

Wednesday, 26 July 2023

1  
2 (9.30 am)  
3 **MR BLAKE:** Good morning, sir.  
4 **SIR WYN WILLIAMS:** Morning, Mr Blake.  
5 **MR BLAKE:** Sir, this morning we're going to hear  
6 from Mr Coyne and Ms Helliwell. As you know, we  
7 finish today at 2.00, so the plan is to take two  
8 breaks, two 15-minute breaks every hour and  
9 a half or so.  
10 There will be a fire alarm at 10.00 today.  
11 The plan is for us to put our hands over our  
12 ears, rather than leave the room.  
13 **SIR WYN WILLIAMS:** Yeah, fine.  
14 **MR BLAKE:** There wouldn't be any lunch. Everybody  
15 will take their lunches at 2.00.  
16 **SIR WYN WILLIAMS:** Yes, that's fine, Mr Blake.  
17 **MR BLAKE:** Thank you very much. I'm going to call  
18 Mr Coyne, please.  
19 **JASON PETER COYNE (sworn)**  
20 **Questioned by MR BLAKE**  
21 **Q.** Can you give your full name, please?  
22 **A.** Jason Peter Coyne.  
23 **Q.** Mr Coyne, you should have in front of you  
24 a witness statement dated 16 May 2023; is that  
25 correct?

1

1 in 2000 you were part of a company, you were  
2 a shareholder in the company called Best  
3 Practice Group Plc; is that right?  
4 **A.** Yes, that's right.  
5 **Q.** Can you very briefly tell us what your role was  
6 in that company and what the company did?  
7 **A.** Yes, so we set up that company in 2000 because  
8 we'd noticed that technology within companies  
9 was accelerating rapidly and, whereas before,  
10 technology was just an aid to businesses,  
11 technology was now being talked about in terms  
12 of business transformation, so requiring  
13 fundamental changes to businesses whilst  
14 technology was brought in.  
15 We spotted that there was a number of what  
16 we at the time called misaligned expectations,  
17 the suppliers would think they were delivering  
18 one things, the customer would think they were  
19 going to receive something different. So Best  
20 Practice Group was set up to help the parties  
21 come together throughout the contracting process  
22 to understand what would be delivered and what  
23 the parties' relative roles and responsibilities  
24 would be.

It was as a result of that that we started

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1 **A.** Yes, I do.  
2 **Q.** Thank you, if you turn to page 16, is that your  
3 signature?  
4 **A.** Yes, it is.  
5 **Q.** Is that statement true to the best of your  
6 knowledge and belief?  
7 **A.** Yes, it is.  
8 **Q.** Do you have any clarifications to make in  
9 respect of that statement?  
10 **A.** In this witness statement I said that I hadn't  
11 seen the letter of instruction from  
12 Ms Helliwell, which was correct at the time that  
13 I made that statement, but later on, at the back  
14 end of last week, I was provided with a number  
15 of other documents and within there was the  
16 letter of instruction.  
17 **Q.** Thank you very much. I'm going to start today  
18 by asking you about your background. Your  
19 witness statement, WITN00210100 -- it doesn't  
20 need to be brought onto screen but that's just  
21 for the purposes of the transcript -- that will  
22 be published in due course.  
23 **A.** Yes.  
24 **Q.** In terms of your background, it's set out in  
25 that statement. Most relevant for today is that

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1 to be instructed by parties that had frustrated  
2 implementations to try to avoid disputes and  
3 that built up our contact with law firms.  
4 **Q.** Was one of the roles you had at that time acting  
5 as an expert witness?  
6 **A.** Yes. Yes, it was.  
7 **Q.** It was in that role that you acted in a case  
8 that we're going to be coming to, which is the  
9 Cleveleys case, or what we refer to as the  
10 Cleveleys case?  
11 **A.** Yes.  
12 **Q.** You then moved in 2009 to IT Group UK; is that  
13 correct?  
14 **A.** That's right, yes. And IT Group was looking  
15 purely at the distressed end of computing, so it  
16 was looking at things like failure mode analysis  
17 to find out why projects had gone wrong, whether  
18 they could be brought back on track or not or  
19 whether we could provide expert witness evidence  
20 throughout the dispute resolution process, if  
21 the contract needed to come to an end.

So we helped people like insurers, we were  
instructed by law firms, often instructed by  
technology companies, to advise how to get  
projects back on track, or purchasers of

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1 technologies to find out what they should change  
 2 within their own organisation to make the  
 3 technology project work better for them.  
 4 **Q.** It was while you were at IT Group UK that you  
 5 acted in the *Bates & Others* litigation, as also  
 6 an expert witness?  
 7 **A.** That's right, from about 2016.  
 8 **Q.** That's something that we'll be looking at in  
 9 more depth in Phase 5 of this Inquiry.  
 10 **A.** Yes.  
 11 **Q.** You're now a partner in Evolution Project  
 12 Consulting; is that correct?  
 13 **A.** Yes.  
 14 **Q.** Is that broadly the same or different to those  
 15 two previous --  
 16 **A.** No, it's broadly the same. The companies that  
 17 I've worked for have gone through various  
 18 mergers and acquisitions over the years, and  
 19 Evolution Project Consulting is now just back to  
 20 me on my own, rather than part of a larger  
 21 organisation. But doing broadly the same thing,  
 22 helping people with technology disputes.  
 23 **Q.** Do you continue to act as an expert witness?  
 24 **A.** I do, yes. The company has only been operating  
 25 on its own for a couple of months, so I don't

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1 changes were in the late 1990s, and CPR35,  
 2 I believe, was updated, certainly before 2000,  
 3 to ensure that experts were shown to be more  
 4 independent and, in fact, were more independent.  
 5 And there was the declaration of independence  
 6 that has to be signed now on all expert reports.  
 7 **Q.** In the *Cleveleys* case you were a joint expert --  
 8 **A.** Yes.  
 9 **Q.** -- and in the *Bates* litigation you were  
 10 an expert for one particular party?  
 11 **A.** Yes.  
 12 **Q.** Can you tell us the difference between those two  
 13 situations?  
 14 **A.** I mean, your obligations are still exactly the  
 15 same. Your obligation is to assist the court  
 16 and you have to remain independent, whether you  
 17 are instructed by two parties or whether you're  
 18 instructed by one party, such as was in the  
 19 *Bates* litigation. So your opinions don't  
 20 change. The way you go about the process, the  
 21 analysis, doesn't change. You have to take as  
 22 much care and diligence, irrespective of which  
 23 process is followed.

24 The only difference really is that the two  
 25 parties in a joint litigation -- in a joint

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1 yet have any instructions but that is the  
 2 desire.  
 3 **Q.** When did you first become an expert witness?  
 4 **A.** I believe it will have been probably the turn  
 5 of -- of 2000, or something like that, when we  
 6 started Best Practice Group.  
 7 **Q.** What did you understand and perhaps what do you  
 8 understand now to be the role of an expert  
 9 witness, in summary?  
 10 **A.** Well, the overriding obligation is to assist the  
 11 court and to ensure that you take an independent  
 12 viewpoint and that you consider all evidence  
 13 very carefully, you don't fail to report any  
 14 evidence that you've seen and that you search  
 15 out all the evidence that might be available.  
 16 It's really the independence side of it that  
 17 was the very, very early teachings that I got  
 18 from all the material that I took from the  
 19 Institute of Experts and all the different  
 20 various parties that were involved in expert  
 21 witness training in those early days, and still  
 22 today.  
 23 **Q.** Was it broadly the same in the early 2000s as it  
 24 is today, in terms of your duties as an expert?  
 25 **A.** Yes, I believe so I think the majority of the

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1 instruction come together to generally agree  
 2 what your instruction should be, and you accept  
 3 that as a joint instruction, and then, when you  
 4 submit your report, you generally invite  
 5 questions from both parties and then you would  
 6 generally respond to those questions. That's  
 7 typically the process and the difference when  
 8 it's a joint instruction.  
 9 **Q.** I'm going to move on now to talk about the  
 10 *Cleveleys* case.  
 11 **A.** Mm-hm.  
 12 **Q.** You're the first witness in this Inquiry who is  
 13 going to be addressing questions on the  
 14 *Cleveleys* case, so I'm going to take you through  
 15 some very basic facts to begin with just to set  
 16 the scene.  
 17 **A.** Yes.  
 18 **Q.** Can we look at POL00118218, please. It's page 3  
 19 of the trial bundle. You'll see here that the  
 20 claim was served, if we scroll down a little  
 21 bit, on 26 April 2001, and it began life, if we  
 22 look at the top, in the Croydon County Court.  
 23 The value of the claim, in the bottom right-hand  
 24 corner, is approximately £11,000.  
 25 **A.** Mm-hm.

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1 Q. Is that your recollection?

2 A. Yes.

3 Q. Can we look at page 5, please, if we scroll on  
4 a couple of pages, there is the particulars of  
5 claim. The defendant is a lady called Mrs Julie  
6 Wolstenholme.

7 A. Mm-hm.

8 Q. If we look at paragraph 2 she was the  
9 subpostmistress at Cleveleys branch and her  
10 contract had been terminated. The Post Office  
11 were suing her for return of certain equipment.  
12 If we scroll over to the next page, and keep on  
13 scrolling to the end of the particulars of  
14 claim, we have there, that's signed by --  
15 a statement of truth by James Cruise or Jim  
16 Cruise, who we will, in due course, become  
17 familiar with, and there's also the name  
18 Catherine Churchard of Legal -- Consignia Legal  
19 Services.

20 This is a document I think that you were  
21 provided with when you prepared your expert  
22 report?

23 A. Yes.

24 Q. Thank you.

25 If we turn over the page to the Defence and  
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1 was unfit for purpose and the Claimant failed to  
2 ensure that the system was working adequately."

3 A. Yes.

4 Q. Thank you very much. If we scroll down to the  
5 next page, Mrs Wolstenholme was claiming  
6 damages, if we keep on scrolling down, damages  
7 for wrongful dismissal, damages for breach of  
8 the implied term to provide a computer system  
9 fit for purpose, and further damages, and it's  
10 signed there at the bottom of page 12. The date  
11 of this document is 6 June, 6 June 2001 --

12 A. Yes.

13 Q. -- which may be of relevance because we're going  
14 to address issues of the provision of audit  
15 data, et cetera, so the date the claim began,  
16 and the date of the defence hear it is June  
17 2001, when the issue of the computer system was  
18 first raised.

19 If we scroll over the page, there's Amended  
20 Particulars of Claim. These don't matter for  
21 present purposes and we can continue scrolling  
22 to page 15, which is the end of the Amended  
23 Particulars and at the bottom of that page we  
24 see the name of Ms Helliwell, who we will be  
25 hearing from later today, who is the signatory

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1 Counterclaim, paragraph 2 of the Defence, so  
2 page 8 now, this is Mrs Wolstenholme's defence,  
3 and at paragraph 2, we see there it says:

4 "The Defendant asserts that her employment  
5 was terminated unlawfully and she has made  
6 an application to the Industrial Tribunal ..."

7 So her defence was that she had been  
8 unlawfully terminated.

9 A. Yes.

10 Q. There is a counterclaim in her claim, if we keep  
11 on scrolling down to the next page, towards the  
12 bottom of page 7, there appears to be  
13 a counterclaim, a little bit further down. This  
14 begins at the bottom of that screen. If we go  
15 over the next page to paragraph 14 of the  
16 Defence and Counterclaim, thank you.

17 Perhaps, if we could blow up paragraph 14.

18 This is where the issue of the computer  
19 system is raised, it says there:

20 "Further or in the alternative it was  
21 an implied term of the contract between the  
22 Claimant and the Defendant that the computer  
23 system provided by the Claimant would be fit for  
24 its purpose and the Claimant is in breach of  
25 this term in that the computer system provided

10

1 there.

2 A. Yes.

3 Q. If we continue to scroll to page 17, this is  
4 still with the Amended Particulars of Claim, and  
5 we see there for the first time appearing in  
6 this bundle the name of Weightmans Vizards  
7 solicitors, who, by that stage, were on record  
8 acting for Post Office.

9 A. Yes, mm-hm.

10 Q. Can we please turn now to page 93 of this  
11 bundle. This is the Post Office's reply to  
12 Mrs Wolstenholme's defence, by now, by this time  
13 we're in the Blackpool County Court, so it's  
14 been transferred.

15 A. Yes.

16 Q. If we scroll down we'll see that's the reply and  
17 the defence to the counterclaim, and it's  
18 page 95, paragraph 4. We see there that the  
19 Post Office state:

20 "It is denied that the said computer system  
21 was unfit for its purpose and it is averred that  
22 the same worked adequately."

23 A. Mm-hm.

24 Q. Thank you. I'm going to take you to a few court  
25 orders just to set the scene and again to take

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1 you to a few relevant dates for your  
2 instruction. Can we turn to page 98, please.  
3 This is an order of the Blackpool County Court  
4 of 16 July 2001 and, if we look at point (B) on  
5 the notice, it says:

6 "There may be an issue as to expert evidence  
7 given the counterclaim."

8 **A.** Yes.

9 **Q.** Can we go to the next page which is another  
10 order, this time 30 August 2001, Order  
11 paragraph 2. At this stage it says:

12 "Both parties ... have permission to rely  
13 upon one expert each in computer systems."

14 **A.** Mm-hm.

15 **Q.** If we turn to page 103, that's an order of  
16 5 August. It seems as though by that stage  
17 there was a stay until October of that year,  
18 possibly because Employment Tribunal proceedings  
19 were continuing during that period.

20 **A.** Right. Mm-hm.

21 **Q.** If we turn over the page to 104, that's  
22 14 February 2003, so by this stage matters had  
23 resumed and, if we look at paragraph 8 of that  
24 order, it is ordered by the Blackpool County  
25 Court that:

13

1 **A.** Yes.

2 **Q.** Then we turn to page 110. A case management  
3 hearing has ultimately taken place on 7 July  
4 2003, and there are certain orders made that are  
5 relevant to your instruction and paragraph 1  
6 says that:

7 "[The] Claimant do by 4 pm on July 21st  
8 serve on the Defendant copies of the relevant  
9 computer logs from June 2000 until November  
10 2000."

11 Paragraph 4, it says there:

12 "It appearing to the Court that archived  
13 material on the computer may have been  
14 destroyed, it is directed that

15 "a) Claimant solicitors so make further  
16 enquiries and copy any correspondence to  
17 Defendant [and the]

18 "b) Parties [are to] make enquiries of  
19 expert as to whether an opinion can be given  
20 using only computer logs."

21 **A.** Right, yes.

22 **Q.** Can we now turn to POL00118221, please. It's  
23 page 47 of that bundle. This is part of the  
24 trial bundle but there are relevant documents  
25 within that that I'm going to take you to. This

15

1 "On it appearing to the court that expert  
2 evidence is needed on the issues of  
3 liability/causation and that the evidence should  
4 be given in the form of written reports of  
5 a single expert instructed jointly by the  
6 parties in the field of Computer Technology."

7 **A.** Yes.

8 **Q.** So this is the first mention of a single joint  
9 appointed expert.

10 Can we please now turn to page 107, thank  
11 you very much.

12 By 17 May 2003, we have Mrs Wolstenholme  
13 writing to the Deputy District Judge and it  
14 appears that she is complaining in this letter  
15 that Weightman Vizards hadn't yet appointed  
16 an expert and also that she had requested call  
17 logs and they hadn't been provided.

18 If we go back a page to page 106, this is  
19 the subsequent order of 5 June 2003, where the  
20 District Judge says that upon reading her letter  
21 and it appearing that the claimants have failed  
22 to give standard disclosure to the defendant and  
23 that the parties had failed to instruct a single  
24 joint expert, the matter latter is listed for,  
25 essentially, a case management hearing.

14

1 is page 47. We're now on 3 September 2003.  
2 Thank you very much. This is a letter to  
3 yourself at Best Practice Group and it is from  
4 Weightman Vizards and it says at the beginning:

5 "We refer to previous communications between  
6 this firm and Judith Bohren and confirm that we  
7 are acting on behalf of the Claimant, Post  
8 Office Limited in connection with its claim  
9 against Julie Wolstenholme."

10 Can you assist us, who was Judith Bohren?

11 **A.** Judith at this time was working in the capacity  
12 of a general administrator within Best Practice  
13 Group.

14 **Q.** Do you recall why you were selected at this  
15 stage?

16 **A.** Possibly proximity to the computer, and I live  
17 in -- near Preston, Lancashire, so it's only  
18 relatively round the corner from Cleveleys.  
19 But -- perhaps, but I really don't know.

20 **Q.** It appears as though there was a conversation  
21 before this letter, discussing your instruction?

22 **A.** Yes, and I seem to think that -- it's a hazy  
23 recollection -- but Judith will have come to me  
24 and explained that we've had a call, an enquiry,  
25 what types of things, would we need? So it

16

1 probably would have been Judith that went back  
2 to Susanne Helliwell and said, "I've spoken to  
3 Jason and these are the things that he would  
4 need in order to opine on this".

5 **Q.** Thank you. Can we go to the bottom of this  
6 page. Can I just check, you've mentioned  
7 Susanne Helliwell there. Was she your only  
8 contact with at Weightman Vizards or was there  
9 anybody else you had contact with or did you  
10 speak to the Post Office?

11 **A.** No, I certainly didn't speak to anyone directly  
12 at the Post Office or I don't believe I did.  
13 And I think it was only Susanne Helliwell that  
14 I dealt with at Weightmans.

15 **Q.** Thank you. Can we have a look at the bottom  
16 paragraph of this page. It explains the  
17 background. So:

18 "Various matters are raised by  
19 Mrs Wolstenholme in the proceedings regarding  
20 the inadequacy of the Horizon computer system  
21 and in this regard, on 10 February 2003, it was  
22 ordered that evidence should be given in the  
23 form of a written report of a single expert  
24 instructed jointly by the parties in the field  
25 of Computer Technology."

17

1 seems as though, by that stage, there wasn't the  
2 audit data available to actually look at the  
3 underlying transaction data; is that correct?

4 **A.** Yes, but I think that, in itself, is quite  
5 surprising. And, you know, I did note that  
6 there was talk about, you know, data being kept  
7 on the machine for so many days, I think it was  
8 30 days, and then data being removed after  
9 18 months. From my knowledge since this matter,  
10 I don't believe that that would have been  
11 correct at the time. I don't believe that  
12 archived data would have been removed after  
13 18 months.

14 So perhaps there was other data that was  
15 available. There were certainly things like  
16 KELs and things like that that were available at  
17 the time that would have assisted me to come up  
18 with my opinion but none of those were provided  
19 either.

20 **Q.** When you say you think the audit data would have  
21 been longer than 18 months is that because you  
22 know subsequently that later data had been held  
23 for longer.

24 **A.** Yes.

25 **Q.** So it may have been there was a change in the

19

1 **A.** Yes.

2 **Q.** Can we scroll down the page, over to the next  
3 page. Just looking at this letter here, can you  
4 summarise briefly for us what you were asked to  
5 do?

6 **A.** To produce an opinion on whether, essentially,  
7 the use of the Helpdesk by the Cleveleys post  
8 office was reasonable use, whether the calls  
9 that were being placed to the Helpdesk by the  
10 subpostmaster were placed appropriately, and  
11 I was given somewhere between 80 or 90 call  
12 logs, really without very much context, and  
13 I was asked to go through those and effectively  
14 categorise them as calls requesting general  
15 help. So, for example, "Could you tell me how  
16 I do this", so that might suggest a lack of  
17 training or a lack of understanding, or whether  
18 they were calls relating to a defect,  
19 generically a defect, could be with  
20 hardware/software interfaces in the operation of  
21 the system, and therefore the subpostmaster  
22 called the Helpdesk seeking guidance and  
23 resolution about that defect.

24 So that's the process that I went through.

25 **Q.** As we saw from those previous court orders, it

18

1 procedure in how long they held data?

2 **A.** It's possible that there was a change and that  
3 statement was correct at the time. Certainly,  
4 later on, data was kept for a lot longer than  
5 that.

6 **Q.** The letter that's on our screens right now, is  
7 that what you understood to be a letter of  
8 instruction?

9 **A.** Yes.

10 **Q.** Thank you. Can we go over the page now to  
11 page 49 of the bundle and it's another letter.  
12 This is a letter from yourself to Ms Helliwell  
13 of 19 September 2003. Looking at this document,  
14 can you tell us what your response to that  
15 letter of instruction was?

