From: Lenton, Matthew[/o=Fujitsu Exchange Organization/ou=Exchange Administrative Group

(FYDIBOHF23SPDLT)/cn=Recipients/cn=87f95ed0a28548a8bd569f2cb6f]

Sent: Mon 07/10/2019 12:51:54 PM (UTC)

To: 'Andrew Parsons'[GRO]; Parker, Steve[GRO

Cc: Newsome, Pete GRO ; Amy Prime GRO]

Jonathan Gribben[GRO

Subject: RE: KELs - query [WBDUK-AC.FID26896945]

Andrew,

The zip "**KELVersions**" is now in Hi Q, in the folder "Fujitsu – KELS". Do not confuse it with the zip "KELComplete" which was uploaded in March 2018.

14,365 KEL versions have been extracted with Status as follows (see reminder of KEL lifecycle below)

Authorised	6489
Deactivated	1721
Deprecated	6155

Total files in the extract: 14,331 files. This is reduced because the duplicated data is not included (see anomalies below)

Anomalies

Latest version status

As a reminder the KEL lifecycle is:

KEL Status	Explanation
Authorised	The current version authorised for usage by the support teams
Deprecated	A previous version (that has been updated)
Deactivated	Version that has been identified as no longer relevant

On the basis of the KEL lifecycle, you would expect to see the last version of a KEL in this extract to show a status of Authorised or Deactivated and all previous versions as Deprecated. Unfortunately this is not the case because the KEL status is not held with each version of the KEL. It is just held as a property of the KEL as an entity. Hence, you may see the last version of some KELs in this extract as status Deprecated, this is due to there being a new version created after the 13-Dec-2018 cut off. There are 314 of these.

KELs without a complete version history

There are 1036 KELs without a complete history. Migrated KELs (when we moved from HORIZON Legacy to HORIZON Online, HNG-X) did not transfer the version history. We only kept the current version of the KEL during the migration.

Some KELs (both Horizon and HNG-X) do not have a full history. We believe this is due to a housekeeping procedure that was run for an indeterminate time which deleted KEL versions for KELs which had more than 3 versions on the database.

Duplicates

There are 34 duplicates in the old Horizon KELs. These are a likely to be due to a defect in the KEL system. Since they represent duplicated data we have not investigated the anomaly further.

represent duplicated	data we h
KEL Reference	Version
AChambers5218Q	3
AChambers5218Q	3
BSheldon1119J	1
GCritchley2615I	3
MCroshaw5423K	3
MHall5726K	1
RColeman1755P	4
RKing289P	11
RKing3454R	5
RKing3839D	3
RKing4029C	7
RKing4447P	4
RKing4515P	5
RKing5424N	1
L	

RKing5455N	4
RKing5617Q	3
RKing5617Q	3
RKing5617Q	3
RKing5650Q	3
RKing5650Q	3
VargheseK1157V	2
vincentn304Q	2
wbra1245N	24
wbra1245N	24
wbra1245N	24
WBragg2639Q	1

The volume of files in the extract is reduced because the duplicated data is not included. So a total of 14,331 files have been created.

Matthew Lenton Document Manager

Post Office Account

Fujitsu

Lovelace Road, Bracknell, Berkshire, RG12 8SN Phone GRO
Email: GRO
Web: https://www.fujitsu.com/global/

From: Andrew Parsons	GRO	>			
Sent: Friday, October 4, 2					
To: Parker, Steve √	GRO	}			
Cc: Newsome, Pete <	GRO	n>; Lent	on, Matthew	GRO	>; Amy
Prime < GRO	; Jonath	an Gribben [GRO	Þ	
Subject: RE: KELs - guerv	[WBDUK-AC.FID2	68969451			

Steve

Thanks. Please can Fujitsu extract all KELs (of all types and all versions) that existed as at 13 December 2018. This will result in extracting again KELs already extracted (which is fine because we can de-dupe at our end) and all past versions. We do not want to extract any new KEL created, or any version of a KEL created, after the above date.

We believe that 13 December 2018 was the date the extraction was last run. Please can you confirm this is correct before proceeding.

