

From: robert worden <GRO>
To: 'Jason Coyne' <GRO>, "James.Hartley" <GRO>
<GRO>
Cc: Andrew Parsons <GRO>
Subject: FW: Post Office Group Litigation - Expert Report
Date: Wed, 22 May 2019 14:28:02 +0000
Importance: Normal
Attachments: RW3_Appendix_A.1_-_OCP_Claimants_v04.xlsx; RW3_Appendix_A.2_-_MSC_Claimants_v03.xlsx; RW3_Appendix_B_-_Peak_Claimants_v06.xlsx; Third_Report_Open.pdf

I have been asked to forward this to you.

With Best wishes

Robert Worden

From: robert worden <GRO>
Sent: Wednesday, May 22, 2019 3:25 PM
To: 'angela.fraser' <GRO> <GRO>
Cc: 'Andrew Parsons' <GRO>
Subject: Post Office Group Litigation - Expert Report

Dear Ms Fraser -

Please could you pass this on, with its attachments, to the Managing Judge in the Post Office Group Litigation? Thank you.

To Mr Justice Fraser - Concerning the Post Office Group Litigation

Dear Judge,

As was explained by Mr De Garr Robinson in court on 11 April, I have made some further analyses of Horizon Issues 1, 12, and 13. This work was done at my own instigation, and was not prompted by the Post Office or its lawyers. In my opinion this work has led to a material change to my opinions, and I am therefore obliged to inform the court of those changes in a report. With this email I am sending you the report and its Appendices, in completion of the action. I am doing this on the basis that the trial will reconvene on 4th June, and so the court may need to be aware of it then. The report is 13 pages long.

As the court is aware from my first expert report, I have interpreted 'extent' in Horizon issue 1 as requiring a number - the maximum proportion of the claimed losses which is attributable to bugs in Horizon. My first estimate of that number, in my first report and revised in the second expert joint statement, is 0.4%. This estimate was adjusted in a direction to favour the claimants, so that the court may better rely on it.

In my opinion, that estimate is still sound. The enclosed report contains an independent estimate of the same number, which is 0.6%. Because that estimate is based on a simpler analysis, and relies on evidence that in my view can be checked over a weekend, I believe it can be of assistance to the court. That is why I started this analysis, and why I am now sending it to the court.

Similarly, for Horizon Issues 12 and 13, the analysis in the attached report is in my opinion simple, easy to check, and leads to results which I was not able to derive before. Therefore I believe it can be of assistance to the court.

A draft version of this report was first provided to Mr Coyne on 25th April, and a final version was sent to him on 16 May . I have not yet been able to have a substantive discussion of this report with him, other than my explaining points in the report to him.

I understand that when cross examined on the Horizon issues, this report is now a part of my opinion and I may need to refer to it. It is also my understanding that Post Office does not intend to make any application to the court in relation to this report.

Yours Sincerely,

Robert Worden