

Wednesday, 12 June 2024

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 2 (9.45 am)
 3 MR STEVENS: Good morning, sir.
 4 SIR WYN WILLIAMS: Good morning.
 5 MR STEVENS: We're hearing from Mr Beezer today.
 6 SIR WYN WILLIAMS: Yes.
 7 THOMAS MATHEW BEEZER (sworn)
 8 Questioned by MR STEVENS
 9 MR STEVENS: Thank you. Before we begin, sir, I should say
 10 we're due to have the usual fire alarm test at 10.00.
 11 I propose we simply sit through it.
 12 SIR WYN WILLIAMS: Yes, of course.
 13 MR STEVENS: Please could you state your full name?
 14 A. Thomas Mathew Beezer.
 15 Q. Thank you for attending the Inquiry today to give
 16 evidence. Mr Beezer, you've made two statements to this
 17 Inquiry, and thank you for your written evidence. The
 18 first has Unique Reference Number WITN09510100. That
 19 was read into the record on 2 February 2024 but, as
 20 you're called to give evidence now, I'll ask you to
 21 affirm it. Can I ask you to turn to the front of that
 22 witness statement in front of you, please?
 23 A. Yes, I have it.
 24 Q. Thank you. It should be dated 13 June 2023 and, if
 25 I could ask you please to turn to page 32 of that

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1 "distinction"?
 2 A. It should.
 3 Q. The second document, please, is WBON0001747 and about
 4 six lines down, I think it says "but only insofar as
 5 clause x 12" and that should say "clauses X, Y, Z"?
 6 A. Agreed.
 7 Q. Thank you. Can we then, please, turn to WBON0001752.
 8 If we could turn to the second page, please, midway down
 9 there's an asterisk and it says "contract incorp is
 10 a problem in this Clause". I understand that "clause"
 11 should read "class"?
 12 A. Agreed.
 13 Q. Finally, can we turn to WBON0001888. I'm playing
 14 catch-up with myself, sorry. I think here, if we turn
 15 the page, please, on the third line at the end it says
 16 "May view (QC)". I understand that should read "My
 17 view"?
 18 A. Agreed.
 19 Q. Thank you. That can be taken down now. Subject to
 20 those corrections to the exhibits, are the contents of
 21 your first and second statement true to the best of your
 22 knowledge and belief?
 23 A. They are.
 24 Q. Thank you. That stands as your evidence in the Inquiry.
 25 The first statement has already been published but

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1 statement, you'll see it runs to 82 paragraphs.
 2 A. Yes.
 3 Q. Is that your signature?
 4 A. Yes, it is.
 5 Q. You made a second witness statement on 8 May 2024.
 6 Could I ask you to turn to that, please?
 7 A. I have it.
 8 Q. Thank you. Page 41, please.
 9 A. Yes.
 10 Q. Is that your signature?
 11 A. It is.
 12 Q. Now, as part of your statement, you have exhibited
 13 several handwritten notes or attendance notes of various
 14 meetings you had. You also exhibited versions you'd
 15 typed recently, transcribing what those notes said --
 16 A. To assist the Inquiry.
 17 Q. Yes, and we're grateful for that. I understand that
 18 since you've re-read your statement you have a four
 19 corrections to make to those?
 20 A. Yes.
 21 Q. I'll deal with those shortly now. Please can we bring
 22 the first one up. It's WBON0001751.
 23 If you go right to the bottom, please, I understand
 24 that the first correction is where it says,
 25 "distraction" at the bottom line, that should read

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1 second statement will be published on the website
 2 shortly. Before I ask you questions about your
 3 evidence, I understand there's a statement you'd like to
 4 make?
 5 A. Yes, thank you. I'd like to take this opportunity at
 6 the outset of my evidence to reiterate my apology in my
 7 second witness statement. To each and every
 8 subpostmaster and mistress, I'm sorry that the recusal
 9 application added to the complexity and challenges they
 10 faced in the GLO.
 11 Additionally, I'd like to apologise to Mr Castleton
 12 personally. I submitted a witness statement in the
 13 Inquiry in its Phase 4 work and I had anticipated I'd be
 14 called in that phase. I had wanted and planned to make
 15 an apology to Mr Castleton in Phase 4 had I been called.
 16 I was not, hence taking this opportunity to now express
 17 my deep regret about the circumstances he and his family
 18 were placed in.
 19 At the time of the case in 2005 and 2006, I was
 20 confident in the assertions made to me by POL about the
 21 robustness of the Horizon system and I believed I was
 22 acting properly and in accordance with my instructions
 23 when dealing with that case. However, with the
 24 information that has come to light over the course of
 25 this Inquiry, my confidence in such assertions has been

