

**From:** Prime, Amy [GRO]  
**Sent:** Wed 27/07/2016 1:44:52 PM (UTC)  
**To:** Michael.Harvey [GRO]  
**Cc:** Rodric Williams [GRO], Rob Houghton [GRO], Parsons, Andrew [GRO]  
**Subject:** RE: Horizon Group Litigation Update - Subject to Privilege [BD-4A.FID26859284]  
**Attachment:** \_DOC\_33442637(2)\_DRAFT Remote Access Rider.DOCX

Hi Mike

By way of introduction, I am assisting Andy Parsons with the Horizon matter.

Further to the below, please find attached a revised version of the relevant extracts from our draft Letter of Response (amendments are in tracked changes to section 1.3.4).

Kind regards

Amy

**Amy Prime**  
Trainee Solicitor  
Bond Dickinson LLP

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**From:** Parsons, Andrew  
**Sent:** 27 July 2016 11:17  
**To:** Michael.Harvey [GRO]  
**Cc:** Rodric Williams; Rob Houghton [GRO], Prime, Amy  
**Subject:** RE: Horizon Group Litigation Update - Subject to Privilege [BD-4A.FID26859284]

Mike

We have a hard deadline (set by Court rules) of sending our Letter to the other side in the litigation by 4pm tomorrow. Any changes to the letter need approval by POL and so we need FJ's input by close today at the absolute latest.

I'm around all day so please call whenever good for you.  
Kind regards  
Andy

**Andrew Parsons**  
Partner

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**From:** Michael.Harvey **GRO**  
**Sent:** 27 July 2016 11:12  
**To:** Parsons, Andrew  
**Cc:** Rodric Williams; Rob Houghton **GRO**  
**Subject:** RE: Horizon Group Litigation Update - Subject to Privilege [BD-4A.FID26859284]

Andy,

Apologies for the delay, unfortunately with holidays and a number of other things happening at once this one has proven to be a struggle to get the right people to review in a timely manner. I will call you this afternoon after I have a call with the team to get an update. We will provide you some interim views but our legal team have asked to get involved given some of the inferences made in the document about Fujitsu and so please let me know what the absolute deadline is and why this is key.

The primary issue we have at the moment is that we don't believe the key element regarding the sanctity of the Core Audit Process comes through in your proposed response and this remains the cornerstone of our inputs to date and the presentations we've done on this point in the past to Post Office and Bond Dickinson. To say that Post Office has never said the system is "error free" whilst correct fails to make the point that the system is built on the expectation that the overarching system could have errors over time but the Core Audit Process captures every submitted "basket" accurately and without error and cannot subsequently be changed but only added to (all such additions include details as to what created the addition etc. to create a full audit log). Numerous audits have proved this and it is the Core Audit Process that forms the basis of the first level of analysis with respect to any suspect fraud or loss and hence why we believe that Horizon is robust.

Kind regards,

Mike

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**From:** Parsons, Andrew [mailto:] **GRO**  
**Sent:** 26 July 2016 18:48  
**To:** Harvey, Michael **GRO**  
**Cc:** Rodric Williams **GRO**; Rob Houghton **GRO**  
**GRO**

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**Subject:** RE: Horizon Group Litigation Update - Subject to Privilege [BD-4A.FID26859284]

Mike

I think Rod tried to call you re the below and I left you a message earlier today. Have you got an ETA for your comments? It's now extremely urgent.

If you could give me a call with an update that would be appreciated.

Kind regards

Andy

**Andrew Parsons**

Partner

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**GRO**

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**From:** Michael Harvey [mailto:**GRO**]

**Sent:** 22 July 2016 09:07

**To:** Parsons, Andrew

**Cc:** Rodric Williams

**Subject:** RE: Horizon Group Litigation Update - Subject to Privilege [BD-4A.FID26859284]

Andrew,

Apologies for the delay in responding. I have forwarded the previous document to the relevant team members and I will do the same without the document you attached to the below email. I will catch up with the team to understand progress but we will not be responding today on either document. We will respond as soon as we can once we have had chance to consolidate the responses and review them with our legal team.

