

**From:** Charlie Temperley [GRO]  
**To:** Katie Simmonds [GRO]  
**Cc:** Amy Prime [GRO]  
**Subject:** FW: 7 additional bug reports: disclosure [WBDUK-AC.FID123887118]  
**Date:** Tue, 28 May 2019 10:14:46 +0000

**Importance:** Normal

**Attachments:** 7\_additional\_bug\_notes.zip

**Inline-Images:** image16bb6d.PNG; image9f573e.PNG; image8e3c22.PNG; image7f883b.PNG; imaged4a2f6.PNG; imaged76a17.PNG

---

Hi Katie

I have now been through these and added the documents to be disclosed to the tracker.

Kind regards

Charlie

**Charlie Temperley**  
Trainee Solicitor  
Womble Bond Dickinson (UK) LLP

d: [GRO]  
t:  
e:

[Manage your e-alert preferences](#)



womblebonddickinson.com



---

**From:** Katie Simmonds  
**Sent:** 22 May 2019 16:19  
**To:** Charlie Temperley  
**Cc:** Amy Prime  
**Subject:** RE: 7 additional bug reports: disclosure [WBDUK-AC.FID123887118]

Hi Charlie

We have now sent all 7 of the additional bug reports to the Counsel team below. Can I please ask you to:

With the exception of bug 23, check all new documents embedded in the bug reports are on your disclosure tracker

WBD\_000121.000001

In relation to bug 23, this includes the embedded NBSC call logs. I asked separately this afternoon for you to check if these have been disclosed but understand from speaking to Michael that it is unlikely they have been. If this is the case and they haven't been disclosed, do not add these to your tracker as I've asked the Counsel team (email below) if these need to be disclosed.

I hope the above makes sense but call if it would be useful to discuss.

Kind regards

**Katie Simmonds**

Associate  
Womble Bond Dickinson (UK) LLP

d:  
m:  
t:  
e:

**GRO**

[Manage your e-alert preferences](#)



[womblebonddickinson.com](http://womblebonddickinson.com)



---

**From:** Katie Simmonds

**Sent:** 22 May 2019 15:59

**To:** Rebecca Keating <[REDACTED]> 'Simon Henderson'

**Cc:** Jonathan Gribben; Lucy Bremner; Jane Atkinson

**Subject:** 7 additional bug reports [WBDUK-AC.FID123887118]

Rebecca, Simon,

As promised, please find attached copies of the 7 additional bug reports. As discussed yesterday, these have not been reviewed by Andy. I have included our queries regarding disclosure and the addition of documents to the trial bundle in the below table below. In terms of timings for adding documents to the trial bundle, we propose to keep a record of any and add these to the list Tony sends through before trial so that everything can be added in one go, unless you need the trial bundle references sooner.

Kind regards

Katie

Bug	Name	Disclosure/ trial bundle point	Queries for Counsel team
23	Bureau de Change	NBSC call logs relating to PC01297671. [F/318.1] show no record of a call to the helpdesk by the SPM.  2.	Should we disclose the NBSC call log  If so, should the NBSC call log be added to the trial bundle
24	Wrong Branch Customer Change	None	None
25	Lyca Top Up	2 x BIMS (BE.0203284 and BE.0203215) have been disclosed with our letter of 22 May 2019, although not in word format.	Counsel team to confirm if word versions of these 2 BIMS should be added to the trial bundle.
26	TPS250	2 x OCRs (11819 and 11782) have been referred to and disclosed but not uploaded to the trial bundle.	Counsel team to confirm if these should be added to the trial bundle.
27	TPS	None	None
28	Drop and Go	1. There are several new documents that we are in the process of disclosing. We have indicated in the bug note which of these we think would be helpful to add to the trial bundle.  2. There is a document relating to the further/ second fix that we could potentially ask ATOS for. I'm not sure 2. precisely how long it would take to obtain this but my initial view was not to ask for this as doing so will generate further disclosure and potentially draw Freeths' attention to the further instance of the issue and the shortcomings in the original fix.	Counsel team to confirm which documents should be added to the trial bundle.  Counsel team to confirm whether we should ask ATOS for this document
29	Network Banking	1. There are 2 OCRs and 1 Peak (embedded in the bug note) that are disclosed but not in the trial bundle.  2. We are in the process of disclosing the NBSC call logs and Remedies Report (as well as finding out and including information about where the Remedies Report came from – i.e. which database).	1. Counsel team to confirm which documents should be added to the trial bundle.  2. Counsel team to confirm if the NBSC call logs and Remedies Report, once disclosed, these should be added to the trial bundle.