

Witness Name: Brian Arthur Pinder

Statement No.: WITN04520100

Dated: 18 July 2023

## POST OFFICE HORIZON IT INQUIRY

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### FIRST WITNESS STATEMENT OF BRIAN ARTHUR PINDER

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I, *MR BRIAN ARTHUR PINDER*, will say as follows:

#### **INTRODUCTION**

1. I am a former employee of Fujitsu Services Limited ("**Fujitsu**"), having retired in 2018.
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 7 June 2023 (the "**Request**"), to the extent I have or had direct knowledge of such matters. Given the passage of time, I have limited recollection of the topics covered by the Request. The content of this witness statement therefore focuses largely on the content of various documents provided to me by the Inquiry. To the extent those documents have assisted my recollection, I set out the URN of the relevant document.
3. I was assisted in preparing this statement by Morrison Foerster, the recognised legal representatives for Fujitsu in the Inquiry.

## PROFESSIONAL BACKGROUND

4. I joined ICL Sorbus (a Fujitsu group company) in November 1996 as a Security Administrator, after 22 years in with the Royal Air Force Police. From this time, I held various non-technical security-focused roles within the Fujitsu group, including:
  - a. 1996 to 1998 / 1999: Security Administrator, employed on military sites working within the Fujitsu team to carry out routine security administrative duties;
  - b. 1998 / 1999 to 2003: Site Security Administrator, working within the Department of Trade and Industry Account; and
  - c. 2003 to 2005: Security Administrator, working within the Fujitsu Security team servicing all of Fujitsu's central government security teams.
  
5. I joined Fujitsu's Post Office Account (the "**Account**") as a Security Manager in around 2005 and left the Account in November 2009. After leaving the Account, I took another role in Fujitsu in the Central Business Continuity team, where I remained until I retired in 2018.
  
6. A summary of my (i) qualifications and accreditations, (ii) professional skills and methodologies, and (iii) professional memberships are set out in Appendix 1 to this statement.

## **MY POSITIONS DEALING WITH SECURITY**

7. As noted above, I became a Security Manager on the Account in 2005, having been made aware of the role through conversations with other Security Managers at Fujitsu. I was formally offered the position following interviews with the Security and Service Managers on the Account at the time.
8. In terms of training and experience, by the time I joined the Account, I had gained almost 10 years of security administrative experience through my employment with the various security teams at Fujitsu. I had also gained knowledge of physical, documentary, personal and IT security, including knowledge of the BS7799 standard, during my time with the RAF.
9. During my time as Security Manager, the Account worked towards compliance with ISO17799. My previous experience within Fujitsu involved co-ordinating (i) central processes and policies, (ii) security documentation, (iii) awareness, and (iv) standardisation, across all Fujitsu central government security teams. These teams were also working within ISO compliance. My experience in these areas was favourable for the Security Manager role on the Post Office Account.
10. As Security Manager, I performed a wide range of security-related activities that (i) assisted the establishment and maintenance of an ISO17799 compliant infrastructure, (ii) supported legal and contractual obligations, and (iii) minimised liabilities for the company. I was responsible for monitoring operations and introducing specific security controls to maintain the integrity, availability and confidentiality of the information used. This included arranging suitable "Pen

Testing” with third party providers and managing issues found, in order to provide a secure solution.

11. My role also involved attending security meetings held by the Post Office Limited (“**Post Office**”) Security team to review, discuss and ultimately resolve any areas of concern with regards to security. I was also involved in (i) the implementation and maintenance of Fujitsu security policies and procedures, including those relating to system and physical access controls, and Anti-Virus and malicious software management, (ii) reporting security incidents, and (iii) problem management.

12. In terms of reporting lines, all members of my team reported to me. This included Peter Sewell (who was my deputy and also the deputy to my predecessor Bill Mitchell), Andy Dunks, Penny Thomas and Neneh Lowther. Mr Dunks, Ms Thomas and Ms Lowther also individually reported to Mr Sewell, who worked more closely with them. As my deputy, Mr Sewell would manage any issues in my absence. I then reported to the Service Director. I believe Dave Baldwin held this role at a point, after which I reported to his replacements, although I cannot recall their names. The role of Chief Information Security Officer (“**CISO**”) for the Account Security team was introduced by the Account at some point during my tenure as Security Manager, although I do not recall when, maybe around 2007. From that point forwards, I reported to the CISO (Howard Pritchard), until I left the Account in November 2009.

