

Message

From: Catherine Hamilton [GRO]
on behalf of Catherine Hamilton [GRO]
Sent: 13/09/2018 13:59:13
To: Jonathan Gribben [GRO]; Andrew Parsons [GRO]
CC: Lucy Bremner [GRO]; Emma Campbell-Danesh [GRO]; Mark Underwood [GRO]; Rodric Williams [GRO]
Subject: RE: PO Group Litigation [WBDUK-AC.FID27032497]

Hi Jonathan,

It should be provided in the next day or so.

Catherine

From: Jonathan Gribben [GRO]
Sent: 13 September 2018 12:05
To: Catherine Hamilton [GRO]; Andrew Parsons [GRO]
Cc: Lucy Bremner [GRO]; Emma Campbell-Danesh [GRO]; Mark Underwood [GRO]; Rodric Williams [GRO]
Subject: RE: PO Group Litigation [WBDUK-AC.FID27032497]

Hi Catherine,

I spoke to Pete Newsome about this yesterday and he was still of the view that it's not for Fujitsu to provide the potted history that we are looking for. Have you been able to speak to Garry? Our expert advises that it's an important requirement for his report.

Kind regards

Jonny

Jonathan Gribben
Managing Associate
Womble Bond Dickinson (UK) LLP

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

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From: Catherine Hamilton [GRO]
Sent: 05 September 2018 13:12
To: Andrew Parsons
Cc: Jonathan Gribben; Lucy Bremner; Emma Campbell-Danesh; Mark Underwood; Rodric Williams
Subject: Re: PO Group Litigation [WBDUK-AC.FID26896945]

Hi Andy,

I'll speak with Garry Stewart this afternoon.

Catherine

Catherine Hamilton
Business Performance Director

GRO

From: Andrew Parsons [GRO]
Sent: Wednesday, September 5, 2018 1:09:50 PM
To: Catherine Hamilton
Cc: Jonathan Gribben; Lucy Bremner; Emma Campbell-Danesh; Mark Underwood [GRO]; Rodric Williams
Subject: FW: PO Group Litigation [WBDUK-AC.FID26896945]

Catherine

Would you (or someone else at Post Office?) be able to help unlock Point 2 below?

Generally, FJ are being quite helpful but they are being a little bit stubborn around providing a potted history of the development of Horizon. What we're looking to do is to give the Judge the story of how Horizon has evolved over 20 years. We're not looking for chapter and verse on every change, but at the moment the only major milestone we are aware of is the change from Horizon to Horizon Online.

I'd be happy for this info to come from POL but I suspect that FJ might have a better corporate memory for this task.

Can you think of any other way forward or would you mind speaking to Pete to see if you can get FJ to help?

Thanks
Andy

Andrew Parsons
Partner
Womble Bond Dickinson (UK) LLP

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From: [pete.newsome](#) [GRO]
Sent: 05 September 2018 11:32
To: Andrew Parsons; [Matthew.Lenton](#) [GRO]; [Dave.Ibbett](#) [GRO]; Jonathan Gribben
Cc: Gavin Matthews; Emma Campbell-Danesh; Amy Prime; [Legal.Defence](#) [GRO]
Subject: RE: PO Group Litigation [WBDUK-AC.FID27032497]

Andy

Thanks for the email. I have produced answers to your questions below.

Point 2 – history of releases – what we are really looking for is a written narrative of how Horizon has evolved. What are the key milestones and events in that evolution? When were major changes made and why? Ideally, this will be cross referenced to the key releases. The experts need this background contextual information to set the foundation for their reports. What I have in mind is a 10-20 page written document setting out, as best as someone can remember, the story of Horizon. We do not have a potted history on the development of Horizon from the point of view of what changes have been made to the system. In terms of Why changes were made we would have knowledge on those driven by technical need e.g. Belfast Refresh but any other change for business need would be best answered by Post Office. We can supply you with more detail on what was in the changes in the document supplied (the CP documents have more detail along with the CR raised by Post Office) but feel any history of the solution should be driven from Post Office with Fujitsu supplying factual information around that change from a technical perspective.