16 **A.** Yes, so I said it's not clear to me what you're  
17 asking me to do. You've simply provided me with  
18 70 or 80 telephone call logs and, in order to  
19 opine whether the system was operating normally,  
20 that what I would need to do -- I'd need to do  
21 a comparison of the Cleveleys subpostmaster --  
22 Horizon System with other terminals in other  
23 branches to see if I could see whether there was  
24 a difference with either the operation -- the  
25 way Ms Wolstenholme operated the system or

20

1 whether there was something specific about the  
 2 technology within Cleveleys or whether this was  
 3 stereotypical of all the Horizon systems.  
 4 **Q.** It seems as though what you're asking for there  
 5 is a further set of logs --  
 6 **A.** Yes.  
 7 **Q.** -- from other branches?  
 8 **A.** Yes.  
 9 **Q.** You're not asking there for, for example,  
 10 statistics?  
 11 **A.** No.  
 12 **Q.** But you're asking for the actual underlying logs  
 13 from other branches?  
 14 **A.** Yes, and I say there "I believe a further set of  
 15 support logs would be required".  
 16 **Q.** If we turn over the page we have the response  
 17 from Weightman Vizards, 17 November 2003, and  
 18 it's the bottom of that first page I'd like to  
 19 look at. It says there:  
 20 "As you are aware, our client has  
 21 unfortunately been unable to obtain a set of  
 22 comparable call logs and it has therefore been  
 23 agreed between the parties that copies of the  
 24 pleadings, witness statements and relevant  
 25 documents in the proceedings would be provided

21

1 **Q.** Thank you. We dealt with this in Phase 2.  
 2 **A.** Mm-hm.  
 3 **Q.** At that time, there may have been PinICLs as  
 4 well as PEAKs --  
 5 **A.** Yes.  
 6 **Q.** -- or at some stage it switched over?  
 7 **A.** That's right, yeah.  
 8 **Q.** I'm going to turn to your report in a moment but  
 9 before we look at your report I just want to  
 10 bring up the statement that had been submitted  
 11 in those proceedings by Elaine Tagg, who was the  
 12 retail manager of the -- Retail Network Manager  
 13 at the Post Office, that's POL00118219. This  
 14 again was in the trial bundle, so this was in  
 15 a bundle you would have seen at the time?  
 16 **A.** Yes.  
 17 **Q.** I think, in fact, we'll see in your report that  
 18 you refer specifically to the witness statement  
 19 of Ms Tagg. That's at page 5 of this bundle.  
 20 This is a statement of 16 October 2003, and it  
 21 explains there that Ms Tagg was employed by Post  
 22 Office, her title was previously Retail Network  
 23 Manager and, at some point, it was changed to  
 24 Retail Line Manager.

25 **A.** Mm-hm.

23

1 to you to assess with a view to confirming  
 2 whether you would be able to provide a report  
 3 which would be of value to the Court and if so,  
 4 detailed the matters upon which you would be  
 5 able to report."  
 6 So you're being told in that letter that  
 7 there isn't a comparable set of call logs. Was  
 8 your understanding from reading that that there  
 9 wasn't a set of call logs, that there was  
 10 an issue with finding comparable cases, or what  
 11 the issue was there?  
 12 **A.** I believe that, because I'd set out various  
 13 criteria, you know, similar numbers off similar  
 14 sites, that they were unable to find either  
 15 a similar sized or similar turnover Post Office.  
 16 I now know that that statement that's made  
 17 there can't really be correct at the time  
 18 because, as a better understanding of the Post  
 19 Office estate there, there would have been many  
 20 sites that could have been used as comparators,  
 21 and because I now understand that these are PEAK  
 22 logs -- well, there was many thousands of PEAK  
 23 documentation that could have been used, and the  
 24 support logs that could have been used to pull  
 25 together that comparable information.

22

1 **Q.** Can we go, please, to page 7 and I'm going to  
 2 just look at two paragraphs there because you  
 3 refer specifically in your report to the second  
 4 of these two paragraphs, it's paragraph 11 and  
 5 12 so the bottom of page 7, please.  
 6 So paragraph 11 sets out the difference  
 7 between the Horizon System Helpdesk and the  
 8 NBSC.  
 9 **A.** Okay, yes.  
 10 **Q.** Then if we scroll down to paragraph 12.  
 11 There's the fire alarm. We'll just take  
 12 a short break.  
 13 *(Fire alarm sounds)*  
 14 I think we can continue. Could we zoom into  
 15 paragraph 12, please. I'm just going to read  
 16 out that paragraph. It says:  
 17 "Mrs Wolstenholme persisted in television  
 18 the Horizon System Helpdesk in relation to any  
 19 problems which she had with the system and  
 20 generally, these problems related to the use and  
 21 general operation of the system and were not  
 22 technical problems relating to the system.  
 23 Copies of the call logs for the period  
 24 10 January 2000 to 30 November 2000 together  
 25 with a brief analysis of the calls to the

24

1 Horizon System Helpdesk which I prepared  
2 following Mrs Wolstenholme's suspension are at  
3 [she gives the reference]. Whilst there were  
4 some problems at other branches, they were not  
5 insurmountable and were often due to the system  
6 crashing or were general teething problems."

7 **A.** Mm-hm.

8 **Q.** This is a particular paragraph that you, in due  
9 course, pick up. I'm just going to take you to  
10 a few more extracts from this witness statement  
11 to provide a bit more context. Can we look at  
12 paragraph 15. That's over the page on page 9  
13 and the second half of paragraph 15. She says:

14 "In the first six weeks of  
15 Mrs Wolstenholme's appointment and prior to the  
16 installation of the Horizon equipment, the  
17 office had an average balancing record.  
18 Following the installation of the Horizon  
19 computer system a period of adjustment time was  
20 allowed and in any event the shortages at  
21 Mrs Wolstenholme's post office were not  
22 excessive up to June 2000 for an office of that  
23 size."

24 The next paragraph, she says that on 1 June  
25 there was an audit, or the results of an audit,

25

1 evidenced by the call logs that the problems  
2 which she was experiencing were largely due to  
3 the misuse and operation of the system and apart  
4 from the times when the system crashed, were not  
5 usually the fault of the system."

6 If we scroll down or go over to the next  
7 page, page 11, paragraph 22, I'm going to again  
8 read that paragraph. It says:

9 "On 1 November 2000, I receive a call from  
10 Mrs Wolstenholme during which she informed me  
11 that the Horizon System had crashed and that she  
12 was unable to roll two stock units, namely those  
13 of herself and Mr Harrison, into the next cash  
14 account period."

15 Just pausing there, this is actually a log  
16 that we're going to come to in due course.

17 **A.** Yes.

18 **Q.** "On 2 November 2000, I attended Cleveleys sub  
19 post office and met with Mrs Wolstenholme. My  
20 colleague, Carol Hargreaves, another Retail Line  
21 Manager, was also in attendance. We found the  
22 system to be operational but accepted that there  
23 had been some problems following the upgrade,  
24 none of which would have prevented rollover.

25 Mrs Wolstenholme was reluctant to open the

27

1 and it can be seen that the report states that  
2 there were good controls in relation to the  
3 Horizon System.

4 Then it's paragraph 17 where she says:

5 "On 21 June 2000, [she] wrote to  
6 Mrs Wolstenholme stating that it was now some  
7 ten weeks since the Horizon System was deemed to  
8 be fully operational and stating that there was  
9 currently a loss being held in her account in  
10 the sum of £2,497.94 and requesting that  
11 arrangements be made to repay the loss ...  
12 Mrs Wolstenholme responded by letter dated  
13 9 July 2000 blaming the shortages on the  
14 problems which she claimed to be having with the  
15 Horizon System."

16 **A.** Mm-hm.

17 **Q.** If we go over the page, it says there:

18 "The Post Office was not experiencing any  
19 problems of this nature with the other sub post  
20 offices and as I have stated above, whilst there  
21 were some problems at other offices, they were  
22 mainly teething problems or involved the system  
23 crashing and were not ongoing to the extent of  
24 the problems which Mrs Wolstenholme was  
25 experiencing. I was very much of the view as is

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1 office as she felt that the Horizon System was  
2 malfunctioning. Mr Harrison indicated that he  
3 may turn off the system as he had no faith in  
4 it. I warned him at the time that  
5 Mrs Wolstenholme would be in breach of contract  
6 to do this and would be suspended. Carol and  
7 I checked the cash and stock which was correct  
8 and the office opened at 2 pm. During my visit,  
9 I discussed with Mrs Wolstenholme the position  
10 regarding the losses on her account."

11 If we go to page 13, this is the penultimate  
12 paragraph I'm going to be taking you to this  
13 morning, paragraph 26, just at the top of  
14 paragraph 26, it says:

15 "On 30 November 2000, I received a call from  
16 the Post Office Helpline to say that Cleveleys  
17 sub post office had not rolled the office and  
18 that again only Mrs Wolstenholme's and  
19 Mr Harrison's stock had been affected. I was  
20 also informed that the subpostmaster had  
21 reported a 'large shortage' and was refusing to  
22 roll the office over until the 'problems' were  
23 sorted out. I telephoned the office and told  
24 Mr Harrison to open the office with the 8 stocks  
25 which had been rolled correctly. He stated that

28

1 the office was already open but that they were  
2 working manually and would not be using the  
3 Horizon System until it had been 'sorted out!'"

4 I'd now like to look at the very final  
5 paragraph of this witness statement. It's  
6 page 19. Ms Tagg ends that statement by saying:

7 "Approximately 18,000 post offices are using  
8 the Horizon System which is fully backed by the  
9 Federation of SubPostmasters. I am of the view  
10 that the problems encountered by  
11 Mrs Wolstenholme stemmed from the misuse and  
12 operation of the system and save for the early  
13 teething problems in February/March 2000 were  
14 not technical problems relating to the Horizon  
15 System itself. On the occasions when I and  
16 other employees of the Post Office used the  
17 Horizon System at Cleveleys post office we  
18 experienced no problems whatsoever. The Post  
19 Office had grounds to terminate  
20 Mrs Wolstenholme's contract and the contract was  
21 properly terminated."

22 We see at the bottom of that statement,  
23 a statement of truth.

24 **A.** Mm.

25 **Q.** Do you recall reading this at the time?

29

1 estate. But when I was told that that wasn't  
2 available, I was told that I would just have to  
3 give an opinion based on the call logs that I've  
4 seen for the Cleveleys one.

5 **Q.** Thank you. Then if we go about halfway down  
6 that page, it begins "The statement from  
7 Ms Tagg", and if we could highlight perhaps from  
8 there down to and including the penultimate  
9 paragraph, so yes, from the bottom there from  
10 the word "This", if we could highlight that  
11 section.

12 **A.** Yes.

13 **Q.** You make findings based on Ms Tagg's statement.  
14 Can you please tell us what those findings were,  
15 up to the penultimate paragraph.

16 **A.** Yes. So I say that, in my opinion, what Ms Tagg  
17 states is not a true representation of the  
18 evidence that I've seen from looking at the  
19 calls, the 90 or so calls. And, as I stated  
20 a minute ago, 63 of those calls are system  
21 failures, and only 13 are Ms Wolstenholme  
22 calling the wrong support Helpdesk and, in  
23 Ms Tagg's statement, she suggests that the vast  
24 majority are asking for help and that there are  
25 practically no reports of system problems.

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1 **A.** I do, yes.

2 **Q.** I'm now going to turn to your report, that can  
3 be found at WITN00210101. This is your covering  
4 letter to Ms Helliwell, 21 January 2004. If we  
5 turn over the page, this is your opinion. Now,  
6 on the second paragraph there you set out your  
7 initial opinion prior to examination. Can you  
8 briefly summarise your initial opinion for us?

9 **A.** So what I set out here is that, of the calls  
10 that I've examined, the call logs that were  
11 provided, that 63 of those calls are, without  
12 doubt, system failures, so relating to either  
13 hardware, software or interfaces, and only 13 of  
14 the calls that I looked at could or should be  
15 considered as Mrs Wolstenholme requesting help  
16 or guidance.

17 **Q.** Sorry to pause you there, but I think that's  
18 your substantive opinion.

19 **A.** Yes.

20 **Q.** In the second paragraph, if we could just zoom  
21 in to that, you gave an initial opinion, I think  
22 you're repeating the initial opinion there.

23 **A.** Yes. No, what I'm saying -- what I was saying  
24 there is it would be difficult of me to give  
25 an opinion without a comparative across the

30

1 Then I go on to say that the system issues  
2 we see, screen lock freezes and blue screen  
3 errors, can't possibly be of Ms Wolstenholme's  
4 making but are due to the faulty computer  
5 system, and I specifically highlight a call  
6 there and I make reference to the constant  
7 rebooting that was requested of her.

8 **Q.** In fact, if we look at the final paragraph on  
9 that page, you address the advice from the Post  
10 Office to reboot the system.

11 **A.** Mm-hm.

12 **Q.** Can you tell us what you say in that final  
13 paragraph or summarise that final paragraph for  
14 us?

15 **A.** Yes, from the looking at the detail in the call  
16 logs, there appeared to be a pattern emerging  
17 where Ms Wolstenholme was told to reboot -- just  
18 simply reboot the terminal. And I made the  
19 observation that, whilst rebooting might get you  
20 back up and running, it essentially masks what  
21 the underlying problem might be. There needs to  
22 be analysis of things like crashdumps, you know,  
23 why did the system freeze, what did go wrong.  
24 But I couldn't see within the call logs that  
25 that analysis was really going on. It was more

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1 just get the machine back up and running.

2 That's not to say that people weren't  
3 changing things in the background but you  
4 couldn't necessarily see that from the logs.

5 In fact, from the knowledge in *Bates*, we  
6 know that there was a huge amount of changes  
7 that was going on in the background and being  
8 pushed out, so it might well be that, you know,  
9 a reboot and then a couple more days, something  
10 then might change with the Horizon terminal.

11 **Q.** Can we go over to the next page, which -- is it  
12 a continuation of the opinion, or has the word  
13 "Opinion" at the top? Are you able to assist us  
14 with whether this is the core of your opinion or  
15 something different to what we've just seen?

16 **A.** Yeah, it's a very curious note this, really, and  
17 it's not in the format that I would typically  
18 put together expert witness notes with, and my  
19 consideration at the time is that this was  
20 a report that would go in that would then prompt  
21 additional information being provided and that  
22 ultimately might turn into a better formatted  
23 expert report with various sections. But  
24 because there was almost very little to work  
25 with, it's formatted in this curious way. It's

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1 a reduction in the calls at the end of June 2000  
2 and I'm not sure if we managed to identify what  
3 that might be.

4 **Q.** I think you say in the report that it could be  
5 due to the faults reducing in frequency but it  
6 could also be that Mrs Wolstenholme tired of --

7 **A.** That's right, yes. One thing that happens with  
8 users -- and this is from a direct experience of  
9 managing helpdesks -- is if the users are  
10 constantly told to reboot, effectively they'll  
11 stop ringing the Helpdesk because, if all you're  
12 told is just to reboot, well when you might as  
13 well reboot yourself. You don't have to waste  
14 your time on the phone, knowing that someone is  
15 going to tell you to reboot. So you do see that  
16 apathy, I think it might be, that you just  
17 simply reboot yourself and don't log the call.

18 **Q.** So a reduction in calls could be caused by  
19 a number of things?

20 **A.** It could be, yes.

21 **Q.** It could be caused by the system being fixed --

22 **A.** That's right.

23 **Q.** -- but also it could be caused by apathy, as you  
24 put it?

25 **A.** Mm-hm.

35

1 more like an observation, a canter through the  
2 various highlights that we see in the call logs.

3 **Q.** Thank you. Beginning with what's at the top,  
4 down to but not including the paragraph that  
5 begins "From 31 October", are you able to  
6 summarise the types of faults that you observed  
7 and your findings in that respect?

8 **A.** Yes. So when a screen freezes, you know, you  
9 can be pressing the keys and nothing is  
10 happening, that has to be a system fault. The  
11 user can't cause that and we certainly saw those  
12 types of problems. We had blue screens, where  
13 the system, the operating system, crashes. You  
14 may well see it on your home PC, you often call  
15 it the "blue screen of death", you lose all your  
16 work and it's just a blue screen. That can't be  
17 anything that a user can cause. It's typically  
18 a hardware fault and there was a number of those  
19 that was going on.

20 There was also the need to exchange  
21 hardware. Hardware was switched out by Post  
22 Office, or Fujitsu, suggesting that they  
23 suspected ongoing hardware problems, although it  
24 would seem that there was no real improvement  
25 that was made. I also point out that there was

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1 **Q.** If we look at the bottom two paragraphs on this  
2 page can you please summarise those paragraphs  
3 for us?

4 **A.** Yes. We start to see within the call logs,  
5 discrepancies being discussed. Whether the word  
6 itself "discrepancies" are mentioned, or whether  
7 it's an imbalance, or something failed to post,  
8 or something like that and there's a reference  
9 to all sorts of figures showing minuses where  
10 there should be pluses. So that appears to be  
11 something within the Horizon System has either  
12 changed, so a different version has been pushed  
13 out by Fujitsu that's tried to fix something and  
14 that's perhaps broken something else, or,  
15 alternatively, a new type of working has been  
16 experienced at Cleveleys, they're doing  
17 something in a different way, and that's exposed  
18 defects within the Horizon System.

19 **Q.** The final paragraph?

20 **A.** Yeah, so in one of the calls it says that the PM  
21 was advised that this was an issue since  
22 an upgrade has taken place, so consistent with  
23 what I'd said before. A new version of Horizon  
24 has been released, was pushed out to the  
25 terminals and, although the subpostmasters

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1 wouldn't necessarily know they were using a new  
2 version, behind the scenes it would be a new  
3 version. And it would seem that this problem  
4 has been seen across the estate by Fujitsu since  
5 they've moved out an upgrade.

6 **Q.** I'll take you to that particular call log  
7 shortly. Can we just turn over the page,  
8 please, to the summary of your opinion. You  
9 have three conclusions there. Can you please  
10 take us through, briefly, each one of those  
11 conclusions?

12 **A.** Yes. Yes, okay. So I say that the technology  
13 installed at Cleveleys was clearly defective in  
14 elements of its hardware, software or  
15 interfaces, and that the majority of the errors  
16 in the fault logs could not be the making of  
17 Ms Wolstenholme. The next statement I made is  
18 that Post Office is more focused on simply  
19 closing calls rather than trying to get to the  
20 bottom of what the issues might be and the  
21 instruction to reboot would allow the business  
22 to get back up and running again but it could  
23 potentially mask the efforts, certainly from the  
24 Post Office -- from the postmaster -- to  
25 understand what's going on.

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1 **A.** I think the simple answer is not. I wouldn't be  
2 an expert in the actual process that was going  
3 on. But there certainly appears to be an issue  
4 with the adjustment of stock figures and that  
5 they are -- appear to be showing in the  
6 different units. So there's some sort of  
7 imbalance going on, as a result of a fault.

8 **Q.** If we scroll down to the fourth entry, this is  
9 something you've already referred to.

10 **A.** Yes.

11 **Q.** It says there:

12 "PM advised that this is an intermittent  
13 problem occurring since the counters were  
14 upgraded on 23 October."

15 **A.** Mm-hm.

16 **Q.** Thank you. If we go over the page, to the  
17 second entry of that, it says:

18 "Still awaiting a reply -- getting very  
19 upset -- waiting to balance and get to family,  
20 etc."

21 This is a call on Wednesday, so I think  
22 Wednesday may have been balancing day --

23 **A.** Yes.

24 **Q.** -- and this was 7.08 pm, 7.00 in the evening,  
25 and it seems to record a message from

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1 And then I also point out that whilst there  
2 was a reduction in calls between July and  
3 October, it might be user disillusionment with  
4 the Helpdesk or comparative system stability.  
5 But then I do point out that from late October,  
6 the re-occurrences of the faults, which had been  
7 the subject of the earlier log calls, seem to  
8 resurface after, in quotes, an "upgrade" to the  
9 counters which seems to have occurred around  
10 23 November 2000.

11 **Q.** Thank you. I'm now going to take you, just by  
12 way of an example, to one of those logs you  
13 analysed. Can we look at POL00118252, please,  
14 and it's page 24 of that particular document.  
15 This does feature in the trial bundle but this  
16 is just a clearer version of the same document.

17 **A.** Yes.

18 **Q.** We see there this is an issue that was opened on  
19 1 November 2000, so that was the date I took you  
20 to in Ms Tagg's statement.

21 **A.** Mm-hm.

22 **Q.** We see there the caller is Julie Wolstenholme.

23 **A.** Mm-hm.

24 **Q.** Are you able to interpret the particular problem  
25 very briefly for us?

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1 Mrs Wolstenholme getting upset.

2 **A.** Yes, and it's -- part of this is to do with the  
3 entry of -- or the remming in of the smart cards  
4 so entering them into stock and registering the  
5 value of those cards within the system and it  
6 would appear that they didn't register correctly  
7 or they registered on one terminal but not the  
8 other terminal or with a different value.

9 **Q.** We see below that it says, "RNM", so Regional  
10 Manager, "Elaine Tagg", that's the author of the  
11 witness statement.

12 **A.** Yes.

13 **Q.** "... called re the call she is on her way to the  
14 office and wants updating on the situation.  
15 Spoke to ref Cath on third line who advised she  
16 will check who is working on the call and get  
17 them to ring the office asap message relayed  
18 back to the [Regional Manager]. [Regional  
19 Manager] not very happy with response."