13. In terms of reporting issues or discussing actions to be taken, I conversed with my team almost daily. From my recollection, I generally only had meetings with Mr Baldwin and his Service Managers if they requested it.

14. The Inquiry has asked me to comment on the competence and professionalism of my colleagues and managers. In this regard, all my staff appeared very competent in their work and worked hard to provide a good service for Post Office. All other Account staff who I came into contact with also seemed to be very competent, aware of their responsibilities, and again worked hard to achieve their goals for the Account and Post Office.

#### **MY INVOLVEMENT IN PROCEEDINGS AGAINST POSTMASTERS**

15. Until reviewing the documents provided to me by Inquiry, I did not recall having any involvement in Post Office disciplinary matters or proceedings against postmasters. From the documents I have received, however, I can see that I was in fact involved, albeit largely as a point of contact for Post Office legal representatives in respect of certain subpostmaster proceedings.

16. In addition to the documents provided to me by the Inquiry in relation to Post Office's proceedings against Mr Lee Castleton, which are addressed in more detail below, I have also been shown an email exchange between myself, Graham Ward of Post Office, Gareth Jenkins and Neneh Lowther in relation to proceedings relating to the Gaerwen branch (FUJ00152587). Unfortunately, however, this has not assisted my recollection any further. Having reviewed the email exchange, I believe my involvement would have been purely administrative as Ms Lowther's line manager.

17. I have also been asked by the Inquiry in which circumstances I would have had contact with Mr Ward. I can see from the documents provided to me that Mr Ward was a casework manager in the POL Investigation team. Beyond what is set out in

the documents however, I have no recollection of Mr Ward. I would imagine that any contact I did have with Mr Ward would have been for one-off specific reasons. In order to help refresh my memory, I have also been provided with the Service Description for the Security Management Service from March 2006 (FUJ00002000). Mr Ward is noted on the external distribution list for this Service Description, I presume this was because he worked as a Case Manager for Post Office.

18. I do not recall producing or signing any witness statements. Neither do I recall undertaking the extraction of any audit data. During my tenure as Security Manager, the extraction of audit data for the Post Office Investigation Team was generally undertaken by Penny Thomas. This process was carried out from a secure office which only Ms Thomas had access to. I was not personally aware of the details of the process, but I am aware that it had to be carried out meticulously so that the data contained the specific details the investigators required. The audit data extraction process was in place prior to my arrival on the Account and, as far as I was aware, was agreed between Fujitsu and the Post Office Investigations Team as the acceptable process to be followed. I was not notified when Ms Thomas was requested to extract data, nor did I expect to be provided with details of such requests.

19. After the extraction process was complete, Ms Thomas would write a statement presenting the audit data formally as evidence for the courts.

20. As far as I was aware, Ms Thomas was always very professional in her work, and I never received any complaints about her or her work. In circumstances where Ms

Thomas was away sick or on annual leave, she would have instructed her colleagues Neneh Lowther or Andy Dunks to cover for her.

21. To the extent that Ms Thomas was required to present any data obtained to the court, as her line manager I would be asked if there was an issue with the court date or whether the distance for her to travel was particularly extensive, but this was the full extent of my involvement in the process. The process itself appeared to me to be a straightforward one in that Ms Thomas would simply extract the data requested and then present that data to the court.

22. The Inquiry has asked me to consider multiple documents in relation to the provision of witness evidence in proceedings. I unfortunately do not have any recollection of these documents. As explained further below, my involvement in such matters would have been minimal or as an intermediary between the parties involved.

### **MY INVOLVEMENT IN PROCEEDINGS AGAINST LEE CASTLETON**

23. The Inquiry has asked me to consider around [35] documents relating to Post Office's proceedings against subpostmaster, Lee Castleton. The URNs for these documents are listed in the index at the back of this statement. Unfortunately, I do not have any recollection of the documents provided to me, of the case against Mr Castleton, or of any other specific case or investigation carried out by the Post Office. By way of background in this regard, this type of work did not form any part of my day-to-day role on the Account. It was very much the exception.

