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**From:** Andy Garner [GRO]  
**Sent:** Thur 28/07/2016 5:02:42 PM (UTC)  
**To:** Porter, Tom [GRO]; Babu Palathoti [GRO]; Parsons, Andrew [GRO]; Mark Underwood1 [GRO]; Shirley Hailstones [GRO]; David Hargreaves [GRO]  
**Subject:** RE: URGENT - Horizon Dispute - document location exercise - confidential and legally privileged [BD-4A.FID26859284]

Hi Tom

Tried phoning this afternoon. I am now on leave however David Hargreaves copied in will support in my absence. Is there anything you specifically need, I am back 8th August.

Thanks  
Andrew Garner  
Head of IT Service  
Network & Financial Services  
[GRO]

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**From:** Porter, Tom  
**Sent:** 28/07/2016 08:43  
**To:** Andy Garner; Babu Palathoti; Parsons, Andrew; Mark Underwood1; Shirley Hailstones  
**Subject:** RE: URGENT - Horizon Dispute - document location exercise - confidential and legally privileged [BD-4A.FID26859284]

Hi Andy.

This has moved on in the last week.

I left you a voicemail yesterday but it sounds like you didn't get it.

I'll try to call again this morning.

Tom

Tom Porter  
Associate  
Bond Dickinson LLP  
Direct: [GRO]  
Mobile: [GRO]

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**From:** Andy Garner  
**Sent:** 28/07/2016 08:16  
**To:** Andy Garner; Babu Palathoti; Parsons, Andrew; Mark Underwood1; Porter, Tom; Shirley Hailstones  
**Subject:** RE: URGENT - Horizon Dispute - document location exercise - confidential and legally privileged [BD-4A.FID26859284]

Andrew, Mark, Tom

Please can you advise asap on my call out below ? Can we go to Fujitsu for some of the documentation ?

Thanks  
Andrew Garner  
Head of IT Service  
Network & Financial Services

GRO

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**From:** [Andy Garner](#)  
**Sent:** 27/07/2016 08:22  
**To:** [Babu Palathoti](#); [andrew.parsons](#); GRO; [Mark Underwood1](#); [tom.porter](#); GRO; [Shirley Hailstones](#)  
**Subject:** FW: URGENT - Horizon Dispute - document location exercise - confidential and legally privileged [BD-4A.FID26859284]

Andrew

My sincerest apologies, for some reason I did not receive Tom or your emails ! Let me attempt to recover the delay asap. With regards to the software upgrades/architecture documents and error logs requirements, these may be with Atos however most likely Fujitsu being their internal records/MI. Is it appropriate I request these from Fujitsu ? Not sure what with the sensitive nature.

Babu - Please can you confirm you are available today to attempt to source the practices /policy and Operations Manual documents ?

Thanks  
Andrew Garner  
Head of IT Service  
Network & Financial Services

GRO

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**From:** [Andy Garner](#)  
**Sent:** 26/07/2016 21:45  
**To:** [Andy Garner](#)  
**Subject:** FW: URGENT - Horizon Dispute - document location exercise - confidential and legally privileged [BD-4A.FID26859284]

Andrew Garner  
Head of IT Service  
Network & Financial Services

GRO

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**From:** [Rob Houghton](#)  
**Sent:** 26/07/2016 09:45  
**To:** [Andy Garner](#); [Sharon Gilkes](#)  
**Subject:** FW: URGENT - Horizon Dispute - document location exercise - confidential and legally privileged [BD-4A.FID26859284]

Nudge - can you help with this?

R

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**From:** Parsons, Andrew [GRO]  
**Sent:** 26 July 2016 09:32  
**To:** Rob Houghton  
**Cc:** Porter, Tom; Mark Underwood1  
**Subject:** URGENT - Horizon Dispute - document location exercise - confidential and legally privileged [BD-4A.FID26859284]

Rob

FYI below. We've been chasing Andy Garner (who I think is in your team) for information on the Horizon Operations Manual. We've not had a reply and this is now urgent. Please could you give Andy a nudge or let us know if there is someone else who might be able to help with this.