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1 eroded, so I'm taking this opportunity to now say that
 2 I'm truly sorry.
 3 **Q.** I'd like to start with some background questions, if
 4 I may. You qualified as a solicitor in 1996?
 5 **A.** Correct, yes.
 6 **Q.** You joined Bond Pearce in 2003?
 7 **A.** Yes.
 8 **Q.** As the Inquiry knows well, Bond Pearce subsequently
 9 became Bond Dickinson --
 10 **A.** Yes.
 11 **Q.** -- and Bond Dickinson then became Womble Bond Dickinson?
 12 **A.** Yes.
 13 **Q.** I'll use the terms interchangeably, treat them as
 14 effectively the same body.
 15 **A.** Fine.
 16 **Q.** You were made a partner of Bond Pearce in 2005?
 17 **A.** Yes.
 18 **Q.** You remain a partner of Womble Bond Dickinson today?
 19 **A.** Yes.
 20 **Q.** Have you practised in civil litigation throughout your
 21 career as a solicitor?
 22 **A.** Yes.
 23 **Q.** Do you have any experience of practice in criminal law?
 24 **A.** No.
 25 **Q.** I'm going to primarily focus in evidence today on two

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1 summary form, what experience did you have of conducting
 2 litigation for Post Office itself?
 3 **A.** I find that quite hard to answer at this distance. It's
 4 18/19 years ago. I suspect it will have been some of
 5 the more complex debt recovery, I suspect. But I'm
 6 dredging my memory.
 7 **Q.** Please can we bring up your first witness statement,
 8 which is WITN09510100, and page 5, paragraph 12, please.
 9 Thank you.
 10 You make a point about an engagement letter relating
 11 to the Castleton litigation, and you then say:
 12 "I cannot now recall why this was done, not least
 13 because my firm had a global engagement in place with
 14 Post Office throughout this period (and, so far as I am
 15 aware, at all times in our relationship) ..."
 16 Could you please describe to me what you mean by
 17 "global engagement"?
 18 **A.** I understand that you could call it a framework
 19 agreement; you could call it an appointment agreement.
 20 I can't picture it, I may never have seen it, I may just
 21 know that each year or at the recommencement of
 22 successful tenders a new framework agreement between
 23 Post Office and its panel law firms was put in place.
 24 So there's a fully termed framework agreement,
 25 I believe. Although I can't picture it and may never

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1 areas: firstly, the case of Post Office v Lee Castleton,
 2 which you've just alluded to and, second, the recusal
 3 application in the GLO proceedings. Before we do that,
 4 I want to turn to Bond Pearce/Womble Bond Dickinson's
 5 relationship with Post Office.
 6 In 2005, when you say you became involved in the
 7 Castleton case, you described the Post Office then as
 8 a significant client?
 9 **A.** Yes.
 10 **Q.** Why did you consider the Post Office to be a significant
 11 client at that stage?
 12 **A.** Bond Pearce had acted for the Post Office, I believe,
 13 for many years in a number of streams of work,
 14 commercial work, employment work, some litigation work,
 15 and it was a household name and a significant client.
 16 It was a client we were proud to have.
 17 **Q.** You've named a few streams of work there. You didn't
 18 mention criminal proceedings. Is that because Bond
 19 Pearce didn't take on criminal work?
 20 **A.** In the Civil Litigation Team we didn't take on criminal
 21 work. There may have been parts of the firm that did
 22 criminal work. We have regulatory teams, for example.
 23 So I can't say no criminal work in the firm at all.
 24 I did no criminal work for Post Office.
 25 **Q.** Prior to dealing with the case of Lee Castleton, in