24. That being said, I can see from the documents provided that, in the case against Mr Castleton, I acted as a point of contact for Post Office's legal representatives,

Bond Pearce LLP (“**Bond Pearce**”). As the Security Manager at the time, I was ideally placed in this regard to facilitate communication between Bond Pearce and the many and varied colleagues on the Account. The communications provided appear largely to have related to technical questions or the provision of information. As with my previous security-related position, my role as Security Manager was not a technical one and I did not therefore, have the requisite technical knowledge to respond to Bond Pearce’s questions myself. From the documents provided, my main contact at Bond Pearce appears to have been Stephen Dilley.

25. By way of example, the email chain at FUJ00122285 shows me acting as the liaison between Bond Pearce and Anne Chambers; I am being requested to ask Mrs Chambers to review her witness statement and respond accordingly. I then forward the email onto Mrs Chambers, as directed. Similarly, the email chain at FUJ00122283 shows me acting in the same capacity as intermediary between Bond Pearce and Gareth Jenkins.

26. In relation to early discussions of the matter, the Inquiry has referred me to document POL00071165, a note of a meeting between Post Office, Bond Pearce and Fujitsu on 6 June 2006. Both myself and Mr Sewell, in addition to Mr Jenkins, Mrs Chambers, Andy Dunks and Naomi Ellis are recorded as having attended the meeting on behalf of Fujitsu (although I note that a Naomi Elliot appears on other documents around this period). I do not recall this meeting but, having reviewed my comments in the “*How Horizon Works*” section, I presume I would have discussed the audit processes with various mainly technical people, including Ms Thomas and maybe others, ahead of the meeting and then reported my findings

as shown. I would then have known where to go to find technical people who had the expertise to answer or explain the exact process if required.

27. With regards to the involvement of Mr Jenkins in the case against Mr Castleton, I believe that Mr Jenkins was a senior technical person at Fujitsu with good knowledge of the system. It is for this reason that I would have gone to him to answer the various questions raised if need be. I would expect Mr Jenkins' evidence to have been very technical and detailed (see for example FUJ00122284).

28. I have also been asked about the involvement of Mrs Chambers in this case, but I have limited recollection of Mrs Chambers or her role within the Account. I believe she may have become involved in this matter as it concerned a call that she had dealt with previously.

29. From the documents provided, it appears that a member of my team, Mr Dunks, was also involved in this matter. Document FUJ00152297, for example, demonstrates that Mr Dunks had retrieved Fujitsu helpdesk call logs for proceedings in the past and was offering to do so again. I imagine that the reason Mr Dunks became involved in this case was because he was in a position that enabled him to gain access to the relevant call logs.

30. I have been asked by the Inquiry to consider document FUJ00152290 and explain why this matter was referred to as a "test case" and the implications of this. I do not have any specific recollection of this email exchange, but I would presume that what Graham Ward of Post Office meant by "test case" was that this was the first case of this nature. On that basis, perhaps identifying someone who might (i) know

and understand the requirements, where to look for the necessary information and have the authority to examine those areas of the system, and (ii) be able to document the information so it could be understood, would have been challenging and time consuming.

31. I have also been asked by the Inquiry about my knowledge of the Horizon system's ability to "lose" transactions, the existence of bugs, errors and defects or any associated enquiries. In particular, I have been pointed to documents POL0069404, POL00069835 and POL00069925. As my role was non-technical, I do not recall having any direct experience of the system's ability to lose transactions. However, I am aware that this was a very large system / network, with thousands of terminals, and bugs, errors and defects were and are not uncommon in any network. This is why IT technicians work on networks day and night. In relation to the documents provided to me by the Inquiry, I do not have any specific recollection of these discussions. Document POL00069835 is a further example of my role as an intermediary between Mr Dilley of Bond Pearce and technical experts within Fujitsu, whose responses are set out in my emails to Mr Dilley.

