

**Stephen Dilley**

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**From:** Pinder Brian [Brian.Pinder@GRO]  
**Sent:** 07 September 2006 12:43  
**To:** Stephen Dilley  
**Cc:** Tom Beezer; Jenkins Gareth GI; Dunks Andy  
**Subject:** RE: WS Marine DriveDOC.DOC

Stephen

1. As you say there is a possibility that Andy could be asked to answer technical questions, but if cannot answer, he can always reply he does not know, or that its not within his particular area of expertise etc.

2. Unfortunately Gareth, although technical, is not au-fait with the helpdesk processes, procedures or terminology.

I would hope that the pre counsel meetings or any subsequesnt technical meetings between the PO expert and FJ will identify where any technical issues may lie and address them as they develop.

Couple of comments on attached statement from Andy

Para 8 : Call Number Should read, 0401290358  
Para 14: Comment to address  
Para 17: Q. Is the person NBSC? Answer, Not known

Kind Regards

Brian

-----Original Message-----

From: Stephen Dilley [mailto:Stephen.Dilley@GRO]  
Sent: 06 September 2006 18:33  
To: Pinder Brian  
Cc: Dunks Andy; Gareth.Jenkins@GRO; Tom Beezer  
Subject: RE: WS Marine DriveDOC.DOC

Dear Brian and Gareth,

I've been working on Andy's draft statement with him today (latest version attached). Andy didn't have any contemporaneous involvement and essentially the statement is about putting the HSH call logs into plain English for a judge who might not be too I.T savvy.

Andy has raised the valid point that he would not be able to answer any technical queries on the HSH calls, if he is asked them at trial. He says you'd almost need a different engineer to explain all the different types of call, (which may be true, but would of course, be impractical to have too many people involved).

There's two answers to Andy's concern:

1. We're not asking Andy to be the technical expert because both sides in this dispute have been given permission to call an independent IT expert to give evidence. In due course, they'll probably need to meet Brian and Gareth at Fujitsu to bounce off any technical queries with you. It is the independent IT expert who will have to deal with technical points. As an expert, they can also give their opinion on sthg rather than simply sticking to the facts.

2. We've also tried to head off any technical questions being directed Andy's way by saying in his statement that he's not a technical person. However, I can't rule out the other side's barrister trying to stretch things and naughtily slipping in some technical queries. This would not be fair on Andy.

Upon reflection, as Gareth has the real technical know how, I wonder whether he would be willing to give evidence in place of Andy about the HSH call logs? That way, he'd be capable of dealing with most of what the other side's barrister could throw at him and I imagine, they'd have a hard time of it. If so, then I could amend the attached draft statement into Gareth's name.

Please let me know your views on this. (Gareth, either way, I confirm that you won't have to attend the conference on Monday).

Kind regards.

Stephen Dilley  
Solicitor  
for and on behalf of Bond Pearce LLP

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-----Original Message-----

From: Dunks Andy [mailto:Andy.Dunks@GRO]  
Sent: 06 September 2006 16:30  
To: Stephen Dilley  
Subject: WS Marine DriveDOC.DOC

Please see my comments in paragraph 14, I have tried to explain/answer your queries within the call descriptions but I am unable to answer your question in paragraph 17 as the NBSC is a POL support team.

Hope this is OK..

Andy Dunks  
CS Security

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