

From: Simon Henderson [GRO]
To: 'Katie Simmonds' [GRO], Rebecca Keating [GRO]
Cc: Jonathan Gribben [GRO], Lucy Bremner [GRO], Jane Atkinson [GRO], "Andrew Parsons" [GRO]
Subject: RE: 7 additional bug reports [WBDUK-AC.FID123887118]
Date: Thu, 23 May 2019 09:00:03 +0000
Importance: Normal
Inline-Images: image001.png; image002.png; image003.png

Dear Katie

Rebecca has looked at the bug scripts and the docs you raise queries on below. We then discussed the docs and the general approach and I set out our thoughts below. Essentially, we think that (i) where a doc has already been disclosed and is relevant to the story of the bug, it should be put in the TB; (ii) we should not be providing further disclosure unless we are under an obligation to do so (adverse doc or should have been previously disclosed etc); and (iii) we should not at this stage be asking 3rd parties for further docs.

I am conscious that some of the docs may not be seen as helpful to PO's case. However, if, as seems to be the case, they are part of the story of that bug, I think it is artificial to omit them

I think the intention is to upload a big batch of docs: these should form part of that batch.

Any questions, do not hesitate to ask or call

Best
Simon

Bug	Name	Disclosure/ trial bundle point	Queries for Counsel team	Response from Counsel
23	Bureau de Change	NBSC call logs relating to PC0129767 [F/318.1] show no record of a call to the helpdesk by the SPM.	<ol style="list-style-type: none"> Should we disclose the NBSC call log If so, should the NBSC call log be added to the trial bundle 	<ol style="list-style-type: none"> No. The NBSC call log does not appear to be adverse to our case; but the point that the SPM did not call is of marginal importance and could have an alternative explanation. N/A.
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.	Yes, add both please.
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.	Yes, add.
27	TPS	None	None	
28	Drop and Go	<ol style="list-style-type: none"> There are several new documents that we are in the process of disclosing. We have indicated in the bug note 	<ol style="list-style-type: none"> Counsel team to confirm which documents should be added to the trial bundle. 	<ol style="list-style-type: none"> Add: Spreadsheet of branch TCs run by Post Office's Core Finance team; NBSC Call Logs confirming

		<p>which of these we think would be helpful to add to the trial bundle.</p> <p>2. There is a document relating to the further/ second fix that we could potentially ask ATOS for. I'm not sure 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.</p>	<p>2. Counsel team to confirm whether we should ask ATOS for this document</p>	<p>SPM reported the issue on 20 June 2017 and Test report issued by ATOS during resolution of Drop and Go issue.</p> <p>2. Do not ask for this additional document.</p>
29	Network Banking	<p>1. There are 2 OCRs and 1 Peak (embedded in the bug note) that are disclosed but not in the trial bundle.</p> <p>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).</p>	<p>1. Counsel team to confirm which documents should be added to the trial bundle.</p> <p>2. Counsel team to confirm if the NBSC call logs and Remedies Report, once disclosed, these should be added to the trial bundle.</p>	<p>1. Add</p> <p>2. Given this is being disclosed, add to TB</p>

From: Katie Simmonds [mailto:[GRO](#)]
Sent: 22 May 2019 15:59
To: Rebecca Keating [[GRO](#)]; Simon Henderson [[GRO](#)]
Cc: Jonathan Gribben [[GRO](#)]; Lucy Bremner [[GRO](#)]; Jane Atkinson [[GRO](#)]
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

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23	Bureau de Change	NBSC call logs relating to PC0129767 [F/318.1] show no record of a call to the helpdesk by the SPM.	<p>1. Should we disclose the NBSC call log</p> <p>2. If so, should the NBSC call log be added to the trial bundle</p>
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	Counsel team to confirm if word versions of these 2 BIMS should be

		May 2019, although not in word format.	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	<ol style="list-style-type: none"> 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 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. 	<ol style="list-style-type: none"> 1. Counsel team to confirm which documents should be added to the trial bundle. 2. Counsel team to confirm whether we should ask ATOS for this document
29	Network Banking	<ol style="list-style-type: none"> 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). 	<ol style="list-style-type: none"> 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.

Katie Simmonds

Associate

Womble Bond Dickinson (UK) LLP

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Simon Henderson
4 Pump Court, Temple, London, EC4Y 7AN | www.4pumpcourt.com

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