

Witness Name: Peter James Sewell

Statement No.: WITN09710100

Dated: 8 September 2023

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF PETER JAMES SEWELL

I, *MR PETER JAMES SEWELL*, will say as follows:

INTRODUCTION

1. I am a former employee of Fujitsu Services Limited ("**Fujitsu**"), having left the company in November 2009.
2. This witness statement is made to assist the Post Office Horizon IT Inquiry (the "**Inquiry**") with the matters put to me in a Rule 9 Request dated 26 July 2023 (the "**Request**"), to the extent I have or had direct knowledge of such matters.
3. The topics covered by the Request concern events that occurred over 13 years ago and relate to audit data from the Horizon IT system ("**Horizon**") and audit queries (also known as audit retrieval queries or "**ARQs**"). I have tried to remember these matters to assist the Inquiry as much as possible, however, due to the time that has passed, my recollection is limited. For this reason, the content of my witness statement focuses largely on the

documents that the Inquiry has referred me to in the Request, which I have referenced below using the Inquiry's Unique Reference Numbers.

4. I was assisted in preparing this statement by Morrison Foerster, the recognised legal representatives for Fujitsu in the Inquiry.

PROFESSIONAL BACKGROUND

5. I joined ICL in 1990. In late 1997, I first joined ICL's Post Office Account team ("POA") as a Project Manager working on various tasks. These included managing a development team who wrote the code for auto configuration whereby a counter PC was switched on and introduced to the estate, managing a third-party supplier who developed the roll out program, and managing a development team to provide a training facility on the counter. I would also interview staff applying for jobs on the Horizon project. My manager at the time was Dick Long.
6. In 2002, I joined the POA security team in a similar capacity as a Project Manager. My work in this role included writing an anti-virus implementation procedure via a change proposal to make it ready to introduce to the live estate. I was also responsible for sample testing the pin pads prior to release to the outlets and maintaining a record of units tested and the test results. I provided support to the security manager, Bill Mitchell, who was later replaced by Brian Pinder.
7. During 2007, the security team was split into policy and operations teams, both reporting to a new security manager, Howard Pritchard. At this point I had the role of Operations Team Manager. My responsibilities were

managerial in nature, namely business as usual tasks and supporting Mr Pritchard.

8. A summary of my professional background, including a summary of my qualifications and career (prior to joining Fujitsu) is set out below.

Organisation	Qualification or Role(s)	Period
Southend Municipal College	O Levels	1970
Carreras Rothmans	Computer Operator Computer Programmer	1970–1978
Ford Motor Company	Computer Programmer	1978–1980
Southend Borough Council	Senior Programmer Development Manager	1980–1990

BACKGROUND

9. The Inquiry has asked me to set out the role I had in relation to each of the following matters in connection with Horizon, both in its first iteration (known as “**Legacy Horizon**”) and the second iteration (known as “**HNGx**”):
- a. Post Office Limited (“**POL**”) disciplinary matters;
 - b. matters relating to those accused of criminal offences;
 - c. matters relating to criminal or civil proceedings;
 - d. witness evidence in any proceedings; or
 - e. the extraction of audit data.
10. In responding to this question and setting out my role, the Inquiry has referred me to the following documents, which I have reviewed:

FUJ00122130, FUJ00122131, FUJ00122134, FUJ00122151,
FUJ00122152, FUJ00122153, FUJ00122154, FUJ00122189,
FUJ00122190, FUJ00122197, FUJ00122198, FUJ00122203,
FUJ00122204, FUJ00122217 and FUJ00122218.

