womblebonddickinson.com



18 February 2019

Freeths LLP 100 Wellington Street Leeds West Yorkshire LS1 4LT

By email only

Email: james.hartley( GRO

Dear Sirs

The Post Office Group Litigation Disclosure – Peaks and KELs

Womble Bond Dickinson (UK) LLP

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Our ref: AP6/AP6/364065.1369 Your ref:

In Mr Coyne's Supplemental Expert Report he makes reference to a number of Peaks and KELs which he says have not yet been disclosed. Fujitsu have undertaken a review of these Peaks and KELS to confirm whether they still hold copies of them outside the Peak and KEL databases.

## **Peaks**

Peak Reference	Response
PC0021327	Fujitsu has not been able to locate a copy of this Peak.
PC0032801	Fujitsu has been able to extract data in relation to this Peak from an archive system but it has not been possible to preserve the formatting or guarantee that the Peak contains all of the original information. We enclose an extract of this data as an Excel spreadsheet.
PC0038631	Fujitsu has been able to extract data in relation to this Peak from an archive system but it has not been possible to preserve the formatting or guarantee that the Peak contains all of the original information. We enclose an extract of this data as an Excel spreadsheet.
PC0044101	Fujitsu has been able to extract data in relation to this Peak from an archive system but it has not been possible to preserve the formatting or guarantee that the Peak contains all of the original information. We enclose an extract of this data as an Excel spreadsheet.
PC006863	This is not a valid Peak reference. Fujitsu think that the intended reference should be PC0006863.
	Fujitsu has been able to extract data in relation to this Peak from an archive system but it has not been possible to preserve the formatting or guarantee that the Peak contains all of the original information. We enclose an extract of this

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Peak Reference	Response
	data as an Excel spreadsheet.
PC0069918	Fujitsu has not been able to locate a copy of this Peak.
PC014479	This is not a valid Peak reference. Fujitsu thinks the intended reference should be PC0014479.
	Fujitsu has been able to extract data in relation to this Peak from an archive system but it has not been possible to preserve the formatting or guarantee that the Peak contains all of the original information. We therefore enclose an extract of this data as an Excel spreadsheet.

A formal disclosure list containing these documents will follow shortly.

## **KELs**

KEL Reference	Response
MWright531p	Fujitsu's investigation shows that this is a deleted KEL that cannot be retrieved. It appears to date from 2000.
AChambers4410R	Fujitsu's investigation shows that this is a deleted KEL that cannot be retrieved. It appears to date from 2000.
RColeman2110J	Fujitsu's investigation shows that this is a deleted KEL that cannot be retrieved. It appears to date from 2000.
DRowe304L	Fujitsu's investigation shows that this is a deleted KEL that cannot be retrieved. It appears to date from 2000.
PSteed34T	Fujitsu's investigation shows that this is a deleted KEL that cannot be retrieved. It appears to date from 2000.

In our letter of 17 January 2019 we provided disclosure of the "Deleted KELs" referred to in Mr Parker's statement. The above KELs are thought to be KELs that have been irretrievably deleted, a long time ago, from the Known Error Log.

Yours faithfully

Womble Bond Dickinson (UK) LLP

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