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1 August 2018

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**Third Letter****By email only****Email:** james.hartley [GRO] imogen.randall [GRO]**Womble Bond Dickinson (UK) LLP**

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Our ref:  
AP6/AP6/364065.1369  
Your ref:

Dear Sirs

**The Post Office Group Litigation  
Stage 3 Disclosure**

Pursuant to paragraph 3 of the Fourth CMC Order (as amended by paragraph 3 of the Fifth CMC Order), please find enclosed Post Office's Disclosure List for Stage 3 Disclosure. The documents are in the process of being exported by Advanced Discovery to Elevate.

The parties have adopted the draft Practice Direction "Disclosure Pilot for the Business and Property Courts" and for this stage of disclosure Post Office has been ordered to provide a request-led search based disclosure under Model C. The classes of documents to be disclosed are set out in Schedule 1 to the Fourth CMC Order. An explanation of the steps taken to locate the documents which fall within each of the classes is set out below.

**1. Classes 1 to 3, 5 to 10 and 15**

- 1.1 Each of these classes required Post Office to provide disclosure of documents which were submitted to either a Category 1, 2 or 3 Custodian. Category 1 comprised of Post Office's Board of Directors and Group Executive. A list of the 68 Custodians who were incorporated within Categories 2 and 3 is set out at Schedule 1 of this letter.
- 1.2 In relation to documents submitted to Category 1 Custodians, Post Office's Company Secretarial team are responsible for managing the documents submitted to Board of Directors and Group Executive. An extract of the documents held within the Company Secretarial team drive was taken (amounting to 10,926 documents) and the following keywords were run:

Search	Documents with hits (including family)
Bug AND Horizon	20
Error AND Horizon	233
Defect AND Horizon	22

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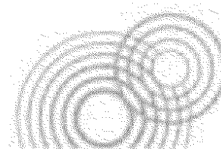
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Search	Documents with hits (including family)
Discrepancy AND Horizon	36
Shortfall AND Horizon	470
Loss AND Horizon	1167
Transaction Correction	62
TC	268

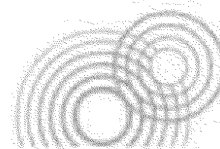
- 1.3 These responsive documents (plus family documents) were subject to a manual review for relevancy and privilege, and disclosure of these documents was provided on 29 June 2018.
- 1.4 In relation to documents submitted to Category 2 and 3 Custodians, searching the email accounts of these custodians inherently confirms that the documents were submitted to them and is likely to return the greatest volume of responsive documents (as explained in our letters of 22 June and 12 July 2018). There were 6.7m documents within these custodians' email accounts (or 5.4 million documents post de-duplication). These 5.4 million de-duplicated documents were uploaded to our e-disclosure platform.
- 1.5 To identify the relevant documents which were submitted to these custodians, the search criteria set out in the table below were applied resulting in 34,785 responsive documents being manually reviewed for relevancy and privilege.

Class	Search Term
1. Reports and briefings (excluding emails) produced by Fujitsu and submitted to Category 1 or 2 Custodians regarding the nature and extent of bugs, errors or defects (not limited to software) in Horizon that had the potential to cause branch accounts to be inaccurate.	<p>Documents sourced from a Category 1 or 2 Custodian which were authored by "Fujitsu", plus family documents (known as <b>Search Criteria 1</b>).</p> <p>Note – Post Office voluntarily expanded this search to include emails.</p> <p>Enquires have also been made with Fujitsu who have informed us that the documents they submit to Post Office are known as Major Incident Reports or Service Review Books. The Major Incident Reports were stored in Dimensions and therefore disclosed as part of Stage 2 Disclosure and disclosure of the Service Review Books has been provided where they have been responsive to keywords.</p>
2. Reports and briefings (excluding emails) produced by Post Office and submitted to Category 1, 2 or 3 Custodians regarding the nature and extent of bugs, errors or defects (not limited to software) in Horizon that had the potential to cause branch accounts to be inaccurate.	<p>For Category 1 and 2 Custodians, the documents of those custodians were filtered so to create a pool of documents which had been sent to a Category 1 or 2 Custodian, plus family documents.</p> <p>The following search terms were then run on this pool of documents (known as <b>Search Criteria 2</b>):</p> <ul style="list-style-type: none"> <li>• Document Type is not email</li> </ul> <p>AND</p> <ul style="list-style-type: none"> <li>• "Horizon"</li> </ul>



