

From: Amy Prime [GRO]
To: Michael Wharton [GRO]
Cc: Joel Durston [GRO], Beth Hooper [GRO]
Subject: RE: 917090 Stage 3 Disclosure - Board Papers and GE Docs
Date: Thu, 28 Jun 2018 16:05:18 +0000

Importance: Normal

Inline-Images: image003.png; image004.png; image005.png; image006.png; image009.jpg;
image010.jpg; image011.jpg; image012.jpg; image8905e1.PNG; image42aaa3.PNG;
image57b741.PNG

Agree, the 1,548 is manageable – please can you liaise with Joel and Beth in the Southampton office (cc'ed) to review these documents. I want to keep Plymouth clear for the email accounts.

They will need a full briefing on the scope of documents which need to be disclosed, including the requirement to disclose all adverse documents we come across. I think we adopt the same approach as the previous board minutes (ie. redact everything which is not relevant).

Thanks

Amy

Amy Prime
Solicitor
Womble Bond Dickinson (UK) LLP

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From: Michael Wharton
Sent: 28 June 2018 16:55
To: Amy Prime
Subject: RE: 917090 Stage 3 Disclosure - Board Papers and GE Docs [WBDUK-AC.FID26896945]

This looks manageable – are we asking Plymouth to do a first level review?

Michael Wharton
Solicitor
Womble Bond Dickinson (UK) LLP

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From: Dan Cheal [mailto:gro@woblebonddickinson.com]
Sent: 28 June 2018 13:38
To: Michael Wharton
Cc: ADUK Viking POD Staff; Amy Prime
Subject: RE: 917090 Stage 3 Disclosure - Board Papers and GE Docs [WBDUK-AC.FID26896945]

Hi Michael

1,304 of these documents are responsive to at least one of the search terms below.

This increases to 1,548 when we include non-responsive family items.

Please find below a summary of results, the full report is attached.

Name	Documents with hits	Documents with hits, including group	Unique hits
Bug AND Horizon	20	20	0
Error AND Horizon	209	233	29
Defect AND Horizon	22	22	4
Discrepancy AND Horizon	36	36	6
Shortfall AND Horizon	431	470	99
Loss AND Horizon	981	1,167	552
Transaction Correction	24	62	6
TC	214	268	145

The responsive items can be found [here](#).

Kind regards

Dan

Dan Cheal

eDiscovery Project Manager





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From: Michael Wharton [GRO]
Sent: 28 June 2018 12:59
To: Dan Cheal [GRO]
Cc: ADUK Viking POD Staff [GRO]; Amy Prime [GRO]
[GRO]
Subject: RE: Stage 3 Disclosure - Board Papers and GE Docs [WBDUK-AC.FID26896945]

Dan

Please could you run the following keyword searches against the 9,305 documents:

- bug AND Horizon
- error AND Horizon
- defect AND Horizon
- discrepancy AND Horizon
- shortfall AND Horizon
- loss AND Horizon
- transaction correction
- TC

Kind regards

Michael

Michael Wharton

Solicitor
Womble Bond Dickinson (UK) LLP

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From: Dan Cheal [<mailto:>  **GRO**]
Sent: 22 June 2018 11:09
To: Amy Prime
Cc: ADUK Viking POD Staff
Subject: RE: 917090 POL Extraction [WBDUK-AC.FID26896945]

Hi Amy

Processing of this data is now complete.

Please see a full summary below:

Collection & Processing

A total of 10,926 documents were provided and processed.

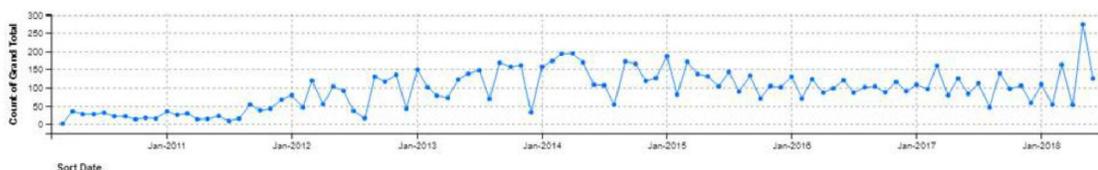
De-duplication (*within this dataset only*) reduced this number to 9,305 documents, amounting to less than 6GB.

4,694 of these documents originate from the Board Papers directory and can be found [here](#).

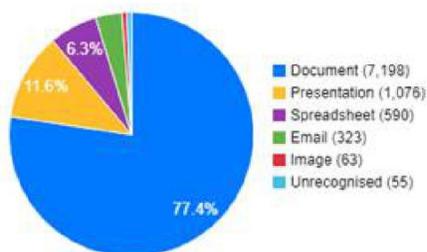
4,611 of these documents originate from the GE Documents directory and can be found [here](#).

Below is a high level display of the Sort Date range found in these documents as well as a breakdown of document types.