20 If we go down four further entries it says:

21 "PM [subpostmistress] chasing call,  
22 contacted EDSC who advised are looking at this  
23 now, relayed back to PM, who advised has managed  
24 to roll 7 stock units but 3 have not. Advised  
25 PM needs to contact NBSC and let them know of

40

1 the situation as they will probably not be able  
 2 to do a cash account."  
 3 **A.** Mm-hm.  
 4 **Q.** The one below says:  
 5 "mm calling they have called a few times now  
 6 ..."  
 7 I think that may be Regional Manager  
 8 calling:  
 9 "... they have called a few times now  
 10 expecting a call back with info and no one has  
 11 called them, the office is closed but they are  
 12 waiting for a call."  
 13 **A.** Mm-hm.  
 14 **Q.** The next substantive entry says:  
 15 "Contacted the [Regional Manager] for this  
 16 office as she has now made a complaint regarding  
 17 this issue."  
 18 **A.** Yes.  
 19 **Q.** "Elaine advised that all SUs have now been  
 20 rolled over and they are now checking them to  
 21 see if the final balance is showing to be  
 22 correct. One of the SUs had something added to  
 23 it, whilst rolling over. Elaine was very  
 24 annoyed that no one from 3rd line had called her  
 25 back, as she had been promised number of

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1 look at the end of that entry it says:  
 2 "Not made any declarations, 4,000 short in  
 3 bal ..."  
 4 That must be balance.  
 5 **A.** Balance, "that week".  
 6 **Q.** Yes. Then the entry below says:  
 7 "Call E was reassigned from the [Horizon  
 8 Helpdesk] to group SMC1. Reassign for  
 9 development as this is a known problem with KEL  
 10 and await solution."  
 11 **A.** Yes, so that's the software needs to be changed  
 12 to fix this problem.  
 13 **Q.** We read earlier -- that can be taken down thank  
 14 you -- the statement from Elaine Tagg of the  
 15 Post Office, that stated to the effect that  
 16 Mrs Wolstenholme's calls to the Helpdesk were  
 17 not technical problems. Was this a technical  
 18 problem?  
 19 **A.** Yes.  
 20 **Q.** We also read in the statement of  
 21 Mrs Wolstenholme -- sorry, Ms Tagg that  
 22 suggested that post offices weren't experiencing  
 23 this kind of problem or the kinds of problems  
 24 that she described.  
 25 **A.** Mm-hm.

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1 callbacks. Apologised for not receiving any  
 2 callbacks, and advised that I would escalate the  
 3 fact that the agents she has spoken to have  
 4 promised callbacks within the hour, as they  
 5 should not be making promises like these.  
 6 Advised that 3rd line are very busy with their  
 7 investigations and sometimes do not have time to  
 8 call back. They may call back sometimes if they  
 9 require additional information ... etc. Advised  
 10 that I would monitor the call, and if any  
 11 updates occurred, I would notify them."  
 12 The entry below says that there is a KEL and  
 13 it says:  
 14 "The KEL explains that it is currently being  
 15 investigated by development. I have not spoken  
 16 to the customer."  
 17 Do you now know what a KEL is and did you at  
 18 the time?  
 19 **A.** I don't believe at the time I knew what a KEL  
 20 would be. It would be my expectation that  
 21 I should have been provided with the KELs that  
 22 matched the call logs because that would have  
 23 held my opinion vastly.  
 24 **Q.** There's an entry of Monday, 6 November, which  
 25 says, "contacted pm on [6 November]." If we

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1 **Q.** Seeing as we know that there was a KEL, a Known  
 2 Error Log for this particular issue --  
 3 **A.** Yes.  
 4 **Q.** -- was that a fair statement?  
 5 **A.** No, it was an incorrect statement. I mean,  
 6 certainly there were a large number of problems  
 7 at Cleveleys and with the information that  
 8 I finally got from Post Office, whilst it wasn't  
 9 comparative logs, it was giving me high level  
 10 information about the types of problems in  
 11 another -- I think it was six post offices.  
 12 They were suffering large numbers of  
 13 problems with hardware and software of  
 14 interfaces in the same way that Cleveleys was,  
 15 and I asked for that to be representative of the  
 16 estate. So that suggests that the whole estate  
 17 was suffering similar types of problems as well  
 18 as what was being experienced at Cleveleys at  
 19 that time.  
 20 **Q.** Seeing Ms Tagg's name as the Regional Manager  
 21 and the contact with the Helpdesk in this  
 22 particular instance, do you have any views on  
 23 whether her statement was fair and accurate?  
 24 **A.** No, it wasn't fair or accurate because she  
 25 clearly would have had knowledge of that

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1 particular -- of that particular call and was  
 2 keeping abreast of what was going on, so was  
 3 fully aware that there was technical problems.  
 4 **Q.** Thank you. I'm going to move on now to some  
 5 discussion within Fujitsu about your report and  
 6 also official responses to your report.  
 7 **A.** Yes.  
 8 **Q.** Can we please look at WITN04600304. These are  
 9 comments made by Steve Parker to Jan Holmes  
 10 within Fujitsu, so it's not an email that you  
 11 would have seen at the time.  
 12 **A.** Mm-hm.  
 13 **Q.** It's dated 17 February 2004, and we'll come on  
 14 and see that there was an official response on  
 15 20 February --  
 16 **A.** Yes.  
 17 **Q.** -- so shortly before the official response.  
 18 They seem to be comments on your report. I'll  
 19 take them one by one.  
 20 If we look at the first, there's a comment  
 21 on the passage which says that the technology is  
 22 clearly defective.  
 23 **A.** Yes.  
 24 **Q.** He says there:  
 25 "Any technology that runs 24 hours a day  
 45

1 the PM working again in the fastest possible  
 2 time to ensure that the PMs business is not  
 3 interrupted.  
 4 "It is a trade off between time taken to  
 5 diagnose and impact to PMs business."  
 6 Do you have a view on that at all?  
 7 **A.** Well -- and again, it is true, whenever you're  
 8 going to decide to reboot and get up and  
 9 running, and we'll see this in our own  
 10 businesses, that is a trade-off. Do I spend the  
 11 time on the telephone reporting all the issues  
 12 to then just reboot or do I just reboot myself?  
 13 At least I'll be up and running, I'll be  
 14 operational, the business continue to trade.  
 15 The difference here is the process of  
 16 rebooting and not analysing the information  
 17 that's led to it, could well mean that you have  
 18 accounts that are incorrect as a result of that  
 19 system flaw and, ultimately, that imbalance,  
 20 that discrepancy, may well be used in evidence  
 21 against you in later action. So I don't think  
 22 it's fair on the subpostmasters for Fujitsu to  
 23 be using the fastest possible -- or Post Office  
 24 to be using the fastest possible approach to  
 25 getting the Horizon terminals back up and  
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1 will have hardware defects that require fixing.  
 2 This is normal business."  
 3 Do you have a view on that at all?  
 4 **A.** So it would be fair to say that there is a risk  
 5 that exists that with any technology that runs  
 6 24 hours a day it will, at some point in time,  
 7 suffer a hardware defect that will require  
 8 fixing. But it will require that qualification  
 9 that the -- they call it the "meantime between  
 10 failure", so how much time would you expect  
 11 before the next failure exists. We were seeing  
 12 failures in Cleveleys almost on a daily or  
 13 weekly basis. So that is an unreasonable  
 14 meantime between failure.  
 15 So there is a real danger with that  
 16 statement that's made there that the  
 17 non-technical user, reading that, might take  
 18 that to be that I'm incorrect in what I'm  
 19 saying, whereas I think what is being said is  
 20 actually he agrees with what I'm saying but  
 21 I think it's very, very clumsily worded.  
 22 **Q.** If we look at the second point, he comments on  
 23 your point about the Helpdesk being focused on  
 24 closing calls and he says:  
 25 "True, but this focus is also about getting  
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1 running then, because, essentially, it's only  
 2 Fujitsu and the Post Office that benefit from  
 3 that reboot and get up and running; the  
 4 subpostmasters are potentially massively  
 5 disadvantaged by that.  
 6 **Q.** The third point comments on your view that there  
 7 work were worrying discrepancies. He says:  
 8 "Must be the major issue. Counter systems  
 9 caused discrepancies. Answer has to be 'no  
 10 way'.  
 11 He makes three points. The first is:  
 12 "Almost all accounting errors in computer  
 13 systems are caused by user error. GIGO  
 14 principle."  
 15 Is that "garbage in, garbage out" principle?  
 16 **A.** I think it is. It really is quite a delusional  
 17 view, though. Why should it be the case that  
 18 accounting errors are caused by user error?  
 19 Anyone in technology will know that it's  
 20 typically bugs within the code that will lead to  
 21 the types of errors that we see here. You've  
 22 always got to examine what the user was doing  
 23 and whether it was being used appropriately.  
 24 But if these systems are designed to be quite  
 25 robust it's typically a software defect that  
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1 will lead to an imbalance.  
 2 **Q.** "b) 'Systems' are in place ... (NBSC, suspense  
 3 account entries, etc) like any other computer  
 4 system to ensure that such discrepancies can be  
 5 resolved."  
 6 Do you have a view on that?  
 7 **A.** It is true that over time, a number of  
 8 additional systems and processes were set up by  
 9 Post Office to deal with the inadequacies of  
 10 Horizon in the early days, and there was number  
 11 of other checks and balances and teams of people  
 12 that were fixing transactions.  
 13 So it should say that, whether they were at  
 14 this point in time or whether they developed  
 15 later over time, systems are in place, but there  
 16 was the huge potential for flaws. They were  
 17 very heavily human-based systems that were put  
 18 in place and that -- some of them were  
 19 mechanised later.  
 20 **Q.** Go when you say human-based, do you mean  
 21 workarounds and things like that, rather --  
 22 **A.** Yeah, workarounds and people putting things into  
 23 a Excel spreadsheet and seeing if it added up  
 24 and making corrections and, yeah, various human  
 25 workarounds.

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1 what's called the happy path, so, if everything  
 2 goes well with the transaction, you'll get the  
 3 successful result at the end. It's only if  
 4 something differs within that or if certain  
 5 types of transactions that have done, or certain  
 6 transactions are done in certain sequences.  
 7 So what goes on at a particular post office  
 8 that exposes a defect may only be seen in  
 9 a handful of other post offices because of the  
 10 nature of it. And, certainly, in some of the  
 11 defects that we looked at as part of the GLO,  
 12 you will see in the bug table at the back, some  
 13 of the defects only hit 20 or 30 or 50 different  
 14 post offices at various points to in time. So  
 15 that's an incorrect statement.

16 **MR BLAKE:** Thank you very much.

17 Sir, we're about halfway through Mr Coyne's  
 18 evidence. Because of the timetable today  
 19 I think it may be sensible to actually take our  
 20 first break of the day now.

21 **SIR WYN WILLIAMS:** Yes, that's fine with me, yes.

22 **MR BLAKE:** So if we could come back at 10.55.

23 **SIR WYN WILLIAMS:** 10.55, that's fine. Okay, see  
 24 you then.

25 **MR BLAKE:** Thank you very much.

51

1 **Q.** There's reference to the suspense account system  
 2 being in place. Are you aware of the suspense  
 3 account being removed at a point in time?  
 4 **A.** Yes, I was. I don't recall at the moment when  
 5 the suspense account was moved but, yes, the  
 6 suspense account would allow a place for  
 7 transactions to be essentially parked until it's  
 8 worked out later what has gone wrong, whether it  
 9 was a misposting or whether it was a defect and  
 10 then it could be taken out and reposted  
 11 somewhere else, and then that was removed later.  
 12 **Q.** If we look at (c), he says:  
 13 "Yes, software errors can make such  
 14 mistakes. However, the systems in place ensure  
 15 that such errors are picked up and resolved. If  
 16 this problem was caught by a software error the  
 17 same error would exist on all Horizon sites.  
 18 17,000 PMs are not complaining of misbalancing  
 19 and discrepancies."  
 20 **A.** No, that's incorrect. What you see with defects  
 21 in software is that they may only trigger with  
 22 a very specific series of either key presses or  
 23 series of transactions, or certain events going  
 24 on with -- on the estate. Because when  
 25 developers test software they generally test

50

1 (10.39 am)

2 (A short break)

3 (10.55 am)

4 **MR BLAKE:** Thank you, sir. I'm going to try to  
 5 perform some computer wizardry of my own and  
 6 bring two documents on side by side: one is  
 7 FUJ00121512 and the second is FUJ00121535.  
 8 Thank you very much.

9 On the left-hand side of our screen, we have  
 10 the Fujitsu response to your expert report, and  
 11 on the right-hand side we have your response to  
 12 their response.

13 **A.** Yes.

14 **Q.** So the left-hand side is dated 20 February 2004  
 15 and your response is a week later, 27 February  
 16 2004.

17 **A.** Yes.

18 **Q.** I'm going to take you through, one by one, each  
 19 of their comments on your report. So if the  
 20 left-hand document, if we could go over to the  
 21 next page, please, thank you. So they address  
 22 first the Horizon System Helpdesk. Can you  
 23 assist us with what your understanding is of  
 24 what Fujitsu were saying about your comments on  
 25 the Horizon Helpdesk?

52

1 **A.** So Fujitsu are explaining that there is what  
2 they call a strict contractual service level  
3 agreement covering up -- sorry, covering aspects  
4 such as pick-up time, time to fix, time to close  
5 and that they operate to that criteria because  
6 that's the commercial contract that they have  
7 with the Post Office.

8 So it could well be the case that it is  
9 better for Fujitsu to close a call by rebooting  
10 a computer than it is to spend a lot of time  
11 investigating it because that might put them in  
12 breach of their service level agreement.  
13 I don't know, I haven't seen that service level  
14 agreement and that's why I've said it's a matter  
15 for the Post Office and Fujitsu because it's  
16 their commercial agreement, rather than me to  
17 comment on that.

18 **Q.** The final part of the entry on the left-hand  
19 side says:

20 "Whilst the primary objective of the HSH is  
21 to return the Outlet to normal operation as soon  
22 as possible, and rebooting the Counter often  
23 meets that objective, this does not mean that  
24 the problem is closed at that point in time, as  
25 a detailed scrutiny of overall problem

53

1 process. But I don't believe it operates  
2 significantly different when I was looking at it  
3 in 2016 to 2018, than what it operated then.  
4 You know, the desire to reboot and get  
5 operational appeared to be consistent then with  
6 what it -- now with what it was then. And the  
7 fixing of faults and effectively pushing those  
8 fault fixes out in the background was also the  
9 same.

10 I think in my second report to the GLO,  
11 we -- I listed a number of release notes  
12 suggesting that something had been changed and  
13 pushed out and it was in the thousands. So the  
14 system constantly evolves and, for that reason,  
15 the reboot, it's conceivable that that might --  
16 the rebooting might not fix the problem but if  
17 something is changed in the background and then  
18 you're told to reboot, then that might actually  
19 lead to an improvement.

20 **Q.** If we scroll down on the left side, Fujitsu then  
21 addressed the transaction handling on reboot.

22 **A.** Mm-hm.

23 **Q.** Are you able to assist us with your  
24 understanding of what Fujitsu's position on that  
25 was?

55

1 management processes would reveal."

2 **A.** That may well be the case and, in my report,  
3 I requested other information with regard to  
4 these calls and I was told that there was no  
5 information available. So if there are -- if  
6 there's other material available that references  
7 the calls that were made by the Cleveleys post  
8 office, then that should have been provided to  
9 me so I could have opined on that.

10 **Q.** Is an example of that the Known Error Log?

11 **A.** Yes.

12 **Q.** In respect of this particular entry, knowing  
13 what you know now, the experience you've gained  
14 over the years, your involvement in the Group  
15 Litigation, et cetera, do you have any  
16 observations now on that particular issue?

17 **A.** Sorry, when you say "that particular issue"?

18 **Q.** The Horizon System Helpdesk point from your  
19 original report. Do you still stand by it? Do  
20 you have any other thoughts that have developed  
21 over time in relation to that?

22 **A.** Well, I have got a far better understanding of  
23 how the process operates, how the calls are  
24 placed, the different tiers of support and the  
25 documents that are created throughout that

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1 **A.** Yes.

2 **Q.** It may be -- we can scroll down the page, as  
3 well, onto the next page on the left-hand side,  
4 because they say:

5 "Simply put, the design of the system  
6 precludes the possibility of a Session Stack  
7 being partially, or doubly committed and thus  
8 accounting errors cannot be introduced through  
9 system crash or forced reboot."

10 **A.** Yes, and that always has been the position  
11 that's been advanced and that was the position  
12 that was advanced in the GLO later, in that,  
13 essentially, by rebooting, there couldn't  
14 possibly be any inconsistencies within the  
15 counter transactions. Although, as the number  
16 of different types of transactions occurred, and  
17 certainly other sort of off-counter  
18 transactions, Camelot and things like that, and  
19 credit and debit card transactions, as it  
20 started to grow, we opined it in the GLO, there  
21 were certainly bugs, errors and defects that  
22 related to that process and it was shown that  
23 discrepancies did occur as a result of that.

24 **Q.** So is that statement at the bottom of the  
25 left-hand side, in your view, incorrect?

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- 1 **A.** Well, the design, if carried out effectively,  
 2 should have precluded the possibility. So from  
 3 a design perspective, but, you know, bugs,  
 4 errors and defects in systems aren't by design.  
 5 They creep in as a result of development or  
 6 a lack of testing or just circumstances that  
 7 haven't been considered that need dealing with  
 8 when they arise. So because the reference is to  
 9 design and it might not be an incorrect  
 10 statement, but it doesn't set the context  
 11 correctly.
- 12 **Q.** If we look on the right-hand side, can you  
 13 summarise what your response was at the time on  
 14 that particular issue?
- 15 **A.** Mm-hm. I would -- just by Fujitsu simply  
 16 stating that that is their position, I could not  
 17 accept that as altering my position, and whilst  
 18 I've said that whilst it assists my  
 19 understanding, it would not be proper of me to  
 20 alter my opinion based on an explanation but if  
 21 you can present supportive evidence to me, but  
 22 I was told that that had been destroyed, I'm  
 23 more than happy to consider that evidence.
- 24 **Q.** Thank you. Moving down on the left-hand side to  
 25 "'Reasonableness' of calls to [the Helpdesk]",

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- 1 **A.** Yes, "S" is software. I mean, you know,  
 2 there's -- there's some very big numbers there,  
 3 in software. And so all of the post offices  
 4 that are listed on the left have all been  
 5 suffering software problems. So these aren't  
 6 user problems because user problems will be  
 7 under "A", advice and guidance.
- 8 **Q.** Are you, in interpreting that particular table,  
 9 also reliant on what call type had been  
 10 attributed to that call by the Helpdesk itself  
 11 or by whoever is making the log in the first  
 12 place?
- 13 **A.** Yes, on the left-hand side this isn't my data,  
 14 this is Fujitsu's data, and they have put  
 15 numbers in the respective boxes. So it's  
 16 Fujitsu that have decided, for example, that  
 17 Headingley has suffered 27 software calls in  
 18 a particular period, and I say I don't know what  
 19 that period actually is.
- 20 **Q.** I think you said earlier that you hadn't been  
 21 provided with the underlying logs and had asked.  
 22 Just to clarify, you didn't have a conversation  
 23 with Fujitsu about this? This was with  
 24 Weightman Vizards or with somebody else?
- 25 **A.** No, that's right. Yes, that's correct.

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- 1 what is your understanding of what Fujitsu were  
 2 saying in relation to this particular point?
- 3 **A.** So Fujitsu had looked at some call logs and  
 4 these should have been the call logs that should  
 5 have been disclosed to me but they said that  
 6 they couldn't be disclosed to me. But then  
 7 they'd found some -- they gave it a particular  
 8 term for these -- it was unregulated data or  
 9 something like that that they then looked at.  
 10 They'd then done some analysis on those calls,  
 11 and had presented in overview their view from  
 12 looking at those calls and they were setting out  
 13 in that table the detail.
- 14 But if you look at that detail, you've  
 15 actually got, for example, "H" is hardware. If  
 16 you look down the "H" column, you can see that,  
 17 you know, Headingley 5, Dungannon 2, so pretty  
 18 much in that representative sample lots of  
 19 people were suffering from hardware issues,  
 20 a number were suffering from implementation  
 21 issues.
- 22 Sorry, can you just show me the legend a bit  
 23 further down?
- 24 **Q.** Absolutely. If we scroll down slightly, and it  
 25 actually goes over the page, as well.

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- 1 I didn't have a conversation with Fujitsu about  
 2 that. But I believe I say, in my response --  
 3 yes, I do. So the -- under "Reasonableness of  
 4 calls", second paragraph starts with "Now it  
 5 seems". So what I say there:
- 6 "Now it seems that your client has located  
 7 data that they believe enables comparison.  
 8 Although the raw data has not been made  
 9 available to me ..."
- 10 **Q.** If we scroll down on that page as well, I think  
 11 there's another paragraph under the  
 12 "Reasonableness of calls".
- 13 **A.** At the top of that I say:  
 14 "Although I must stress that no raw data has  
 15 been [provided] so I am disadvantaged, is it  
 16 your client's intention to rely upon the data  
 17 sample referred to in this letter?"
- 18 So am I to take that table as evidence that  
 19 I should be considering or am I going to get the  
 20 raw underlying data?
- 21 **Q.** If we could scroll down on that left-hand side,  
 22 what is it that Fujitsu were saying that  
 23 analysis shows?
- 24 **A.** So Fujitsu were suggesting that Cleveleys is no  
 25 better or worse, broadly, than the rest of the

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1 estate, which I thought was quite a bizarre  
 2 position to take and I think I made a comment on  
 3 this because it appears that the whole estate  
 4 was suffering huge numbers of problems. So by  
 5 just saying they're all as bad as Cleveleys,  
 6 I didn't know why that was helping anything.

7 But then what they say is it is worth noting  
 8 that Fujitsu Services is not aware of similar  
 9 complaints or claims being made from the other  
 10 outlets on the list. But I know full well that  
 11 there was a number of complaints and claims  
 12 being made broadly across the estate. That's  
 13 not to say that it was those particular post  
 14 offices on the list there. So I didn't know  
 15 whether had list had perhaps been cherrypicked  
 16 because there'd been no complaints by them or  
 17 not. But I know across the estate that there  
 18 was large numbers of problems.

19 **Q.** Looking at your response on the right-hand side,  
 20 what was your response at the time in relation  
 21 to the analysis that had been put forward by  
 22 Fujitsu?