Thanks  
Andy

**Andrew Parsons**  
Partner

*Bond Dickinson*

Direct: [GRO]  
Mobile: [GRO]

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**From:** Parsons, Andrew  
**Sent:** 19 July 2016 17:05  
**To:** 'andy.garner' [GRO]  
**Cc:** Porter, Tom; Mark Underwood1 [GRO]  
**Subject:** URGENT - Horizon Dispute - document location exercise - confidential and legally privileged [BD-4A.FID26859284]  
**Importance:** High

Andy

Apologies for chasing but please can you respond to the below as a matter of urgency. We need an answer by cob tomorrow at the latest in order to meet a litigation deadline. Any questions, please feel free to call me or Tom.

Kind regards  
Andy

**Andrew Parsons**  
Partner

*Bond Dickinson*

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**From:** Porter, Tom  
**Sent:** 15 July 2016 09:44  
**To:** andy.garner [REDACTED] GRO  
**Cc:** Mark Underwood1 [REDACTED] GRO  
**Subject:** FW: Horizon Dispute - document location exercise - confidential and legally privileged [BD-4A.FID26859284]  
**Importance:** High

Good morning Andy

I just wanted to send you an email to make sure you got the below, and to check that everything is in order.

We are sending the wider points for approval to Legal today – but I suspect we will need to send this to follow.

I look forward to hearing from you.

Tom

**Tom Porter**  
Associate

*Bond Dickinson*

Direct: [REDACTED]  
Mobile: [REDACTED]  
Office: [REDACTED] **GRO**

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**From:** Porter, Tom  
**Sent:** 04 July 2016 11:28  
**To:** 'andy.garner' [REDACTED] GRO  
**Cc:** Mark Underwood1 [REDACTED] GRO  
**Subject:** Horizon Dispute - document location exercise - confidential and legally privileged [BD-4A.FID26859284]  
**Importance:** High

Good morning Andy

I have been given your contact details by Shirley Hailstones.

Shirley thought that you might be best placed to help us locate certain documents that we have been asked to disclose in the Horizon dispute.

We will be taking a view on what to disclose, but as a first step we also need to work out what we have and where. I

include a small table of documents below, and I would be grateful for any guidance/assistance you can provide for each.

It may also be useful to have a quick call so I can give you some background to this, and to give us a chance to talk through the requests. Would you be free for a chat today?

We have an ongoing central dialog with Fujitsu relating to the dispute – if we need to ask Fujitsu for any of these documents please could you list the documents for us to request (rather than requesting them yourself)?

No.	Document sought by the other side	Comment / request
1	Documents containing non-contractual understandings, practices, policies etc relating to Post Office's relationship with Fujitsu and Fujitsu's performance (Horizon specific)	We consider that this request is too wide. However, please could you let us know if you have a single location where you store information of this type (that would be easily accessible)?
2	Operations manuals for Horizon – 1999 to present	<p>We suspect that it will not be possible to go all the way back to 1999 but we would like to provide the latest versions as a minimum.</p> <p>Please could you let us know how far Post Offices records go back on this point, and whether you have access to these documents?</p> <p>Alternatively, Shirley thought Jonathon Knox may be able to assist with this point also.</p>
3	Schedule of Horizon updates, modifications and software versions since 1999 (including details of what the updates fixed)	We do not anticipate that this documents exists, but is there any document showing the various revisions to Horizon and setting out dates for the same?
4	Schedule of the software architecture since 1999	We do not know precisely what they are looking for here. We therefore intend to reject the request on this basis but, before doing so, I wanted to make sure that you agreed. Are you aware of any such schedule?
5	The "known error log" kept by Fujitsu and any correspondence relating to the same	We are not aware of this document (or whether it exists). Do you know of a "known error log" and, if so are you able to provide us with a copy?

Mark Underwood is assisting with a similar exercise for different documents. I have copied Mark to this email on the off-chance that he finds any of the above documents whilst carrying out his own searches.

I look forward to hearing from you.

Kind regards

Tom

Tom Porter  
Associate

Bond Dickinson

Direct: GRO  
Mobile:  
Office:

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