Witness Name: Jan Robert Holmes

Statement No.: WITN04600300

Dated: 16 MAY 2023

POST OFFICE HORIZON IT INQUIRY

THIRD WITNESS STATEMENT OF JAN ROBERT HOLMES

I, JAN ROBERT HOLMES, will say as follows:

- I have been asked to provide a further Rule 9 Witness Statement in regard to my involvement in the Cleveleys Post Office incident.
- 2. This witness statement is made to assist the Post Office Horizon IT Inquiry (the "Inquiry") with the matters set out in my third Rule 9 Request dated 18 April 2023. The request was in the form of a six-page 49 point Annex within which questions were embedded.

Initial POL contact with Fujitsu POA regarding Cleveleys Post Office incident

- 3. I am referred to paragraph 3 of my second witness statement to the Inquiry (WITN04600200), which says that my first involvement in the Cleveleys Post Office incident was "via an email from a Pathway colleague, Peter Sewell who worked in Security, asking if I would be able to take on the task". I am asked whether this was the first occasion that a task had been sent to me regarding the production of a witness statement covering the issue of Horizon equipment at a particular post office and whether it still contained transaction data. While I had previously received Witness Statement requests this was, to the best of my memory, the first such request involving the issue of Horizon equipment to a particular office and whether it still contained transaction data.
- 4. I am asked about an email, dated 7th August 2003, in which Mr Jim Cruise (POL) stated that Mrs Wolstenholme (SPM for Cleveleys Post Office) would not release the equipment because she believed that the expert needed to examine it to produce his report. He went on to state that "as we know he will not be able to glean anything from inspecting the equipment". I am asked whether I agree with Mr Cruise's conclusion regarding whether any transaction data could be found on the Horizon equipment. With regard to transaction data, yes I agree.
- 5. I am referred to a document entitled Review of Expert Witness Report (FUJ00121504), which was authored by myself, which states that in relation to POL's request in February 2003 for a witness statement regarding the Cleveleys Post Office incident, Fujitsu was unwilling to produce a witness statement at that Page 2 of 18

stage. I am asked to explain why this was the case. WITN04600201 has a series of emails in a chain behind it. The first email, from Kevin Parkin to Jim Cruise dated 8th August 2003 requested an update on the situation. Jim Cruise suggested the production of a Witness Statement, signed by Kevin Parkin, to encourage the Postmaster to reconsider their view that retaining the equipment for inspection by an Expert might vindicate them. Kevin Parkin took the view that as he worked for POL the Postmaster may not believe him so the request was then passed to Peter Sewell at POA Security and subsequently to me. I drafted a reply to Jim and sought approval from Colin Lenton-Smith on 21st August 2003 (FUJ00121482). Approval was given and I sent an email response to Jim Cruise, cc Kevin Parkin, on the same date (WITN04600202). That email identifies that until such time as POA understood more about the situation we would be unwilling to provide a formal Witness Statement that might be relied on in court by POL.

- 6. I do not recall having a particular view or an opinion about POL's request for a witness statement on the Horizon equipment at the Cleveleys Post Office in February 2003. It was just another piece of work coming down the line.
- 7. I am asked who the individuals were at Fujitsu who were involved at this early stage in providing the response to the POL's request for a witness statement; specifically the individuals who assisted by providing me with the information contained in my email to Jim Cruise, dated 21 August 2003, and individuals who approved this email (WITN04600202). Initial technical assistance was provided by Mik Peach (System Support Centre 3rd line support) on 20th August 2003 Page 3 of 18

((WITN04600301)). Approval was granted by Colin Lenton-Smith on 21st August 2003 ((FUJ00121482)).