It is really important that this extraction is done accurately because it is likely to be subject to close scrutiny by the

Claimants / Court. If you are at all unclear as to the scope of what is required, please contact us. Please also flag any issues that may cause the extraction to miss or over capture KELs.

Kind regards Andy

Andrew Parsons

Partner

Womble Bond Dickinson (UK) LLP



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womblebonddickinson.com



From: ParkerSP		GRO		}
Sent: 04 October 2019 3	14:18			
To: Andrew Parsons 🔄		GRO	>	
Cc: pete.newsome	GRO	; <u>Matthew</u>	.Lenton	GRO
Subject: RE: KELs - quer	v [WBDU	K-AC.FID268	96945]	

Andy,

Further to our discussion over the phone. I can confirm that we do hold a revision date for the KEL versions so the extract can be filtered to a point in time.

Regards

Steve

Steve Parker Head of Post Office Application Support Digital Technology Services

Fujitsu

Lovelace Road, Bracknell, Berkshire. RG12 8SN Tel: GRO

From: Parker, Steve				
Sent: Friday, October 4, 2				·
To: 'Andrew Parsons' ﴿	GRO	⇒; Lenton, Matthew <	GRO)Þ; Amy
Prime GRO	}; Lucy B	··	<u>}</u>	
Cc: Newsome, Pete <u></u>	GRO	>; Jonathan Gribben ﴿	GRO	> ;
Godeseth, Torstein <	GRO	j>		
Subject: RE: KELs - query	[WBDUK-AC.FID2	26896945]		
		ve got in the FJ — POL commercial ernal approval to complete the wo		
the extract.	it, i now nave inte	errial approval to complete the wo	ork regardless, onc	e WDD ask us to start
was Friday! In mitigation	, this is just my se	w, we'd have the information to y econd day back from leave. That s to you lunchtime the following w	tatement should h	
Regards				
Steve				
From: Andrew Parsons <	GRO)		
Sent: Friday, October 4, 2	.019 12:09 PM			
To: Parker, Steve <	GRO	>; Lenton, Matthew <	GRO	; Amy Prime
< GRO	>; Lucy Bremne	r ⊲ GRO >		
Cc: Newsome, Pete 🗧	GRO	>; Jonathan Gribben ∢	GRO	>;
Godeseth, Torstein <	GRO	>		
Subject: RE: KELs - query	[WBDUK-AC.FID2	26896945]		
Steve – to be clear, pleas ahead from WBD. Thanks Andy	se do not start the	extract (even when you have fina	ancial clearance) u	intil you get the go
Andrew Parsons Partner				

