

Message

**From:** Andrew Parsons [GRO]  
**Sent:** 04/10/2019 16:00:51  
**To:** Ben Foat [GRO]; Emanuel, Catherine [GRO]; Rodric Williams [GRO]; Watts, Alan [GRO]; Kenneth Garvey [GRO]  
**CC:** Lucy Bremner [GRO]; Jonathan Gribben [GRO]; Tom Beezer [GRO]; Amy Prime [GRO]  
**Subject:** RE: KELs - query [WBDUK-AC.FID26896945]  
**Attachments:** RE: KELs - query [WBDUK-AC.FID26896945]

FYI - Instruction to Fujitsu attached.

Kind regards  
Andy

**Andrew Parsons**  
Partner  
Womble Bond Dickinson (UK) LLP

d: [GRO]  
m: [GRO]  
t: [GRO]  
e: [GRO]

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**From:** Andrew Parsons  
**Sent:** 04 October 2019 16:45  
**To:** Ben Foat [GRO]; Emanuel, Catherine [GRO]; Rodric Williams [GRO]; Watts, Alan [GRO]; Kenneth Garvey [GRO]  
**Cc:** Lucy Bremner [GRO]; Jonathan Gribben [GRO]; Tom Beezer [GRO]; Amy Prime [GRO]  
**Subject:** RE: KELs - query [WBDUK-AC.FID26896945]

Thanks Both – I will send the instruction to Fujitsu to begin the extraction now.

Kind regards  
Andy

**From:** Ben Foat [GRO]  
**Sent:** 04 October 2019 15:04  
**To:** Emanuel, Catherine [GRO]; Andrew Parsons [GRO]; Rodric Williams [GRO]; Watts, Alan [GRO]; Kenneth Garvey [GRO]  
**Cc:** Lucy Bremner [GRO]; Jonathan Gribben [GRO]; Tom Beezer [GRO]; Amy Prime [GRO]  
**Subject:** Re: KELs - query [WBDUK-AC.FID26896945]

Agreed. Thanks Kate.

Let's proceed in that basis. We should note this in the board update report that Ken and Rod are pulling together now to be sent to me in about an hour.

Ben Foat

General Counsel

Post Office Limited

**GRO**

---

**From:** Emanuel, Catherine <[REDACTED]>

**Sent:** Friday, October 4, 2019 2:50 pm

**To:** Ben Foat; andrew.parsons; Rodric Williams; Watts, Alan

**Cc:** Lucy Bremner; Jonathan Gribben; Tom Beezer; Amy Prime

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

Ben,

My view is that we should proceed expeditiously and, if a further "QA" process is required before we can be sure we have provided everything, we need to make that clear in our communications with the Claimants.

The situation we want to avoid is where we say we have given full disclosure but in response to probing by the Claimants we find ourselves having to reveal more.

Kate

---

**From:** Ben Foat <[REDACTED]>

**Sent:** 04 October 2019 14:39

**To:** andrew.parsons <[REDACTED]>; Rodric Williams <[REDACTED]>; Watts, Alan

[REDACTED]

**Cc:** Emanuel, Catherine <[REDACTED]>; Lucy Bremner <[REDACTED]>; Jonathan Gribben

[REDACTED]

Tom Beezer

[REDACTED]

Amy Prime

[REDACTED]

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

Andy

Thanks. How have we previously disclosed the KELs – did we have a forensic consultant design the process and assure it?

My view is that the disclosure needs to be made quickly and our obligation is to make the disclosure. It is then a separate issue around the level of assurance, review and analysis (including having the experts consider) the additional disclosure. There is already a significant risk that the delay that this issue creates is that it could cause the judgment and settlement discussions to be delayed.

As HSF is instructed by the Board, I would like to have their view and be guided by that recommendation (and I'm happy for preliminary assessment to be challenged).

Kind regards

Ben

Ben Foat

General Counsel

Post Office Limited

**GRO**

---

**From:** Andrew Parsons

**GRO**

**Sent:** Friday, October 4, 2019 2:16:23 PM

**To:** Rodric Williams

**GRO**

**Cc:** Ben Foat

**GRO**

Emanuel, Catherine

**GRO**

Lucy Bremner

**GRO**

Jonathan Gribben

**GRO**

Tom Beezer

**GRO**

**GRO**

Amy Prime

**GRO**

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

Sorry for the misunderstanding Rod.

Ben – are you able to provide instructions on the below or does this question need to go to the board / elsewhere?

