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**THE POST OFFICE GROUP LITIGATION**

**Claim Nos. HQ16X01238, HQ17X02637, HQ17X04248**

**IN THE HIGH COURT OF JUSTICE**
**QUEEN'S BENCH DIVISION**

**BEFORE THE HONOURABLE MR. JUSTICE FRASER**

**B E T W E E N:**

**ALAN BATES & OTHERS**

**Claimants**

**-AND-**

**POST OFFICE LIMITED**

**Defendant**

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**CORRECTIONS TO DEFENDANT'S WITNESS STATEMENTS**

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In the course of preparing for the Horizon Issues Trial, the Defendant has identified a number of errors in its Witness Statements. The table below sets out the corrections required.

| Witness Statement, paragraph | Correction |
|---|---|
| **Johnson 1** | |
| Johnson 1, paragraph 47.3 | The reference to POL-0171713 should be POL-0444009 |
| Johnson 1, paragraph 48.5 | The reference to POL-0171713 should be POL-0444009 |
| **Smith 1** | |
| Smith 1, paragraph 16 | This paragraph should read:<br>"*Post Office introduced a case management system in September 2018 that records each individual challenge to a TC ~~in September 2018~~ raised via the NBSC helpline and, if the FSC product team is currently working via case management, passed directly to the FSC team for action. Individual challenges to TCs were not recorded prior to this and therefore it is not possible to state what proportion of TCs have been challenged historically (or what proportion of the challenges were successful) definitively. However, I have spoken to various Team Leaders within the business in order to gain a sense of proportion of TCs or Error Notices that have been challenged in their departments historically and what proportion of those challenges were* |

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| Witness Statement, paragraph | Correction |
|---|---|
| | *successful (i.e. preventing issue of a TC or leading to a change in the TC before eventually being accepted or a compensating TC being issued). The following sections of this witness statement are based on information provided to me by the Team Leaders identified in the headings or when no Team Leader is identified from information within my own knowledge."* |
| **Mather 1** | |
| Mather 1, paragraph 8 | "*Post Office*" should be "*my team*" |
| Mather 1, paragraph 15 | "*Post Office was able to use Credence*" should be "*Post Office initially used Credence*"<br><br>An additional sentence at the end of the paragraph should be added *"However, page 2 of the Helen Rose report shows that the reversal 'was not an explicit reversal by the clerk'"* |
| Mather 1, paragraph 16 | End of paragraph 16 continues<br><br>"*because, I understand from my colleague Tracy Middleton that the branch confirmed that the bill had been paid for by a Lloyds TSB cash withdrawal for £80.00 and that the branch only gave the customer change of £3.91*." |
| **Bogerd 2** | |
| Bogerd 2, paragraph 30 | " *complimented*" should be "*complemented*" |
| Bogerd 2, paragraph 32.3 | "*Audit Request Query data*" should be "*Audit Recovery Query data*" |
| Bogerd 2, paragraph 47 | "*against a 'ZZAUD' user*" should be "*against a 'ZAUD' user*" |
| Bogerd 2, paragraph 56 | "*Horizon Service*" should be "*Horizon Service Desk*" |
| Bogerd 2, paragraph 62 | The reference to POL-0444069 should be POL-0511427 |
| Bogerd 2, paragraph 63 | The reference to POL-0444059 should be POL-0444075 |
| Bogerd 2, paragraph 69 | "*11 May 2018*" should be "*11 May 2016*" |
| Bogerd 2, paragraph 71 | The reference to POL-0444060 should be POL-0511400 |
| Bogerd 2, paragraph 72 | This paragraph should read:<br><br>"*Mr Patny is correct that on 23 February 2016, he processed a MoneyGram transaction for £3,100 and the customer's debit card payment for the transaction was declined by the customer's bank. At this point the transaction was committed and could not be removed from the stack, therefore Mr Patny had to settle to cash. Process is that the MoneyGram transaction should have been cancelled on Horizon followed by a reversal of the transaction. The data shows that Mr Patny cancelled the transaction, however did not complete the reversal. This* |