32. Document POL00070126 is a Bond Pearce attendance note recording a phone call that I was not a party to. The call seems to relate to an issue with Horizon at the Falkirk branch and what actions needed to be taken in the case against Mr Castleton as a result. The end of the note records that Mr Dilley stated he had spoken with me about the issue and asked me to look into it. The note then records that I forwarded the email to Mr Sewell. The Inquiry has asked what actions I took

in response to this discussion. I do not recall this issue but would assume that Mr Sewell progressed the matter as recorded in the note.

33. Document POL00069806 is an email exchange between myself and Mr Dilley about (i) the availability of Mr Castleton's cash declarations, and (ii) the "database" from which data provided by Fujitsu had been collected. The Inquiry has asked how I obtained the information set out in my response. Although I do not recall the email exchange, I believe I would have acquired the information from various people on the Account, both technical and otherwise, including Mr Sewell and my own Security team.

34. I am unable to comment on the content on the evidence provided by my Fujitsu colleagues itself, as I do not have the technical knowledge or expertise necessary to do so (nor did I have such knowledge at the relevant time).

35. In relation to how the matter developed after the conclusion of the trial, the Inquiry has referred me to (i) an email exchange between myself and Mik Peach in relation to whether an internal review of the case should take place (FUJ00152300), and (ii) an "Afterthoughts" document prepared by Mrs Chambers (FUJ00152299). I have no recollection of either of these documents but set out below my current interpretation.

36. In relation to the email exchange at FUJ00152300, I have been asked by the Inquiry why I did not consider a "mop up" following the case to be necessary. In the email exchange with him, my response informs me that I sought advice from technical people regarding the need for a wash up meeting and my response was the conclusion of that, (i) as this was a rare occurrence and unusual case, involving

specific areas, which had not occurred prior and would be highly unlikely to repeat itself, and (ii) given all the routine procedures, despite being stretched, were followed and served us well, no wash up meeting was considered necessary from my perspective as Security Manager. So, provided the areas highlighted by Mrs Chambers in her "Afterthoughts" document were picked up by those on the email to the extent they were relevant to their specific areas, I as Security Manager did not believe any mileage would be gained in holding a wash up meeting.

37. In relation to Mrs Chambers' "Afterthoughts" document, Mrs Chambers had obviously highlighted some areas of interest and written up her thoughts in relation to the case. This document was attached to Mr Peach's email, which was addressed to both me and Ms Elliot to review / comment on / follow up on. I also agreed to discuss the contents of Mrs Chambers' document with Ms Elliot (Service Manager) and to keep both Mr Peach and Mrs Chambers informed. I do not recall any further action beyond this on my part, although it may have been brought up at further meetings within the Service Management teams. My email would have been to ensure that the Service Managers were aware. I was not specifically involved in Customer Service Management.

38. In preparing this statement, I have also been provided with a copy of the transcript of the evidence provided by Mr Peach to the Inquiry on 16 May 2023 and have the following observations:

- a. on pages 63 and 64 of this transcript, Mr Peach discusses an argument he had in relation to Mrs Chambers' participation in the proceedings against Mr Castleton. I have no recollection of any arguments concerning the presentation of evidence to court; and

- b. on pages 64 and 65 of the transcript, Mr Peach clarifies that it was not me who was tasked with presenting data to court, but rather I managed the team who undertook this exercise. I agree with Mr Peach's clarification. As described above, the individual who presented extracted data in any legal proceedings would have been the individual who extracted the data. This extraction process was undertaken by certain members of my team but not by myself.

### **MY RELATIONSHIP WITH POST OFFICE AND BOND PEARCE**

39. The Inquiry has asked me to describe the circumstances in which I would have had contact with Post Office in relation to issues concerning Horizon and who my relevant contacts at Post Office were. If I ever needed to contact the Post Office, my contact would have been Sue Lowther, who headed up the Security team. To the best of my recollection, Ms Lowther was my primary point of contact at Post Office.