POL Request for Fujitsu POA views on Jason Coyne's Expert Review

- 8. At paragraph 5 of my second witness statement to the Inquiry, I stated that nothing further was heard from POL until 6th February 2004 when a letter was received from POL containing a copy of the Expert's report. Given that Fujitsu POA had dealt with POL's initial request in a timely manner it would be a professional courtesy for them to respond in a similar fashion. So yes, I was expecting a more prompt reply than 5 months, especially if there was going to be further effort to be expended by Fujitsu POA on this topic.
- 9. I am asked, following receipt of Mr Baines' letter on 6th February 2004, what my understanding was of what POL required of Fujitsu in the context of the Cleveleys Post Office incident and Jason Coyne's expert report. Through the final paragraph of Keith Baines's letter (POL00095375) seeking our opinion of the main points of the Expert's report and our assistance in providing information which might help him change his opinion.
- 10. A description of the discussion with Jim Cruise on 12th February 2004 was presented in the internal POA draft report on the Expert's report ((WITN04600203)). I do not have a contemporaneous day-book entry to substantiate this. At that time our role was to respond to POL on the Expert's report which I did in an objective manner. There were some areas where I agreed with Jim Cruise's opinion, but only where I felt the Expert had not

adequately addressed the topic in question. And no, other than what is expressed in our initial response I cannot recall any specific instances of Jim Cruise's criticism of the report.

- 11. In order to provide a comprehensive, valid and accurate response to the Expert's report I consulted with a number of people and departments, including but not limited to:
 - a. Mark Jones with regard to HSH call volumes ((WITN04600302)) who supplied an analysis of 6 counter outlets (WITN04600303).
 - b. Steve Parker with regard to some of the content generally (WITN04600304).
 - c. Richard Brunskill with regard to helpdesk responsiveness and SLAs in force in 2000 (WITN04600305).
 - d. Dave Cooke with regard to Session Stack management in the event of a reboot (WITN04600306).
 - e. Dave Law with regard to any Complaint activity made by Cleveleys during 2000 (WITN04600307).
- 12.I am referred to the emails at FUJ00121485, FUJ00121489, FUJ00121490, FUJ00121498, FUJ00121502, FUJ00121503, FUJ00121511. I am asked to explain the nature of my discussions with Mr Lenton-Smith between 18 20 February 2003 concerning Fujitsu's response to the expert report, and in particular:
 - a. What the "data/response that we/POL have used before" that Mr Lenton-Smith was referring to in his email of 18 February 2004 (FUJ00121489). I do not know.

- b. In response to Mr Lenton-Smith's email, I stated that I could "probably get something from POL investigations". I do not recall receiving anything from POL investigations.
- 13.I am asked referred to "Fujitsu Services, Report on Cleveleys Post Office" (version 0.1, 29 March 2004) (POL00095376), as well as the report's later iterations at POL00088579, POL00095379 and FUJ00080715.
- 14. In my evidence to the Inquiry on 16 November 2022 (INQ00001019), I stated that I suspect I was probably instructed by Martyn or perhaps asked by Security to draft this report. As to why I was asked to do this report in March 2004, by now Cleveleys was taking up a lot of my time and the time of my colleagues. Under any circumstance I would have written a report on how that time was spent and what the outcomes were, including any opportunities for improvement. It's always possible that Martyn Bennett or Security might have asked for its production but I cannot remember. It's always possible that I might have initiated it myself.
- 15. In the report of 29 March 2004, I was of the view that "arguably you we were brought into this too late". I did not communicate this to anyone at POL. It was an POA internal report.

Jason Coyne's Reply to POA Response to Expert Report and POL decision to pursue settlement

16.I am referred to the the emails at FUJ00121535, FUJ00121521, FUJ00121549, FUJ00121567, FUJ00121571, FUJ00121602 and FUJ00121557. In POL00095375 Keith Baines specifically asked POA to identify any areas where

we did not agree with the Expert's report and for any information or advice that we could offer that might lead him to change his (Coyne's) findings. POA's response provided the requested information and advice to POL although at that time we did not know how it would be used by them.