Class	Search Term
	<p>AND</p> <ul style="list-style-type: none"> <li>• "bug*" OR</li> <li>• "peak*" OR</li> <li>• "error*" OR</li> <li>• "defect*" OR</li> <li>• "work" w/2 "*"round" OR</li> <li>• "shortfall" OR</li> <li>• "loss*" OR</li> <li>• "discrepanc*" OR</li> <li>• "problem*" OR</li> <li>• "mismatch*" OR</li> <li>• "inaccura*" OR</li> <li>• "transaction data" OR</li> <li>• "transaction correction"</li> </ul> <p>Note – these are the search terms agreed by the parties for Category 3 Custodians plus "transaction correction".</p> <p>For category 3 custodians, the search terms as agreed between the parties were applied to the documents sourced from the Category 3 Custodians' email accounts (known as <b>Search Criteria 3</b>).</p> <p>Note – Post Office voluntarily expanded this search to include emails and documents sent or authored by Category 3 Custodians (in addition to documents submitted to Category 3 Custodians).</p>
<p>3. Reports and briefings (excluding emails) produced by ATOS and any other third party IT suppliers (excluding individual contractors) who was engaged by Post Office to work primarily on the Horizon system, Bank of Ireland and Camelot and submitted to Category 1 or 2 Custodians regarding the nature and extent of bugs, errors or defects (not limited to software) in the Horizon system that had the potential to cause branch accounts to be inaccurate between: (i) 1 January 1999 to 31 December 2000; (ii) 1 January 2005 to 30 April 2006; and (iii) 1 January 2010 to 31 July 2013.</p>	<p>Documents (plus family documents) sourced from a Category 1 or 2 Custodian which were sent or authored by:</p> <ul style="list-style-type: none"> <li>• "Atos"</li> <li>• "BoI"</li> <li>• "Camelot"</li> </ul> <p>AND</p> <ul style="list-style-type: none"> <li>• Documents within the date ranges set out in the Class.</li> </ul> <p>(known as <b>Search Criteria 4</b>)</p> <p>Note – Post Office voluntarily expanded this search to include emails.</p>
<p>5. Reports and briefings (excluding emails) produced by Fujitsu and submitted to Category 1 or 2 Custodians regarding necessary or recommended measures for preventing/fixing</p>	<p>Same as Search Criteria 1.</p>





Class	Search Term
bugs in Horizon that might cause branch accounts to be inaccurate.	
6. Reports and briefings (excluding emails) produced by Fujitsu and submitted to Category 1 or 2 Custodians regarding necessary or recommended measures for developing Horizon so to mitigate the risk that Horizon might cause branch accounts to be inaccurate.	Same as Search Criteria 1.
7. Reports and briefings (excluding emails) produced by Post Office and submitted to Category 1, 2 or 3 Custodians regarding necessary or recommended measures for preventing/fixing bugs in Horizon that might cause branch accounts to be inaccurate.	Same as Search Criteria 2 and 3.
8. Reports and briefings (excluding emails) produced by Post Office and submitted to Category 1, 2 or 3 Custodians regarding necessary or recommended measures for developing Horizon so to mitigate the risk that Horizon might cause branch accounts to be inaccurate.	Same as Search Criteria 2 and 3.
9. Reports and briefings (excluding emails) produced by ATOS and any other third party IT suppliers excluding individual contractors) who was engaged by Post Office to work primarily on the Horizon system, Bank of Ireland and Camelot and submitted to Category 1 or 2 Custodians regarding necessary or recommended measures for preventing/fixing bugs and developing the Horizon system, to mitigate or prevent impact on branch accounts or transactions between: (i) 1 January 1999 to 31 December 2000; (ii) 1 January 2005 to 30 April 2006; and (iii) 1 January 2010 to 31 July 2013.	Same as Search Criteria 4
10. Reports and briefings (excluding emails) submitted to Category 1, 2 or 3 Custodians regarding the nature and extent of postmaster complaints, reports or notifications regarding bugs, errors or defects in Horizon that had the potential to cause a branch accounts to be inaccurate.	Same as Search Criteria 4
15. Reports and briefings (excluding emails) submitted to Category 1 or 2 Custodians regarding aggregated (not branch specific) information on the underlying causes of, or circumstances leading to, transaction corrections issued to the branch network via Horizon.	Same as Search Criteria 2.

- 1.6 In running final checks on disclosure during the course of yesterday and today, it was discovered that the Search Criteria 1 and 2 had not accurately run against the following email accounts:



Andy Garner, Ian Trundell, Dave Hulbert, Ben Cooke, Steve Beddoe, Neil Wilkinson, Michael Austin, Mick Mitchell, Rob Houghton and Steve Allchorn.

- 1.7 Having corrected this, additional responsive documents have been identified. We are considering these and how best to filter / review them for disclosable documents and will update you on this shortly.

**2. Class 4 and 11 to 14**

- 2.1 Enquires have been made with Fujitsu to source the documents which fall within Classes 4 and 11 to 14.

