

From: Jonathan Gribben <[REDACTED]>
To: "Anthony de Garr Robinson" <[REDACTED]>, "Simon Henderson" <[REDACTED]>, 'Owain Draper' <[REDACTED]>
Cc: Andrew Parsons <[REDACTED]>
Subject: Question re POL's Opening Submissions [WBDUK-AC.FID124042615]
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Dear all,

Brian Altman QC is advising Post Office in relation to the Horizon Issues Judgment from a criminal perspective. He has asked the following question in relation to a statement made in para. 41 of our opening submissions:

"The reference in POL's opening submissions to the occasions on which privileged Fujitsu users "have exercised their ability to remotely inject, edit or delete branch transactions or accounting entries will represent a tiny percentage of the relevant transactions/accounting entries. And the occasions on which they have done so negligently or dishonestly will ... represent a tiny percentage of those occasions" [A/2/18, para. 41]. This apparent concession made on behalf of POL appears to be that entries may have been entered/edited/deleted negligently or dishonestly. On what factual basis was this concession made?"

Please would you let me have a response for Brian?

Kind regards

Jonny

Jonathan Gribben
Managing Associate
Womble Bond Dickinson (UK) LLP

d: [REDACTED]
m: [REDACTED]
t: [REDACTED]
e: [REDACTED]

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