11. I did not have a role in relation to the matters listed in subparagraphs 9(a)–(d) above. In relation to subparagraph 9(e), in 2007, I became the Operations Team Manager within the security team (as noted above), overseeing Penelope (Penny) Thomas, Andy Dunks and Neneh Lowther. My responsibilities were managerial only. Ms Thomas was a specialist in ARQs and reported to me, which included providing weekly updates regarding outstanding ARQs and court dates. However, I did not have a personal role in relation to the extraction of audit data (i.e., I did not perform ARQs myself).
12. The Inquiry has also asked me to set out the nature of my working relationship with Gareth Jenkins, Penny Thomas and Anne Chambers and to detail what I understood to be their roles in respect of matters relating to the provision of evidence in court proceedings. I have set this out below.
 - a. Gareth Jenkins was an “Applications TDA (Technical Design Authority)”; he provided the security team (mainly Ms Thomas) with technical advice and guidance and provided evidence in court.
 - b. Penny Thomas was in litigation support, providing POL with ARQ data. Ms Thomas was an ARQ specialist and a member of the security team.
 - c. Anne Chambers was a technical designer who worked in the Software Support Centre (“SSC”). Mrs Chambers provided the security team

(mainly Ms Thomas) with technical support advice and guidance and provided evidence in court.

RELATIONSHIP WITH POL

13. The Inquiry has asked me to describe any circumstances in which I would have contact with POL in relation to issues concerning Horizon, including the relevant contacts and the nature of my relationship.
14. I had contact with Sue Lowther, the POL Security Manager. I had detailed knowledge of the Horizon project, including the relevant people, their roles, and where to find information, and so would attend security meetings between managers, Bill Mitchell (later, Brian Pinder) in the POA security team and the POL security team on a monthly basis to provide support.
15. I liaised with Alan Simpson at POL to review incident management, mainly of counter down time. I worked directly with the POA customer service team and so could provide Mr Simpson with information on the counters.
16. I was also in contact with Graham Ward at POL, and his manager Dave Posnett. Mr Ward was the Casework Manager who requested ARQs and Mr Posnett was the Fraud and Risk Manager. Mr Ward liaised directly with Ms Thomas on ARQ matters, and he regularly visited ICL's Feltham and then Bracknell offices to meet with Ms Thomas. When I became the Operations Team Manager in the security team, I wanted to meet the POL team and I believe Ms Thomas and I had at least two meetings with Mr Ward and Mr Posnett. I do not recall discussing the specifics of ARQ data with Mr Ward or Mr Posnett; while I was Operations Team Manager, Mr Ward continued to liaise with Ms Thomas in relation to this.

ARQ DATA FROM HORIZON AND THE PROSECUTION SUPPORT SERVICE

17. The Inquiry has asked me to set out my recollection as to the process for providing audit data to POL and explain the structure and function of Fujitsu's Prosecution Support Service and my role in relation to the service. The Inquiry has also referred me to FUJ00155212, FUJ00155214 and FUJ00155413, which I have reviewed.
18. I recall that Fujitsu had contractual requirements with respect to the provision of audit data, which included:
 - a. the retrieval and analysis of archived Riposte message store data, including event logs, and calls to the Horizon Helpdesk;
 - b. responding to ARQ requests from POL for Horizon branch transaction data and the retrieval of event logs and Horizon Helpdesk calls; and
 - c. providing witness statements and attending court when requested to support the ARQ data supplied.
19. I did not have a direct role in relation to the provision of ARQ data to POL, however, as noted above at paragraph 11, I was Ms Thomas' line manager in 2007. Ms Thomas was the security team member primarily responsible for the provision of ARQ data to POL.
20. I do not know if the processes described above varied in relation to Legacy Horizon and HNGx.
21. In relation to the structure and function of the Prosecution Support Service, there was one security team member who primarily provided this service with

another team member to provide back-up support when needed. These two security team members would respond to ARQ requests from the POL Casework Manager and carry out data extractions from audit files. This data was then sent securely to POL via a CD-ROM.

22. The technical support for this role was primarily Gareth Jenkins, with the help of various technical support staff within the Horizon technical teams, including the SSC.