*Class 4 – Documents or records recording all data sources outside of Horizon which provide financial or transactional data into Horizon.*

- 2.2 The Application Interface Specification (**AIS**) documents (disclosed as part of Stage 2 Disclosure) record the interfaces between Horizon and external systems. The AIS documents can be found using a keyword search. Disclosure has also been provided of documents within this Class which were revealed by the searches explained above.

*Class 11 - Written policies and processes regarding how the Horizon Service Desk is operated (by both Fujitsu historically and ATOS now).*

- 2.3 Documents which relate to the operation of the Horizon Service Desk by Fujitsu were disclosed as part of Stage 2 Disclosure. Fujitsu have identified these as documents with the following references:

2.3.1 SVM/SDM/PRO/0021

2.3.2 SVM/SDM/SD/0001

2.3.3 CS/SER/002

2.3.4 SVM/SDM/PRO/0003

2.3.5 CS/FSP/021

2.3.6 SVM/SDM/SD/0023

- 2.4 Documents which relate to the operation of the Horizon Service Desk by ATOS were disclosed within the early tranche of Stage 3 Disclosure given on 29 June 2018.

- 2.5 Further documents have also been located through the searching of the Category 2 and 3 Custodians' email accounts as explained above.

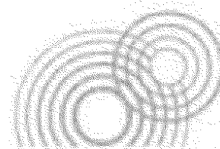
*Classes 12 - Written policies and processes regarding database administrator access to Horizon, including relating to the implementation of fixes that had the ability to impact upon branch accounts or transactions.*

- 2.6 See document POL-0215659 which was disclosed as part of Stage 2 Disclosure. This Class also overlaps with the requests made by the Claimants' expert which Post Office shall be responding on shortly.

*Class 13 - Any logs in Horizon of when database administrator access has been used and how it was used.*

- 2.7 Horizon does keep logs of database administrator access. Fujitsu are working on extracting the logs. We will update you on this shortly.

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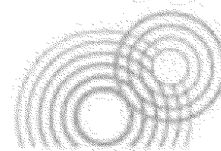
*Class 14 - Documents containing lists of individuals who had or have database administrator access to the Horizon Audit Store and the BRDB (Branch Database), from 1999 to date, which allows them to implement fixes in branch accounts or transactions.*

- 2.8 There is no formal record or single document that lists individuals with database administrator access (historic or present). A current list of database administrators could be compiled but it would only reflect the position on the day it was produced.

Yours faithfully

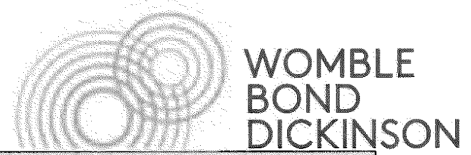
*Womble Bond Dickinson (UK) LLP*

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**SCHEDULE 1**

Category	Custodians
Category 2 Custodians	1. Antonio Jamasb
	2. Emma Langfield
	3. Alan Simpson
	4. Julia Marwood
	5. Ian Trundell
	6. Andrew Winn
	7. Clive Read
	8. Delwar King
	9. David Smith
	10. Michael Young
	11. Lesley Sewell
	12. Robert Houghton
	13. Michael Kevin Mitchell
	14. Michael Terence James Austin
	15. Neil Wilkinson
	16. Paul Antony Bleasby
	17. Blake Griffin
	18. Jason Black
	19. Jeffrey William Alexander Smyth
	20. Benjamin Tom Cooke
	21. Andrew John Garner
	22. Catherine Hamilton
	23. Donna Sharon Yvette Gilkes
	24. Alistair Roman
	25. Michael Passmore
	26. Nicholas Paul Sambridge

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Category	Custodians
	27. David Andrew Hulbert
	28. Colin Andrew Pletts
	29. Timothy White
	30. Stephen Taylor
	31. Stephen Beddoe
	32. Patricia Stewart
	33. Susan Lowther
	34. Michael Gallagher
	35. Timothy Clifton Connold
	36. Stephen Bell
	37. John Bethell
	38. Richard Evans
	39. Edward Coleman
	40. Ursula Williams
	41. Matthew Williams
	42. Kirk Delaney
	43. Andrew McLean
	44. David Smith
	45. Keith Rann
	46. Nicholas Gittens
	47. Stephen Allchorn
	48. Mark Burley
	49. Simon Baker
	50. Christopher Taylor
	51. Andrew Jones
	52. David Gray
	53. Steven Rogers
	54. Simon Baker



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Category	Custodians
	55. Neil Lecky-Thompson
	56. Brian Deveney
	57. Mark Pearce
	58. Julie George
	59. Peter Goodman
	60. Blake Griffin
	61. Mike Wells
	62. Ian O'Driscoll
	63. Mark Burley
Category 3 Custodians	64. John Jenkinson
	65. John Scott
	66. Lynn Hobbs
	67. Kevin Gilliland
	68. Rob Bolton