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1 have seen it, I just know it existed.
 2 **Q.** Based on your knowledge of it or whatever knowledge you
 3 had, would that global agreement then be supplemented by
 4 individual retainers on specific matters?
 5 **A.** It may have been. It may have been.
 6 **Q.** The Inquiry heard evidence from Chris Aujard, who was
 7 General Counsel between October 2013 and March 2014,
 8 with some overlap with Jane MacLeod, as a General
 9 Counsel of Post Office Limited. In his evidence, he
 10 described during that period that Bond Dickinson was so
 11 embedded within Post Office that, in many ways, they
 12 acted as an extension of the in-house team. Would you
 13 accept that is a fair characterisation of how Bond
 14 Dickinson operated with Post Office at that time?
 15 **A.** 2013/2014?
 16 **Q.** Yes.
 17 **A.** I probably wasn't much to do with the Post Office
 18 relationship at that time, so I can't answer that with
 19 any precision. I suspect I was doing no Post Office
 20 work at all at that time. As a partner in the firm,
 21 I would say we always had a proper lawyer-client
 22 relationship but, from my personal experience, I can't
 23 answer. I wasn't doing Post Office work.
 24 **Q.** In respect of when you were doing Post Office work,
 25 would that description be fair for any period of time

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1 which you were involved with it?
 2 **A.** I don't think so. I did Post Office work in those early
 3 years and then, later on, as we will see, in the recusal
 4 but in the intervening years not at all.
 5 **Q.** So you say "early years", we're talking --
 6 **A.** Early 2000s, yeah.
 7 **Q.** When do you think you stopped doing that work?
 8 **A.** It's a guess but, if you want me to guess, I will.
 9 2007/8/9, somewhere like that. Before, probably 2007/8,
 10 I drop out of that vein of work and that relationship.
 11 **Q.** As a partner in the litigation team during that period,
 12 would you have had any oversight at all of the Post
 13 Office relationship, even when you weren't specifically
 14 working on cases for them?
 15 **A.** No, not oversight of the relationship but, as a partner
 16 in the litigation team, I will have had a connection
 17 with the people in the litigation team, yes, and they
 18 may have been doing Post Office work. So I would have
 19 known about stuff going on but we had a proactive
 20 relationship partner for Post Office and that wasn't me.
 21 **Q.** Who was that?
 22 **A.** That was a gentleman called Simon Richardson.
 23 **Q.** We may come back to that period of time in due course.
 24 I want to look at the early years first and let's start
 25 with 2005, please, and some emails relating to the case
 9

1 anticipation of the criminal trial, Paul Whitaker's
 2 report and his interview of David Blakey."
 3 So, at this stage, you were aware of an overlap in
 4 some cases between civil proceedings being brought by
 5 the Post Office and criminal proceedings; is that right?
 6 **A.** No, probably not. My read of this, when I was sent this
 7 recently by the Inquiry, is that we were doing the debt
 8 recovery afterwards, is what I think, but I don't know
 9 that.
 10 **Q.** Let me rephrase my question, sorry. You were aware
 11 that, in some cases where you were instructed to pursue
 12 debts on behalf of the Post Office, the Post Office had
 13 prosecuted the people you were pursuing?
 14 **A.** I believe that must be right, from this email, yeah.
 15 **Q.** Presumably, you were aware that Post Office relied on
 16 Horizon data when pursuing those criminal prosecutions?
 17 **A.** Yes, probably, but -- I say, "yes, probably" in answer
 18 to that question because I think the first time that was
 19 gone into intellectually as a topic was in the Castleton
 20 case. Everything in the Castleton case suggests to me
 21 we -- me and the people in that case -- are on that
 22 journey for the first time. You know, the language
 23 is -- we're not saying we did this in the last case.
 24 I think that's the first forensic investigation. So --
 25 **Q.** Just to clarify, are you saying that Castleton was the
 11