40. Any contact with Ms Lowther would have been for Fujitsu Security-related reasons, for example during routine meetings with the Post Office Security team, or if there were technical issues (including software and hardware issues) or risk analysis that needed to be discussed. These meetings, which I believe were minuted, were held either bi-monthly or whenever required by Post Office and would be run by Ms Lowther. At the meetings, Sue Lowther would have a technical advisor who worked with her and I would often bring along someone who was technically savvy to answer any queries.

41. In relation to these meetings, I have been provided with the minutes of a Security Liaison Meeting that took place on 26 June 2008 which was attended by myself, Ms Lowther and another Post Office employee, Paul Halliden (FUJ00088340). Having reviewed this document, I believe that Mr Halliden may have been Ms Lowther's regular technical advisor. In most cases I attended meetings such as this by myself; however, I can see on this occasion I was joined by others from Fujitsu. This was likely to have been because there were particular technical issues to discuss.

42. In order to refresh my memory, I have also been provided with the minutes of a HNG-X Core Team Security meeting which took place on 25 May 2006 (FUJ00157865) and was attended by myself and Ms Lowther (amongst others). Whilst I do not recall these meetings specifically, I note the inclusion of Bill Membery's name on the attendee list. This has caused me to remember that Mr Membery accompanied me to meetings with Post Office on a few occasions in order to provide appropriate technical input.

43. Apart from my interaction with Bond Pearce as a liaison between the solicitors and other Fujitsu staff members (as detailed above), I do not recall having any other involvement with Bond Pearce.

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

**Statement of Truth**

I believe the content of this statement to be true.

Signed: \_\_\_\_\_

**GRO**

Dated: 18 July 2023

## **APPENDIX 1**

### **Professional Background**

1. Qualifications & Accreditations:

- a. NT Systems Administration & NT Core
- b. BS7799 -2: 2002 Internal Lead Auditor
- c. RSA 1 & 2 Computer Literacy
- d. Integrated Certified Business Technology IBT2
- e. Managing Safely with the Institute of Certified Occupational Safety & Health.

2. Professional Skills / Methodologies:

- a. City & Guilds Computer Maintenance
- b. BS7799 Information Security
- c. BS7799 Risk Analysis & Implementation
- d. Windows NT 4 Basic Administration

3. Membership to Security Forums:

- a. Member of the Information Security Steering Group
- b. Representing Fujitsu at the Managed Service Providers Information Exchange (MSPIE) Government Body

**INDEX TO FIRST WITNESS STATEMENT OF BRIAN ARTHUR PINDER**

<b>Exhibit No.</b>	<b>Description</b>	<b>Control Number</b>	<b>URN</b>
1.	Email chain between Graham Ward, Brian Pinder, Neneh Lowther and Gareth Jenkins with subject "Gaerwen statement", dated 28 March 2006	POINQ0158782F	FUJ00152587
2.	Fujitsu Service Description for the Security Management Service, Version 3.0, dated 6 March 2006	POINQ0008171F	FUJ00002000
3.	Email from Andy Dunks to Stephen Dilley, Graham C Ward and Peter Sewell, with subject "First draft witness statement of Ann Chambers (PO v Lee Castleton)", dated 18 August 2006	POINQ0128499F	FUJ00122285
4.	Email from Gareth Jenkins to Brian Pinder and Pete Sewell, with subject "to First statement of Gareth Jenkins (PO V Lee Castleton)", dated 3 August 2006	POINQ0128497F	FUJ00122283
5.	Womble Bond Dickinson personal attendance meeting notes concerning Lee Castleton, dated 6 June 2006	POL-0067728	POL00071165
6.	Draft witness statement of Gareth Jenkins, dated 2 August 2006	POINQ0128498F	FUJ00122284
7.	Email chain between Anne Chambers and Gareth Jenkins with subject "Trial Date: Post Office Limited -v- Mr L Castleton", dated 20 November 2006	POINQ0158600F	FUJ00152297
8.	Email from Anne Chambers to Peter Sewell with subject "P.O v Castleton: Transaction Logs", dated 7 August 2006	POINQ0158593F	FUJ00152290
9.	Email from Stephen Dilley to Brian Pinder, with subject "Post Office Limited v Lee Castleton", dated 31 October 2006	POL-0065967	POL00069404
10.	Email Chain between Brian Pinder and Stephen Dilly with subject "Post Office Limited -v- Lee Castleton", dated 6 November 2011	POL-0066398	POL00069835
11.	Telephone Attendance Note by Stephen Dilley regarding Lee	POL-0066488	POL00069925

