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**From:** Defence Legal (Chris Jay) [GRO]  
**Sent:** Fri 30/06/2017 8:57:53 AM (UTC)  
**To:** Rodric Williams [GRO]  
**Cc:** Newsome Pete [GRO]; Mark Underwood [GRO]; Parsons, Andrew [GRO]  
**Subject:** RE: Post Office/Horizon- SUBJECT TO PRIVILEGE - DO NOT FORWARD

Rodric,

OK – thanks for these extra points, which I will disseminate to the team.

Also happy for Andrew to contact me direct.  
Kind regards,

Chris

Christopher Jay, Senior Counsel  
FUJITSU  
Jays Close, Viabes Business Park, Basingstoke, Hampshire, RG22 4BY

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**From:** Rodric Williams [mailto:[GRO]]  
**Sent:** 29 June 2017 15:26  
**To:** Defence Legal (Chris Jay) [GRO]  
**Cc:** Newsome Pete [GRO]; Mark Underwood [GRO]  
Parsons, Andrew [GRO]  
**Subject:** RE: Post Office/Horizon- SUBJECT TO PRIVILEGE - DO NOT FORWARD

Chris,

Thank you for your email below, and especially for attending the meeting last week, where the input from Fujitsu was much appreciated.

In addition to the below actions, please could you also provide some further information on:

1. whether FJ was responsible for the phone lines (rather than POL or the SPMR) and did this change over time?;
2. in relation to the recent barcoding issue on parcels, how was this error detected and what fix(es) were implemented; and
3. the controls which are in place to ensure that the audit trail is secure.

It is likely that further discrete points will crop up as we finalise the Defence. Given the tight timelines we are now

working to, are you happy for Andy Parsons (Partner, Bond Dickinson; cc'ed) whom you met last week to contact you directly if/when the need arises? That would speed things up while still keeping the exchanges between our companies at a solicitor-to-solicitor level for privilege purposes.

With thanks for your continued support,  
Rodric

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**From:** Defence Legal (Chris Jay) [mailto:GRO]  
**Sent:** 29 June 2017 09:46  
**To:** Rodric Williams <GRO>  
**Cc:** Newsome Pete <GRO>; Mark Underwood <GRO>  
**Subject:** RE: Post Office/Horizon- SUBJECT TO PRIVILEGE - DO NOT FORWARD

Rodric,

Good to meet up last Thursday with Tony Robinson and the Bond Dickinson team in 1 Essex Court, and apologies for the slight delay in getting back to you but I was at our annual Legal & Commercial Conference the first 2 days of this week.

We took away a few actions from our meeting, which I have listed below.

- Re Horizon - whether POL will have had access to line by line data since 1999
- How many days data is available to the branch
- FJ to confirm when the data was first extracted from Horizon and supplied to Post Office regardless of the system Post Office used (a) to interpret this data and (b) make it available to their employees to support branch accounting
- Whether FJ could change data in the Audit store prior to the Eternus hardware protection being implemented
- Re Pleading 21 - FJ to provide a Summary of what the HORIZON/HNG-X Contract "does". Also to confirm that BT/ other telecoms suppliers supplied lines prior to 2010?
- Pleading 23 "Known Error" log . Yes FJ kept one but this not material to the Branch Accounting. FJ to confirm
- Pleading 25 - FJ not agent of Post Office

No doubt you will let us know if this list is inaccurate or incomplete from your perspective.

In the meantime we will crack on and get you our responses, which we will aim to get to you by mid next week.

Just a gentle reminder re Legal Privilege. Our colleague Torstein and your Mark have been exchanging emails direct instead of through you and me. I have raised this internally with Pete and Torstein and reminded them of the protocol.

Kind regards,

Chris

Christopher Jay, Senior Counsel  
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**From:** Rodric Williams [mailto:**GRO**]  
**Sent:** 12 June 2017 18:21  
**To:** Defence Legal (Chris Jay) <**GRO**>  
**Cc:** Newsome Pete <**GRO**>; Mark Underwood <**GRO**>  
**Subject:** Post Office/Horizon- SUBJECT TO PRIVILEGE - DO NOT FORWARD

Chris,

I hope this finds you well. I have now received the NDA executed by Post Office, and attach it for execution by Fujitsu.

I also attach for your information the Generic Particulars of Claim filed in the Group litigation (without Appendices, which are available on request). There are a number of sections of the GPoC which our leading counsel Tony Robinson QC would like to discuss with Fujitsu in order to plead Post Office's defence. These sections have been extracted into the Word document attached. For ease of reference, I also attach "Schedule 6" of our Letter of Response referred to in Section 24 of the GPoC (a draft of which was provided to Fujitsu for comment before sending to Freeths).

I would be grateful if you could please let me know if and when the appropriate people from Fujitsu would be available to discuss these sections with us. As ever, please feel free to give me a call if this is something easier to discuss over the telephone.

With thanks and kind regards,  
Rodric



**Rodric Williams**

Head of Legal - Dispute Resolution & Brand  
20 Finsbury Street  
London EC2Y 9AQ

T: **GRO**  
E: **GRO**

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