- 17. With regards to Mr Coyne's reply to Fujitsu's response to his expert report (FUJ00121535), I was a little disappointed that our initial response had been rejected but perhaps not surprised that an Expert would not change his position. POA did prepare a second document FUJ00121554 on the topic which is, I believe, self explanatory.
- 18. FUJ00121554 was sent to Jim Cruise and I believe Keith Baines. As to whether POL shared these concerns, remember that we were responding to a request for assistance from POL, and not expressing any concerns or otherwise of our own, In the end POL decided not to forward our updated response to the Expert.
- 19. I am asked if I can recall if a request was made by POL for me to provide this further response to Mr Coyne's reply. FUJ00121536 is a letter sent by Suzanne Helliwell (Weightman Vizards) to Jim Cruise seeking his views on the Expert's response to POAs reply to his report. I have a copy of that letter so I must assume that Jim passed on that request to me resulting in FUJ00121554.
- 20. As to how I felt about POL's decision not to forward my further response to Mr Coyne, I suspect that at the time I was somewhat frustrated but acknowledged that this was POL's case to deal with as they saw fit.
- 21. I can't comment on how POL interacted with the expert. All I saw were documents

- 22. In my email of 12 March 2004 to Jim Cruise regarding Jason Coyne's rejection of our response to his report, I indicated that Fujitsu would be happy to "accommodate him at any or all of our locations and arrange such interviews and access to data that he requires, and would ask that you make this offer to him" (FUJ00121567 & FUJ00121554). As to how I felt about the fact that POL did not make this offer to Mr Coyne, POA had gone out of its way to try and accommodate the Expert's needs and spent time and effort preparing a second response so it was frustrating to find that document not used. However, as stated elsewhere, this was a POL matter for them to manage.
- 23. In my email of 19 March 2004, I provided Mr Lenton-Smith with an update on this case, following a discussion with Mr Cruise. As to my views on how POL intended to proceed with regards to the Cleveleys Post Office incident, it was POL's business. We had no say on how they conducted themselves in this matter.
- 24. In my email of 19 March 2004, I stated that "They recognise the difficulty of providing objective evidence to counter Coyne's non-specific assertions and I get the impression they want to avoid a showdown for that reason". I am asked what Mr Cruise stated for me to reach this view. Other than what is in my daybook I do not recall the specifics of the conversation. However, the Expert was appointed by the Court so it was POL themselves under scrutiny. POA were doing what we could to assist them but ultimately it was for POL to manage their relationship with the Expert. The Expert had already indicated his unwillingness to shift his

- position and I suspect POL realised this hence the statement. WITN04600206 is a scan of my daybook entry of that conversation with Jim Cruise.
- 25. In my evidence to the Inquiry on 16 November 2022 (INQ00001019, page 166), I stated that the fear of a precedent being set if Mr Coyne's report went unchallenged probably came through Jim Cruise. I do not specifically recall what Mr Cruise said for me come to this view.

SubPostmaster's Rejection of POL offer and Preparation for Trial

- 26.I am asked to consider FUJ00121637 and FUJ00121639, and explain what my understanding was of Mandy Talbot's view on the best way to proceed following the SPM's rejection of POL's offer, considering my comment in my email to Mr Lenton-Smith that "Mandy's view/belief was that the safest way to manage this is to throw money at it and get a confidentiality agreement signed" (FUJ00121637). This followed a conversation with Mandy Talbot on 7th May as captured in my Daybook at the time WITN04600308.
- 27. With regards to Mandy Talbot's criticism of the expert report, she, like us, felt the Expert's report did not provide sufficient specific evidence to support his findings and was too general.
- 28.I am referred to FUJ00121668, FUJ00121689 and FUJ00121702. As to how POL had interacted with Fujitsu over the course of this litigation, I did not have a view either way. It was POL's activity with us providing information and advice as requested. If they were late in seeking this information then that just added a bit of pressure to our timeframe. The delay between the problems being reported by

Cleveleys (2000) and our initial involvement (2003), and the resultant loss of transaction data and HSH records due to contractual retention periods, just exacerbated the situation with regard to detail and the Expert's report. The possibility of giving evidence in court was a little problematic since I did not know, at that stage, what that evidence was going to be and, unless it was purely a statement of known fact and record, and whether I was best qualified to do it.