Point 5 – Access logs – this is urgent. When will FJ be able to give us the logs? This week? We have taken an extract of logs from the audit store and are now examining those records to ensure they have the data on super user logins. Once this data is confirmed as suitable we will be able to give a timetable for delivery along with dates for which the data is available and an estimate of the volume of data.

Regards

Pete

Pete Newsome
Account Manager
DHL and Post Office Account, Fujitsu UK&I
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From: Andrew Parsons [REDACTED] GRO
Sent: Tuesday, September 4, 2018 8:04 PM
To: Lenton, Matthew [REDACTED] GRO; Newsome, Pete [REDACTED] GRO; Ibbett, Dave [REDACTED] GRO; Jonathan Gribben [REDACTED] GRO
Cc: Gavin Matthews [REDACTED] GRO; Emma Campbell-Danesh [REDACTED] GRO; [REDACTED] GRO Amy Prime [REDACTED] GRO; Defence Legal (Chris Jay,) [REDACTED] GRO
Subject: RE: PO Group Litigation [WBDUK-AC.FID27032497]

Matthew (and others)

Jonny is on holiday this week so I don't think your regular call will be going ahead tomorrow.

Just picking up a couple of points in your comments below.

Point 2 – history of releases – what we are really looking for is a written narrative of how Horizon has evolved. What are the key milestones and events in that evolution? When were major changes made and why? Ideally, this will be cross referenced to the key releases. The experts need this background contextual information to set the foundation for their reports. What I have in mind is a 10-20 page written document setting out, as best as someone can remember, the story of Horizon.

Point 5 – Access logs – this is urgent. When will FJ be able to give us the logs? This week?

Thanks
Andy

Andrew Parsons

Partner
Womble Bond Dickinson (UK) LLP

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From: Matthew.Lenton **GRO**
Sent: 04 September 2018 16:32
To: pete.newsome **GRO**; Dave.Ibbett **GRO**; Jonathan Gribben
Cc: Andrew Parsons; Gavin Matthews; Emma Campbell-Danesh; Amy Prime; Legal.Defence **GRO**
Subject: RE: PO Group Litigation [WBDUK-AC.FID27032497]

Jonny,

Please see responses below, for further discussion on the call on Wednesday morning.

Matthew Lenton
Post Office Account Document Manager
P&PS, Digital Technology Services

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

From: Jonathan Gribben **GRO**
Sent: 29 August 2018 16:52
To: Newsome, Pete **GRO**; Ibbett, Dave **GRO**; Lenton, Matthew **GRO**
Cc: Andrew Parsons **GRO**; Gavin Matthews **GRO**; Emma Campbell-Danesh **GRO**; Amy Prime **GRO**; Defence Legal (Chris Jay,) **GRO**
Subject: PO Group Litigation [WBDUK-AC.FID27032497]

Pete, Dave,

Further to our call this morning and yesterday's discussion with Gareth and Torstein I have summarised the current status of our various work streams and set out some requested additional actions in the table below.

Having spoken to Andy I'm now aware that Post Office has been ordered to disclose the privileged user logs that we discussed yesterday by the Court. One of the requested actions below is therefore for Fujitsu to provide the logs – please would you let me know how long this will take? Once we have them we can discuss what witness evidence (if any) we need to prepare in relation to Issue 12 ("If [Post Office] and/or Fujitsu did have [the] ability [the ability/facility to: (i) insert, inject, edit or delete transaction data or data in branch accounts; (ii) implement fixes in Horizon that had the potential to affect transaction data or data in branch accounts; or (iii) rebuild branch transaction data], how often was that used, if at all?").

Feel free to give me a call to discuss.