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From: Andrew Parsons Sent: 04 October 2019 :	11.31					
		tthou Lonton	GRO	Amy Drima	GRO	
	RO	tthew.Lenton	GRU	Amy Prime	GRO	j>; Lucy
			-:	CDO		
Cc: pete.newsome	GRO	Jonathan G	ribben 4	GRO	;	
Torstein.O.Godeseth	GRO		0.453			
Subject: RE: KELs - quer	y [WBDUK	-AC.FID26896	945]			
Steve						
Thanks. Where has the from the Post Office en		clearance got	to? Is it with Po	st Office? If so w	/ho? I can the	n try to move it forwa
Kind regards Andy						
From: ParkerSP		GRO	}			
Sent: 04 October 2019 :	10:55					
To: Andrew Parsons		GRO	>; Matthew	.Lenton GR	O; Amy	Prime
GRO	; Lucy	Bremner 🚛	GRO	>		
Cc: pete.newsome	GRO	; Jonathan G	ribben ⊲	GRO		
Torstein.O.Godeseth	GRO	m.V	L			
Subject: RE: KELs - quer		<u>.</u> -AC.FID26896	945]			
Andy, Apologies for the TLA, y	ves 1 MD =	one man dav	Given clearanc	e now we'd have	e the informat	ion to you tomorrow
lunchtime.	,	, , , , , , , , , , , , , , , , , , ,				
Regards						
Steve						
Steve Parker Head of Post Office Application Digital Technology Services	n Support					
Steve Parker Head of Post Office Application		8SN				
Steve Parker Head of Post Office Applicatio Digital Technology Services Fujitsu Lovelace Road, Bracknell, Berl Tel: GRO Mobile: GRO Web: http://uk.fujitsu.com	kshire. RG12					
Steve Parker Head of Post Office Application Digital Technology Services Fujitsu Lovelace Road, Bracknell, Berl Tel: GRO Mobile: GRO E-mail: GRO Web: http://uk.fujitsu.com	kshire. RG12	GRO	>			
Steve Parker Head of Post Office Application Digital Technology Services Fujitsu Lovelace Road, Bracknell, Berl Tel: GRO GRO Mobile: GRO Web: http://uk.fujitsu.com From: Andrew Parsons Sent: Friday, October 4,	kshire. RG12	GRO 2 AM	onton Matthew		2PO	Amy Drive o
Steve Parker Head of Post Office Application Digital Technology Services Fujitsu Lovelace Road, Bracknell, Berl Tel: GRO Mobile: GRO Web: http://uk.fujitsu.com From: Andrew Parsons Sent: Friday, October 4, To: Parker, Steve	kshire. RG12	GRO 2 AM >; L	enton, Matthew	<	GRO	>; Amy Prime
Steve Parker Head of Post Office Application Digital Technology Services Fujitsu Lovelace Road, Bracknell, Berl Tel: GRO Mobile: GRO Web: http://uk.fujitsu.com From: Andrew Parsons Sent: Friday, October 4, To: Parker, Steve GRO	kshire. RG12	GRO 2 AM >; L Bremner <[GRO	<u> </u>		>; Amy Prime
Steve Parker Head of Post Office Application Digital Technology Services Fujitsu Lovelace Road, Bracknell, Berl Tel: GRO Mobile: GRO Web: http://uk.fujitsu.com From: Andrew Parsons Sent: Friday, October 4, To: Parker, Steve	kshire. RG12	GRO 2 AM >; L	GRO	· < > . Gribben <	GRO GRO	>; Amy Prime

Steve

Thanks. To be clear - does 1 MD mean one man day? If so, if you got financial clearance today, when would the documents be passed to us?

Kind regards Andy

Andrew Parsons

Partner Womble Bond Dickinson (UK) LLP



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From: ParkerSP		GRO	>				
Sent: 04 October 2019	10:30						
To: Andrew Parsons		GRO	>; <u>Matthew</u>	.Lenton	GRO	Amy Prime	
GRO	>; Luc	y Bremner <	GRO	>			
Cc: pete.newsome	GRO	Jonathan Gribb	en <[GRO		> ;	
Torstein.O.Godeseth	GRO]					
Subject: RE: KELs - quer	ry [WBDU	K-AC.FID26896945]				

Andy,

Apologies, I didn't realise that Matthew was on leave today.

While I still don't have the internal confirmation of funding to do this activity I can say that the elapsed time to produce the data for you would be 1 MD. Is that enough information for now?

Steve

Steve Parker Head of Post Office Application Support Digital Technology Services

Fujitsu

Lovelace Road, Bracknell, Berkshire. RG12 8SN

Tel: GRO

Mobile: GRO

E-mail: GRO

Web: http://uk.fujitsu.com

From: Andrew Parsons <	GRO	}		
Sent: Friday, October 4, 20	019 8:12 AM			
To: Lenton, Matthew <	GRO	>; Amy Prime ₹	GRO	; Lucy Bremner
€ GRO				
Cc: Newsome, Pete <	GRO	>; Jonathan Gribben <	GRO	> ;
Godeseth, Torstein 🗧	GRO	>; Parker, Steve <	GRO	>
Subject: RE: KELs - query [WBDUK-AC.FID26896	945]		

Matthew

Please can you confirm as a matter of urgency (this morning) how long you believe it will take to extract the KELs? We are expecting questions from the Claimants / the Court about this and need to be prepared to answer them immediately.