- 29. Other than possibly appearing in Court I had no concerns about this case. It was work. You can see from the numerous emails that I had constantly kept Colin Lenton-Smith in the information loop and while not my immediate superior Colin was the Finance and Contract Manager and was on the Senior Management Team.
- 30. I have been provided with emails at FUJ00121686, FUJ00121696, FUJ00121697 and FUJ00121700. I am asked why a conference call was initiated in relation to the Cleveleys Post Office case, who initiated this conference call, who attended and what was discussed. I suspect time was getting tight and a level of urgency was needed. I do not recall who initiated the call. See Daybook scan WITN04600309 for details of attendees and my notes on the meeting.
- 31. I am referred to an email FUJ00121686 which outlines numerous actions which I was to complete for the purpose of a witness statement being completed on my behalf. I do not recall if there were any other areas that were under consideration for inclusion in my witness statement. In fact the opposite occurred with regard to the deleted transaction data and HSH records and the 'Clean Start' evidence where this was available but not included in the Witness Statement.

- While I provided the information it was physically drafted by Suzanne Helliwell of Weightmans.
- 32.1 am referred to emails WITN04600214, FUJ00121704 and attachments to emails concerning my witness statement FUJ00121705, FUJ00121706, FUJ00121707. I can not recall why my analysis on escalation and site visits were being withheld from my witness statement. I did provide said information to Suzanne during the Witness Statement drafting process. See WITN04600310.

POL Settlement with Subpostmaster and Future Litigation Strategy

- 33. I am referred to the email at WITN04600215. As to my view on the settlement amount to Mrs Wolstenholme, up to the 16th November 2022 that figure I had been aware of was £25k, which I understood to be roughly the equivalent of 3 months money, reflecting the minimum notice period that POL were obliged to give to PostMasters. However, while I might have been 'fairly stunned' in 2022 (my evidence to the Inquiry on 16 November 2022 (INQ00001019, page 169) at the amount finally settled it was none of my business and it was for POL to decide in 2004 how they wanted this to play out.
- 34. I am asked how I became aware that Mrs Wolstenholme was going to call other postmasters as part of her case if the matter proceeded in court and whether this issue was discussed in the conference call held before the hearing date. The email WITN04600215 was sent to Bill Mitchell on 16th August 2004, after the settlement was reached, so I don't understand the question. Given that this threat/promise was made after the settlement it would have not been known, by me anyway, beforehand and was certainly not discussed during the 3rd August

- 2004 Conference Call. As to whether I discussed the implications of this with any individuals from POL, other than the email to Bill Michell, no.
- 35. FUJ00121724 is an internal POA email to two senior colleagues in that organisation, written to 2004. In my capacity as Risk Manager it was my job to consider what might constitute a risk to POA or our relationship with POL. At that time I felt it appropriate to raise this matter internally.

It was my view that it could be construed that POL bought off Mrs Wolstenholme rather than defend their system was based on earlier conversations with Mandy Talbot before the case reached Court WITN04600310. See my reply at paragraph 34s.

- 36. It was my view that that POL realised "that to expose the HSH transcripts in Court would not help their case" because if I could see potential pitfalls in the form and content of the HSH transcripts then a Barrister's forensically trained mind would see that as well. I cannot specifically recall what in the HSH transcripts that would not help POL's case.
- 37.I am asked to explain why I was of the view that POL could not rely on HSH transcripts to counter claims made by SPMs that they wanted to prosecute. I was raising a question, not making a statement, about POL's reliance on HSH records.
- 38. With regards to the Shobnall Road case, I believe the original request for a Fujitsu witness statement was made to Bill Mitchell, POA Security Manager

FUJ00121724. I would not raise a Witness Statement unless specifically asked to. I do not recall such a request being made to me.

- 39. I am referred to my evidence to the Inquiry on 16 November 2022
 (INQ00001019, page 169), and asked about why I indicated that the Cleveleys case was a missed opportunity in getting to the bottom of problems with Horizon.

 For clarification, in 2022 my response to Mr Blake's question was 'yes' but then qualified with 'possibly'. However, in 2004 I had no specific reason to believe that there were any fundamental problems with Horizon so would not have asked that question of myself or others.
- 40.I am asked whether there were any mistakes in POL or Fujitsu's approach to the Cleveleys Post Office Incident or whether there anything I think I could have been done differently. No. My only complaint was the time-gaps and little communication with POL until such time as we were up against the wire to get stuff done.

