Monday** so that we can complete all the cross referencing and proof reading before the Tuesday deadline. If you have any final comments, please let us know before then.

Thanks  
Andy

**Andrew Parsons**  
Partner  
Bond Dickinson LLP

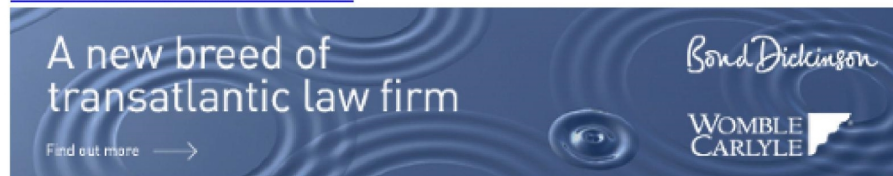
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**From:** Andrew Parsons  
**Sent:** 12 July 2017 14:49  
**To:** 'Mark Underwood1'; Jane MacLeod; Angela Van-Den-Bogerd; Mark R Davies; Stuart Nesbit; Patrick Bourke; Rob Houghton; Rodric Williams; Thomas P Moran; Tom Wechsler; Mark Ellis; Melanie Corfield

**Cc:** Kevin Morgan; Amy Prime

**Subject:** RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

All

Please find attached the draft Defence for your review and comment. As discussed earlier, if possible please provide comments rather than amendments to the actual text. I've also attached the Claimants' Generic Particulars of Claim for reference.

You'll see a few points where input from Deloitte and Fujitsu is needed – we expect to get this today.

Please send any comments to me and Amy Prime (copied).

Thanks  
Andy

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**From:** Mark Underwood1 [<mailto:mark.underwood@postoffice.co.uk>] **GRO**

**Sent:** 12 July 2017 14:40

**To:** Jane MacLeod; Angela Van-Den-Bogerd; Mark R Davies; Stuart Nesbit; Patrick Bourke; Rob Houghton; Rodric Williams; Thomas P Moran; Tom Wechsler; Andrew Parsons; Mark Ellis; Melanie Corfield

**Cc:** Kevin Morgan

**Subject:** RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

Dear all, please find attached the open action list, which includes those taken today.

I have highlighted in yellow those that require people's imminent attention.

Many thanks

Mark



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Mobile number: [07946 000003](tel:07946 000003) **GRO**

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**From:** Mark Underwood1  
**Sent:** 11 July 2017 13:46  
**To:** Jane MacLeod; Angela Van-Den-Bogerd; Mark R Davies; Stuart Nesbit; Patrick Bourke; Rob Houghton; Rodric Williams; Thomas P Moran; Tom Wechsler; 'Parsons, Andrew'; Mark Ellis; Melanie Corfield  
**Cc:** Kevin Morgan  
**Subject:** RE: PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

Dear all, further to my note earlier today, please find attached the final Decision Paper.

Mark



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**From:** Mark Underwood1  
**Sent:** 11 July 2017 09:30  
**To:** Jane MacLeod; Angela Van-Den-Bogerd; Mark R Davies; Stuart Nesbit; Patrick Bourke; Rob Houghton; Rodric Williams; Thomas P Moran; Tom Wechsler; 'Parsons, Andrew'; Mark Ellis; Melanie Corfield  
**Cc:** Kevin Morgan  
**Subject:** PLSG meeting on Wednesday 24 May 2017 @12 in Tonbridge (1.11)

Dear all,

We have a PLSG meeting on Wednesday 12 July @12 in Tonbridge (1.11). Ahead of that meeting please find attached:

The Agenda

Decision Paper: Access to Second Sight

Decision Paper: Standstill Agreement with Fujitsu

Decision Paper: Communications Strategy

Decision Paper: Wider Risks to POL [**To follow later today**]

Open actions list as at 11 July 2017

Please let me know if you are intending to dial in.

Many thanks, and apologies for the delay in circulating these papers.

Mark

GRO

**Dial-in numbers:**

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GRO

United Kingdom International direct:

GRO

Chairperson passcode: 85009207 then #

Participant passcode: 82368934 then #



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