Thank you Andy

Andrew Parsons

Partner

Womble Bond Dickinson (UK) LLP



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From: Matthew.Lentor	1	GRO	· ·	
Sent: 03 October 2019	15:22			
To: Amy Prime	GRO	>; Lucy Bremner <	GRO	······································
Cc: pete.newsome	GRO	; Andrew Parsons <	GRO	>; Jonathan Gribben
₫ GRO		>; Torstein.O.Godeseth	GRO ; ParkerSF	GRO
Subject: RE: KELs - que	rv (WBDL	JK-AC.FID268969451		

Amy,

We are just awaiting internal confirmation of funding before starting this activity.

Matthew Lenton Document Manager Post Office Account

Fujitsu Lovelace Road, Bracknell, Berkshire, RG12 Phone Email: Web: https://www.fujitsu.com/global/	8SN			
From: Amy Prime <	iRO			
Sent: Wednesday, October 2, 20)19 6:16 PM			
Sent: Wednesday, October 2, 20 To: Lenton, Matthew < Cc: Newsome, Pete € Gribben ◆ GRO GRO	GRO	>; Lucy Bremner <	GRO	<u> </u>
Cc: Newsome, Pete	GRO	>; Andrew Parsons <	GRO	>; Jonathan
Gribben ⊲ GRO	>; Gode	seth, Torstein ∢	GRO	; Parker, Steve
GRO Subject: RE: KELs - query [WBDU				
Matthew				
Further to the below and our dis deprecated KELS as HTML files producing this script, but <u>not</u> rur	it would be neces	sary to produce a new script	t. Please could Fujit	
If you could let me know and ET	A for this script be	eing ready it would be much	appreciated.	
Many thanks Amy				
Amy Prime Associate Womble Bond Dickinson (UK) L	LP			
d: m: t: e: GRO				
Sign up for legal updates, e-newsle	tters and event invit	<u>ations</u>		
		womblebone	ddickinson.com	
WOMBLE BOND DICKINSO	PΝ	wombleson.) in	
From: Matthew.Lenton Sent: 01 October 2019 10:15	GF	RO >		
	GRO			
Cc: pete.newsome GRO		amy.primei GRO ; /	Andrew Parsons < <u>an</u>	drew.parsons GRO
GRO >; Jonathan Gribben ∢	GRO	p>; <u>Torstein.O.Go</u>	deseth GRO	
ParkerSP GRO GRO GRO GROSUBJECT: RE: KELs - query [WBDU	JK-AC.FID2703249	77]		

Lucy,

This part: "[t]he KEL only contains the current database entries" – I'm not completely clear what that is intended to mean, but it may be clarified by the following:

This is correct: "is constantly updated and so the current version will not necessarily reflect the version that was in place at the relevant time"

The second sentence is not correct: "The previous entries / versions of the current entries are no longer available". You may recall that there are three status categories of KEL: current, deprecated and deleted. For those that are current or deprecated, they have been updated in such a way that previous content is not permanently overwritten, but instead a new version is created, with the previous versions being retained and accessible. For those that have been deleted, only the last version at the point of deletion has been retained.

Matthew Lenton

Document Manager Post Office Account

Fujitsu

Lovelace Road, Bracknell, Berkshire, RG12 8SN Phone:

GRO

Web: https://www.fujitsu.com/global/

From: Lucy Bremner <	GRO	>		
Sent: Monday, Septembe	er 30, 2019 6:37 PM			
To: Lenton, Matthew <	GRO	<u> </u>		
Cc: Newsome, Pete	GRO	j>; Amy Prime <	GRO	; Andrew Parsons
<ଥ୍ GRO)>; Jonathan Gribbe	n ⊲ GRO	<u> </u>	
Subject: KELs - query [W	BDUK-AC.FID27032497]	·		

Matthew,

Post Office is seeking to quote from its Electronic Documents Questionnaire submitted back in 2017. It is seeking to rely on the following quote in relation to KELs:

"[t]he KEL only contains the current database entries and is constantly updated and so the current version will not necessarily reflect the version that was in place at the relevant time. The previous entries / versions of the current entries are no longer available".

Can you confirm that this is definitely the correct position (i.e. that previous entries are no longer available)? We need to respond to Freeths by 10am tomorrow, so confirmation ASAP would be appreciated.

Kind regards,

Lucy

Lucy Bremner

Associate

Womble Bond Dickinson (UK) LLP



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