Other Matters

41. For the avoidance of doubt I would like to present my understanding of the relationship between POL and POA in the matter of 'prosecution support' in 2003/4, that being the timeframe of this Witness Statement. Investigations into, and any subsequent prosecutions of Postmasters was entirely the responsibility of POL. It was their decision as to where to target their efforts, who to investigate, what offices to consider and how far to take those investigations and

- prosecutions. POA's role, as custodians of the audit data, was to provide audit data, on request, to meet POL's needs.
- 42. However, as POA were responsible for the collection, safekeeping and subsequent retrieval of data, possibly to be used in court as evidence, we were sometimes asked to provide a Witness Statement to support POL's case. These might be to do with how the data audit data was collected, stored and subsequently retrieved, how the integrity of the data was maintained during that process; how certain elements of Horizon worked, for example how time was managed in the system; how support was provided to the POL users of Horizon.
- 43. As far as I can remember, other than R829C2 there was no contractual obligation to provide this support service, other than data retention being extended if an Outlet was being investigated (and we were notified by POL) and the volumes of extractions. The role evolved over time.
- 44. POA were not in a position to undertake any kind of 'due diligence' of POLs activities in this area. I am confident that had we attempted anything like this we would have been told to 'mind our own business'.

Stateme	nt of Tru	<u>ıth</u>	
l believe	GF	RO-B	ment to be true.
Signed :			and the Assessment
	JAN ROI	BERT HOLM	ES
Dated :	16	May	2023

Page 14 of 18

Index to Third Witness Statement of Jan Robert Holmes

<u>No</u>	URN	Document Description
1.	WITN04600200	Second Witness Statement of Jan Holmes – 27 January 2023
2.	FUJ00121504	Post Office Account - FAD: 153405 Cleverleys - Runnymede Ave, Thornton Cleverly, Lancs, FY5 1DF Review of Expert Witness Report: Claim CR101947
3.	WITN04600201	Email chain re Cleveleys (15.08.2003)
4.	FUJ00121482	Email from Colin Lenton-Smith to Jan R Holmes re: Cleverleys - Horizon equipment (21.08.2003)
5.	WITN04600202	Email from Jan Holmes to Jim Cruise copied Kevin Parkin re Cleveleys – Horizon Equipment (21.08.2003)
6.	WITN04600301	Email from Mik Peach to Jan Holmes re: Horizon Equipment (20.08.2003)
7.	POL00095375	Letter from Keith Baines to Colin Lenton-Smith re: Post Office Counters Ltd v Mrs Julie Wolstenholme (05.02.2004)
8.	WITN04600203	Internal POA draft report on the Expert's report
9.	WITN04600302	Email from Mark Jones to Jan Holmes re: HSH call volumes (11.02.2004)
10.	WITN04600303	Spreadsheet with HSH 6 Counter Call Analysis (12.02.2004)
11.	WITN04600304	Email from Steve Parker to Jan Holmes (17.02.2004)
12.	WITN04600305	Email from Richard Brunskill to Jan Holmes re: SLAs (18.02.2004)
13.	WITN04600306	Email from Dave Cooke to Jan Holmes re: Stacks (20.02.2004)
14.	WITN04600307	POL NBSC Complaint from Cleveleys (31.03.2000)

	T	
15.	FUJ00121485	Email from Jan R Holmes to Colin Lenton- Smith re: Cleverleys Response - Early view (18.02.2004)
16.	FUJ00121489	Email from Colin Lenton-Smith to Jan R Holmes re: Cleverleys Response early view (18.02.2004)
17.	FUJ00121490	Email from Jan R Holmes to Colin Lenton- Smith re: Cleverleys Response - Early View (18.02.2004)
18.	FUJ00121498	Email from Jan R Holmes to Colin Lenton - Smith re: Cleverleys v3 (19.02.2004)
19.	FUJ00121502	Email from Colin Lenton-Smith to Jan R Holmes re: Cleverleys latest (20.02.2004)
20.	FUJ00121503	Email from Jan R Holmes to Colin Lenton- Smith re: Cleverleys latest (20.02.2004)
21.	FUJ00121511	Email from Colin Lenton-Smith to Keith Baines re: Letter re Cleveleys Branch (20.02.2004)
22.	POL00095376	Fujitsu Report on Cleveleys Post Office (version 0.1) (29.03.2004)
23.	POL00088579	Postmasters' In Service Debt Policy v1.2 draft
24.	POL00095379	Fujitsu Report on Cleveleys Post Office (version 0.3) (03.08.2004)
25.	FUJ00080715	Fujitsu Services: Report on Cleveleys Post Office (V.1.0) (01.09.2004)
26.	INQ00001019	Transcript from 16 November 2022 public hearings (16.11.2022)
27.	FUJ00121535	Email from J Coyne to Weightman Vizards re: Post Office Limited v Mrs J Wolstenholme (02.03.2004)
28.	FUJ00121521	Email from Jan R Holmes to Colin Lenton- Smith re: Letter re Cleveleys Branch (23.02.2004)
29.	FUJ00121549	Email from Jan R Holmes to Colin Lenton- Smith re: Cleveleys reply (04.03.2004)