Post Office has three principal options for the extraction:

1. It can rely on Fujitsu to extract the documents, disclose them to the Cs and take no further action. This may leave problems latent or to be discovered and raised by the Cs. I don't believe that this option is in line with the general strategy of "owning the story" around this issue.
2. It can have Fujitsu extract the documents now, disclose them to the Cs and then ask a forensic consultant to retrospectively assure the process (having told the Cs that the assurance is being conducted). If any issues are found, these would need to be explained to the Court and the Claimants and, potentially, further / corrective disclosure may be needed. This could further damage Fujitsu's / Post Office's credibility.
3. It can engage the forensic company upfront to design and assure the extraction process, but this could add days / weeks to the extraction. We cannot give a firm time estimate for this until the forensic consultants have commenced work (which could be started today).

Kind regards  
Andy

**Andrew Parsons**

Partner

Womble Bond Dickinson (UK) LLP




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**From:** Rodric Williams <

**Sent:** 04 October 2019 13:35

**To:** Andrew Parsons <

**Cc:** Ben Foat <; Emanuel, Catherine <; Lucy Bremner

[GRO] Jonathan Gribben [GRO] Tom Beezer [GRO]  
[GRO] Amy Prime [GRO]  
**Subject:** RE: KELs - query [WBDUK-AC.FID26896945]

Thanks. I don't agree with the final point – we need instructions on whether quick extraction is preferred to assured but slower extraction.

Rod

---

**From:** Andrew Parsons [GRO]  
**Sent:** 04 October 2019 13:25  
**To:** Rodric Williams [GRO] [GRO]  
**Cc:** Ben Foat [GRO] [GRO] Emanuel, Catherine [GRO] Lucy Bremner  
[GRO] Jonathan Gribben [GRO] Tom Beezer [GRO]  
[GRO] Amy Prime [GRO]  
**Subject:** FW: KELs - query [WBDUK-AC.FID26896945]

All

See below. FJ are now content to proceed with the extraction without waiting for financial clearance.

In terms of the scope of the extraction, we intend to ask FJ for a copy of all previous versions of KELs up to January 2019, being the last KEL extraction date. More KELs will have been created after that date (and the Cs know that already). The concern with extracting all KELs up to today's date is that we will be adding more new KELs. A line has to be drawn somewhere otherwise disclosure is a continuously moving target and we need to be consistent with our previous approach to this. We are seeking Tony Robinson's views on this urgently before giving Fujitsu the final instruction to proceed.

I understand from a conversation between Rod and Amy that we are to commission the extraction from Fujitsu now so to get the documents out as quickly as possible, but we are then to retrospectively assure that process through using a third party forensics firm. We will provide a list of options for this shortly.

Kind regards  
Andy

**Andrew Parsons**  
Partner  
Womble Bond Dickinson (UK) LLP



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---

**From:** ParkerSP <[REDACTED]> **GRO**

**Sent:** 04 October 2019 12:27

**To:** Andrew Parsons <[REDACTED]> **GRO**; Matthew.Lenton <[REDACTED]> **GRO**; Amy Prime <[REDACTED]> **GRO**

**GRO**; Lucy Bremner <[REDACTED]> **GRO**

**Cc:** pete.newsome <[REDACTED]> **GRO**; Jonathan Gribben <[REDACTED]> **GRO**

**GRO**; Torstein.O.Godeseth <[REDACTED]> **GRO**

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

I'm unsure where the financial aspects have got in the FJ – POL commercial process, I'll defer to Pete / Matthew on that one. Having said that, I now have internal approval to complete the work regardless, once WBD ask us to start the extract.

In stating earlier that "Given clearance now, we'd have the information to you tomorrow lunchtime" I had forgotten it was Friday! In mitigation, this is just my second day back from leave. That statement should have been: Given clearance now, we'd have the information to you lunchtime the following working day.

Regards

Steve

---

**From:** Andrew Parsons <[REDACTED]> **GRO**

**Sent:** Friday, October 4, 2019 12:09 PM

**To:** Parker, Steve <[REDACTED]> **GRO**; Lenton, Matthew <[REDACTED]> **GRO**; Amy Prime

**GRO**; Lucy Bremner <**GRO**>  
**Cc:** Newsome, Pete <**GRO**> Jonathan Gribben <**GRO**>; Godeseth,  
Torstein <**GRO**>  
**Subject:** RE: KELs - query [WBDUK-AC.FID26896945]

Steve – to be clear, please do not start the extract (even when you have financial clearance) until you get the go ahead from WBD.