ARQ PROCESS ISSUES

The incident at Craigpark and the "ARQ Service Issue"

23. The Inquiry has asked me for a detailed account of (i) an incident that occurred at the Craigpark Post Office branch (FAD code 141832) ("**Craigpark**") and how it related to the ARQ process and the reliability of data, (ii) the approach to witness evidence that followed the issue at Craigpark, and (iii) a certain issue or issues regarding ARQ data variously referred to as an "ARQ Service Problem", "ARQ Service Issue", "Prosecution Support Urgent Issue" and a "Security Incident" in the 2008/early 2009 period ("**ARQ Service Issue**"). In responding to these questions, I have reviewed the following documents as referenced in the Request: FUJ00154823, FUJ00154824, FUJ00154841, FUJ00154842, FUJ00155455, FUJ00155448, FUJ00155474, FUJ00155476, FUJ00155478, FUJ00155492, FUJ00155498, FUJ00155456, FUJ00155231, FUJ00155232, FUJ00155263, FUJ00155271, FUJ00155272, FUJ00155274, FUJ00155276, FUJ00154828, FUJ00155278, FUJ00155397, FUJ00155367, FUJ00155402, FUJ00155371, FUJ00155373, FUJ00155257, FUJ00155265, FUJ00155268,

FUJ00155270, FUJ00155409, FUJ00155412, FUJ00155421,
FUJ00155422, FUJ00154833, FUJ00154835, FUJ00155241,
FUJ00155242, FUJ00155371, FUJ00155378, FUJ00155385,
FUJ00155386, FUJ00155387, FUJ00155388, FUJ00155389,
FUJ00155391, FUJ00155392, FUJ00155390, FUJ00155394,
FUJ00155399, FUJ00155400 and FUJ00122604.

24. The ARQ Service Issue was related to the incident at Craigpark. The incident at Craigpark concerned an event log issue that highlighted errors with the End of Day (“**EOD**”) process which caused some transactions to freeze and create an event error. The issue identified at Craigpark raised questions regarding the integrity of data supplied to POL as part of the ARQ service.
25. Having reviewed contemporaneous records regarding the incident at Craigpark (for example, FUJ00155397), I recall that the issue was identified following a detailed technical investigation by Fujitsu technical staff, who found out that transactions running during the EOD process had caused a lock in processing and a Riposte error event was written to the event log. It was identified that this problem had been caused by a previous bug fix, which was introduced into Legacy Horizon’s live estate in May 2007. Whilst this investigation was running, a manual exercise was carried out to examine the event log data from ARQ data associated within the dates of May 2007 and November 2008.
26. I became aware of the issue when error events were discovered whilst examining event data during an ARQ extraction for Craigpark. There were several meetings and discussions between Mr Jenkins, Mrs Chambers and

Ms Thomas, and other managers and support staff. I was usually invited to these meetings; however, my input was very limited as I did not always understand the technical details in relation to the ARQ extraction. As manager, my objective was to find out what went wrong and identify the appropriate individuals to resolve the issue. The task of resolving any issues were left to the technical staff, including those I have named above. There were many meetings that took place to find a resolution to the problem; these were mainly between the technical staff. I cannot recall who attended these meetings, but I believe some of the meetings were documented.

27. When the error was identified, it raised questions regarding the integrity of ARQ data previously supplied to POL. Previous ARQ data was analysed and events stripped out to check other event errors. A change proposal was then raised by Alan Holmes to incorporate this manual process of performing additional counter event checks into the ARQ service to enable analysis of counter event messages (as shown in FUJ00155272) and check for any other event errors. As the change proposal concerned the security team's function, it required a sponsor/owner from the security team, and I was made sponsor for this particular change proposal. As sponsor of the change proposal, I was invited to meetings to discuss the wording of the change proposal, but again my input was very limited as I lacked the technical knowledge. The meetings were run by Mr Holmes, and individuals like Ms Thomas and possibly Mr Jenkins would have been present. The change proposal was enhanced to incorporate the manual process into the ARQ application and remove manual intervention in the ARQ process for the HNGx solution. Once the analysis of the problem was completed, Fujitsu's

senior manager of the POA customer service team, Steve Denham, was given a presentation of the change proposal and why it was being raised. Once the change proposal was approved, the work on implementing the changes could begin and changes to the HNGx ARQ application could be introduced. I do not recall any discussions regarding POL's likely reaction to the proposed changes.