23 **A.** Yes. Okay. I say from the sample presented,  
 24 the mean for software issues is 20 across the  
 25 rest of the estate but for Cleveleys it's 35;

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1 accuracy of the response or fairness of the  
 2 response?

3 **A.** There consistently appears to be, within Fujitsu  
 4 and/or Post Office, a reluctance to ever really  
 5 grasp the analysis of the issue and to look at  
 6 it. And the times that this is -- that this  
 7 comment about, you know, by design, double entry  
 8 bookkeeping, the way that the audit logs are  
 9 kept, all of these sort of principled issues are  
 10 just repeated, when really it's often absolutely  
 11 obvious that there has to be a technical problem  
 12 that should be looked at.

13 And I don't know whether it's an outward  
 14 facing position, "This is what we say but we  
 15 will actually have a look at it", or whether  
 16 it's "This is what we say and we don't need to  
 17 bother having a look at it", and I don't know  
 18 which of those it actually is.

19 **Q.** If we now look at "Operator advice to 'Reboot'",  
 20 and if we scroll down on the right-hand side, so  
 21 that they match up -- thank you. Can you tell  
 22 us what you understand Fujitsu to be saying in  
 23 this respect and your response to Fujitsu?

24 **A.** Yes, so Fujitsu agree with me that it deals with  
 25 effect and not the cause but they say that work

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1 for network, the mean is one against five for  
 2 Cleveleys; software, the mean is 20 against 35;  
 3 and hardware, the mean is four against six. So  
 4 what I say is that all of these issues are  
 5 significantly higher for Cleveleys than the  
 6 mean. So it's inconsistent with the statement  
 7 that Fujitsu are making that Cleveleys is  
 8 largely no better or worse than the rest of the  
 9 estate.

10 **Q.** So is it an accurate summary of your evidence  
 11 now that, on the one hand or first of all, the  
 12 figures themselves don't really help because  
 13 they show lots of problems at lots of places?

14 **A.** Yes.

15 **Q.** But, second, to the extent that they do help,  
 16 what they do show is that Cleveleys was actually  
 17 suffering from a large number of software  
 18 faults --

19 **A.** Yes.

20 **Q.** -- compared to others?

21 **A.** Yes.

22 **Q.** Do you have any observations again, now having  
 23 gained further experience of the system, your  
 24 experience in the GLO, as to the response that  
 25 was provided at that time by Fujitsu, the

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1 goes on in the background and regular  
 2 maintenance updates are made to adjust those  
 3 problems. So the suggestion there is that they  
 4 acknowledge that there are problems, that the  
 5 system is then changed and that an update is  
 6 then rolled out. So, theoretically, it should  
 7 be better the next time, although there has  
 8 often been cases where a fix has been rolled out  
 9 that's then caused what's called regression  
 10 problems. So it breaks other things that had  
 11 been previously fixed, when -- because of  
 12 version control issues within the software.

13 **Q.** So being told that there are fixes, is that  
 14 helpful or does it cause other issues that you  
 15 might want to investigate?

16 **A.** Well, you see, whenever a fix is made within the  
 17 software, you then have to understand what the  
 18 impact of that fault actually was and, in order  
 19 to look at the impact, you've got to know when  
 20 did that version of software get pushed out to  
 21 the estate, when did we fix it and, during that  
 22 period of time, how many subpostmasters have the  
 23 potential to be impacted by that particular  
 24 defect?

25 And if there was an impact, you've really

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1 got to, effectively, rerun all of the accounts,  
 2 or potentially make an exclusion that there was  
 3 knowledge of a particular issue during that  
 4 period and, therefore, you certainly couldn't  
 5 rely upon that data, certainly not for  
 6 a prosecution, but you just couldn't rely upon  
 7 that data because you don't really understand  
 8 what the impact or potential impact on the data  
 9 that defect might have had.

10 **Q.** Again, knowing what you know now, your  
 11 experience in the GLO, et cetera, do you have  
 12 any additional views on this particular response  
 13 from Fujitsu or is that the evidence you've just  
 14 given?

15 **A.** No, I think I'm content.

16 **Q.** Thank you.

17 Moving down to "Defective Equipment", again  
 18 can you tell us what you understood Fujitsu to  
 19 be saying there and your response at the time?

20 **A.** So Fujitsu suggests that it was just simply  
 21 a subjective view that I provided. But my  
 22 response is that this is tool for business.  
 23 This isn't a home PC that might -- at the time  
 24 might have got used, you know, a couple of hours  
 25 a day and got switched off every night. You

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1 Fujitsu saying, you know, "We're doing what we  
 2 said we would do" to Post Office, doesn't really  
 3 help the matter with Cleveleys suffering  
 4 horrendous problems.

5 **Q.** If we scroll down on the left-hand side to the  
 6 section on "Worrying Discrepancies", I'm going  
 7 to read you that first paragraph. It says:

8 "It is difficult to comment on the statement  
 9 made by the Expert in this part of the Summary  
 10 although he is alluding to the fact that system  
 11 errors may be responsible for this. I have  
 12 explained why this cannot happen earlier in this  
 13 report. The argument has been put forward by  
 14 a number of postmasters in the past when  
 15 challenged by Post Office Limited for  
 16 unacceptable losses and each time it has fallen  
 17 when confronted by transaction data that  
 18 demonstrates that the system was operating  
 19 normally during the disputed period.

20 "Unfortunately Fujitsu Services is unable to  
 21 provide archived transaction data in respect of  
 22 Cleveleys for the disputed period as, under the  
 23 terms of the contract in force with Post Office  
 24 Limited at that time, it would have been deleted  
 25 from the archive 18 months after it was ..."

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1 know, this needs to have a much lower level of  
 2 defect and a much higher meantime before failure  
 3 than the rest of the technology because of the  
 4 criticality of it. So I say that I was  
 5 confident in my statement that it was clearly  
 6 defective.

7 **Q.** Again, knowing what you know now, is there  
 8 anything you would add to that?

9 **A.** Well, only that, you know, we know that there  
 10 was a large number of hardware -- or hardware  
 11 and interface problems that were seen, whether  
 12 it be PIN pads or printers or network devices  
 13 that have all suffered from problems that led to  
 14 or had the potential to cause problems with  
 15 postmaster accounts.

16 **Q.** The next one "Closing Calls", I don't think that  
 17 is actually addressed in your response but are  
 18 you able to assist us with what you understood  
 19 Fujitsu to be saying there?

20 **A.** Yes, so again, Fujitsu are referring to their  
 21 own commercial agreement with Post Office, and  
 22 rightly so. If they've got that agreement with  
 23 Post Office, that's the way that they should  
 24 operate. It doesn't necessarily correlate with  
 25 the interests of the subpostmaster. So just

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1 What was your response to that?

2 **A.** So what I said at the time is I'm unsure how  
 3 this can be resolved, as, clearly, the PM  
 4 reported discrepancies and those discrepancies  
 5 correlate with the reported upgrade in the  
 6 system. So the suggestion is that the upgrade  
 7 has led to these discrepancies. But I've said,  
 8 without further information, I think you'd need  
 9 an additional witness of fact to be able to  
 10 opine on that, if there's no documents or  
 11 a system that I can look at, because I've been  
 12 told it's not available -- although we know that  
 13 there was additional information that was  
 14 available -- that then there's very little I can  
 15 do with that.

16 But then I conclude that by saying, in  
 17 short, the answer posed by your letter -- and  
 18 this was the letter from Susanne Helliwell --  
 19 will I change my opinion, is no, my opinion  
 20 currently remains as set the out in my original  
 21 note.

22 **Q.** The statement on the left-hand side that system  
 23 errors can't happen, knowing what you know now,  
 24 reading the precise words that are on the  
 25 left-hand side, do you have any views on what's

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1 said there?

2 **A.** Well, you know, I mean, absolutely we know, as  
3 a result of the work that was done in the GLO,  
4 that system errors can be responsible for  
5 accounting issues, shortfalls and, in fact, we  
6 proved, and Judge Fraser agreed, that a number  
7 of -- I don't exactly know what the number was  
8 off the top of my head but 25, 28 or whatever of  
9 the defects, had lasting impacts.

10 So, effectively, all of the workarounds that  
11 may well have been put in place by Post Office  
12 to deal with the technical defects weren't  
13 successful and it was lasting problems with  
14 accounts. And it's clear from the -- well,  
15 I say recent disclosure from my point of view --  
16 I only got the documents on Wednesday or  
17 Thursday of last week -- there are references to  
18 PEAKs in those documents that I'm absolutely  
19 convinced were not disclosed to me as part of  
20 the GLO.

21 So the number that we reported to the GLO of  
22 bugs, errors and defects may possibly increase  
23 with other disclosure.

24 **Q.** I'm going to take you to one more response by  
25 Fujitsu, and that's WITN04600206, please. It

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1 Case Manager) and we both feel that there is  
2 probably another opportunity to influence the  
3 Expert's opinion by inviting him to Post Office  
4 Account locations ... and providing him with  
5 access to data, records and people who can deal  
6 with his observations directly."

7 Is that ever an opportunity that was  
8 extended to you?

9 **A.** No, no, and, you know, I was told that there was  
10 no records that were available. It's only now,  
11 when my opinion appears to be adverse, if you  
12 will, to them that they're now suggesting that  
13 they can set up people and documents that I can  
14 go and have a look at.

15 **Q.** If you have a read to yourself of that first  
16 entry, the "Horizon System Helpdesk", are you  
17 able to assist us with what you understand  
18 Fujitsu to be saying there and whether that  
19 changes your position at all?

20 **A.** So, I mean, what they are simply saying is  
21 they're restating the primary objective of the  
22 Helpdesk is short-term and return the outlet to  
23 normal business as rapidly as possible, and  
24 certainly what we saw in the call logs was lots  
25 of reboots:

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1 may be that you didn't see this particular  
2 document. Are you able to assist us with  
3 whether you saw this or received this at the  
4 time?

5 **A.** No, I didn't see this at the time. I think this  
6 was provided to me by the Inquiry.

7 **Q.** Yes. It was certainly in your document pack  
8 that was provided.

9 **A.** Yes.

10 **Q.** I'd like to just take you through each one of  
11 those headings and see if anything that was said  
12 further internally at Fujitsu that wasn't  
13 received by you would have changed anything.

14 **A.** Yes.

15 **Q.** If you have look at the first entry, so "Horizon  
16 System Helpdesk".

17 **SIR WYN WILLIAMS:** Sorry, Mr Blake, is there a date  
18 on this document?

19 **MR BLAKE:** There's not a date on the document  
20 itself. I'm sure I can assist at some point by  
21 providing that date.

22 **SIR WYN WILLIAMS:** Thank you.

23 **MR BLAKE:** If we look at the third paragraph it  
24 says:

25 "I have spoken to Jim Cruise, (Post Office  
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1 "Advice to reboot is the most effective way  
2 of doing this. It is not the function of the  
3 HSH to analyse crashdumps while on the phone to  
4 postmasters."

5 Because crashdumps are one of the things  
6 that are typically created when a machine will  
7 blue screen and that was experienced at  
8 Cleveleys. So I suggested, I think in the first  
9 document that I sent, that I would analyse those  
10 crashdumps but Fujitsu said that they've now  
11 been deleted so they weren't available to me.  
12 But what he does go on to say here is that my  
13 comment regarding not getting to the bottom is  
14 flawed because he says that there is a KEL that  
15 was produced at least for one of the calls, that  
16 shows that they were investigating things.

17 And, again, if that KEL had have been  
18 provided, it may well have been the case that my  
19 opinion would be -- have been extended to  
20 "Whilst they are rebooting, I can see that there  
21 are KELs which show that further analysis was  
22 going on in the background", but that wasn't  
23 provided to me.

24 **Q.** If we scroll down to "Transaction Handling on  
25 Reboot" again, are you able to just have a quick

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1 read of that and summarise it for us and tell us  
 2 if that would have changed your opinion in any  
 3 way?  
 4 **A.** No, it wouldn't have changed my opinion. And,  
 5 you know, I agree the way the system is  
 6 designed, and if you went to test a system, as  
 7 I did as part of the GLO, and tried to reboot  
 8 and try and make it cause a transaction failure,  
 9 you'd struggle to do it. You might have to do  
 10 this thousands or tens of thousands of times to  
 11 get it to happen for you on demand, or then it  
 12 might happen for a subpostmaster five times in  
 13 succession, but that's just the way these issues  
 14 occur. So, no, there's nothing in there that  
 15 would change my opinion.  
 16 **Q.** Thank you.  
 17 **A.** I'm quite surprised that they say that the audit  
 18 data would be deleted as quick as this because  
 19 I thought it was kept for a longer time. Maybe  
 20 that's only changed in more recent times.  
 21 **Q.** The next heading "Reasonableness of Calls", can  
 22 you assist us with that, please?  
 23 **A.** Yes. So --  
 24 **Q.** Perhaps we can scroll over the page, as well.  
 25 **A.** Yeah. So I think there appears to be suggestion

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1 **Q.** Would that have assisted you?  
 2 **A.** I mean, it might be of interest to see how it  
 3 works but, when it comes to committing something  
 4 to an expert report, then you really need to  
 5 evidence the detail of this. So I'd really want  
 6 to drill into what specifically was going on at  
 7 Cleveleys. So going there and asking them to  
 8 drill into the records at Cleveleys might be --  
 9 might have been interesting but, no, I wouldn't  
 10 be convinced just by a walk around and  
 11 an assurance.  
 12 **Q.** The next one, "Defective Equipment".  
 13 **A.** So the response here is that he would need to  
 14 understand the basis of my opinion. Well, that  
 15 opinion was formed from the call logs and it  
 16 talks about equipment being changed, which would  
 17 suggest that somebody contemporaneously has  
 18 determined that it was faulty, or blue screens.  
 19 Blue screens is normally a hardware fault or  
 20 perhaps software fault. So I think that's  
 21 a reasonable assumption to make, that there was  
 22 likely hardware faults.  
 23 **Q.** Finally on this document, they address your  
 24 point on "Worrying Discrepancies". If we could  
 25 scroll down.

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1 there that Fujitsu say that they could pull the  
 2 raw data for the call logs, which was asked for  
 3 at the time but wasn't provided. But it would  
 4 appear that that data, it's now being suggested,  
 5 could be available, but only after my initial  
 6 opinion has been documented.  
 7 **Q.** In respect of the dispute between the two of you  
 8 with regards to the comparison data, do you have  
 9 a view on what they say there?  
 10 **A.** So what's being said there is that there are  
 11 other factors, including but not limited to  
 12 training, competency, capability and the PM's  
 13 attitude towards raising calls. Interestingly,  
 14 that list only includes the human factors rather  
 15 than the technology factors or the differences  
 16 in the types of transactions that the post  
 17 offices do.  
 18 **Q.** "Operator advice to Reboot". Again, are you  
 19 able to assist us?  
 20 **A.** So they acknowledge that I've asked for the  
 21 crashdumps but said that they will have been  
 22 destroyed. They offer for me to go, and it  
 23 looks like there's some sort of -- they're going  
 24 to offer me a walk around to assure me of the  
 25 support and proper resolution activity.

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1 **A.** Yes, so that appears that they haven't yet  
 2 considered the specific calls that I referred to  
 3 at that point in time.  
 4 **Q.** Because it says "We need to consider" --  
 5 **A.** "We need to consider the specific calls that the  
 6 Expert is referring to."  
 7 I mean, the worry there is that they've made  
 8 statements there about how robust and resilient  
 9 the system is generically, without actually  
 10 going and looking at these particular issues  
 11 that I raised. So that's, you know, potentially  
 12 a failure there, really and they should have  
 13 been considered in detail, presumably before  
 14 this action was ever started.  
 15 **Q.** Can we briefly look at FUJ00121690. This is  
 16 a covering letter, a covering email from Jan  
 17 Holmes of Fujitsu to Keith Baines, Mandy Talbot,  
 18 Susanne Helliwell and others, Colin Lenton-Smith  
 19 mentioned there as well. The date of this is  
 20 5 August 2004 and it attaches further analysis  
 21 that has been carried out as at this date. So  
 22 we're now in August 2004. And if we look at  
 23 FUJ00121691, this is the further analysis.  
 24 **A.** Oh, right.  
 25 **Q.** Is this anything that was shared with you at the

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1 time or anything that you were aware of at all?  
 2 **A.** It looks like that table is the same table, is  
 3 it not? Headingley and Dungannon?  
 4 **Q.** It certainly has the same post offices, there  
 5 are slightly different statistics, it may be  
 6 a slightly different period.  
 7 **A.** Right.  
 8 **Q.** But I don't believe that this is a document that  
 9 you have ever seen?  
 10 **A.** I don't believe I've seen that document, no.  
 11 **Q.** Thank you. Can we look at POL00022842. This is  
 12 the summary of bugs, errors and defects from the  
 13 *Bates & Others* litigation?  
 14 **A.** Yes.  
 15 **Q.** Can we turn over the page, please. If we look  
 16 at number 2 "Callendar Square", it's agreed that  
 17 the bug occurred between the years of 2000 and  
 18 2006.  
 19 **A.** Yes.  
 20 **Q.** If we go down to number 9, "Reversals", this  
 21 occurred for a short period in 2003.  
 22 **A.** Yes.  
 23 **Q.** Number 10, "Data Tree Build Failure  
 24 discrepancies", its identified effect was during  
 25 1999 and 2000.

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1 during the period in which you were toing and  
 2 froing with Fujitsu in respect of your expert  
 3 report, do you have a view as to the sufficiency  
 4 of information that you were given during that  
 5 Cleveleys case about bugs, errors and defects in  
 6 the Horizon System?  
 7 **A.** Yes, I mean, that -- the information that I was  
 8 given was deficient. There was lots of  
 9 information that would appear was available, and  
 10 had to be available because we've seen it or we  
 11 saw it as part of the GLO, that simply wasn't  
 12 provided to me.  
 13 **Q.** Would knowing about those bugs, errors and  
 14 defects that I've just highlighted in 2000,  
 15 1999, et cetera, would they have made  
 16 a difference to your report in its strength of  
 17 opinion or otherwise?  
 18 **A.** It may have been a longer report, setting the  
 19 scene better but I think, ultimately, my opinion  
 20 was that the Horizon System, as installed at  
 21 Cleveleys, was flawed. It had hardware,  
 22 software and interface problems and had suffered  
 23 from discrepancies. So my opinion wouldn't have  
 24 changed. There might have been more underlying  
 25 evidence that would have supported that ultimate

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1 **A.** Yes.  
 2 **Q.** Over the page, "Girobank discrepancies", that's  
 3 number 11.  
 4 **A.** Mm-hm.  
 5 **Q.** It occurred between May and September 2000.  
 6 **A.** Mm-hm.  
 7 **Q.** Number 12, "Counter replacement issues", the  
 8 first was created in 2000.  
 9 **A.** Mm-hm.  
 10 **Q.** 15, "Phantom Transactions".  
 11 **A.** Yes.  
 12 **Q.** That arose in 2001.  
 13 At number 16, "Reconciliation issues",  
 14 mentioned in 2000.  
 15 **A.** Mm-hm.  
 16 **Q.** 18, "Concurrent logins".  
 17 **A.** Yes.  
 18 **Q.** This occurred in 1999 and 2000.  
 19 If we go over the page, number 22,  
 20 "Bugs/errors/defects introduced by previously  
 21 applied PEAK fixes".  
 22 **A.** Yes.  
 23 **Q.** Some of the PEAKs are from 2000.  
 24 Thank you very much.  
 25 Knowing that these bugs were present, some

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1 opinion.  
 2 **Q.** Do you have a view as to whether it should have  
 3 been disclosed to you at the time?  
 4 **A.** Certainly, yes. My position is that all  
 5 information that relates to defects, because  
 6 this was a report about whether there was  
 7 defects or not, should be disclosed, and I think  
 8 that the question of relevance should actually  
 9 be left with the person who's opining on it,  
 10 rather than lawyers taking a view on whether  
 11 something is relevant or not, because there is  
 12 a danger that documents get taken out because  
 13 they're considered as being not relevant, where  
 14 if you had the technical context, you might be  
 15 able to see that a document was relevant.  
 16 In addition, I expressly asked for certain  
 17 categories of documents and they weren't  
 18 provided. I was told that it was destroyed.  
 19 **Q.** Can we look at FUJ00121724. This is an email  
 20 you won't have seen at the time but it has  
 21 subsequently been provided to you. It's from  
 22 Jan Holmes of Fujitsu to Colin Lenton-Smith, and  
 23 William Mitchell. It says:  
 24 "Colin, Bill.  
 25 "following on from the Cleveleys outcome,

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1 what looks like the reappearance of Shobnall  
 2 Road and the possible outcome of that case  
 3 I believe we should consider a risk position  
 4 around the litigation support."

5 He then comments on the Cleveleys case. He  
 6 says:

7 "Although Cleveleys may appear to be closed  
 8 it could be construed that POL bought off  
 9 Mrs Wolstenholme rather than defend their  
 10 system. Even if a gagging order is placed on  
 11 the woman she apparently had a gaggle of  
 12 postmasters lined up to support her case and  
 13 they will be well aware of what the final  
 14 outcome was. I'm sure they will not be keeping  
 15 quiet. It is not clear why Post Office chose to  
 16 settle rather than fight although I suspect they  
 17 realised that to expose the HSH transcripts in  
 18 Court would not help their case -- personally  
 19 I can understand that position."