1 against Gillian Blakey and David Blakey. Can we please
 2 turn to POL00142517.
 3 *(Pause for fire alarm test)*
 4 Right, I think that's over.
 5 So we have an email on the screen here, if you could
 6 just scroll up slightly, thank you. So this is from
 7 a solicitor at Bond Pearce, is it Dave Panaech?
 8 **A.** Panaech.
 9 **Q.** Panaech, thank you. It's to Cheryl Woodward at Post
 10 Office and Mandy Talbot, and you are in copy, and it's
 11 referring to sending a letter before action off on the
 12 Riby Square Post Office case. Why would you have been
 13 copied in as a partner on a correspondence such as this?
 14 **A.** Dave was a solicitor in the team. In those early times,
 15 I had a footprint within the Post Office relationship.
 16 I think that's why Dave is copying me in.
 17 **Q.** Okay if we look for an email further on in the timeline,
 18 it's POL00142534, please, from Dave Panaech again to
 19 Cheryl Woodward, you're in copy, dated 22 November.
 20 This concerns civil proceedings and it sets out that
 21 Particulars of Claim were enclosed with the email. The
 22 penultimate paragraph, it says:
 23 "The facts of the case were ascertained from the
 24 documents prepared by the investigators in the POID
 25 file, in particular, the witness statements produced in
 10

1 first time at least you turned your mind to data
 2 produced by Horizon being used as an evidential basis to
 3 pursue claims for debt?
 4 **A.** Yes, I think so. I think so but, given that Horizon
 5 underpinned their business, the debts being chased at
 6 this time -- if that's what's happening because I don't
 7 remember this at all -- must have been generated from
 8 Horizon.
 9 **Q.** It seems that, from here, Bond Pearce, as part of its
 10 debt recovery work, were being sent bundles of documents
 11 relevant to those criminal prosecutions?
 12 **A.** That seems to be some of the background material that we
 13 sent but, as I say, I've no memory of this whatsoever.
 14 **Q.** So, as a broad question, if a solicitor at Bond Pearce
 15 at this time, who was handling a debt recovery action,
 16 if they had or discovered evidence that called into
 17 question the reliability of the Horizon IT System, to
 18 what extent do you think they would have
 19 a responsibility to consider whether that document or
 20 information ought to be disclosed to subpostmasters
 21 convicted of theft or false accounting in criminal
 22 proceedings that relied on data generated by the Horizon
 23 IT System?
 24 **A.** As a civil practitioner, I'm not sure I'm really placed
 25 to answer that. Can we unpack that question a little
 12

1 bit? So if there was a document that demonstrated
 2 the --
 3 Q. Well, let me unpack it. There's a civil practitioner
 4 dealing with a claim for debt --
 5 A. Yes.
 6 Q. -- and that claim for debt relies on data generated by
 7 the Horizon IT System.
 8 A. Yeah.
 9 Q. That civil practitioner is aware that his or her client
 10 also prosecutes subpostmasters for theft or false
 11 accounting based on Horizon data?
 12 A. Yes, if that was what had happened in the Blakey case
 13 but I don't know that.
 14 Q. Yes, setting out some hypotheticals here.
 15 A. Yes.
 16 Q. In those circumstances, if that civil practitioner
 17 discovered evidence or information that undermined or
 18 tended to undermine the reliability of the Horizon IT
 19 System, do you think there was any responsibility on the
 20 civil practitioner to consider whether that document
 21 ought to be disclosed to subpostmasters who had been
 22 convicted of theft or false accounting?
 23 A. The specific subpostmasters or subpostmasters generally
 24 as a class?
 25 Q. Well, let's start with generally as a class first.

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1 A. Yes, I believe so. We're going way back into my memory.
 2 Q. Following an audit on 23 March 2004, the Post Office
 3 suspended Mr Castleton because of alleged discrepancies?
 4 A. I believe, so.
 5 Q. The Post Office subsequently instructed Bond Pearce to
 6 pursue Mr Castleton for the shortfall as a debt?
 7 A. Yes.
 8 Q. This was initially handled by a team called CMS within
 9 Bond Pearce?
 10 A. Yes.
 11 Q. A claim was issued and served on Mr Castleton --
 12 A. Yes.
 13 Q. -- and he served a defence and counterclaim on 15 August
 14 2005?
 15 A. Yes.
 16 Q. The Post Office failed to file a defence to the
 17 counterclaim by the deadline --
 18 A. Yes.
 19 Q. -- and that was because of an error by a fee earner. We
 20 don't need to go into the details of it but that was
 21 subsequently resolved?
 22 A. Yes.
 23 Q. But the court had entered judgment in default of
 24 a defence being served, which led to your involvement in
 25 the case?