- **Sort Date Range**



- **Document Type Breakdown**



Encrypted & Non-Text Searchable Documents

Please note that 19 documents are encrypted.

These documents can be found [here](#) but will not be accessible without the appropriate password.

If you have the password (or potential passwords), we will attempt to unlock these files.

A further 65 documents are non-text searchable.

For your reference, these documents can be found [here](#) and they breakdown by type as follows:

Document Type Category	Grand Total
Image	63
Document	2
Grand Total	65

Please note that encrypted and non-text searchable items will not be responsive to search terms.

In some previous loads, we have been instructed to mass-tag all non-searchable images as Not Relevant and to OCR all remaining documents.

Should this be done in this case?

Search Term Reporting & Batching

Are there any search terms to be applied to this data?

Should any/all of this data be batched for review?

Kind regards

Dan

Dan Cheal

eDiscovery Project Manager



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From: Amy Prime { GRO }
Sent: 21 June 2018 10:20
To: Dan Cheal { GRO }
Cc: ADUK Viking POD Staff < GRO >
Subject: RE: 917090 POL Extraction [WBDUK-AC.FID26896945]

Hi Dan

Please can the data be de-duplicated within itself.

Many thanks

Amy

Amy Prime

Solicitor
Womble Bond Dickinson (UK) LLP

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From: Dan Cheal [<mailto:>  **GRO**]
Sent: 21 June 2018 10:13
To: Amy Prime
Cc: ADUK Viking POD Staff
Subject: RE: 917090 POL Extraction [WBDUK-AC.FID26896945]

Thanks for the update Amy.

We are now in the process of extracting and imaging this data ahead of processing.

I see that we have a total of 84 files, amounting to less than 5GB, uploaded to folders **GE Documents** and **Board Papers**.

This puts the estimated processing cost at £400. However, a number of the files are zipped and so the final data size/processing cost is likely to increase.

Should this data be de-duplicated against the existing document pool (including nearline archived items) or only within itself (or not at all)?

Kind regards

Dan

Dan Cheal

eDiscovery Project Manager

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From: Amy Prime [REDACTED] GRO
Sent: 21 June 2018 09:49
To: Dan Cheal [REDACTED] GRO
Subject: RE: 917090 POL Extraction [WBDUK-AC.FID26896945]

Hi Dan

I don't know what happened with the hard drive (user error probably) but the encryption process didn't speed up and it seemed to want to encrypt itself before any data had been put on it. I will send the hard drive back to you. The documents have instead been uploaded to the FTP.

Please could you process into Relativity the documents in the folders named:

Board Papers (20 June 18 Extraction)

GE Documents (extracted 20 June 2018)

Could the documents please be kept into two separate folders in Relativity, one named Board Papers and the other named GE Papers.

Many thanks

Amy

Amy Prime
Solicitor
Womble Bond Dickinson (UK) LLP

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From: Dan Cheal [<mailto:>] **GRO**
Sent: 20 June 2018 11:43
To: Amy Prime
Subject: RE: 917090 POL Extraction [WBDUK-AC.FID26896945]

Hi Amy

That does seem on the slow side, how much data is being encrypted?

Dan Cheal

eDiscovery Project Manager



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From: Amy Prime **GRO**
Sent: 20 June 2018 11:33
To: Dan Cheal **GRO**
Subject: RE: 917090 POL Extraction [WBDUK-AC.FID26896945]

Hi Dan

The BitLocker Drive Encryption seems to be taking a long time (20 minutes to do 3.4%) – is this normal?

Many thanks

Amy

Amy Prime

Solicitor
Womble Bond Dickinson (UK) LLP

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GRO

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From: Dan Cheal [<mailto:> GRO]
Sent: 20 June 2018 09:13
To: Amy Prime
Subject: RE: 917090 POL Extraction [WBDUK-AC.FID26896945]

Incidentally, the password for the drive you have received is: **BjzwK8gy(Dy!MHe6p0.a**

Dan Cheal

eDiscovery Project Manager

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GRO

GRO



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From: Dan Cheal
Sent: 20 June 2018 09:12
To: 'Amy Prime' [REDACTED] GRO
Cc: ADUK Viking POD Staff [REDACTED] GRO
Subject: RE: 917090 POL Extraction [WBODUK-AC.FID26896945]

Hi Amy

I'll check availability at this end and will get back to you.

Does the custodian have full admin rights/access to the data to be collected?

Dan Cheal

eDiscovery Project Manager



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From: Amy Prime [REDACTED] GRO
Sent: 20 June 2018 09:09
To: Dan Cheal [REDACTED] GRO
Cc: ADUK Viking POD Staff [REDACTED] GRO
Subject: POL Extraction [WBODUK-AC.FID26896945]

Morning Dan

Is it possible to try a remote forensic extraction of the POL documents today? I am meeting with the custodian at 11am and if this doesn't work then we can just drag and drop the documents. No worries if not but thought it might be worth a try.

Many thanks

Amy

Amy Prime

Solicitor

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