28. Following the discovery of the additional event error (noted above at paragraph 25), there was discussion over amending the wording of the witness statements provided by Fujitsu to POL to include the additional checks. There were several meetings (some of which I was present at), and emails exchanged on how to make these changes. From reviewing the documents provided to me by the Inquiry, it looks like no substantial changes were made to the witness statement to reflect the changes to the ARQ service. There may have been smaller revisions made to the witness statement, but I do not have any recollection of this.
29. I believe POL were informed of the ARQ Service Issue and the change proposal once the full impact of the potential problem was established. In relation to POL's involvement in investigations relating to the issue, there were emails exchanged between Fujitsu and POL discussing the problem. The problem was recognised as sensitive as the event errors raised questions regarding the integrity of ARQs. I believe the POL legal team were also consulted and they reviewed the situation with the POL management team to provide their input. There was a change in the approach taken to reviewing event errors related to cases being pursued by POL when this

issue arose, and the manual process was introduced and continued to be run to check event logs for potential problems. POL requested that Fujitsu process the outstanding cases and complete the event analysis as soon as possible. Both POL and Fujitsu staff worked together to agree on a workable solution due to the sensitive nature of the problem.

30. Senior management from Fujitsu and POL were involved and kept up to date with progress. Fujitsu senior management communicated with POL senior management on the matter, and both were constructive to agree a solution. I believe Fujitsu and POL senior management were concerned with ensuring that the necessary checks were carried out on the ARQ data retrospectively once the issue had been identified. In turn, they were concerned with getting the change proposal approved so that the new changes could be incorporated into HNGx code.
31. In relation to the resolution of the issue, the fix for the software issue relating to the EOD process was delivered to the live estate in October 2008. The issue of manually analysing event logs was replaced by introducing this automatically into the application for the HNGx solution once the change proposal was approved and the additional filtering was introduced in the retrieval application. The tactical solution would have to continue during the lifetime of the Legacy Horizon audit system. As can be seen from FUJ00155476, the change proposal was finalised and approved on 31 March 2009.

My handover

32. The Inquiry has asked me to set out any handover or discussions of ongoing work I recall having with Andy Dunks or others following my move to another role. In doing so, I have reviewed FUJ00155498 and FUJ00155507 as referenced in the Request. I recall speaking with Mr Dunks about him continuing the meetings with Mr Simpson regarding incident management. These meeting were mainly based on reviewing lost time on the counters. There were no other handovers made and I retired after this in November 2009.

GENERAL

33. There are no other matters that I would like to draw to the attention of the Chair of the Inquiry.

Statement of Truth

I believe the content of this statement to be true.

Signed:

GRO

Dated: 8 September 2023

INDEX TO THE FIRST WITNESS STATEMENT OF PETER JAMES SEWELL

Exhibit No.	Document Description	URN	Control Number
1.	Email from Penny Thomas to Gareth Jenkins and Neneh Lowther with subject 'CS Witness Statement Amendment', dated 24 November 2005.	FUJ00122130	POINQ0128344F
2.	Witness statement of Gareth Jenkins dated 3 October 2005.	FUJ00122131	POINQ0128345F
3.	Email from Gareth Jenkins to Penny Thomas, Neneh Lowther with subject 'Re: CS Witness Statement', dated 28 November 2005.	FUJ00122134	POINQ0128348F
4.	Email from Penny Thomas to Peter Sewell and Gareth Jenkins with subject 'Re: Witness Statement Review' dated 7 December 2005.	FUJ00122151	POINQ0128365F
5.	Undated witness statement of Penelope Anne Thomas	FUJ00122152	POINQ0128366F
6.	Email from Penny Thomas to Peter Sewell and Gareth Jenkins with subject 'Re: Witness Statement Review', dated 7 December 2005.	FUJ00122153	POINQ0128367F
7.	Undated witness statement of Penelope Anne Thomas	FUJ00122154	POINQ0128368F
8.	Email from Brian Pinder to Andy Dunks and Peter Sewell with subject 'Gaerwen Witness Statement', dated 22 March 2006.	FUJ00122189	POINQ0128403F
9.	Witness Statement of William Leslie Mitchell, dated 22 March 2006.	FUJ00122190	POINQ0128404F
10.	Email chain last dated 23 March 2006 between Neneh Lowther, Gareth Jenkins, Penny Thomas, Graham Ward and Brian Pinder with subject 'Re: Gaerwen'.	FUJ00122197	POINQ0128411F
11.	Witness Statement of Gareth Jenkins dated 23 March 2006.	FUJ00122198	POINQ0128412F
12.	Email from Gareth Jenkins to Neneh Lowther and Brian Pinder with subject 'Re: Gaerwen' dated 23 March 2006.	FUJ00122203	POINQ0128417F
13.	Witness statement of Gareth Jenkins dated 23 March 2006.	FUJ00122204	POINQ0128418F
14.	Email from Gareth Jenkins to Graham Ward and Neneh Lowther	FUJ00122217	POINQ0128431F

Exhibit No.	Document Description	URN	Control Number
	with subject 'Re: Gaerwen' dated 28 March 2006.		
15.	Witness statement of Gareth Jenkins dated 24 March 2006.	FUJ00122218	POINQ0128432F
16.	Email dated 22 January 2008 from RMGA Document Management to multiple individuals with subject 'Horizon Document for Review: RS/PRO/049 – V0.2 – Horizon Event Logging Process for Operational Security'.	FUJ00155212	POINQ0161406F
17.	Horizon Event Logging Process for Operational Security - RS/PRO/049 - version 0.2 dated 22 January 2008.	FUJ00155214	POINQ0161408F
18.	Horizon Event Logging Process for Operational Security - RS/PRO/049 - version 0.3, dated 3 February 2009.	FUJ00155413	POINQ0161607F
19.	Email chain last dated 14 August 2008 between Penny Thomas, Gareth Jenkins, Alan Holmes and others with subject 'Branch 141832 Craigpark'.	FUJ00154823	POINQ0161018F
20.	Record of meeting dated 13 August 2008.	FUJ00154824	POINQ0161019F
21.	HNG-X Change Proposal No. 4867 dated 26 February 2009.	FUJ00154841	POINQ0161036F
22.	Email chain last dated 20 April 2009 between Gerald Barnes, Gareth Jenkins, Anne Chambers and Penny Thomas with subject 'ARQ 023 241007 LPD 6 May 09 (and possible filter change)'.	FUJ00154842	POINQ0161037F
23.	Excel document with filename 'HNG-X CP Impact Web Dump 0336'.	FUJ00155455	POINQ0161649F
24.	Email from Diane Tribe to the RMGA Change Management mailbox with subject 'HNG-X CP0336 (PVCS 4867) - Impact Web Dump', dated 24 March 2009.	FUJ00155448	POINQ0161642F
25.	HNG-X Change Proposal - HNG-X No. 4867 dated 26 February 2009.	FUJ00155474	POINQ0161668F
26.	Royal Mail Group Account Change Management Change Control Board, Meeting Number 530 dated 31 March 2009.	FUJ00155476	POINQ0161670F