20 Number 2:

21 "Shobnall Road has come back. Bill has  
 22 apparently been asked to provide a Witness  
 23 Statement to the effect that nothing contained  
 24 in the HSH calls over the period in question  
 25 could have caused, or be described as, a system

1 if it is an ongoing case at an approximate time  
 2 in which reference is made to phantom  
 3 transactions, would that information have  
 4 assisted you in your analysis of the Cleveleys  
 5 case? Do you think it would or should have been  
 6 disclosed to you?

7 **A.** Yes. It should have been disclosed. I mean,  
 8 I expressly asked for call logs from other  
 9 postmasters with a similar profile -- I think  
 10 that was the word that I used. So I would have  
 11 thought that I would -- you know, should be able  
 12 to distill something from that. Certainly if  
 13 anyone was aware of defects that was causing  
 14 discrepancies at the time, those should be  
 15 disclosed and then the exercise that should  
 16 follow from that is, once we're aware of what  
 17 the defects are and how they lead to  
 18 discrepancies, then attempt to demonstrate that  
 19 Cleveleys was or was not subject to that  
 20 particular defect. And that -- that would have  
 21 to be done across the whole estate and certainly  
 22 should have been provided to me by way of  
 23 evidence.

24 **Q.** Thank you. I want to ask you about a different  
 25 topic very briefly and that's ARQ data.

1 malfunction. I'm attaching a brief analysis of  
 2 the HSH transcripts that I did in April.  
 3 Comments made by engineers that 'keyboards can  
 4 cause phantom transactions' do not help the Post  
 5 Office's position. I suspect that we cannot  
 6 make the statement required and when [Post  
 7 Office] read the transcripts in detail they may  
 8 well think that they could not submit them  
 9 anyway."

10 That reference there to an issue in Shobnall  
 11 Road and keyboards can cause phantom  
 12 transactions, in that email of August 2004, does  
 13 that impact your view as to the sufficiency of  
 14 information that you were provided with in the  
 15 Cleveleys case?

16 **A.** I don't know what the particular issue was at  
 17 Shobnall Road but I am certainly aware now of  
 18 phantom transactions and, throughout the GLO,  
 19 there was a number of documents that we looked  
 20 at that theorised about whether keyboards could  
 21 lead to phantom transactions but, certainly  
 22 during the Cleveleys investigation, none of that  
 23 was provided and, if that's thought to relate to  
 24 Cleveleys, then that's significant.

25 **Q.** If it isn't thought to relate to Cleveleys but

1 **A.** Yes.

2 **Q.** A significant feature of the Cleveleys case is  
 3 that there was no audit data available.

4 **A.** Mm-hm.

5 **Q.** Were you at the time aware of different types of  
 6 data that might be available to you, had it been  
 7 available, had it been kept?

8 **A.** I'm not sure I would have been aware of the  
 9 different types. I would have known just from  
 10 general industry experience of accounting  
 11 systems -- yeah, I've created accounting systems  
 12 myself -- that there would be some sort of audit  
 13 data. But I perhaps wouldn't have known it was  
 14 called or ultimately ends up being ARQ data.  
 15 I don't think I would have known that at the  
 16 time.

17 **Q.** We've heard, and we will no doubt hear more,  
 18 about differences between a standard ARQ extract  
 19 and raw data from the audit store.

20 **A.** Yes. Mm-hm.

21 **Q.** What would you have wanted to have seen had you  
 22 had the opportunity in the Cleveleys case?

23 **A.** So for the particular transactions of interest,  
 24 or days of interest that you can determine from  
 25 looking at the call logs, the expectation would

1 then be, or the next request would then be "Can  
2 I have a look at the transactional data for  
3 those days?", which would show me the  
4 transactions in accounting terms, and then from  
5 that, look at the audit data that's behind those  
6 transactions, to try to determine whether  
7 something has gone wrong with the posting of the  
8 transactions or systematically from the back  
9 end.

10 **Q.** Are you able to assist us at all, and you may  
11 not be, whether filtered ARQ data is something  
12 you would have been satisfied with in this case  
13 or whether you would have wanted to see more?

14 **A.** I would never be satisfied by seeing filtered  
15 anything, without understanding what filtering  
16 has gone on. The danger is with any filter,  
17 well, what has been taken out? So my preference  
18 would always be to go for the raw data, and then  
19 I will filter myself based on what I see fit.

20 **Q.** Knowing what you know now, do you have any  
21 concerns in that particular regard?

22 **A.** Well, I certainly know that filtered and  
23 unfiltered data was a feature in the GLO and  
24 there was problems then with the filtering, as  
25 such, about what was left out. But there is

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1 **A.** Right.

2 **Q.** Finally, I'd just like to take you to a few  
3 criticisms that were made by Fujitsu and by the  
4 Post Office in respect of your report or you  
5 acting as the expert in the Cleveleys case. Can  
6 we look at FUJ00121561, please. This is  
7 an email from Jan Holmes to Colin Lenton-Smith,  
8 and he says:

9 "Draft email to Jim Cruise for you to  
10 consider. I've transferred the contentious  
11 statements from the paper to the email because  
12 it's not in the interests to piss the Expert  
13 off. That said it has to be pointed out to Jim  
14 that his report is far from impartial and, in  
15 truth, we have a problem because there is little  
16 we can do to dispel some of the assertions other  
17 than say 'rubbish'."

18 I want to take you to one more document  
19 before I ask the question and that's  
20 FUJ00121747. This is a subsequent report on the  
21 Cleveleys case and it was written by Jan Holmes.  
22 Can we look at page 4, please, of that report.  
23 It's halfway down, under 3.1. He says there:

24 "The Expert, who was supposed to be jointly  
25 appointed, has taken a very one-sided view of

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1 a factor that I just noted in the documents that  
2 were disclosed -- certainly disclosed to me only  
3 last week -- that relates to a discovery that  
4 the ARQ data itself has duplicates within it.  
5 So it shows that transactions have been  
6 duplicated in the ARQ data. And this is  
7 a report, I believe, from Penny Thomas and  
8 Gareth Jenkins, and it refers to two PEAKs, the  
9 numbers of which I don't recognise, and it also  
10 refers to two specific post offices that were  
11 involved in some form of litigation or criminal  
12 action at the time.

13 So it would appear that, as a result of  
14 pulling the ARQ data perhaps -- and I don't know  
15 this for a fact -- but perhaps to support the  
16 litigation or whatever it was at the time, they  
17 discovered that ARQ data was incorrectly showing  
18 duplicate transactions.

19 Now, the potential impact that flows from  
20 that could be huge but, without investigating it  
21 further, I don't know. There is a PEAK  
22 number -- there's two PEAK numbers listed in  
23 there.

24 **Q.** It is a matter we will be dealing with with  
25 other witnesses in due course.

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1 life and has drawn conclusions that are based on  
2 a paper review of HSH call logs covering the  
3 period from initial rollout of the office to  
4 November 2000. In some cases his analysis of  
5 the call logs is incomplete and stops at the  
6 point where it supports his opinion."

7 What's your view of those comments that were  
8 made by Mr Holmes?

9 **A.** I mean, certainly I dispute that "taken  
10 a one-sided view of life". Part of my training,  
11 and it's a constant focus in what I do, is  
12 I have to look -- I have to take a very balanced  
13 view. And, certainly, when it's a joint expert  
14 report, you have to make sure that everything  
15 that's available from the parties has been  
16 considered. So I completely refute that view.

17 And the fact of the matter is, I did only do  
18 that paper review because that was the only  
19 information that was said to be available to me.  
20 He's obviously got other additional information  
21 that wasn't disclosed to me.

22 **Q.** Finally, similar points made by the Post Office.  
23 It's POL00031815. This is a PowerPoint  
24 presentation by somebody called Dave Smith who  
25 was the IT Director at the Post Office. If we

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1 look at page 3 of this presentation, he  
 2 addresses the Cleveleys case, and he says there:  
 3 "Solicitor appoints 'expert'.  
 4 "Expert was not challenged or managed.  
 5 "Expert assumes status of 'joint' expert.  
 6 "Produced a report which in my view exposed  
 7 the expert as a 'sham'.  
 8 "Nonetheless expert concluded that Horizon  
 9 could have caused the discrepancy.  
 10 "Did not have access to audit trail so  
 11 couldn't refute.  
 12 "That is prove that what the expert said  
 13 could happen didn't happen."  
 14 Are you able to give is your view on that  
 15 opinion?  
 16 **A.** Well, I mean -- I believe it's delusional to  
 17 then look at evidence and simply say that that  
 18 isn't correct, and I looked at the evidence and  
 19 I said what my opinion was, and still remains:  
 20 that system was absolutely flawed at that point  
 21 in time and throughout the GLO we proved, and  
 22 Judge Fraser agreed, that that system had  
 23 a large number of bugs, errors and defects.  
 24 If Fujitsu aren't going to look at the  
 25 detail of the evidence or they're going to look

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1 a witness statement in advance. As you will  
 2 appreciate, I have read a great deal of what  
 3 you've had to say in many different contexts, so  
 4 it's nice to put a face to the voice, so to  
 5 speak. Thank you.  
 6 **THE WITNESS:** Thank you.  
 7 **MR BLAKE:** Thank you, sir. Can we take a 15-minute  
 8 break until 12.10 and then we will hear from  
 9 Ms Helliwell.  
 10 **SIR WYN WILLIAMS:** Yes. I'm very sorry that there's  
 11 a sort of hard endpoint at 2.00, so that even  
 12 a few minutes, I'm afraid, we can't go beyond  
 13 it, but I know that you'll manage it very well,  
 14 Mr Blake.  
 15 **MR BLAKE:** Thank you, it's actually Ms Price who  
 16 will be managing it very well, even better.  
 17 **SIR WYN WILLIAMS:** Oh, well, then you'll have new  
 18 points to manage. Thank you.  
 19 **MR BLAKE:** Thank you.  
 20 **(11.53 am)**  
 21 **(A short break)**  
 22 **(12.10 pm)**  
 23 **MS PRICE:** Sir, can you see and hear us?  
 24 **SIR WYN WILLIAMS:** Yes, I can, thank you very much.  
 25 **MS PRICE:** Thank you. May I call Ms Helliwell,

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1 at the evident and then say they have  
 2 a different view of it, I do believe that that  
 3 is a delusional view. They just fail -- they  
 4 fail either to consider it or their opinions are  
 5 flawed when looking at that evidence. Or,  
 6 alternatively, from Fujitsu's point of view,  
 7 they're looking at it from a commercial lens  
 8 that all they need to do is satisfy Post Office.  
 9 They don't have any real primary interest in  
 10 satisfying subpostmasters.  
 11 **Q.** Finally, are there any other matters relevant to  
 12 the Cleveleys case that you think should be  
 13 drawn to the attention of the Chair?  
 14 **A.** No, not relevant to Cleveleys, no. No.  
 15 **Q.** We may well have you back in Phase 5 to address  
 16 issues relating to the Group Litigation.  
 17 **A.** Mm-hm.  
 18 **MR BLAKE:** Sir, before I ask whether any Core  
 19 Participants have any questions, do you have any  
 20 questions?  
 21 **SIR WYN WILLIAMS:** No, thank you very much, no.  
 22 **MR BLAKE:** I don't believe there are any questions  
 23 from any Core Participants, so we are finished.  
 24 **SIR WYN WILLIAMS:** Thank you very much, Mr Coyne,  
 25 for coming to give oral evidence and for making

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1 please.  
 2 **SIR WYN WILLIAMS:** Yes.  
 3 **SUSANNE JANE HELLIWELL (affirmed)**  
 4 **Questioned by MS PRICE**  
 5 **MS PRICE:** Good afternoon, Ms Helliwell, my name is  
 6 Emma Price. As you know, I ask questions on  
 7 behalf of the Inquiry.  
 8 **A.** Yes.  
 9 **Q.** Could you give your full name, please?  
 10 **A.** Susanne Jane Helliwell.  
 11 **Q.** Thank you for coming to the Inquiry to assist it  
 12 in its work and for providing a witness  
 13 statement to the Inquiry. We are very grateful.  
 14 You should have in front of you a hard copy  
 15 of a witness statement in your name --  
 16 **A.** Yes.  
 17 **Q.** -- dated 14 July 2023?  
 18 **A.** Yes.  
 19 **Q.** If you turn to page 7 of that statement; is that  
 20 your signature?  
 21 **A.** Yes, my signature has been removed, obviously,  
 22 but I did sign that statement.  
 23 **Q.** Are the contents of that statement true to the  
 24 best of your knowledge and belief?  
 25 **A.** Yes.

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1 Q. For the purposes of the transcript, the URN is  
2 WITN09420100. There is no need to display that.  
3 Today I'm going to be asking you about  
4 issues which arise in Phase 4 of the Inquiry,  
5 focusing on action taken by the Post Office  
6 against subpostmasters and others and, in  
7 particular, upon the proceedings brought by the  
8 Post Office against Julie Wolstenholme in  
9 relation to her time as a subpostmaster of  
10 Cleveleys sub post office.

11 In terms of your background, you were  
12 admitted as a solicitor in 1990; is that  
13 correct?

14 A. Yes.

15 Q. Where did you practice when you first qualified?

16 A. When I first qualified, I practised at a small  
17 firm in Manchester called -- it was called  
18 Shammah Nicholls.

19 Q. Around 10 years after being admitted as  
20 a solicitor, in January 2000, you became  
21 a solicitor at Weightman Vizards; is that right?

22 A. Yes.

23 Q. Which team at Weightmans did you first join?

24 A. I first joined the commercial litigation team,  
25 as it was known then, and then I had done some

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1 A. I believe that I may have had some involvement  
2 in some employment cases. But I can't -- it's  
3 just the timing is very -- it's just very  
4 difficult to think of the timing but I believe  
5 I may have had some involvement or it may have  
6 coincided with me having some involvement in  
7 employment cases for the Post Office.

8 Q. Did you have any knowledge of the Horizon IT  
9 System before becoming involved in the Cleveleys  
10 case?

11 A. No, not as far as I can recall.

12 Q. You have explained in your witness statement  
13 that proceedings against Mrs Wolstenholme were  
14 initially issued and dealt with by the Legal  
15 Services Department of Consignia Plc; is that  
16 right?

17 A. Yes.

18 Q. We have a copy of the trial bundle prepared for  
19 the Cleveleys trial, which was listed in August  
20 2004. Could we have on screen, please, trial  
21 bundle A from that, which contains the pleadings  
22 in the case. The reference is POL00118218.

23 Starting please on page 3 of that document  
24 using the external electronic numbering, we have  
25 the claim form and, towards the bottom of the

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1 employment work at my previous firms, so  
2 I started -- I moved more into employment over  
3 time. So I did a mix of commercial litigation  
4 and employment work.

5 Q. Which team were you in at the point you became  
6 involved in the Cleveleys case?

7 A. I believe -- I was still doing a mix but I had  
8 moved more towards employment but I was still  
9 doing a mix of commercial litigation as well.

10 Q. You remained employed with Weightmans until  
11 around July 2005?

12 A. Yeah, that's -- yes, for the best of my  
13 recollection it was around then.

14 Q. Then for around four years you were away from  
15 the practice of law running your own business?

16 A. Yes.

17 Q. Then in 2009, you went back to practice as  
18 a solicitor with a firm in Manchester; is that  
19 right?

20 A. Yes, that's right.

21 Q. You left to take on a consultancy role to that  
22 firm in 2019, a role you remain in now?

23 A. Yes, that's right.

24 Q. Before the Cleveleys case, had you been involved  
25 in any other cases on behalf of the Post Office?

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1 page, please, we have the issue date here of  
2 23 April 2001. We can see, about halfway down  
3 the page, brief details of claim, delivery up of  
4 goods belonging to the claimant and, going over  
5 the page, please, the statement of truth on the  
6 claim form, towards the bottom. This is signed  
7 by James Cruise, said to be a senior lawyer at  
8 Consignia Plc Legal Services.

9 Could we go over the page again, please.

10 These are the original Particulars of Claim; is  
11 that right?

12 A. Yes.

13 Q. Over the page, please, to the second page of  
14 those particulars. We can see at the bottom  
15 that these are dated 19 April 2001 and again the  
16 statement of truth is signed by James Cruise?

17 A. Yes.

18 Q. You say at paragraph 5 of your statement --  
19 I don't think we need to turn it up -- that you  
20 would have become involved in the case at some  
21 point after the issue of proceedings in 2001,  
22 and prior to the preparation of the Amended  
23 Particulars of Claim in February 2003. Should  
24 we understand from these documents that, as of  
25 19 April 2001, the date of the original

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1 Particulars of Claim, Weightmans had not yet  
 2 been instructed on the case?  
 3 **A.** I believe so. I believe that we were instructed  
 4 subsequently and that they might have been  
 5 dealing with it, I assume dealing with it,  
 6 in-house.  
 7 **Q.** Could we turn, please, within this bundle to  
 8 external page 87. This is the "Notice of  
 9 Transfer of Proceedings" dated 11 June 2001, and  
 10 we can see that this is addressed to the  
 11 claimant's solicitor identified as being  
 12 Consignia Legal Services?  
 13 **A.** Yes.  
 14 **Q.** So it seems as though the matter was still being  
 15 dealt with in-house at this stage on 11 June  
 16 2001?  
 17 **A.** Yes.  
 18 **Q.** Turning, please, to page 98 of the bundle. This  
 19 is the notice of allocation or listing hearing,  
 20 dated 16 July 2001.  
 21 **A.** Mm-hm.  
 22 **Q.** We can see here the claimant's solicitor is here  
 23 identified as Weightman, so would we be right to  
 24 understand by this, that by the 16 July 2001,  
 25 Weightman Vizards was on record as acting for

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1 About halfway down the page, we can see what  
 2 the claim was for:  
 3 "delivery up of these items and equipment or  
 4 their value in damages ..."  
 5 So it's right, isn't it, that the original  
 6 claim brought by the Post Office related only to  
 7 the recovery of items and equipment or their  
 8 value in damages?  
 9 **A.** Yes. Could I just correct one small thing that  
 10 I mentioned before about which department I was  
 11 in at the time that Weightmans became involved.  
 12 **Q.** Of course.  
 13 **A.** Just having seen the fact that our name appeared  
 14 on the notice back in July 2001, at that stage  
 15 I would definitely have been just in the  
 16 commercial litigation department.  
 17 **Q.** Thank you. Turning, please, to page 8, using  
 18 the external pagination, this is the defence and  
 19 counterclaim on behalf of Mrs Wolstenholme.  
 20 Paragraph 2 of that reads as follows:  
 21 "In relation to paragraph 2 of the  
 22 Particulars of Claim the Defendant admits that  
 23 she was a subpostmistress but she contends that  
 24 on its true construction the contract between  
 25 her and Claimant was a contract of employment.

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1 the Post Office?  
 2 **A.** Yes.  
 3 **Q.** Could we turn back, please, to page 5 in this  
 4 document, the original Particulars of Claim  
 5 looking at paragraph 3, please. We can see the  
 6 description here of number of items and  
 7 equipment, including two safes, Horizon computer  
 8 equipment, an alarm system and some scales, and  
 9 then estimates of value of these items at  
 10 paragraph 4. Then at paragraph 5 we have this:  
 11 "Expressly or by implication the Defendant  
 12 agreed that she would deliver up to the Claimant  
 13 and/or would permit the Claimant to collect the  
 14 said items and equipment on demand and/or after  
 15 termination of the said contract and/or on or  
 16 after cessation or use of the said premises as  
 17 a sub post office and/or within a reasonable  
 18 time of such demand or termination or cessation  
 19 of use."  
 20 Turning over the page, the background to the  
 21 dispute is provided. Then at paragraph 8 we  
 22 have this:  
 23 "The Defendant has therefore refused to  
 24 deliver up the safes and other equipment or  
 25 permit the same to be collected ..."

98

1 The Defendant asserts that her employment was  
 2 terminated unlawfully and she has made  
 3 an application to the Industrial Tribunal for  
 4 unfair dismissal and in that claim she has  
 5 claimed re-engagement and reinstatement at the  
 6 premises in Cleveleys where she was carrying out  
 7 her employment ..."  
 8 Mrs Wolstenholme raises here the ongoing  
 9 employment proceedings she had bought against  
 10 the Post Office for unfair dismissal.  
 11 **A.** Mm-hm, yes.  
 12 **Q.** Over the page, please, to paragraph 5 of that  
 13 document, which reads:  
 14 "Paragraph 5 of the particulars of claim is  
 15 denied. In the alternative it is necessary for  
 16 the said items to remain in the said premises  
 17 until the determination of the disputes between  
 18 the parties."  
 19 We see here Mrs Wolstenholme's response to  
 20 the claim. She denied that she had agreed to  
 21 surrender the items and equipment.  
 22 Alternatively, it was necessary to keep them for  
 23 those reasons.  
 24 Then, over the page again, please, at  
 25 paragraph 14:

100

1 "Further or in the alternative it was  
2 an implied term of the contract between the  
3 Claimant and the Defendant that the computer  
4 system provided by the Claimant would be fit for  
5 its purpose and the Claimant is in breach of  
6 this term in that the computer system provided  
7 was unfit for its purpose and the Claimant  
8 failed to ensure that the system was working  
9 adequately. The Defendant has supplied the  
10 Claimant with details of the persistent  
11 inadequacies of the said computer system."

12 It's right, isn't it, that Mrs Wolstenholme  
13 was raising as part of her counterclaim  
14 an allegation that the computer system in her  
15 branch was unfit for purpose and that the Post  
16 Office had failed to ensure that the system was  
17 working adequately.