30.	FUJ00121567	Email from Jan R Holmes to Jim Cruise re: Cleveleys - Reply to Jason Coyne's Paper (12.03.2004)
31.	FUJ00121571	Email from Jan Holmes to Colin Lenton-Smith re: Cleveleys Update (19.03.2004)
32.	FUJ00121602	Email from Jan R Holmes to Colin Lenton- Smith re: FW: Cleveleys PO Mrs J Wolstenholme. Relates to settlement negotiations (06.04.2004)
33.	FUJ00121557	Email from Jan R Holmes to Colin Lenton- Smith re: Cleveleys (11.03.2004)
34.	FUJ00121536	Letter from Suzanne Helliwell (Weightman Vizards) to Jim Cruise re Witness Availability (03.03.2004)
35.	WITN04600206	Scanned daybook entry conversation Holmes/Cruise (12.03.2004)
36.	FUJ00121637	Email from Jan Holmes to Colin Lenton-Smith re 'Cleveleys'. Refers to conversation with Mandy Talbot (07.06.2004)
37.	FUJ00121639	Email from Jan Holmes to Mandy Tablot re Cleveleys (07.06.2004)
38.	WITN04600308	Scanned daybook entry conversation Holmes/Talbot (19.03.2004)
39.	FUJ00121668	Email from Jan Holmes to Colin Lenton-Smith and Ian Lamb re Clevleys Court Case – Update (30.07.2004)
40.	FUJ00121689	Email from Jan R Holmes to Devinder Purewal and Peter Jeram re: Programme Board Material - Wednesday 4th August 2004 (04.08.2004)
41.	FUJ00121702	Email from Jan Holmes to David Barker re: Cleveley Additional Evidence - Next Steps (10.08.2004)
42.	FUJ00121686	Email from Jan R Holmes to Keith Baines re: Actions post conference call – Cleveleys (03.08.2004)
43.	FUJ00121696	Email from Jan Holmes to Keith Baines, Mandy Talbot and Susanne Helliwell re 'Clean Start Evidence - Cleveley' (05.08.2004)