Exhibit No.	Document Description	URN	Control Number
27.	HNG-X Change Proposal No. 4867- dated 26 February 2009.	FUJ00155478	POINQ0161672F
28.	Email from David Hinde to George Zolkiewka copying Graham Allen and others with subject 'Urgent - FOR IMPACT - HNG-X CP0336 (Release: HNG-X) - Enable analysis of Counter event messages within the HNG-X Audit solution', dated 26 August 2009.	FUJ00155492	POINQ0161686F
29.	Email from George Zolkiewka to RMGA Change Management and David Hinde with subject 'HNG-X CP0336 (Release: HNG-X) - Enable analysis of Counter event messages within the HNG-X Audit solution', dated 13 October 2009.	FUJ00155498	POINQ0161692F
30.	Email from David Hinde to RMGA Change Management, Peter Sewell and Penny Thomas with subject 'CP0336 - Enable analysis of Counter event messages within the HNG-X Audit solution', dated 24 March 2009.	FUJ00155456	POINQ0161650F
31.	Email chain last dated 12 August 2008 between Penny Thomas, Alan Holmes, Peter Sewell and others with subject 'Branch 141832 Craigpark'.	FUJ00155231	POINQ0161425F
32.	Email chain last dated 12 August 2008 from Peter Sewell to Gareth Jenkins with subject 'Branch 141832 Craigpark'.	FUJ00155232	POINQ0161426F
33.	Email from Anne Chambers to Penny Thomas dated 16 September 2008 with subject 'Riposte Timeout waiting for lock events'.	FUJ00155263	POINQ0161457F
34.	Email from Alan Holmes to Peter Sewell, Roy Birkinshaw and Gareth Jenkins with subject 'Counter Audit CP', dated 13 October 2008.	FUJ00155271	POINQ0161465F
35.	HNG-X Change Proposal dated 13 October 2008.	FUJ00155272	POINQ0161466F
36.	Email chain last dated 15 October 2008 between Gareth Jenkins, Penny Thomas and others with subject 'Counter Audit CP'.	FUJ00155274	POINQ0161468F

Exhibit No.	Document Description	URN	Control Number
37.	Email from Alan Holmes to Steve Evans, Penny Thomas, Gareth Jenkins and others withy subject 'RE: AUDIT - CP update', dated 20 October 2008.	FUJ00155276	POINQ0161470F
38.	HNG-X Change Proposal dated 20 October 2008.	FUJ00154828	POINQ0161023F
39.	Meeting invite scheduled for 24 October 2008 with subject 'Updated: Audit CP – Words'.	FUJ00155278	POINQ0161472F
40.	Email chain last dated 23 December 2008 between Graham Allen, Steve Evans, Peter Sewell, Alan Holmes, Penny Thomas, Gareth Jenkins with subject 'Audit and PC0152376'.	FUJ00155397	POINQ0161591F
41.	Email chain last dated 12 November 2008 between Steve Evans, Penny Thomas, Peter Sewell and others with subject 'RE: Audit Strengthening CP - Words for Review'.	FUJ00155367	POINQ0161561F
42.	Email from Steve Evans to Gerald Barnes with subject 'Audit Issue', dated 8 January 2009.	FUJ00155402	POINQ0161596F
43.	Meeting invitation scheduled for 26 November 2008 with subject 'Updated: Audit Strengthening CP Review/Refresh'.	FUJ00155371	POINQ0161565F
44.	Email from Penny Thomas to Peter Sewell with subject 'ARQ Service', dated 1 December 2008.	FUJ00155373	POINQ0161567F
45.	Email from Roy Birkinshaw to Penny Thomas, Peter Sewell, Alan Holmes and others dated 5 September 2008 with subject 'Recent Exercise to review Audit in Horizon'.	FUJ00155257	POINQ0161451F
46.	Email from Penny Thomas to Peter Sewell dated 18 September 2008 with subject 'whether to check event errors for cases outside of advice'.	FUJ00155265	POINQ0161459F
47.	Email from Gareth Jenkins to Peter Sewell and Penny Thomas with subject 'Checking ARQ Events', dated 8 October 2008.	FUJ00155268	POINQ0161462F
48.	Email from Penny Thomas to Peter Sewell with subject 'Checking ARQ events' dated 13 October 2008.	FUJ00155270	POINQ0161464F