Exhibit No.	Description	Control Number	URN
	Castleton Litigation, dated 30 November 2006		
12.	Telephone attendance note of Thomas Bourne, SDJ3, Richard Morgan and Mandy Talbot regarding "Lee Castleton and problems with Horizon system at Falkirk Branch", dated 6 December 2006	POL-0066689	POL00070126
13.	Email from Brian Pinder to Stephen Dilley, Graham Ward, Tom Beezer and others with subject "PO Ltd v Lee Castleton", dated 8 November 2005	POL-0066369	POL00069806
14.	Email from Pinder Brian to Mik Peach and Anne Chamber with subject "'Mop up" on the Castleton case", dated 28 February 2007	POINQ0158603F	FUJ00152300
15.	Afterthoughts on the Castleton case authored by Anne Chambers, dated 29 January 2007	POINQ0158602F	FUJ00152299
16.	Post Office / Fujitsu Review Meeting Minutes (Security Liaison), dated 26 June 2008	POINQ0094511F	FUJ00088340
17.	HNG-x Core Team Security Meeting Minutes, dated 25 May 2006	POINQ0173632F	FUJ00157865
18.	Email chain between Stephen Dilley and Andrew Wise and others with subject "Post Office Limited v Mr L Castleton", dated 6 June 2006	POL-0067727	POL00071164
19.	Email from Brian Pinder to Anne Chambers with subject "Update on trial, P.O -v- Castleton", dated 23 November 2006	POINQ0158601F	FUJ00152298
20.	Email chain between Stephen Dilley, Tom Beezer, Brian Pinder and others with subject "Post Office Limited -v- Mr L Castleton", dated 6 November 2006	POL-0070306	POL00073743
21.	Email from Stephen Dilley to Brian Pinder, Gareth Jenkins, Tom Beezer and others with subject "Post Office Limited v Lee Castleton", dated 7 November 2006	POL-0070307	POL00073744

Exhibit No.	Description	Control Number	URN
22.	Email from Stephen Dilley to Brian Pinder with subject "Post Office Limited v Lee Castleton", dated 7 November 2006	POL-0070308	POL00073745
23.	Email from Brian Pinder to Gareth Jenkins and Peter Sewell with subject "First draft statement of Gareth Jenkins (PO V Lee Castleton)" dated 2 August 2006	POINQ0128493F	FUJ00122279
24.	Draft witness statement of Gareth Jenkins (Post Office Limited v Castleton - High Court), dated 2 August 2006	POINQ0128494F	FUJ00122280
25.	Receipt and suspense account for Marine Drive, dated 3 March 2004	POINQ0128495F	FUJ00122281
26.	Transaction log dated 28 April 2004	POINQ0128496F	FUJ00122282
27.	Email from Richard Morgan to Stephen Dilley with subject "Post Office Limited v Lee Castleton", dated 13 October 2006	POL-0066035	POL00069472
28.	Email from Stephen Dilley to John Jones and others with subject "trial date - POL v Castleton", dated 20 November 2006	POL-0066304	POL00069741
29.	Email from Stephen Dilley to Pinder Brian with subject "trial date - POL v Castleton", dated 20 November 2006	POL-0066302	POL00069739
30.	Email from Stephen Dilley to Liz Morgan, Davlyn Cumberland, Tom Beezer and others with subject "Post Office Limited v Lee Castleton", dated 24 August 2006	POL-0070297	POL00073734
31.	Email from Brian Pinder to Stephen Dilley, copying Peter Sewell with subject "P.O – Castleton", dated 1 December 2006	POL-0066456	POL00069893
32.	Email chain between Anne Chambers and Stephen Dilley with subject "Urgent Post Office Limited v Lee Castleton", dated 16 December 2006	POL-0066668	POL00070105
33.	Email from Stephen Dilley to Brian Pinder, Graham Ward, Peter Sewell with subject "Post Office	POL-0067384	POL00070821