Horizon Migration Acceptance Form by Julie Wolstenholme (WIT 11) confirming the live operations on Horizon had taken place as part of the migration process (10.02.2000) 45. FUJ00121700 Email from Jan Holmes to Mandy Talbot re: 'Cleveley Additional Evidence - Next Steps' (10.08.2004) 46. WITN04600309 Scanned daybook entry Conference Call (07.05.2004) 47. WITN04600214 Email from Jan Holmes to David Barker (Masons) re final witness statement in Cleveleys Post Office case (12.08.2004) 48. FUJ00121704 Email from Jan R Holmes to Colin Lenton-Smith regarding Mrs J Wolstenholme (11.08.2004) 49. FUJ00121705 Notes to go with Jan Holme's statement and cover email (FUJ00121704) (11.08.2004) 50. FUJ00121706 Notes to go with Jan Wolstenholme's statement and cover email (FUJ00121704) (11.08.2004) 51. FUJ00121707 Draft Witness Statement from Jan Holmes working for Fujitsu and dealing with the Post Office, regarding a description of the support services provided by Fujitsu to the PO in respect of Horizon and its users (11.08.2004) 52. WITN04600310 Notes between Holmes and Helliwell on draft Witness Statement (03.08.2004) 53. WITN04600215 Email from Jan Holmes to William Mitchell re settlement of Cleveleys Post Office case following acceptance of POL offer by Mrs Wolstenholme (16.08.2004) 54. FUJ00121724 Email from Jan R Holmes to Colin Lenton-Smith and Mitchell William regarding Risk Position on Littigation Support (20.08.2004)			
'Cleveley Additional Evidence - Next Steps' (10.08.2004) 46. WITN04600309 Scanned daybook entry Conference Call (07.05.2004) 47. WITN04600214 Email from Jan Holmes to David Barker (Masons) re final witness statement in Cleveleys Post Office case (12.08.2004) 48. FUJ00121704 Email from Jan R Holmes to Colin Lenton- Smith regarding Mrs J Wolstenholme (11.08.2004) 49. FUJ00121705 Notes to go with Jan Holme's statement and cover email (FUJ00121704) (11.08.2004) 50. FUJ00121706 Notes to go with Jan Wolstenholme's statement and cover email (FUJ00121704) (11.08.2004) 51. FUJ00121707 Draft Witness Statement from Jan Holmes working for Fujitsu and dealing with the Post Office, regarding a description of the support services provided by Fujitsu to the PO in respect of Horizon and its users (11.08.2004) 52. WITN04600310 Notes between Holmes and Helliwell on draft Witness Statement (03.08.2004) 53. WITN04600215 Email from Jan Holmes to William Mitchell re settlement of Cleveleys Post Office case following acceptance of POL offer by Mrs Wolstenholme (16.08.2004) 54. FUJ00121724 Email from Jan R Holmes to Colin Lenton- Smith and Mitchell William regarding Risk	44.	FUJ00121697	Wolstenholme (WIT 11) confirming the live operations on Horizon had taken place as part
47. WITN04600214 Email from Jan Holmes to David Barker (Masons) re final witness statement in Cleveleys Post Office case (12.08.2004) 48. FUJ00121704 Email from Jan R Holmes to Colin Lenton-Smith regarding Mrs J Wolstenholme (11.08.2004) 49. FUJ00121705 Notes to go with Jan Holme's statement and cover email (FUJ00121704) (11.08.2004) 50. FUJ00121706 Notes to go with Jan Wolstenholme's statement and cover email (FUJ00121704) (11.08.2004) 51. FUJ00121707 Draft Witness Statement from Jan Holmes working for Fujitsu and dealing with the Post Office, regarding a description of the support services provided by Fujitsu to the PO in respect of Horizon and its users (11.08.2004) 52. WITN04600310 Notes between Holmes and Helliwell on draft Witness Statement (03.08.2004) 53. WITN04600215 Email from Jan Holmes to William Mitchell re settlement of Cleveleys Post Office case following acceptance of POL offer by Mrs Wolstenholme (16.08.2004) 54. FUJ00121724 Email from Jan R Holmes to Colin Lenton-Smith and Mitchell William regarding Risk	45.	FUJ00121700	'Cleveley Additional Evidence - Next Steps'