Thanks  
Andy

**Andrew Parsons**

Partner  
Womble Bond Dickinson (UK) LLP

d: **GRO**  
m:  
t:  
e:

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**From:** Andrew Parsons

**Sent:** 04 October 2019 11:31

**To:** ParkerSP <**GRO**> Matthew.Lenton <**GRO**> Amy Prime <**GRO**>; Lucy Bremner  
<**GRO**>

**Cc:** pete.newsome <**GRO**>; Jonathan Gribben <**GRO**>

**GRO** Torstein.O.Godeseth <**GRO**>

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

Steve

Thanks. Where has the financial clearance got to? Is it with Post Office? If so who? I can then try to move it forward from the Post Office end.

Kind regards  
Andy

---

**From:** Parker, Steve [GRO]  
**Sent:** 04 October 2019 10:55  
**To:** Andrew Parsons [GRO]; Matthew Lenton [GRO]; Amy Prime [GRO]  
[GRO]; Lucy Bremner [GRO]  
**Cc:** [pete.newsome](#) [GRO]; Jonathan Gribben [GRO]  
[GRO]; Torstein.O.Godeseth [GRO]  
**Subject:** RE: KELs - query [WBDUK-AC.FID26896945]

Andy,

Apologies for the TLA, yes, 1 MD = one man day. Given clearance now, we'd have the information to you tomorrow lunchtime.

Regards

Steve

Steve Parker  
Head of Post Office Application Support  
Digital Technology Services

Fujitsu  
Lovelace Road, Bracknell, Berkshire. RG12 8SN

**GRO**

Web: <http://uk.fujitsu.com>

---

**From:** Andrew Parsons [GRO]  
**Sent:** Friday, October 4, 2019 10:42 AM  
**To:** Parker, Steve [GRO]; Lenton, Matthew [GRO]; Amy Prime  
[GRO]; Lucy Bremner [GRO]



Cc: Newsome, Pete [GRO]; Jonathan Gribben [GRO] Godeseth,  
Torstein [GRO]  
**Subject:** RE: KELs - query [WBDUK-AC.FID26896945]

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

d: [GRO]  
m:  
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e:

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**From:** ParkerSP [GRO]  
**Sent:** 04 October 2019 10:30  
**To:** Andrew Parsons [GRO]; Matthew Lenton [GRO]; Amy Prime [GRO]  
[GRO] Lucy Bremner [GRO]  
**Cc:** pete.newsome [GRO]; Jonathan Gribben [GRO]  
[GRO] Torstein.O.Godeseth [GRO]  
**Subject:** RE: KELs - query [WBDUK-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

**GRO**

Web: <http://uk.fujitsu.com>

---

**From:** Andrew Parsons **GRO**

**Sent:** Friday, October 4, 2019 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.FID26896945]

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

d:  
m:  
t:  
e:

**GRO**

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**From:** Matthew Lenton **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**; ParkerSP **GRO**

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

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 8SN

**GRO**

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

---

**From:** Amy Prime **GRO**

**Sent:** Wednesday, October 2, 2019 6:16 PM

**To:** Lenton, Matthew **GRO**; Lucy Bremner **GRO**

**Cc:** Newsome, Pete **GRO**; Andrew Parsons **GRO**; Jonathan Gribben **GRO**; Godeseth, Torstein **GRO**; Parker, Steve **GRO**

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

Matthew

Further to the below and our discussion yesterday, I understand that to extract the previous versions of the current or deprecated KELS as HTML files it would be necessary to produce a new script. Please could Fujitsu proceed with producing this script, but not run the script until we provide further confirmation to do so?

If you could let me know and ETA for this script being ready it would be much appreciated.

Many thanks

Amy

**Amy Prime**

Associate

Womble Bond Dickinson (UK) LLP



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---

**From:** Matthew.Lenton

**GRO**

**Sent:** 01 October 2019 10:15

**To:** Lucy Bremner

**GRO**

**Cc:** [pete.newsome](#)

**GRO**

Amy Prime

**GRO**

; Andrew Parsons

**GRO**

**GRO**

Jonathan Gribben

**GRO**

**GRO**

; [Torstein.O.Godeseth](#)

**GRO**

; [ParkerSP@](#)

**GRO**

**Subject:** RE: KELS - query [WBDUK-AC.FID27032497]

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  
**GRO**  
Web: <https://www.fujitsu.com/global/>

---

**From:** Lucy Bremner <GRO>  
**Sent:** Monday, September 30, 2019 6:37 PM  
**To:** Lenton, Matthew <GRO>  
**Cc:** Newsome, Pete <GRO> Amy Prime <GRO>; Andrew Parsons  
<GRO> Jonathan Gribben <GRO>  
**Subject:** KELs - query [WBDUK-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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