From: "pete.newsome(	GRO			GRO	h		
To: Elisa Lukas {		GRO		j>		-	
Cc: Andrew Parsons <			GRO		<u> </u>		
"Legal.Defence	GRO	" <		GRO		Þ,	
"Torstein.O.Godesetl	h	GRO	11 4		GRO		>
"Steve.Bansal	GRO	<[		GRO	i		

Subject: RE: Queries - Post Office Group Litigation - legally privileged

**Date:** Fri, 6 Oct 2017 09:03:52 +0000

Importance: Normal

Inline-Images: image001.gif; image002.gif; image003.gif; image004.gif; image005.png; image006.gif;

image007.jpg; image008.jpg; image009.png; image010.png; image011.png

Elisa

We have now sent through the NDA's and we are able to make available the KEL system in Bracknell on Monday assuming the NDA's are signed in advance. I will check on the approximate cost of the 120 days of effort we would need to recover if the data extraction options were taken up.

Here are the answers below we discussed in outline yesterday evening.

Regards

Pete

Answers to questions asked last week:

Data extraction

We discussed previously that it takes roughly a day to extract a week's data for one branch. Would you agree that to extract a week of data for 600 branches would take around 600 weeks?

If PO were to ask FJ to design a process to extract data for branches quicker (without invalidating integrity controls) could this be done, and roughly how much would it cost?

We have looked at the current process for extracting data and have made the following assumptions and would need dedicated additional staff members funded. We have based the logic on 600 ARQ requests each for 1 months data:

Approximately 120 days of People effort of around

Elapsed time with current Sec Ops resource would be well over a year to complete even with the ability to run multiple requests at the same time

Elapsed time of around 9 months could be achieved but would need to engage One dedicated resource for 9 months to complete within 9 months for the 600 ARQs

Two dedicated heads could complete in 3-4 months

We cannot complete any quicker than that due to the limitations of the technology and processes used

To further improve the speed of extraction Post Office would need to invest in additional technology which would be very costly e.g. additional AUW workstations and secure environment to run ARQ's and its likely to take longer to stand up that technology than it would to complete with the additional heads

#### Horizon Online introduction

On what date was Horizon Online released? Roll out of HNGX started in January 2010 and completed in October 2010.

#### Peaks

How many peaks are there in the Peaks System? Open 859

Is it possible to export information from Peaks and what format would this be in? No this is not possible without losing all the key context

Did I note correctly that many of the Peaks have no impact on branch accounting and can relate to entirely separate parts of Horizon? Fujitsu use the Peak system to report actions and changes required in all of the systems required to support the Post Office HNGX solution. This includes not just the live system but also testing and other support systems and include all areas of the system including infrastructure and the request of any data extracts by Post Office. The vast majority will have no bearing on the branch accounting system

• We discussed previously the possibility of giving the Claimants' access to inspect the Peaks System as well as the KEL. Would you be happy with us offering this? Due to the nature of the Peak system Fujitsu believe the best course of action is to make available the Peak system for any references that are quoted in the KEL system. The system is not designed for running searches or clarifying Peaks for a particular functional purpose. It also has information within it which is both proprietary to Fujitsu and release to a wider audience could cause security issues.

Pete Newsome

**Account Manager** 

Post Office Account, Fujitsu UK&I

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From: Elisa Lukas	GRO			
Sent: Thursday, October 5,	2017 2:26 PM			
To: Newsome, Pete <	GRO	<b>h</b> >		
Cc: Andrew Parsons	GRO	1	; Defence Legal (Chris J	ay,)
GRO	; Godeseth,	Γorstein <	GRO	>; Bansal
Steve (BRA01) <	GRO	>		
Subject: RE: Queries - Pos	t Office Group Litis	gation - legally p	privileged	
1115				
Hi Pete				
Sorry to chase you, I was won	idering how you are o	etting on with the	e below questions?	
	0 , 0	,		
Kind regards,				
Flisa				

# Elisa Lukas

Solicitor

Bond Dickinson LLP

Bond Dickinson

Direct GRO Mobile GRO Office: GRO

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We are pleased to announce we will be changing our name to Womble Bond Dickinson (UK) LLP on 1 November 2017:



From: pete.newsome( GRO		GRO	]
<b>Sent:</b> 04 October 2017 14:10	l		
To: Elisa Lukas			
Cc: Andrew Parsons; Legal.Defence	GRO	Torstein.O.Godeseth(	GRO
Steve.Bansal( GRO		i	

**Subject:** RE: Queries - Post Office Group Litigation - legally privileged [BD-4A.FID26896945]

Elisa

I will discuss the questions with our team and get back to you shortly.

Pete

Pete Newsome

**Account Manager** 

Post Office Account, Fujitsu UK&I

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From: Elisa Lukas	GRO	
Sent: Tuesday, October	3, 2017 6:53 PM	
To: Newsome, Pete <	GRO	<u>}</u>
Cc: Andrew Parsons <	GRO	Þ
Subject: Queries		

Hi Pete

Thanks very much for your time today in clarifying the technical documents we can make available. I'm afraid I have a few more questions to trouble you with though. Is it at all possible to provide answers to these before the end of Thursday as we are currently finalising our evidence for the upcoming hearing.

#### Data extraction

We discussed previously that it takes roughly a day to extract a week's data for one branch. Would you agree that to extract a week of data for 600 branches would take around 600 weeks?

If PO were to ask FJ to design a process to extract data for branches quicker (without invalidating integrity controls) could this be done, and roughly how much would it cost?

Horizon Online introduction

On what date was Horizon Online released?

## Peaks

How many peaks are there in the Peaks System?

Is it possible to export information from Peaks and what format would this be in?

Did I note correctly that many of the Peaks have no impact on branch accounting and can relate to entirely separate parts of Horizon?

We discussed previously the possibility of giving the Claimants' access to inspect the Peaks System as well as the KEL. Would you be happy with us offering this?

Kind regards,

Elisa

Elisa Lukas Solicitor Bond Dickinson LLP

Direct: GRO



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