Exhibit No.	Description	Control Number	URN
	Limited v Mr L Castleton", dated 26 August 2006		
34.	Email from Stephen Dilley to Anne Chambers and Brian Pinder with subject "First draft Witness Statement of Anne Chambers (Post Office Limited v Lee Castleton)", dated 17 August 2006	POL-0067656	POL00071093
35.	Email from Brian Pinder to Stephen Dilley, Mandy Talbot, Tom Beezer and others with subject "First Draft Statement of Gareth Jenkins (Post Office Limited v Lee Castleton)", dated 2 August 2006	POL-0067672	POL00071109
36.	Email chain between Brian Pinder and Stephen Dilley copied to others with subject "Post Office Limited v Mr L Castleton", dated 16 June 2006	POL-0067713	POL00071150
37.	Stephen Dilley's attendance note summarising preparatory work and telephone conference with Brian Pinder (Lee Castleton), dated 21 December 2006	POL-0069271	POL00072708
38.	Email from Jennifer Robson to Carol King and Cheryl Woodward with subject "Lee Castleton, Marine Drive Post Office, Bridlington", dated 25 October 2006	POL-0106089	POL00107851
39.	Letter from Bond Pearce to Lee Castleton with subject "Post Office Limitec -v- Yourslef" enclosing Post Office's supplemental disclosure list, dated 22 November 2006	VIS00010644	LCAS0000404
40.	Email from Brian Pinder to Gareth Jenkins with subject "WS for Rvs Teja", dated 4 November 2005	POINQ0128338F	FUJ00122124
41.	Witness statement of Beatrice Neneh Lowther, dated 3 October 2005	POINQ0128339F	FUJ00122125
42.	Email to Gareth Jenkins and Neneh Lowther from Penny Thomas with subject "CS Witness Statement Amendment", dated 24 November 2005	POINQ0128344F	FUJ00122130
43.	Witness statement of Gareth Idris Jenkins, dated 3 October 2005	POINQ0128345F	FUJ00122131

Exhibit No.	Description	Control Number	URN
44.	Email from Gareth Jenkins to Penny Thomas, Neneh Lowther with subject "CS Witness Statement", dated 28 November 2005	POINQ0128348F	FUJ00122134
45.	Email to Peter Sewell and Gareth Jenkins from Penny Thomas with subject "Witness Statement Review", dated 7 December 2005	POINQ0128365F	FUJ00122151
46.	Witness statement of Penelope Anne Thomas (undated)	POINQ0128366F	FUJ00122152
47.	Email to Peter Sewell and Gareth Jenkins from Penny Thomas with subject "Witness Statement Review", dated 7 December 2005	POINQ0128367F	FUJ00122153
48.	Witness statement of Penelope Anne Thomas (Undated)	POINQ0128368F	FUJ00122154
49.	Email to Andy Dunks and Peter Sewell from Brian Pinder with subject "Gaerwen Witness Statement", dated 22 March 2006	POINQ0128403F	FUJ00122189
50.	Witness Statement of William Leslie Mitchell (Version 3.0), dated 22 March 2006	POINQ0128404F	FUJ00122190
51.	Email chain between Neneh Lowther, Gareth Jenkins, Penny Thomas, Graham Ward and Brian Pinder with subject "Gaerwen branch", dated 23 March 2006	POINQ0128411F	FUJ00122197
52.	Witness Statement of Gareth Idris Jenkins, dated 23 March 2006	POINQ0128412F	FUJ00122198
53.	Email to Neneh Lowther and Brian Pinder from Gareth Jenkins with subject "Gaerwen", dated 23 March 2006	POINQ0128417F	FUJ00122203
54.	Witness Statement of Gareth Idris Jenkins, dated 23 March 2006	POINQ0128418F	FUJ00122204
55.	Email to Graham C Ward and Neneh Lowther from Gareth Jenkins with subject "Gaerwen", dated 28 March 2006	POINQ0128431F	FUJ00122217
56.	Witness statement of Gareth Jenkins, dated 24 March 2006	POINQ0128432F	FUJ00122218