Kind regards,

Mike

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**From:** Parsons, Andrew [mailto:**GRO**]

**Sent:** 21 July 2016 19:55

**To:** Harvey, Michael <**GRO**>

**Cc:** Rodric Williams **GRO**

**Subject:** RE: Horizon Group Litigation Update - Subject to Privilege [BD-4A.FID26859284]

Mike

I should be grateful if you could confirm that the review below is underway and that you're on course for a response by tomorrow.

Please could you also review the attached very short document, which addresses a very specific point around Post Office's / Fujitsu's capability to change branch data (this overlaps with Deloitte's work).

Apologies for the short notice but please could you again come back with any comments by close tomorrow.

Kind regards  
Andy

**Andrew Parsons**

Partner

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**From:** Parsons, Andrew

**Sent:** 19 July 2016 17:52

**To:** 'Michael.Harvey'; **GRO**

**Cc:** 'Rodric Williams'

**Subject:** RE: Horizon Group Litigation Update - Subject to Privilege [BD-4A.FID26859284]

Mike

Further to below, please find attached relevant extracts in relation to Horizon from our draft Letter of Response.

I should be grateful if you (or someone suitably placed at Fujitsu) could review the attached and flag / amend any points that you consider to be incorrect. If possible, please could you provide your feedback by the end of this week. Amendments by way of track changes would be perfect.

I've also attached relevant extracts from the Letter of Claim for context (no need to comment on these but feel free to do so if appropriate).

Please keep circulation of our draft Letter within Fujitsu to the absolute minimum necessary to undertake the above task. This document has been prepared for litigation purposes and should it be circulated for any other purpose within Fujitsu, then legal privilege over the document may be lost.

Any questions, please do not hesitate to call.

Kind regards  
Andy

**Andrew Parsons**

Partner

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**From:** Rodric Williams [mailto: [REDACTED] GRO]  
**Sent:** 18 July 2016 18:06  
**To:** 'Michael.Harvey' [REDACTED] GRO  
**Cc:** Parsons, Andrew  
**Subject:** RE: Horizon Group Litigation Update - Subject to Privilege

Mike – thanks for calling me back.

Andy Parsons (cc'ed) is the partner at Bond Dickinson leading our defence of the Group Litigation. The Bond Dickinson team has been preparing a substantive response to the long Letter of Claim received from the claimants' solicitors Freeths, and I have asked Andy to contact you directly to get Fujitsu's input on the sections of the response which concern the services Fujitsu supplies to Post Office.

Andy – can you please drop Mike a line or give him a call [REDACTED] GRO to get this moving.

With thanks for your continued cooperation, Rodric

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**From:** Rodric Williams  
**Sent:** 18 July 2016 14:28  
**To:** 'Michael.Harvey' [REDACTED] GRO  
**Subject:** RE: Horizon Group Litigation Update - Subject to Privilege

Mike – I hope this finds you well.

I've just left a fairly long voicemail with you (apologies!), but I'd be grateful if you could please give me a call when you get a moment so I can give you an update on where we have got to in the Group Litigation, our next steps, and the input we'd like from Fujitsu to help us advance our position.

The best number is my mobile – [REDACTED] GRO

With thanks and kind regards, Rodric

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**From:** Rodric Williams  
**Sent:** 15 April 2016 19:00  
**To:** 'Michael.Harvey' [REDACTED] GRO  
**Subject:** Horizon Group Litigation Update - Subject to Privilege

Mike,

Just to let you know that earlier this week we received a letter from Freeths LLP (a firm of solicitors) advising that on 11 April 2016 they issued a Claim Form against Post Office in the High Court on behalf of some 91 claimants. They have not as yet served the Claim Form or any Particulars of Claim on us, and did not send a Pre-Action Letter of Claim before issuing, so we remain unsighted on the basis of the claim or who has brought it.

So we're not really that much further forward, although Freeths did say they intend to send us a Letter of Claim by 26 April 2016 (which I'm sure you'll appreciate is rather putting the horse after the cart...).



Apologies for not being in touch sooner – I had intended to give you the courtesy of a call much sooner, but unfortunately kept running out of time. I am in the office all week next week so will try to give you a call then (one of the things we will need to discuss is document preservation), but please feel free give me a call any time.

Kind regards, Rodric



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