Exhibit No.	Document Description	URN	Control Number
49.	Email from Penny Thomas to Steve Denham, Howard Pritchard, Peter Sewell with subject 'Outlet Checking List - Audit Issue', dated 27 January 2009.	FUJ00155409	POINQ0161603F
50.	Email chain last dated 3 February 2009 between Anne Chambers, Penny Thomas and others with subject 'Outlet Checking List - Audit Issue'.	FUJ00155412	POINQ0161606F
51.	Email from Penny Thomas to Steve Denham, Peter Sewell with subject 'Security Incident', dated 4 February 2009.	FUJ00155421	POINQ0161615F
52.	Email from Penny Thomas to Steve Denham with subject 'Outlet Checking List - Audit Issue', dated 4 February 2009.	FUJ00155422	POINQ0161616F
53.	Email chain last dated 15 December 2008 from Penny Thomas to Graham Allen, David Hinde, Adam Cousins and others with subject 'Proposed Slides for ARQ Service Issue'.	FUJ00154833	POINQ0161028F
54.	PowerPoint presentation titled 'Prosecution Support Urgent Issue'	FUJ00154835	POINQ0161030F
55.	Email chain last dated 28 August 2008 between Gareth Jenkins, Roy Birkinshaw and David Johns with subject 'Potential Audit Issue.doc'.	FUJ00155241	POINQ0161435F
56.	Document titled 'Potential Audit Issue – Horizon'.	FUJ00155242	POINQ0161436F
57.	Email chain last dated 4 December 2008 between Penny Thomas, Howard Pritchard and Peter Sewell with subject 'ARQ Service problem'.	FUJ00155378	POINQ0161572F
58.	Email from Penny Thomas to David Hinde, Graham Allen and others with subject 'Proposed Slides for ARQ Service Issue', dated 11 December 2008.	FUJ00155385	POINQ0161579F
59.	PowerPoint presentation titled 'Prosecution Support - Urgent Issue'.	FUJ00155386	POINQ0161580F
60.	Email from Penny Thomas to Graham Allen, David Hinde and others with subject 'Proposed Slides for ARQ Service Issues'.	FUJ00155387	POINQ0161581F

Exhibit No.	Document Description	URN	Control Number
61.	PowerPoint presentation titled 'Prosecution Support Urgent Issue slide presentation'.	FUJ00155388	POINQ0161582F
62.	Email from Penny Thomas to Graham Allen, Adam Cousins, Steve Evans and others with subject 'New Witness Statement Request Support', dated 16 December 2008.	FUJ00155389	POINQ0161583F
63.	Email from Penny Thomas to Steve Evans, Graham Allen and others with subject 'New Witness Statement Request Support', dated 16 December 2008.	FUJ00155391	POINQ0161585F
64.	Email from Steve Denham to Graham Allen, Adam Cousins, Steve Evans and others 'Re: Updated: ARQ Service issue - Meeting invite', dated 17 December 2008.	FUJ00155392	POINQ0161586F
65.	Excel document with filename 'New Witness Statement Request Support 11122008No3'	FUJ00155390	POINQ0161584F
66.	Email from Peter Sewell to David Hinde, Penny Thomas, Adam Cousins, Graham Allen, Steve Evans, Alan Holmes, Howard Pritchard, Steve Denham with subject 'Proposed slides for ARQ service Issue' dated 19 December 2008.	FUJ00155394	POINQ0161588F
67.	Email from Penny Thomas to Dave Posnett with subject 'Security Incident', dated 7 January 2009.	FUJ00155399	POINQ0161593F
68.	Email from Penny Thomas to Howard Pritchard, Wendy Warham and Steve Denham with subject 'Security Incident', dated 8 January 2009.	FUJ00155400	POINQ0161594F
69.	Draft witness statement dated 2008.	FUJ00122604	POINQ0128818F
70.	Email from Andy Dunks to Peter Sewell with subject 'Transfer of information', dated 23 November 2009.	FUJ00155507	POINQ0161701F