18 **A.** Yes, she has raised that allegation.

19 **Q.** Turning, please, to page 93, using the external  
20 pagination, this is the reply and defence to  
21 counterclaim. Could we have, please, page 97.  
22 Scrolling down a little, we can see that this  
23 document appears to be dated 2001, it's no more  
24 specific than that. And there is a statement of  
25 truth going up a little, please, signed by

101

1 **Q.** Does this help you date your involvement at all?

2 **A.** Possibly. Sorry, could you just go back to the  
3 document you were in before, was that the Reply  
4 and Counterclaim?

5 **Q.** Yes, that's page 93, please, and the last page  
6 of that, sorry, is 97.

7 **A.** Yes, so I think that I probably -- I wouldn't  
8 have been involved at that stage and, again, to  
9 the best of my recollection, I may have become  
10 involved when we dealt with the Amended -- just  
11 before we dealt with the Amended Particulars of  
12 Claim in, was it February 2003? Because again,  
13 with the proceedings stayed for a period of time  
14 after this, I can't remember the exact dates.  
15 But proceedings were stayed and then I think the  
16 first time my reference comes into play is more  
17 around 2003.

18 **Q.** When you did pick up the file, presumably you  
19 would have read the pleadings that were on file?

20 **A.** Yes.

21 **Q.** Just looking then, please, at the substance of  
22 the Reply and Defence to Counterclaim, this is  
23 page 95, please. At paragraph 3, we can see  
24 here the Post Office's case in relation to  
25 whether or not the agreement was lawfully

103

1 a solicitor named David Robert Jacks.

2 Weightmans' name and address appears beneath  
3 this. Was David Jacks a fellow solicitor at  
4 Weightmans?

5 **A.** I believe he was a partner at Weightmans, but he  
6 may not have been at that time because he  
7 describes himself as a solicitor, but I believe  
8 he was a partner.

9 **Q.** Can you help us with whether you were the file  
10 handler on this case from the start when  
11 Weightmans were first instructed or whether the  
12 file was transferred to you at a later date?

13 **A.** Is it possible to just go back to the notice  
14 from the court where Weightmans appeared?

15 **Q.** Of course.

16 **A.** That could have the reference on it.

17 **Q.** This is page 98 of the bundle. Notice of  
18 allocation or listing hearing. Was this the  
19 order you were looking for --

20 **A.** Yeah.

21 **Q.** -- 16 July 2001?

22 **A.** Yeah, at that stage it's just David Jacks'  
23 reference. My name doesn't appear on it and it  
24 would have done if I was the file handler at  
25 that time.

102

1 terminated.

2 **A.** Yes.

3 **Q.** We can see here, 3.1:

4 "The Defendant well knew and accepted that  
5 the Claimant had given lawful and proper notice  
6 of termination of the said agreement and offered  
7 a payment in lieu of the 3-month notice the  
8 Defendant was entitled to under the written  
9 agreement;

10 "The said sum was calculated from the date  
11 of suspension of the Defendant (30/11/2000) with  
12 the last date of service identified as 28/2/01;

13 "3.3 The Defendant normally would have  
14 £19,322.85 in commission for this period. Due  
15 to the fact that there were outstanding losses  
16 incurred by the Defendant (£17,825.37) and for  
17 which she was liable to make good to the  
18 Claimant, the claimant paid the balance or  
19 excess of commission or remuneration to the  
20 Defendant in the sum of £1,497.48."

21 So the Post Office was suggesting that there  
22 were outstanding losses incurred by  
23 Mrs Wolstenholme, which was why she was not paid  
24 the full commission she would have received in  
25 the three-month notice period. Is that a fair

104

1 reading of that?

2 **A.** Yes, it seems to be, yeah.

3 **Q.** Then at paragraph 4, please:

4 "It is denied that the said computer system

5 was unfit for its purpose and it is averred the

6 same worked adequately."

7 Would you agree that it is clear, on the

8 face of the pleadings we have been through so

9 far, all dated 2001, that an issue in the case

10 from the outset was whether the computer system

11 in the Cleveleys branch was fit for purpose and

12 worked adequately?

13 **A.** Yes, I'd agree with that.

14 **Q.** Could we have on screen, please, WITN09020113.

15 This is a draft letter exhibited by Julie Kay,

16 (née Wolstenholme) to her witness statement

17 provided to the Inquiry.

18 We need not have her statement up on screen

19 but the reference for the witness statement for

20 the transcript is WITN09020100. This document

21 is referenced at paragraph 9 of that statement

22 and it is her evidence that this was drafted by

23 her father.

24 Could we have, please, the second page of

25 that document, three lines down:

105

1 the Post Office in 2001. Starting, please, with

2 page 98, and this is going back, please, to the

3 trial bundle POL00118218. That's page 98. This

4 is the order we've looked at already of the

5 16 July 2001, for the purposes of trying to date

6 Weightmans' involvement, and we can see here

7 that an allocation hearing is being listed.

8 Over the page please, we that have the order

9 of 30 August 2001. This appears to be an order

10 made following the allocation hearing?

11 **A.** Yes.

12 **Q.** As far as you are aware, were you involved in

13 this stage in August 2001? If we just scroll

14 down a little, so we can see the directions

15 there.

16 **A.** I don't believe I was because, again, my

17 reference doesn't appear on the order.

18 **Q.** Do you have any recollection of there being

19 a direction at one stage in the proceedings

20 giving permission for both parties to rely on

21 one expert each in computer systems?

22 **A.** I actually don't. My recollection is that there

23 was the -- an order was made for a joint expert.

24 I don't -- yeah, when I saw this, I just don't

25 have any recollection of that. It's obviously

107

1 "On 28 August 2001 we wrote via solicitor to

2 Weightmans for logs from June 2002, [I think

3 that's 'NO 2000'] never received. I wonder

4 why."

5 It may be that you can't help us if you

6 believe you were involved later but were you

7 ever aware of a request in 2001 on behalf of or

8 from Mrs Wolstenholme for call logs.

9 **A.** No, I wasn't, no.

10 **Q.** At any stage before the Particulars of Claim

11 were amended in February 2003, did anyone at

12 Weightman Vizards ask the Post Office for

13 records of any reports made by Mrs Wolstenholme

14 of problems with the computer system? I know

15 you may be slightly limited by what you would

16 have picked up, if you took that file on later,

17 but were you ever aware of such a request before

18 February 2003?

19 **A.** I can't recall, to be truthful, I just can't

20 recall. It's 19 years ago, or more, isn't it,

21 then? But, yeah, I just can't remember.

22 **Q.** We have a number of court orders in the trial

23 bundle which provide some insight into the

24 progress of the proceedings after the Reply and

25 Defence to Counterclaim was filed on behalf of

106

1 before my involvement and I don't think it was

2 ever really acted on, was it, because the

3 proceedings were stayed.

4 **Q.** We'll come in due course to that order you're

5 thinking of in terms of the single joint expert

6 direction. Over the page, please, to the order

7 of 11 March 2002. We can see the case

8 management conference which had been listed

9 being adjourned to May. Over the page again,

10 14 May 2002, again we have an adjournment to

11 June 2002. Over the page again, please, the

12 order of the 14 June 2002. We have another

13 adjournment to July 2002.

14 **A.** Can I just -- my reference then appears on that

15 order, doesn't it?

16 **Q.** If you can just indicate where you see your

17 reference?

18 **A.** The -- this is the general form or judgment of

19 order, dated 14 June 2002. My reference appears

20 in the claimant's reference. The reference to

21 NJK was the partner, the Head of Commercial

22 Litigation, from memory, in Liverpool.

23 **Q.** Okay, and who was that individual?

24 **A.** Neil Kelly.

25 **Q.** How do you spell that surname?

108

1 A. K-E-L-L-Y.  
 2 Q. Just going back, please, one page, so your  
 3 reference doesn't appear on that May 2002  
 4 document and it does for the first time --  
 5 A. Yes.  
 6 Q. -- on the next page, please, 14 June 2002. So  
 7 does that help us pinpoint then when you became  
 8 involved?  
 9 A. Yes, it does, yes.  
 10 Q. If we can go over the page again, please. This  
 11 is the order of 5 August 2002. We can see the  
 12 claim is stayed until October 2002.  
 13 Paragraph 2, please, of the directions, just  
 14 a little further down the page:  
 15 "Upon termination of the stay, the  
 16 Claimant's solicitor shall within 14 days of  
 17 termination write to the court explaining the  
 18 position in relation to the hearing before the  
 19 EAT, and the court shall then consider whether  
 20 to list for a case management conference or  
 21 whether to order a further stay."  
 22 So it would appear that there were a number  
 23 of adjournments and then a stay, seemingly  
 24 because of the ongoing Employment, and then  
 25 Employment Appeal, Tribunal proceedings.

109

1 liability/causation and that the evidence should  
 2 be given in the form of written reports of  
 3 a single expert instructed jointly by the  
 4 parties in the field of Computer Technology."

5 What can you recall, if anything, about the  
 6 change in the directions in the case from each  
 7 party having permission to rely on its own  
 8 expert to the direction for a single joint  
 9 expert?

10 A. I actually don't really recall why that  
 11 happened. It may have -- I'm guessing, but it  
 12 may have been that there was more of a move  
 13 towards a single joint expert, maybe previously  
 14 parties had been each allowed to rely on their  
 15 own expert but there was -- I don't know when  
 16 the shift was but there was a shift to the  
 17 courts, you know, going more along the single  
 18 joint expert approach. So whether it's that,  
 19 I don't know.

20 Q. Can you recall now what the Post Office's  
 21 position was on whether each party should have  
 22 its own expert or whether there should be  
 23 a single joint expert? I know it's difficult  
 24 after so much time?

25 A. I can't recall. No, I can't recall, I'm afraid.

111

1 A. Yes.  
 2 Q. Do you recall that being the case?  
 3 A. Vaguely. Having read the bundle, the trial  
 4 bundle, it did come back to me that there was  
 5 a stay for a period of time, yes.  
 6 Q. If we could turn, please, to page 104. We come  
 7 now to a directions order of 14 February 2003.  
 8 Just looking at the recital there, it appears  
 9 that a hearing took place at which the claimant  
 10 was represented by a solicitor from Weightman  
 11 Vizards. Was this you?  
 12 A. I can't specifically recall but I believe it  
 13 would have been me.  
 14 Q. It appears here that the defendant was in person  
 15 at that hearing?  
 16 A. Yes.  
 17 Q. We can see from paragraph 2 here that permission  
 18 was given for amended Statements of Case from  
 19 the Post Office and permission for an Amended  
 20 Defence and Counterclaim. The order records  
 21 that Mrs Wolstenholme's claim and appeal to the  
 22 Employment Appeal Tribunal had been dismissed.  
 23 Then at paragraph 8, we have this:  
 24 "On it appearing to the court that expert  
 25 evidence is needed on the issues of

110

1 Q. Could we look, please, to the amended  
 2 Particulars of Claim, which is page 13 of this  
 3 bundle, using the external pagination. We can  
 4 see here particulars were amended pursuant to  
 5 the order of Deputy District Judge Lambert,  
 6 which we have looked at. Turning, please, to  
 7 page 15, scrolling down to the bottom, please,  
 8 we can see your name and signature on the  
 9 statement of truth on behalf of the Post Office.

10 A. Yes.  
 11 Q. Were these Amended Particulars drafted by  
 12 counsel? It may assist if we scroll down  
 13 a little more.

14 A. Yes, I think they were. Is it Tina  
 15 Rañales-Cotos?

16 Q. Just scrolling down a little more, please.

17 A. Yes.

18 Q. Looking, then at the new paragraphs in these  
 19 particulars, page 13 again, please. Starting  
 20 with paragraph 3:

21 "A copy of the contract for services is  
 22 attached at pages 1-60. The Claimant will rely  
 23 on the contract for services for its full terms  
 24 and effect at trial."

25 Paragraph 4:

112

1 "In particular, pursuant to section 9(M)  
2 paragraphs 12 and 13 of the contract for  
3 services, the Defendant is liable for losses  
4 arising at the defendant's post office during  
5 the period of the contract for services.

6 "The Defendant's subpostmaster's account  
7 shows an overall final loss in the sum of  
8 £25,034.04 in respect of the period up and to  
9 including 4 December 2000. An itemised  
10 breakdown of this figure is attached at  
11 pages 61-67. Such sum remains outstanding to  
12 date."

13 Over the page once more, please.  
14 Paragraph 13 reads:

15 "Further the Defendant is indebted to the  
16 Claimant in the sum of 25,034.04 which  
17 represents the overall final loss figure on the  
18 Defendant's subpostmaster's account and the  
19 Claimant claims such sums."

20 It's right, isn't it, that the Post Office  
21 was no longer limiting its claim to the return  
22 of equipment, it was also seeking payment of the  
23 sum of £24,034.04, a sum it claimed represented  
24 losses in the Cleveleys branch, which  
25 Mrs Wolstenholme was liable for under her

113

1 **Q.** Of course. So the Particulars of Claim, the  
2 Amended Particulars of Claim we've just looked  
3 at, contained a bold statement that  
4 Mrs Wolstenholme was liable under the contract  
5 for the losses?

6 **A.** Yes.

7 **Q.** But there was no reference there, was there, to  
8 those losses having been caused by  
9 Mrs Wolstenholme's negligence, carelessness or  
10 error?

11 **A.** Not in that document, no.

12 **Q.** Did this reflect your instructions at the time  
13 that subpostmasters were liable for all apparent  
14 losses in branch, regardless of the cause of  
15 those apparent losses?

16 **A.** Yes, it did.

17 **Q.** At the time that the Particulars of Claim were  
18 amended, were you asked to advise on the  
19 contractual position on liability of  
20 subpostmasters like Mrs Wolstenholme for  
21 apparent losses or shortfalls occurring within  
22 their branch?

23 **A.** I just don't -- I don't recall.

24 **Q.** Moving then, please, to the Amended Defence and  
25 Counterclaim, page 88, please. We can see here

115

1 contract for services?

2 **A.** Yes.

3 **Q.** The Post Office was relying upon section 9(M) of  
4 the contract and, in particular, paragraphs 12  
5 and 13, which was appended to the Amended  
6 Particulars of Claim. Could we have, please,  
7 page 45 of this bundle. Paragraphs 12 and 13  
8 read as follows:

9 "The subpostmaster is responsible for all  
10 losses caught through his own negligence  
11 carelessness or error, and also for losses of  
12 all kinds caused by his assistants. Such losses  
13 must be made good immediately.

14 "The financial responsibility of the  
15 subpostmaster does not cease when he  
16 relinquishes his appointment, and he will be  
17 required to make good any losses incurred during  
18 the term of his office which may subsequently  
19 come to light."

20 There is no reference, is there, in the  
21 Particulars of Claim, the Amended Particulars of  
22 Claim, to the losses alleged by the Post Office  
23 having been caused by Mrs Wolstenholme's  
24 negligence, carelessness or error, is there?

25 **A.** Sorry, could you just repeat that?

114

1 that the title of "Defence" has been amended to  
2 "Re-amended Defence", and looking at the first  
3 page, scrolling down a bit, please, we can see  
4 an amendment to the paragraph numbers to reflect  
5 the new numbering in the Amended Particulars of  
6 Claim, a change to paragraph number 6. So at  
7 paragraph 3, there. Over the page, please, we  
8 see some further changes to paragraph numbers.  
9 The paragraphs dealing with the new aspects of  
10 the Post Office's claim, that is the claim for  
11 losses to be paid, were paragraphs 3, 5 and 13.  
12 Just scrolling down, please, to check, they  
13 don't appear to be referenced, do they, in this  
14 re-amended defence?

15 **A.** No.

16 **Q.** Just for completeness, turning to the last page  
17 of this document page 92, please. This document  
18 is dated 14 April 2003.

19 External page 110, please, in this bundle.  
20 This is the order of District Judge Bryce, dated  
21 7 July 2003 and it appears from the recital  
22 that, again, a solicitor from Weightmans  
23 attended this hearing on behalf of the Post  
24 Office. Was this you, do you think?

25 **A.** I believe, unless if I was on holiday or

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1 anything like that, it probably would have been  
2 me that attended that hearing.  
3 **Q.** We can see the first direction here reads:  
4 "Claimant do by 4 pm on July 21st 2003 serve  
5 on Defendant copies of relevant computer logs  
6 from June 2000 until November 2000."

7 Does this direction tell us that the Post  
8 Office had not, up to this point, provided  
9 Mrs Wolstenholme with the computer logs for this  
10 period?

11 **A.** Yes, it does tell us that.

12 **Q.** Can you help us at all with why that was?

13 **A.** I'm afraid I just -- I can't recall. It may be  
14 that we had been asking for them but, without  
15 seeing my correspondence to the Post Office  
16 around this time, I can't -- I just can't  
17 recall.

18 **Q.** At point 4 of the directions please:

19 "It appearing to the Court that archived  
20 material on the computer may have been  
21 destroyed, it is directed that

22 "a) Claimant solicitors so make further  
23 enquiries and copy any correspondence to  
24 Defendant.

25 "b) [I think that is] Parties make enquiries  
117

1 contact at this time?

2 **A.** Yes, he was.

3 **Q.** We can see from the first paragraph, going back  
4 to the first page, please, that this letter  
5 addresses the court order of 7 July 2003 and  
6 computer evidence in particular. The next  
7 paragraph sets out the basis on which computer  
8 equipment was provided by Fujitsu and then two  
9 paragraphs down, starting "The Horizon System":

10 "The Horizon System went live at Cleveleys  
11 on 10th February 2000 and the sub post office at  
12 Cleveleys closed on 30th November 2000. It is  
13 understood that the computer equipment was left  
14 plugged in and running for some time after the  
15 office closed and the data would therefore have  
16 been archived. Fujitsu Services have informed  
17 Post Office Limited that their technicians would  
18 not be able to retrieve the data in these  
19 circumstances."

20 The next paragraph deals with data which  
21 would have been held by the data warehouse which  
22 would have been kept for 13 weeks, and then,  
23 over the page, please:

24 "Beyond the data warehouse Fujitsu have  
25 a message store which holds greater detail.  
119

1 of experts as to whether an opinion can be given  
2 using only computer logs."

3 So were these your instructions at the time  
4 in relation to archived material, that they may  
5 have been destroyed? There appears to be some  
6 uncertainty about that.

7 **A.** Yes, it would have been my instructions at the  
8 time and we were probably trying to make  
9 enquiries just to see what had happened, and  
10 that's why that direction was given.

11 **Q.** That document can come down now. Thank you.

12 Is it right that this material, the archived  
13 material, was held by Fujitsu and not the Post  
14 Office?

15 **A.** Yes, as I understand it. Yes.

16 **Q.** Looking, then, to what steps were taken by and  
17 on behalf of the Post Office following this  
18 directions order, may we have on screen, please,  
19 the second part of trial bundle C, which is the  
20 documents bundle. The reference for that is  
21 POL00118221. If we could turn to external  
22 page 217, please. This is a letter to you dated  
23 24 July 2003. Going over the page, please, down  
24 to the bottom, please, we can see this is from  
25 Jim Cruise. Was he your primary Legal Services  
118

1 This detail is held for 35 days in an accessible  
2 area and after that time it is archived. I have  
3 been informed by Fujitsu that prior to 1st April  
4 2003 this detail was only held for 18 months.  
5 The position is now that since 1st April 2003  
6 Fujitsu hold message store information for  
7 7 years.

8 "However, no transaction details are now  
9 available and accessible for the period 1999 and  
10 2000."

11 Some emails appear to have been attached to  
12 Mr Cruise's letter and those appear over the  
13 page, please. Starting please at the bottom of  
14 the email chain, which is page 220, scrolling  
15 down, please, the first email in this chain is  
16 from a man called Reg Barton, writing to Kevin  
17 Parkin at 8.35 on 4 July 2003, the first line  
18 reads:

19 "I understand ... that POL have been raising  
20 some questions about Cleveleys SPSO ..."

21 He goes on to explain the position in  
22 relation to Horizon equipment and the data  
23 warehouse.

24 Going back, please, to page 219, just one  
25 page, about two-thirds of the way down the page.  
120

1 There is an email from John Moran. He addresses  
2 the position in relation to the data warehouse  
3 and the message store. Then over to the top of  
4 the next page, please.

5 "In any case it would appear that any date  
6 in 2001 is well beyond the 18-month everywhere  
7 thus there is nothing we can do on this one."

8 Was it your understanding at the time, from  
9 these emails, that this was the first time the  
10 Post Office had tried to attain any data  
11 relating to the relevant period at the Cleveleys  
12 branch, in early July 2003?

13 **A.** It was certainly the first time I'd have raised  
14 it with -- around the first time I'd raised it  
15 with them. I'm not sure if it had been raised  
16 with them before then.

17 **Q.** Before we move to a different document in this  
18 bundle, just going up, please, to the top of  
19 page 219, it would seem that by this point,  
20 Mandy Talbot, from Legal Services, had at least  
21 some involvement in the case, because she's at  
22 the top of that email chain. Was there a time  
23 when both Jim Cruise and Mandy Talbot were  
24 involved in the case?

25 **A.** There may have been. I'm just trying to  
121

1 Mr Coyne specifically came to be approached as  
2 a potential single joint expert?

3 **A.** I can't specifically recall but, at that time,  
4 we'd have -- I'd have looked at suitable experts  
5 in that field -- that's the best information  
6 I can give -- unless he was recommended by  
7 somebody.