Kind regards

Jonny

	Work stream	Current status	Requested additional actions
1	Experts' request for specific Peaks.	Requested by Dave on 29 August. <i>[Matthew Lenton] Done</i>	N/A
2	Experts' request for a summary of the major Horizon releases (new functionality and fundamental bugs).	Dave to speak to someone about how the major releases came about. <i>[Matthew Lenton] Policy agreement with POL on how major releases are formed is in PA/STR/003.</i> Pete to speak to Matthew next week to work out who is best placed to provide the requested summary. <i>[Matthew Lenton] The Release Schedule [attached] details Release numbers against CPs and descriptions of the purpose of the release. Would this be sufficient? Some of the information has been archived off the sheet, but we think it can be provided.</i>	N/A
3	Horizon Issues witness evidence (Issues 2, 10, 11 and 12 as discussed yesterday)	Dave and Pete to obtain written answers to the questions in paragraphs 2.54, 2.7.1 – 2.7.4 (inclusive), 3.4 and 3.5 of the 28 August areas to cover document (attached) and set up calls with the relevant people to discuss the written answers with WBD during the week	Please provide details of their availability between now and 28 September (the deadline for exchange of witness evidence).

		<p>commencing 10 September.</p> <p><i>[Matthew Lenton] 2.5.4: The wording of 2.4.2 confuses use of the term "Balancing Transaction" as it states both that "there has only been one usage of BTs" and "BTs are used more routinely". Please therefore confirm which type of correction are we being asked to comment on in 2.5.4 ? On the assumption that it is the "Branch Database transaction correction", I have added the answer that it is documented in DEV/APP/LLD/0142 and DES/APP/HLD/0020 (section 5.6.2).</i></p> <p><i>2.7.1: Yes, numbers quoted are correct.</i></p> <p><i>2.7.2: We have records going back to January 2014 only; these contain the names of individuals within the NT and Unix teams. Would it be necessary to include the names?</i></p> <p><i>2.7.3: Jason Muir: No they cannot. Access is controlled by a specific MSAD group and the DBA's aren't in that group. (Need confirmation on this statement).</i></p> <p><i>Gerald Barnes: Refer to DES/APP/HLD/0029 and DES/APP/HLD/0030, Audit HLDs.</i></p> <p><i>When a session is started at the counter a special temporary private session key and public key are generated using the public keys stored on the counter and audit server. The public key is stored in the audit trail and all messages written in the</i></p>	
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		<p><i>session are signed with the private key. At the end of the session the private key is destroyed. In addition each message is assigned a contiguous JSN.</i></p> <p><i>When a prosecution ARQ is done the audit server can check each signature is correct using a combination of its public key and the temporary public key stored for each session. Now it is completely impossible to tamper with a message because the signature can only be generated with the private session key that was destroyed. In addition messages cannot be inserted or deleted because the audit server checks JSNs are contiguous and without duplicates.</i></p> <p><i>It is a similar thing to public private key encryption. Anyone can encrypt a message with his public key but the only one who can read it is the one with the private key which was used to generate the public key in the first case.</i></p> <p><i>2.7.4: Jason Muir has provided one week of sample audit data showing those Privileged Users that have logged into the database, this is now with Gareth Seemungal and Torstein for analysis to see if it will provide the required information.</i></p>	
4	Horizon Issues witness evidence (development and testing)	We need a witness to cover the processes used by Fujitsu to develop, maintain and support Horizon and to confirm that the processes are followed in practice and	Please let us know who the best person/people to speak to about this is/are and provide details of their availability between now and 28 September.

		realise the expected benefits. <i>[Matthew Lenton] We have asked our Quality and Compliance Manager if he could provide evidence of audit compliance.</i>	Please let us know when they are available for a call ASAP.
5	Disclosure of privileged user logs	Post Office is required to disclose these logs by the Court. <i>[Matthew Lenton] As per 2.7.4 in row 3 above.</i>	Please provide the logs.
6	Horizon audits	Gareth mentioned that these go to the remote access issue. In addition, the Claimants' provisional / outline allegations in relation to Horizon raise issues with certain Detica and EY reports. <i>[Matthew Lenton] This was covered in the Deloitte's report, we had expected that you would extract this from the report.</i>	Please let us know who the best person/people to speak to about this is/are and provide details of their availability between now and 28 September. Please let us know when they are available for a call ASAP.

Jonathan Gribben
Managing Associate
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