(Masons) re final witness statement in Cleveleys Post Office case (12.08.2004) 48. FUJ00121704 Email from Jan R Holmes to Colin Lenton-Smith regarding Mrs J Wolstenholme (11.08.2004) 49. FUJ00121705 Notes to go with Jan Holme's statement and cover email (FUJ00121704) (11.08.2004) 50. FUJ00121706 Notes to go with Jan Wolstenholme's statement and cover email (FUJ00121704) (11.08.2004) 51. FUJ00121707 Draft Witness Statement from Jan Holmes working for Fujitsu and dealing with the Post Office, regarding a description of the support services provided by Fujitsu to the PO in respect of Horizon and its users (11.08.2004) 52. WITN04600310 Notes between Holmes and Helliwell on draft Witness Statement (03.08.2004) 53. WITN04600215 Email from Jan Holmes to William Mitchell re settlement of Cleveleys Post Office case following acceptance of POL offer by Mrs Wolstenholme (16.08.2004) 54. FUJ00121724 Email from Jan R Holmes to Colin Lenton-Smith and Mitchell William regarding Risk	46.	WITN04600309	1
Smith regarding Mrs J Wolstenholme (11.08.2004) 49. FUJ00121705 Notes to go with Jan Holme's statement and cover email (FUJ00121704) (11.08.2004) 50. FUJ00121706 Notes to go with Jan Wolstenholme's statement and cover email (FUJ00121704) (11.08.2004) 51. FUJ00121707 Draft Witness Statement from Jan Holmes working for Fujitsu and dealing with the Post Office, regarding a description of the support services provided by Fujitsu to the PO in respect of Horizon and its users (11.08.2004) 52. WITN04600310 Notes between Holmes and Helliwell on draft Witness Statement (03.08.2004) 53. WITN04600215 Email from Jan Holmes to William Mitchell re settlement of Cleveleys Post Office case following acceptance of POL offer by Mrs Wolstenholme (16.08.2004) 54. FUJ00121724 Email from Jan R Holmes to Colin Lenton-Smith and Mitchell William regarding Risk	47.	WITN04600214	(Masons) re final witness statement in
cover email (FUJ00121704) (11.08.2004) 50. FUJ00121706 Notes to go with Jan Wolstenholme's statement and cover email (FUJ00121704) (11.08.2004) 51. FUJ00121707 Draft Witness Statement from Jan Holmes working for Fujitsu and dealing with the Post Office, regarding a description of the support services provided by Fujitsu to the PO in respect of Horizon and its users (11.08.2004) 52. WITN04600310 Notes between Holmes and Helliwell on draft Witness Statement (03.08.2004) Email from Jan Holmes to William Mitchell re settlement of Cleveleys Post Office case following acceptance of POL offer by Mrs Wolstenholme (16.08.2004) 54. FUJ00121724 Email from Jan R Holmes to Colin Lenton-Smith and Mitchell William regarding Risk	48.	FUJ00121704	Smith regarding Mrs J Wolstenholme
and cover email (FUJ00121704) (11.08.2004) 51. FUJ00121707 Draft Witness Statement from Jan Holmes working for Fujitsu and dealing with the Post Office, regarding a description of the support services provided by Fujitsu to the PO in respect of Horizon and its users (11.08.2004) 52. WITN04600310 Notes between Holmes and Helliwell on draft Witness Statement (03.08.2004) 53. WITN04600215 Email from Jan Holmes to William Mitchell re settlement of Cleveleys Post Office case following acceptance of POL offer by Mrs Wolstenholme (16.08.2004) 54. FUJ00121724 Email from Jan R Holmes to Colin Lenton-Smith and Mitchell William regarding Risk	49.	FUJ00121705	
working for Fujitsu and dealing with the Post Office, regarding a description of the support services provided by Fujitsu to the PO in respect of Horizon and its users (11.08.2004) Notes between Holmes and Helliwell on draft Witness Statement (03.08.2004) Email from Jan Holmes to William Mitchell re settlement of Cleveleys Post Office case following acceptance of POL offer by Mrs Wolstenholme (16.08.2004) FUJ00121724 Email from Jan R Holmes to Colin Lenton-Smith and Mitchell William regarding Risk	50.	FUJ00121706	1
Witness Statement (03.08.2004) 53. WITN04600215 Email from Jan Holmes to William Mitchell re settlement of Cleveleys Post Office case following acceptance of POL offer by Mrs Wolstenholme (16.08.2004) 54. FUJ00121724 Email from Jan R Holmes to Colin Lenton-Smith and Mitchell William regarding Risk	51.	FUJ00121707	working for Fujitsu and dealing with the Post Office, regarding a description of the support services provided by Fujitsu to the PO in
settlement of Cleveleys Post Office case following acceptance of POL offer by Mrs Wolstenholme (16.08.2004) 54. FUJ00121724 Email from Jan R Holmes to Colin Lenton-Smith and Mitchell William regarding Risk	52.	WITN04600310	
Smith and Mitchell William regarding Risk	53.	WITN04600215	settlement of Cleveleys Post Office case following acceptance of POL offer by Mrs
	54.	FUJ00121724	Smith and Mitchell William regarding Risk