8 **Q.** Then three paragraphs down, you explain that  
9 you're enclosing the letter that we've just  
10 looked at of 24 July 2003. So that's the fourth  
11 paragraph on the page:

12 "We enclose a copy of the letter from the  
13 Post Office to this firm dated 24 July 2003 ..."

14 **A.** Yes.

15 **Q.** You continue:

16 "... we are writing to you for the purposes  
17 of ascertaining whether you would be able to  
18 provide an expert report having that sight of  
19 only the computer logs and having not had  
20 an opportunity to inspect the computer system."

21 Finally, on the last paragraph, you enclose  
22 the computer logs. So:

23 "We accordingly enclose copies of the  
24 computer call logs between January 2000 and  
25 November 2000."

123

1 remember Mandy Talbot's position at that time.

2 Was she Jim Cruise's -- was she senior to Jim  
3 Cruise?

4 **Q.** We know from correspondence that she is  
5 described as his boss, in effect.

6 **A.** Yeah. So maybe she had some involvement.  
7 I don't know. But it looks obviously as though  
8 she did have some involvement.

9 **Q.** Could we have, please, page 47, still within  
10 this bundle. This is a letter from you to  
11 Mr J Coyne from Best Practice Group. That is  
12 Jason Coyne, the single joint expert in the  
13 case; is that right?

14 **A.** Yes.

15 **Q.** It's dated 3 September 2003. You set out in  
16 that first paragraph the background to the  
17 matter?

18 **A.** Yes.

19 **Q.** Then, over the page, please, you provide the  
20 history of the contact between your firm and  
21 Mr Coyne. Is that right that the first contact  
22 was in June 2003?

23 **A.** I believe it would have been because that's when  
24 I referred to it in the letter.

25 **Q.** Can you recall how the Best Practice Group and  
122

1 Just pausing there, the information that was  
2 provided to you by the Post Office and which was  
3 passed on to the expert was that in 1999 and  
4 2000, archived material was held for 18 months.

5 **A.** Yes.

6 **Q.** So had a request for archived material in the  
7 message store been made in June 2001, when the  
8 Post Office received Mrs Wolstenholme's original  
9 defence, then material going all the way back to  
10 January 2000 would, on this estimate of time,  
11 still have been available?

12 **A.** On this estimate, it would have been, yes.

13 **Q.** In terms of why such a request was not made,  
14 Mrs Wolstenholme raised this point in  
15 correspondence with you in November 2003 and  
16 then January 2004.

17 We need not look at both letters as the  
18 point is restated in exactly the same terms in  
19 the second but if we could have, please,  
20 page 231 in this bundle, this is a letter dated  
21 21 January 2004 to you, the penultimate  
22 paragraph reads as follows:

23 "Why when it was obvious in December 2000  
24 that this case was going to be pursued through  
25 court were all computer details destroyed?"

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1 If we can go over the page, please, to  
2 page 232, we will find your response dated  
3 26 January 2004. Over the page again, please,  
4 at point 5, we find your response on this  
5 particular issue and you say:

6 "Proceedings were commenced by our client in  
7 April 2001 seeking only delivery up of the goods  
8 and equipment at the former post office premises  
9 following your suspension in November 2000. The  
10 fitness of the computer equipment was referred  
11 to in your Defence and Counterclaim received in  
12 June 2001 and it is therefore not correct to  
13 state it should have been obvious to our client  
14 in December 2000 that this was going to be  
15 an issue. As we now know, the computer records  
16 were only kept for a limited period at that time  
17 under the procedures then existing.  
18 Unfortunately, it was not apparent to our  
19 client's representatives at the time that the  
20 computer records would feature so heavily in the  
21 preparation of the case. Further, you did not  
22 at any time request that they be preserved."

23 Who were you referring to when you described  
24 your client's representatives at the time? Were  
25 you referring to Royal Mail in-house Legal

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1 instructed. I also don't know whether the  
2 person that dealt with it before me made  
3 a request to the Post Office, so it's difficult  
4 for me to comment on that.

5 **Q.** Of course. There was some further  
6 correspondence between you and Mr Coyne before  
7 he provided his opinion, wasn't there? So  
8 Mr Coyne replied to your letter of  
9 3 September 2003 on 19 September 2003, and this  
10 is within the bundle we're currently looking at,  
11 at external page 49, please. If we can scroll  
12 down a little bit, please.

13 So Mr Coyne is effectively asking in this  
14 letter for clarification, further information,  
15 and instructions, isn't he?

16 **A.** Yes.

17 **Q.** I think you've had a chance to see this letter  
18 before?

19 **A.** Yes.

20 **Q.** Then you wrote to Mr Coyne on 17 November 2003  
21 before he provided his opinion, enclosing some  
22 further documentation, so may we go to that  
23 letter, please, page 50 in this bundle.

24 **A.** Yes.

25 **Q.** The first line there:

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1 Services or Weightmans?

2 **A.** Royal Mail in-house Legal Services.

3 **Q.** Were these your instructions: that the Post  
4 Office had not appreciated that the computer  
5 records would feature so heavily in the  
6 preparation of the case?

7 **A.** Yes, they were my instructions. They would have  
8 been -- the letter would have been written in  
9 accordance with those instructions.

10 **Q.** Did you find it surprising that nobody within  
11 Post Office had recognised the need to obtain  
12 computer records upon receipt of  
13 Mrs Wolstenholme's defence in June 2001?

14 **A.** Did you say "do" I find it or "did" I find it?

15 **Q.** Did you then and do you now?

16 **A.** To the best of my recollection, I do recall  
17 being surprised that there were no records  
18 available: surprised and probably frustrated.

19 **Q.** With hindsight, should your firm have recognised  
20 the need for Post Office to obtain computer  
21 records in this case when the firm was first  
22 instructed in July 2001?

23 **A.** It's difficult because, obviously, I wasn't  
24 involved at the time and I don't know what  
25 information and on what basis we were

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1 "We refer to your recent telephone  
2 conversation with our Ms Helliwell and in that  
3 regard, we enclose copies of the followed ..."

4 So the letter appears to have been sent  
5 following a telephone call that you had with  
6 Mr Coyne. Do you recall now what you discussed  
7 with Mr Coyne during that telephone call?

8 **A.** I don't. It was virtually 20 years ago.

9 **Q.** Of course. We can see here that you enclosed  
10 those documents listed below, including the  
11 witness statements being relied upon by the Post  
12 Office and Mrs Wolstenholme.

13 **A.** Yes.

14 **Q.** You refer to the background to the case set the  
15 out in your previous letter and, just scrolling  
16 down a little, please, there is reference to the  
17 comparable call logs that Mr Coyne had asked for  
18 and then we have "As you are aware", the last  
19 paragraph there.

20 **A.** Yes.

21 **Q.** "... our client has unfortunately been unable to  
22 obtain a set of comparable call logs and it has  
23 therefore been agreed between the parties that  
24 copies of the pleadings, witness statements and  
25 relevant documents in the proceedings would be

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1 provided to you to assess with a view to  
2 confirming whether you would be able to provide  
3 a report which would be of value to the Court  
4 and if so, detailing the matters upon which you  
5 would be able to report."

6 Was this letter and your previous letter to  
7 Mr Coyne, dated 3 September 2003, the extent of  
8 your instructions to Mr Coyne, as far as you can  
9 recall?

10 **A.** As far as I can recall.

11 **Q.** Do you recall whether Mrs Wolstenholme had any  
12 input into the instructions provided to  
13 Mr Coyne?

14 **A.** I think she would have had to have some. Yeah,  
15 she would have had to have some involvement  
16 because it was a joint instruction and  
17 I referred to that in my correspondence. Do  
18 I -- is she copied into my letter, or -- or not?

19 **Q.** If we can scroll up to the top, please. Not on  
20 the face of that letter.

21 **A.** There's nothing at the end of it, then.

22 **Q.** If we can just scroll down and go over the page,  
23 please, and just scrolling down a little  
24 further, please.

25 **A.** I can't -- I mean, I can't recall, but it's  
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1 on screen that's POL00118219. That is external  
2 page 5, please.

3 If we could scroll down a little more. To  
4 the best of your recollection, were you involved  
5 in the drafting of this statement?

6 **A.** Yes, to the best of my recollection, I would  
7 have been -- I was. I obviously hadn't recalled  
8 because I didn't have the document and  
9 I couldn't remember who the witnesses were so  
10 I was only -- my statement was based on the  
11 documents that I had at that time.

12 **Q.** Of course. This statement addresses the call  
13 logs which are exhibited to the statement by  
14 Ms Tagg. Did you yourself do any analysis of  
15 the call logs for the period 10 January 2000 to  
16 30 November 2000?

17 **A.** I can't recall. I assume I worked through the  
18 statement with each individual and that would  
19 have been the case with Elaine Tagg, and worked  
20 through the documents with her. But that's as  
21 far as I can recall.

22 **Q.** Going, please, to paragraph 12 of that statement  
23 which is external page 8:

24 "Mrs Wolstenholme persisted in telephoning  
25 the Horizon System Helpdesk in relation to any  
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1 a joint instruction, so she would have had to  
2 have had some involvement and I refer to  
3 agreement being reached between the parties for  
4 the expert to report, as far as -- if to the  
5 extent he is able. So that would -- yeah, that  
6 would obviously assume that she has had  
7 involvement and has seen correspondence but  
8 I can't be certain, just because of the time.

9 **Q.** The Inquiry does have documentation indicating  
10 that it was a joint instruction. It was just in  
11 terms of the content of that letter but if you  
12 can't recall --

13 **A.** I can't recall.

14 **Q.** One of the documents which was sent to Mr Coyne  
15 was a witness statement from a lady called  
16 Elaine Tagg, who was Mrs Wolstenholme's Retail  
17 Line Manager. You say in your statement to the  
18 Inquiry at paragraph 13(v) that, to the best of  
19 your recollection, you were involved in the  
20 drafting of the witness statements of Keith  
21 Baines and Jan Holmes.

22 You have fairly recently, I know, had the  
23 opportunity to refresh your memory as to the  
24 content of Elaine Tagg's statement dated  
25 16 October 2003. If we can have that, please,  
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1 problems which she had with the system and  
2 generally, these problems related to the use and  
3 general operation of the system and were not  
4 technical problems relating to the system.  
5 Copies of the call logs for the period  
6 10 January 2000 to 30 November 2000 together  
7 with a brief analysis of the calls to the  
8 Horizon System Helpdesk which I prepared  
9 following Mrs Wolstenholme's suspension are at  
10 the pages 28-112 of 'EMT1'. Whilst there were  
11 some problems at other branches, they were not  
12 insurmountable and were often due to the system  
13 crashing or were general teething problems."

14 At the time, did you have any concerns about  
15 the accuracy of Ms Tagg's assessment of the  
16 types of problems which Mrs Wolstenholme was  
17 reporting via the Horizon System Helpdesk?

18 **A.** I don't recall that I did, because we were just  
19 acting on the information and instructions that  
20 we received from the client and, obviously, the  
21 documents, you know, that were provided.

22 **Q.** You refer in your statement for the Inquiry to  
23 your involvement in the drafting of Keith  
24 Baines' witness statement. He was at the time  
25 a Post Office employee who held the role of  
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1 contract manager with responsibility for  
 2 contracts with Fujitsu Services; that's right,  
 3 isn't it?  
 4 **A.** Yes.  
 5 **Q.** He appears to have produced two witness  
 6 statements for these proceedings, one dated  
 7 14 October 2003 and the second dated 11 August  
 8 2004, the second one being a matter of days  
 9 before the trial date. Just to clarify, were  
 10 you involved in the drafting of both of those  
 11 statements?  
 12 **A.** Yes, I was involved in the drafting of both of  
 13 them, and I think, as I mentioned in my  
 14 statement, it would also have been the case that  
 15 counsel was instructed to review and advise on  
 16 the draft statements, as he would have been with  
 17 Elaine Tagg's as well.  
 18 **Q.** Just looking for now at the first of these  
 19 statements, please, may we have on screen  
 20 POL00118250. If we can go over the page,  
 21 please, to paragraph 5 of this statement. We  
 22 see here the evidence:  
 23 "Any faults that occurred in the Horizon  
 24 computer system were eliminated once they were  
 25 identified. Whilst it is possible for mistakes

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1 involved in the process. So was anyone from  
 2 Royal Mail Legal Services involved in this  
 3 process?  
 4 **A.** With all the statements before they were  
 5 finalised, everything went through my contact at  
 6 Royal Mail, or it would have done. That's  
 7 whether, you know, it's Jim Cruise or Mandy  
 8 Talbot and, as I said, counsel would also be  
 9 involved as well.  
 10 **Q.** Were you told by Mr Baines or indeed anyone else  
 11 from the Post Office about the faults that  
 12 occurred in the Horizon computer system that are  
 13 referenced at that paragraph 5 when the  
 14 statement was being drafted? Were you told what  
 15 they were?  
 16 **A.** I can't remember.  
 17 **Q.** Jason Coyne provided an opinion in the case in  
 18 January 2004. May we have this on screen,  
 19 please. It is WITN00210101. That first page is  
 20 the covering letter, dated 21 January 2004, sent  
 21 to you and copied to Mrs Wolstenholme. We've  
 22 been through this document in some detail this  
 23 morning with Mr Coyne and I know you are  
 24 familiar with it, so I don't intend to go over  
 25 the report line by line but, just picking up on

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1 to occur, this is usually through incorrect  
 2 inputting to the computer system in the office  
 3 affected by the mistake. All subpostmasters  
 4 were fully trained in the use of the Horizon  
 5 equipment. The system was fully tested before  
 6 it was used by the Post Office and it is fit for  
 7 its purpose. The system itself does not create  
 8 losses as is claimed by Mrs Wolstenholme."  
 9 What was the process by which Mr Baines'  
 10 first statement was drafted; can you remember?  
 11 **A.** What do you mean by "the process"?  
 12 **Q.** Did you take instructions over the telephone?  
 13 Did you have a meeting? Did he send you  
 14 a draft?  
 15 **A.** I would have either taken instructions over the  
 16 telephone or face-to-face, and then produced  
 17 a draft, which we'd have amended and looked at  
 18 over a period of time. I can't remember, is it  
 19 in this statement or his other one where  
 20 there's -- isn't there a query in the draft?  
 21 **Q.** There is a version of this statement with  
 22 a query in the draft --  
 23 **A.** Yeah.  
 24 **Q.** -- which we can turn up if you'd like us to. My  
 25 question for the moment is about who else was

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1 the key points, going over to the second page,  
 2 please, about halfway down. A little further  
 3 down, please, starting:  
 4 "The statement from Ms Elaine Tagg, the  
 5 Retail Network Manager of the Post Office  
 6 Limited, at paragraph 11 stated that:  
 7 "Mrs Wolstenholme persisted in television  
 8 the Horizon System Helpdesk in relation to any  
 9 problems which she had with the system  
 10 generally, these problems related to the use and  
 11 general operation of the system and were not  
 12 technical problems relating to the system.'  
 13 "This, in my opinion is not a true  
 14 representation on the evidence that I have had  
 15 access to. Of the 90 or so fault logs that  
 16 I have reviewed, 63 of these are without doubt  
 17 system related failures. Only 13 could be  
 18 considered as Mrs Wolstenholme calling the wrong  
 19 support helpdesk requesting answers to 'How do I  
 20 ...? type training questions.'  
 21 Pausing there, did you find this assessment  
 22 of Ms Tagg's evidence by Mr Coyne troubling at  
 23 all?  
 24 **A.** Well, I would have done at the time, yes.  
 25 **Q.** Did you raise it with Ms Tagg or anyone else

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1 from the Post Office, as far as you can  
 2 remember?  
 3 **A.** I don't remember specifically raising this but  
 4 I know I certainly raised concerns about the  
 5 report itself. Not only the -- his opinion  
 6 about Ms Tagg's statement but just generally.  
 7 **Q.** Mr Coyne goes on in the next paragraph:  
 8 "The majority of the system issues were  
 9 screen locks, freezes, and blue screen errors  
 10 which are clearly not a fault of  
 11 Mrs Wolstenholme's making, but most probably due  
 12 to faulty computer hardware software, interfaces  
 13 or power."  
 14 Over the page, please, about halfway down,  
 15 we then have this:  
 16 "From 31st October, (starting at call log  
 17 number 10253234) there seems to be a number of  
 18 logs which talk of 'large discrepancies' in  
 19 stock figures, trial balances with 'all sorts of  
 20 figures showing minus figures' [with another  
 21 call log referenced]."  
 22 What was your reaction at the time to  
 23 Mr Coyne's opinion?  
 24 **A.** I was shocked and concerned.  
 25 **Q.** Would you have sent this opinion from Mr Coyne  
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1 to be referred to Fujitsu itself? It may be  
 2 that we can take up with the expert witness some  
 3 of the matters referred to in the report and  
 4 clarify them or even persuade them that they are  
 5 wrong -- if this is possible."  
 6 Turning over the page, please, we see  
 7 Mr Coyne's opinion was sent under cover of this  
 8 email to its recipients.  
 9 **MS PRICE:** Being conscious of the time, sir, should  
 10 we have a very short break now? I do hope still  
 11 to finish my questioning by 2.00 when we need to  
 12 finish for the day but I'm conscious we've been  
 13 going for some time. Just five minutes, sir.  
 14 I think you may be on mute, sir.  
 15 **SIR WYN WILLIAMS:** I'm saying that I'm in your hands  
 16 and five minutes is fine by me.  
 17 **MS PRICE:** Five minutes, then.  
 18 (1.20 pm)  
 19 (A short break)  
 20 (1.28 pm)  
 21 **MS PRICE:** Sir, can you see and hear us?  
 22 **SIR WYN WILLIAMS:** Yes, thank you.  
 23 **MS PRICE:** We just had up on screen the document  
 24 POL00118249, the email from Jim Cruise to Keith  
 25 Baines and others from 30 January 2004.  
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1 to your primary Post Office contact from Legal  
 2 Services in the first instance?  
 3 **A.** Yes, I'd have sent it to Jim Cruise, I think, at  
 4 the time, would I? But yeah, I'd have sent it  
 5 to my primary contact immediately, yes.  
 6 **Q.** May we have on screen, please, POL00118249.  
 7 This is an email from Jim Cruise to Keith Baines  
 8 and others, copied to you, dated 30 January  
 9 2004. We can see here:  
 10 "You have previously had some involvement  
 11 with this case in which losses at the above SPO  
 12 are being blamed by the former SPM on the  
 13 Horizon computer system being faulty and causing  
 14 the losses.  
 15 "The case is before Blackpool County Court  
 16 and a computer expert, Best Practice Group Plc,  
 17 is the expert witness and they have produced  
 18 an opinion which concludes that the system was  
 19 defective and the majority of errors noted in  
 20 the fault logs could not be attributed to being  
 21 Mrs W's case fault. This is clearly unhelpful  
 22 to POL's case."  
 23 Then he asks:  
 24 "Who would be the best person to see the  
 25 opinion and comment on it please. Would it need  
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1 Can you remember now what Mr Cruise's  
 2 immediate response to Mr Coyne's opinion was?  
 3 **A.** I believe it was surprise and, you know, shock,  
 4 similar to mine.  
 5 **Q.** Did you think Mr Cruise's suggestion, if we can  
 6 go back, please, to the first page of that  
 7 document, that it may be that they could  
 8 persuade the expert that he was wrong, was  
 9 an appropriate one?  
 10 **A.** Sorry, could you just repeat that again?  
 11 **Q.** Did you think that suggestion from Mr Cruise,  
 12 that it may be that they could persuade the  
 13 expert that he was wrong, was an appropriate  
 14 one?  
 15 **A.** No, but, obviously, I wasn't involved in the  
 16 drafting of that detail but I certainly wouldn't  
 17 have advised that that be said or that be, you  
 18 know, that that would ever be done.  
 19 **Q.** May we have on screen, please, FUJ00121515.  
 20 This is another email from Jim Cruise, this time  
 21 dated 24 February 2004. It's sending  
 22 an attachment called "Cleveleys letter" to Keith  
 23 Baines and Colin Lenton-Smith. It is copied to  
 24 you, among a number of others. We have the  
 25 letter which was attached. Could we have that  
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1 on screen please, it is FUJ00121512. This is  
2 a letter from Colin Lenton-Smith to Keith  
3 Baines, dated 20 February 2004. So scrolling  
4 down, please, we see Colin Lenton-Smith at the  
5 bottom there.

6 He explains that he's writing:

7 "... in response to [Mr Baines'] letter of  
8 6 February 2004 and note Post Office's concern  
9 in respect the Expert's opinion that the Horizon  
10 System installed at Cleveleys branch was  
11 defective and that the HSH was more concerned  
12 with closing call than preventing recurrence of  
13 faults.

14 "An appendix is attached which sets out  
15 Fujitsu Services' view of and response to the  
16 main points in the Expert's report.

17 "In respect of the earlier correspondence  
18 between Jan Holmes (Fujitsu Services) and Jim  
19 Cruise (Post Office Limited), we would be  
20 prepared to discuss this further if this would  
21 help progress the situation."

22 Then going over the page, please, we can see  
23 an attached document entitled "Appendix". Do  
24 you remember reading this document at the time?

25 **A.** Yes, I do now, having seen it, yes.

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1 as stated in my original note."

2 One of the reasons Mr Coyne gave for the  
3 comparative figures from other branches provided  
4 in Fujitsu's appendix not changing his mind was  
5 that he had not been provided with the raw data.  
6 Do you know why the raw data from the comparison  
7 exercise was not provided to Mr Coyne?