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| Witness Statement, paragraph | Correction |
|---|---|
| | *would result in the £3100 loss.* ~~Mr Patny says that he therefore cancelled the transaction. The data shows that he in fact completed the transaction for a cash payment and then tried to cancel the transaction showing the cancellation at nil value, the effect being that the £3,100 transaction still showed in the accounts. I do not know whether the customer actually paid in cash – I suspect not as few people carry that much cash on them. If no cash was paid, this would generate a £3,100 cash shortfall. This was due to user error in recording a cash payment on a transaction when in fact no cash was taken. "~~ |
| Bogerd 2, paragraph 74 | "*The Moneygram transaction*" should be "*The MoneyGram transaction*" |
| Bogerd 2, paragraph 77 | The reference to Peak PC0214226 should include a reference to POL-0383868 |
| Bogerd 2, paragraph 78 | The reference to POL- 200000366 should be POL-0156821 |
| Bogerd 2, paragraph 83 | "*At that time, Mr Tank*" should be "~~At that time,~~ *Mr Tank*" |
| Bogerd 2, paragraph 90 | "*The transaction data*" should be "*The transaction and event data*" |
| Bogerd 2, paragraph 90 | Following documents should also be referenced POL-0511359, POL-0511363, POL-0511367 |
| Bogerd 2, paragraph 91.2 | Paragraph should read "*In July 2015 there were two transfers of £2,000 from the AA stock unit to the SP1 stock unit, both of which were successful*" should be "*In July 2015 there were two transfers of £2,000 ~~from~~ between the AA stock unit ~~to~~ and the SP1 stock unit, one from the AA stock unit to the SP1 stock unit and one from the SP1 unit to the AA stock unit, both of which were successful"* |
| Bogerd 2, paragraph 91.3 | Paragraph should read "*In total there were 5 ~~4~~ separate transfers of £2,000 in August 2015, 4 (on the 1st, 3rd, 5th, 26th) ~~all of~~ which were successfully transferred into stock unit SP1 and 1 (on the 3rd) which was successfully transferred into stock unit AA."* |
| Bogerd 2, paragraph 98 | The reference to POL-0444076 should be POL-0511446 |
| Bogerd 2, paragraph 104 | After the words "*From Horizon's perspective, this would have looked like a set of transactions relevant to a single customer*" it should read "*However this had no bearing on the failed recovery of the £150 cash withdrawal*" |
| Bogerd 2, paragraph 117 | The reference to POL- 200000366 should be POL-0030977 |
| Bogerd 2, paragraph 122 | The reference to POL- 200000355 should be POL-0030979 |
| Bogerd 2, paragraph 122 | The reference to POL- 200000352 should be POL-0030982 |
| Bogerd 2, paragraph 126 | The reference to C-0714-0000005 should be C-0000332 |

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| Witness Statement, paragraph | Correction |
|---|---|
| Bogerd 2, paragraph 126 | "*On this basis, I cannot see that this shortfall gives rise to any evidence of their being a problem in Horizon*" should be "*On this basis, I cannot see that this shortfall gives rise to any evidence of there being a problem in Horizon.*" |
| Bogerd 2, paragraph 128 | This paragraph should read:<br>"*The FSC customer account (i.e. the record of all branch discrepancies, TCs, credits and debits on the Subpostmaster's account) confirms that Mrs Stubbs ~~chose to~~ settled this shortfall centrally. ~~and so this does not appear to be a problem with Horizon as I would expect Mrs Stubbs to dispute this shortfall if Horizon was thought to be the cause.~~ "* |
| Bogerd 2, paragraph 133 | The reference to C-0019-0000014 should be C-0000014 |
| Bogerd 2, paragraph 145 | "*The first two of the TCs were issued as a result of the branch over-stating*" should be "*The first two of the TCs were issued as a result of the branch ~~over~~under-stating*" |
| Bogerd 2, paragraph 145 | "*Those TCs were followed by evidence of the relevant over-stated transactions*" should be "*Those TCs were followed by evidence of the relevant ~~over~~under-stated transactions*" |
| Bogerd 2, paragraph 158.3 | "*This change went live to all counters on June 26 2015*" should be "*This change went live to all counters in August 2015 ~~on June 26 2015~~*" |
| **Godeseth 2** | |
| Godeseth 2, paragraph 15 | "*this bug affected thirty branches, resulting in mismatches at twenty*" should be "*this bug affected twenty nine branches, with one branch being affected twice, resulting in mismatches at nineteen*" |
| Godeseth 2, paragraph 42 | "60" should be "62" |
| **Parker 1** | |
| footnote to paragraph 26.3.6 | "SVM/SDM/PRO/0020" should be "SVM/SDM/PRO/0012" |
| **Parker 2** | |
| Parker 2, paragraph 29 | "*From the results I can determine that this was only carried out in the following circumstances while Mr Roll was employed by Fujitsu*" should be "*From the results I can determine that this was only carried out in the following circumstances in Legacy Horizon*" |
| Parker 2, footnote to paragraph 30 | "PC0112293 {POL-0283845}" is duplicated and should be "PC0107043" {POL-0278647}" |