8 **A.** No, I don't, I'm afraid, no.

9 **Q.** May we have on screen, please, FUJ00121534.

10 This appears to be an email sent on 3 March 2004  
11 by your secretary, but sending on your comments  
12 about Mr Coyne's response; is that right?

13 **A.** Mm-hm. Yes.

14 **Q.** In those comments you say:

15 "The response to the initial report of Jason  
16 Coyne of Best Practice Group has been sent to  
17 him and his reply is attached. He has not taken  
18 on board any of the points made and has not  
19 revised his report at all.

20 "I would welcome any further points you have  
21 to make on his further report but it seems to me  
22 that his report cannot be accepted by PO Limited  
23 and that an application needs to be made to the  
24 court for Fujitsu to give evidence about the  
25 Horizon System and its working in view of the

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1 **Q.** Just pausing there. You say at paragraph 17 to  
2 your statement of the Inquiry that Peter Sewell  
3 asked Fujitsu to review Mr Coyne's report. The  
4 reference you provided in your statement is to  
5 an email chain from August 2003, before  
6 Mr Coyne's instruction. Is it right to  
7 understand that it was, in fact, Mr Baines who  
8 asked Fujitsu, through Mr Lenton-Smith, to  
9 review Mr Coyne's opinion?

10 **A.** Yes, it is right, yes.

11 **Q.** May we have on screen, please, POL00118221, at  
12 external page 236, please. This is a letter  
13 from you to Mr Coyne, dated 27 February 2004.  
14 Was this you sending on the Fujitsu document  
15 entitled "Appendix" containing comment on  
16 Mr Coyne's opinion?

17 **A.** Yes, I believe it would have been that, yeah.

18 **Q.** We have Mr Coyne's response to Fujitsu's  
19 observations. Can we turn up, please, external  
20 page 57, within this bundle. Mr Coyne's  
21 response came by email on 2 March 2004 and we  
22 can see Mr Coyne's conclusion over the page,  
23 please, just above the "Best Regards":

24 "In short to answer the question posed in  
25 your letter, No my opinion, currently, remains

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1 stance taken by the expert witness."

2 So was this your advice to the Post Office,  
3 that an application should be made for the Post  
4 Office to rely on evidence from Fujitsu about  
5 the Horizon System and its working?

6 **A.** From -- to the best of my recollection, what  
7 would probably have happened is that we were --  
8 the Post Office were being told one thing by the  
9 expert and something else by Fujitsu, so, on the  
10 basis of the information that they were  
11 receiving from Fujitsu, then I would have said  
12 that on the basis of that, then we couldn't  
13 accept the report and Fujitsu would need to  
14 therefore, like I say, give evidence and then it  
15 would be a matter for the court to decide.

16 **Q.** May we have on screen, please, FUJ00121567.

17 This is an email from Jan Holmes to Jim Cruise,  
18 dated 12 March 2004, copied to Colin  
19 Lenton-Smith. It doesn't appear that you were  
20 copied into this email but I'd like to ask you  
21 about some of the observations made in it.  
22 Mr Holmes gives his observations on Mr Coyne's  
23 reply in the first sentence:

24 "We have reviewed Jason Coyne's reply to our  
25 paper and are disappointed that he was unable or

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1 unwilling to change any of his original opinions  
2 based on our original submission."

3 He made some further observations on  
4 Mr Coyne's reply and explains that a further  
5 paper is attached. Then this, in the  
6 penultimate sentence:

7 "We are happy to accommodate him at any or  
8 all of our locations and arrange such interviews  
9 and access to data that he requires, and would  
10 ask that you make this offer to him."

11 May we have on screen, please, WITN04600206.  
12 This is the attachment to Mr Holmes email of  
13 12 March.

14 Sir, you were asking about the date for this  
15 document earlier in relation to the evidence of  
16 another witness. It was attached to an email of  
17 12 March 2004.

18 **SIR WYN WILLIAMS:** Thanks very much.

19 **MS PRICE:** Were you provided with the email from  
20 Mr Holmes or the attached response from Fujitsu  
21 that we see here at the time?

22 **A.** I don't remember seeing the email that you just  
23 showed me before. I can't say. But I would  
24 have been provided with this response.

25 **Q.** About halfway down this page there is  
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1 Cruise's boss:

2 "The PM rejected the offer that was made to  
3 her some time ago and a trial date has been set  
4 for August (I don't know exactly when). POL are  
5 still taking advice as to how best to deal with  
6 this and Mandy's view/belief was that the safest  
7 way to manage this is to throw money at it and  
8 to get a confidentiality agreement signed. She  
9 is not happy with the 'Experts' report as she  
10 considers it to be not well balanced and wants,  
11 if possible, to keep it out of the public  
12 domain. This is unlikely to happen if it goes  
13 to Court."

14 Is this description of Mandy Talbot's view  
15 of the case consistent with your recollection of  
16 the Post Office position at the time, that the  
17 safest way to manage this was to throw money at  
18 it and get a confidentiality agreement signed?

19 **A.** I don't ever recall having that discussion or  
20 even the reference to a confidentiality  
21 agreement. I don't think that was discussed  
22 with myself anyway. I don't think so.

23 **Q.** Were you aware at all that it was a priority for  
24 the Post Office to keep Mr Coyne's opinion about  
25 the Horizon System confidential?  
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1 a reference to a Known Error Log, a KEL, and  
2 that's his statement, that paragraph starting  
3 "His statement that the HSH". Did you  
4 understand what a KEL was at the time of your  
5 involvement in Cleveleys?

6 **A.** Gosh. I may have known at the time but I can't  
7 recall.

8 **Q.** If you had known that Known Error Logs still  
9 existed, would you have considered those to be  
10 potentially disclosable documents?

11 **A.** If I'd have known that they existed, I would  
12 have said that they were disclosable documents,  
13 yes.

14 **Q.** Were you aware at the time that Fujitsu had made  
15 an offer to Jim Cruise, for forwarding to  
16 Mr Coyne, to accommodate Mr Coyne at Fujitsu  
17 locations?

18 **A.** I don't know, I actually don't remember that at  
19 all.

20 **Q.** May we have on screen, please, FUJ00121637.  
21 This is an email from Jan Holmes to Colin  
22 Lenton-Smith, dated 7 June 2004. We can see  
23 here that there's an account of a conversation  
24 with Mandy Talbot and this was the document that  
25 I was thinking of earlier, the reference to Jim  
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1 **A.** I think it -- I may not have been involved at  
2 this -- I may not have known that at this stage  
3 but then I've seen the advice that we got from  
4 our barrister, Stefan Lewinski and advice on  
5 evidence and quantum, and that talks about  
6 publicity. So if it was -- it would have been  
7 referred to probably shortly after this or  
8 around the time of the conference with counsel  
9 that the Post Office were concerned about  
10 publicity.

11 **Q.** Picking up, then, on that advice from counsel,  
12 may we have this on screen, please. The  
13 reference is POL00118229. May we have page 18  
14 of this document, please. We can see here that  
15 the date of the document is 26 July 2004, so  
16 less than a month before the listed trial.  
17 Would you have drafted the instructions to  
18 counsel to advise on evidence in quantum?

19 **A.** Yes, I would have done.

20 **Q.** Turning back, please, to page 3 and starting at  
21 paragraph 10, we have here the advice from  
22 counsel:

23 "Mrs Wolstenholme has defended the  
24 proceedings, claiming that the computer system  
25 installed by the Post Office was defective and  
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1 this was, in fact, the cause of the losses  
 2 recorded within her accounts. Further,  
 3 Mrs Wolstenholme puts the Post Office to strict  
 4 proof of the losses it claims. Finally,  
 5 Mrs Wolstenholme counterclaims for damages in  
 6 respect of: wrongful termination of her  
 7 contract; breach of her human rights; a claim  
 8 under the Commercial Agents (Council Directive)  
 9 Regulations 1993; a claim for the breach of the  
 10 implied term to provide a computer system fit  
 11 for its purpose."

12 At paragraph 11:

13 "The trial of this matter is now about one  
 14 month away. A joint computer expert's report  
 15 has been obtained. This report concludes, from  
 16 the limited records available, that the computer  
 17 system installed by the Post Office did appear  
 18 defective. There is a very limited amount of  
 19 documentation available in respect of the detail  
 20 of calls made by Mrs Wolstenholme and problems  
 21 with her computer at the relevant time as well  
 22 as in relation to the errors and losses which  
 23 built up in her Post Office records. This is  
 24 because these records were destroyed about  
 25 18 months after events occurred.

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1 to fail."

2 Over the page, again, please to  
 3 paragraph 19:

4 "Further, for the Post Office to have  
 5 a chance of succeeding in its monetary claim  
 6 against Mrs Wolstenholme it would also need  
 7 evidence of the following:

8 "(i) clear proof that the secondary evidence  
 9 provided by the Post Office had to be or was  
 10 extremely likely to be, correct;

11 "(ii) clear evidence that the computer  
 12 problems reported by Mrs Wolstenholme would not  
 13 or could not have had any impact on the losses  
 14 and figures contained within her accounting  
 15 system;

16 "(iii) ideally, clear evidence to counter  
 17 the criticisms made by the computer expert in  
 18 this case."

19 Paragraph 20:

20 "On my understanding of this case, I do not  
 21 anticipate that such evidence will be  
 22 available."

23 Then at paragraph 21, in relation to the  
 24 claim for wrongful termination of  
 25 Mrs Wolstenholme's contact:

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1 "Recognising the weakness of its position,  
 2 the Post Office has made a payment into court of  
 3 £25,000."

4 Over the page to paragraph 14, we can see  
 5 that counsel was advising on a number of  
 6 matters, the first one being the Post Office  
 7 claim against Mrs Wolstenholme and the issues of  
 8 evidence that it raised. Over the page again,  
 9 please, we find the crux of the matter at  
 10 paragraph 17:

11 "In view of the negative expert's report in  
 12 this case regarding the computer system in  
 13 place, Mrs Wolstenholme's suggestion that the  
 14 errors that arose were the result of defects in  
 15 the computer system must be taken seriously. It  
 16 is sufficient to place genuine and significant  
 17 doubt on the evidence relied upon by the Post  
 18 Office. In my opinion, to dispel that doubt and  
 19 to persuade a Court that its claim was  
 20 justified, the Post Office would need to be able  
 21 to produce to the Court sufficient original  
 22 evidence in support of its claim. It is unable  
 23 to do so. I therefore conclude that the Post  
 24 Office's claim against Mrs Wolstenholme in  
 25 respect of losses on her asked would be likely

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1 "Given the lack of evidence in support of  
 2 the Post Office's position on losses, and also  
 3 the strong evidence suggestive of serious  
 4 failures in the computer system installed at the  
 5 Cleveleys' premises, the suggestion that  
 6 Mrs Wolstenholme was in serious or repudiatory  
 7 breach of her subpostmaster agreement appears  
 8 unsustainable. In the circumstances, there  
 9 would appear not to have been grounds for  
 10 summary termination of that contract.  
 11 Accordingly, pursuant to paragraph 9(1)(m) of  
 12 the Contract, Mrs Wolstenholme was entitled to  
 13 a minimum of three months notice of  
 14 termination."

15 Over the page, please, to paragraph 25:

16 "In the circumstances, Mrs Wolstenholme's  
 17 breach of notice claim appears likely to  
 18 succeed."

19 May we turn, please, to page 11 of this  
 20 document, which is paragraph 37, a little  
 21 further down, and this is dealing with  
 22 Mrs Wolstenholme's claim that there had been  
 23 a breach of an implied term in respect of the  
 24 computer:

25 "Mrs Wolstenholme claims that there was

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1 a breach of an implied term that she be provided  
 2 with a computer system that was fit for purpose.  
 3 This term has not been admitted by the Post  
 4 Office and there is a case for arguing that any  
 5 such term should only extend as far as the  
 6 obligation to take *reasonable steps* to provide  
 7 a computer system that was fit for its purpose.  
 8 The basis for implying either term would be that  
 9 it was necessary for the purpose giving the  
 10 subpostmaster contract business efficacy and/or  
 11 as representing the obvious but unexpressed  
 12 intentions of the parties."

13 Over the page, please. Counsel addresses  
 14 a possible argument on the qualification of such  
 15 a claim at paragraph 39, namely that  
 16 Mrs Wolstenholme's contract would never have  
 17 been terminated were it not for the defects in  
 18 the computer system.

19 Then at paragraph 40, there is some advice  
 20 on how to address this aspect of  
 21 Mrs Wolstenholme's claim:

22 "It is in relation to the possibility of  
 23 such a claim being advanced by Mrs Wolstenholme  
 24 that the form of any implied term in respect of  
 25 the computer system becomes important. If the

1 retained. Her claim against the Post Office in  
 2 respect of failure to give proper notice is  
 3 likely to succeed. What is the appropriate  
 4 course of conduct in the circumstances,  
 5 particularly given the desire of those  
 6 instructing me and the Post Office to avoid, if  
 7 possible, publication of the negative experts'  
 8 report in the public arena?"

9 Just pausing there, "the desire of those  
 10 instructing me and the Post Office", who had  
 11 expressed the view, as far as you can remember,  
 12 that they wanted to avoid publication of the  
 13 negative experts' report in the public arena?

14 **A.** The Post Office.

15 **Q.** Can you remember who in particular, now?

16 **A.** No, it would be whoever I was dealing with at  
 17 that time.

18 **Q.** What did you understand lie behind this concern  
 19 of the Post Office?

20 **A.** At the time, I can't remember what would --  
 21 I don't know what lay behind that, because  
 22 I just knew, from their point of view, that they  
 23 wouldn't want the adverse publicity of defects  
 24 being shown in the system -- in the Fujitsu --  
 25 you know, the Horizon System. But I don't

1 term extended simply to the Post Office taking  
 2 all reasonable steps to provide a computer  
 3 system fit for its purpose, then the fact that  
 4 the system provided may have been defective on  
 5 occasion does not necessarily indicate a breach  
 6 of this term. However, evidence would need to  
 7 be adduced, on behalf of the Post Office, that  
 8 reasonable steps were indeed taken. For this  
 9 reason, I consider it would be advisable to seek  
 10 to introduce, on behalf of the Post Office,  
 11 further evidence setting out further detail as  
 12 to: support provided in respect of the computer  
 13 system installed; and attempts made to rectify  
 14 defects identified. This evidence might be from  
 15 an appropriate employee within the Information  
 16 Technology part of the Post Office business,  
 17 and/or from an appropriate employee from the  
 18 suppliers of the computer system itself."

19 Moving, then, to counsel's conclusions.  
 20 Page 15 of this document, please, paragraph 49  
 21 at the bottom of the page:

22 "On the basis of the above, it can be  
 23 concluded that the Post Office claim against  
 24 Mrs Wolstenholme will fail, save for the return  
 25 of the equipment which she has possibly

1 remember. I can't remember anything more than  
 2 that. I mean, I suppose it was already --  
 3 Mrs Wolstenholme had already brought a claim in  
 4 the Employment Tribunal. It had gone to the EAT  
 5 and they probably just were concerned that  
 6 adverse publicity would follow any decision of  
 7 the court.

8 **Q.** Did you share counsel's view that the Post  
 9 Office's claim against Mrs Wolstenholme will  
 10 fail, save for the claim relating to the  
 11 equipment retained?

12 **A.** The Post Office would have had a copy of that,  
 13 of the advice -- of counsel's advice.

14 **Q.** Yes, but did you share counsel's view on the  
 15 case, on the merits?

16 **A.** Did I share that with the Post Office?

17 **Q.** Did you share that view? Did you agree with it?

18 **A.** Oh, yes. Yes, I did.

19 **Q.** Would we be right to understand that the only  
 20 aspect of the claim or counterclaim which  
 21 counsel was advising should not be conceded was  
 22 claim for the breach of the implied term that  
 23 the computer system provided to Mrs Wolstenholme  
 24 would be fit for purpose?

25 **A.** Sorry, could you just repeat that, please?

1 Q. We've been through a number of aspects of the  
2 claim. So the claim the Post Office brought  
3 against Mrs Wolstenholme for the recovery of  
4 losses, the counterclaim relating to not giving  
5 notice of termination and then the alleged --  
6 the counterclaim relating to an alleged breach  
7 of an implied term that the computer system  
8 provided to Mrs Wolstenholme should be fit for  
9 purpose. The counsel addressed each of those  
10 and, in relation to the implied term point,  
11 seemed to be taking a slightly more nuanced  
12 view.

13 A. Mm.

14 Q. So looking, please, at paragraph 51:

15 "In the circumstances, it seems that one  
16 method by which seems the Post Office might best  
17 achieve its objectives could be by making  
18 careful admissions within the Court proceedings.  
19 This is a matter which I have discussed already  
20 with those instructing me, but I can set briefly  
21 out a possible approach.

22 "To illustrate, the Post Office could  
23 formally abandon its claim against  
24 Mrs Wolstenholme and formally admit her claim of  
25 wrongful termination of her contract. The

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1 was fit for purpose to deal with that implied  
2 term breach argument being made by  
3 Mrs Wolstenholme.

4 A. Yes.

5 Q. So my question is: is that the only aspect of  
6 the claim that counsel was advising should be  
7 continued with, that should be defended?

8 A. Yes, it does appear that that's the case, yes.

9 Q. So was it in this context that counsel was  
10 suggesting further evidence should be obtained  
11 from the Post Office and Fujitsu?

12 A. Yes. Yes, to the best of my recollection,  
13 I think it would have been.

14 Q. We know that Jan Holmes and Keith Baines both  
15 produced statements dated 11 August 2004,  
16 shortly before trial and I think it's your  
17 evidence that you assisted with the drafting of  
18 those statements. Was that the point of these  
19 statements: to address reasonable steps taken by  
20 the Post Office to provide a computer system  
21 that was fit for purpose?

22 A. I believe so but there's a reference to -- we  
23 clearly had a conference with Stefan Lewinski,  
24 as well.

25 Q. We can go to that. May we have on screen,

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1 matter could then proceed to a more limited  
2 hearing to deal specifically with the remainder  
3 of her counterclaim."

4 Just going over the page, please, at  
5 paragraph 54:

6 "The opportunity for taking these points  
7 will of course be the dates already listed for  
8 trial. The issues for the client and those  
9 instructing me are the additional evidence  
10 raised above and the question of how the trial  
11 should be approached. Again, I have already  
12 discussed this with my instructing solicitor.  
13 Having considered the matter further, my view is  
14 that the most appropriate course would be for  
15 these matters to be raised at trial following  
16 appropriate application having been made in  
17 respect of any further evidence and/or changes  
18 to the statement of case put forward by the Post  
19 Office. With careful case management, the  
20 issues identified could then be isolated at  
21 trial and dealt with as deemed fit by the trial  
22 judge."

23 So the evidence that counsel was advising in  
24 relation to appears to relate to reasonable  
25 steps taken to produce a computer system that

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1 please, WITN04600310. We can see there's a list  
2 of attendees there, including you, Mandy Talbot,  
3 counsel, Jan Holmes and Keith Baines, and there  
4 are some notes with counsel's opinion on the  
5 case, on the first page.

6 Going over to the second page and the third  
7 page, we see about halfway down:

8 "SL: cannot say there were no glitches.

9 Will be candid about that but what did we do to  
10 help it?"

11 A. Yes.

12 Q. Then there's some discussion further down this  
13 page about evidence that might be obtained from  
14 POL or POA. Over the page again, to the last  
15 page, please. We see:

16 "JH will take up with KB.

17 "Turning info into Witness Statements -- JH  
18 & KB liaise with SH."

19 So is that you?

20 A. Yes.

21 Q. "SH agreed."

22 So is that the background to you working on  
23 those statements with Jan Holmes and Keith  
24 Baines?

25 A. Yes. We'd have had the -- received the advice

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1 from counsel and then had the conference, on the  
2 basis of the advice which he gave, to discuss it  
3 in more detail, and then, as a consequence of  
4 this conference, those statements would have  
5 been prepared.

6 **SIR WYN WILLIAMS:** Ms Price, we're perilously close  
7 to 2.00.

8 **MS PRICE:** Sir, I was just comparing notes with  
9 Mr Blake. We are going to need to come back  
10 tomorrow, I'm afraid, sir. I don't have much  
11 more but it will be another five or ten minutes  
12 and we are now nearly at 2.00, I'm afraid.  
13 I apologise for not being able to keep to my  
14 time.

15 **SIR WYN WILLIAMS:** No, that's fine. Subject to  
16 anybody in the room thinking this is  
17 inappropriate, if you really are only five or  
18 ten minutes away from finishing, then I would  
19 have no objection to the witness being asked to  
20 answer questions in writing to complete her  
21 evidence, rather than be dragged back tomorrow,  
22 unless of course she doesn't mind. If she  
23 doesn't mind, that's fine.

24 But feel free to discuss that possibility.  
25 All right? I don't need to make a ruling about

1 it. You can decide between you how best to  
2 proceed in these rather unfortunate  
3 circumstances.

4 **MS PRICE:** Sir, I think we have some questions on  
5 behalf of Core Participants, maybe about  
6 20 minutes in total, as I understand, in  
7 addition to my five or ten minutes. So we do  
8 have around half an hour of evidence left.

9 **SIR WYN WILLIAMS:** All right, that's fine. I'll say  
10 no more, then. See you in the morning, 10.00.

11 **(2.00 pm)**

12 **(The hearing adjourned until 10.00 am**  
13 **the following day)**

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**I N D E X**

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