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1 A. I don't know how to answer that, to be honest with you.
 2 I'm not trying to avoid answering it. It would need the
 3 civil practitioner to have sufficient knowledge of
 4 criminal process to be able to navigate those waters.
 5 It would certainly have an impact on the civil case that
 6 was on the desk at the time, of course it would.
 7 Absolutely. Would it trigger a solicitor out there in
 8 law land to take on a proactive disclosure duty?
 9 I don't know the answer to that.
 10 Q. Let's not go as far as to say they have a disclosure
 11 duty but do you think there's any responsibility to
 12 raise or discuss it with the client and say, "You may
 13 need to consider your criminal prosecutions" or --
 14 A. If they had a full enough picture of what was going on,
 15 and so, if a case on a desk had -- if someone was --
 16 became -- actually knew that the data that had
 17 underpinned a civil case or a criminal case was wrong,
 18 I believe there would be a conversation with the client.
 19 Q. I want to move to look at the Lee Castleton case now.
 20 It's a case the Inquiry has looked at in some detail in
 21 Phase 4. Just to refresh on the background,
 22 Mr Castleton was a subpostmaster of the Marine Drive
 23 Post Office from 18 July 2003.
 24 A. I believe so.
 25 Q. You're nodding, yes?

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1 A. It did.
 2 Q. Let's have a look at a document, then. It's
 3 POL00070496, please. Could we go to page 2, please,
 4 right at the bottom. There's an email from Stephen
 5 Dille; he was an associate, was he, at the time in Bond
 6 Pearce?
 7 A. Yes.
 8 Q. Did he report to you?
 9 A. Yes, on this case.
 10 Q. We see there this is to Bob Heckford on 18 November.
 11 Who was Bob Heckford?
 12 A. I believe Bob Heckford was one of our internal risk
 13 people. I'm not absolutely sure but I think that's the
 14 role he fulfilled.
 15 Q. So we see "Private, Privileged and Confidential and
 16 Prepared for the Purposes of a Possible Claim Against
 17 the Firm", and this goes on to set out the background
 18 which we've just discussed. We can see you're copied in
 19 to it there. So, against that background, can we turn
 20 to your email on page 1, please. Thank you. So
 21 21 November, you say that you have spoken to Mandy,
 22 that's Mandy Talbot?
 23 A. Agreed.
 24 Q. What was your working relationship with Mandy Talbot at
 25 that point?

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1 A. Solicitor-client, cordial. Which aspect do you?
 2 Q. Well, how often did you work with her?
 3 A. I can't remember but sporadically but regularly.
 4 Q. You said cordial?
 5 A. Yes.
 6 Q. Is your evidence that it was a cordial relationship?
 7 A. Yes, yes.
 8 Q. You say:
 9 "I spoke to Mandy. She is understandably a little
 10 disturbed."
 11 Presumably that's by the default judgment?
 12 A. She was angry.
 13 Q. We've said already in your witness statement you
 14 describe Post Office Limited as a very significant
 15 client. Were you effectively being brought in --
 16 A. Yes.
 17 Q. -- to calm Post Office's nerves?
 18 A. Yes.
 19 Q. So it was being brought in to show that a partner was
 20 having clear oversight of this case?
 21 A. Yes.
 22 Q. Would you usually have been brought into a debt claim
 23 such as this?
 24 A. No.
 25 Q. If we go down -- it's already there, sorry. You see at

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1 she could be quite forceful, and, at this time, I think
 2 she was saying to me words to the effect of "You've
 3 really stuffed up, there's an embryonic class action" to
 4 put fear into me and to tell me off.
 5 That's what I thought at this point, when this
 6 conversation took place. As time moved on, although
 7 I didn't know it at the time this conversation took
 8 place, I think she was overstating the embryonic class
 9 action because, as I understand it, it was, in fact, two
 10 cases, I think, and I think she was overstating the
 11 position to extract her ounce of flesh from the firm for
 12 having made a mistake, is what I think was going on but
 13 I don't know that for certain.
 14 Q. But, at this stage, there's a clear link being drawn
 15 between Mr Castleton's case and an overall background
 16 worry of other cases relating to the integrity of the
 17 Horizon IT System?
 18 A. Yes.
 19 Q. Point 1, under "Requests from Mandy", you say "I feel we
 20 MUST comply with", the first one is:
 21 "that she is kept fully informed on this matter --
 22 including steps to be taken. I will lead on this.
 23 "2) that she be sent a full set of proceedings (in
 24 order) and a full set of correspondence ..."
 25 You go on to say:

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1 number 2 it says:
 2 "Hugh James are currently trying to contain
 3 an embryonic and not yet issued class action relating to
 4 the Horizon [IT] system. A judgment in relation to it
 5 (even a default) is currently very bad news for RM."
 6 Presumably that's Royal Mail?
 7 A. Royal Mail, POL; at that time they were the same entity.
 8 Q. So breaking that down, Hugh James are another firm of
 9 solicitors?
 10 A. Yes.
 11 Q. They are acting for Post Office in relation to what's
 12 described here as a potential class action?
 13 A. Yes.
 14 Q. Can you recall what Mandy Talbot told you about this
 15 potential class action?
 16 A. No, because it's 18/19 years ago. I can go on, if you
 17 want me to, to give you some colour.
 18 Q. Well, yes, what was your understanding of the scale of
 19 the action at this point?
 20 A. I don't think I had an understanding at this point in
 21 time. What I think was going on here was Mandy was
 22 pretty peeved with the firm. We'd got a default
 23 judgment against them, which -- for £250,000, which is
 24 thoroughly bad news. Mandy -- as I said, I did interact
 25 with Mandy periodically, I knew her reasonably well and

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1 "As you know I would like a full set too please."
 2 So you're envisaging a very hands-on role for
 3 yourself, it seems, in this case.
 4 A. We need to get that default judgment set aside.
 5 Q. So that's getting the default judgment set aside. Was
 6 it also because of wider concerns about a class action
 7 that had been raised?
 8 A. At this point, I mean, it's a long time ago but, knowing
 9 me because I know me, I will have been laser focused on
 10 the default judgment, the mistake the firm had made, and
 11 responding to the urgency that the client is putting
 12 upon me. And so my concern, my irritation that's coming
 13 across to my internal team here is saying "We're going
 14 to get this default judgment set aside". That's what
 15 I think is going on.
 16 Q. Well, if we look at (3), it says:
 17 "due to matters handled by Hugh James relating to
 18 Horizon, Mandy asks that we speak to them to ensure we
 19 are all pulling in the same direction. This is even
 20 more important given the threatened class action."
 21 You go on to say at (4) about not issuing
 22 proceedings in a claim based on Horizon evidence without
 23 her consent, and (5):
 24 "... wants a report on how many Horizon based claims
 25 we currently handle."

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1 So you may be focused on the default judgment but
 2 the class action was certainly playing a part in your --
 3 **A.** Yes.
 4 **Q.** -- mind and work going forward?
 5 **A.** Yes.
 6 **Q.** At that point, did you or anyone at Bond Dickinson have
 7 a desire to become more involved in handling the wider
 8 potential class action?
 9 **A.** I don't believe so, not at that point.
 10 **Q.** Could we look, please, at POL00070480. This is
 11 an attendance note dated 23 November 2005. We see on
 12 the left in the second tramlines, it says "Name: Stephen
 13 Dilley", and it says:
 14 "I had a telephone conference with Tom Beezer and
 15 Mandy Talbot."
 16 So this is Stephen Dilley's note of that?
 17 **A.** Agreed.
 18 **Q.** Would you have seen that at the time or not?
 19 **A.** No. I have seen it since.
 20 **Q.** So, at this stage, default judgment hadn't been set
 21 aside?
 22 **A.** No.
 23 **Q.** If you just read, as best you -- well, as much as you
 24 need, points 1 to 5, would you agree those are all about
 25 the substance of the case and not the default judgment?

21

1 **Q.** -- and serve that as part of the --
 2 **A.** I think that's what happens. If I'm wrong, I'm really
 3 sorry but I think that's what's happened.
 4 **Q.** We then have point 6 about recommendations for counsel:
 5 Richard Morgan, now Richard Morgan KC, who we know came
 6 on to be counsel in this case.
 7 **A.** Yes.
 8 **Q.** At 7, referring to Mandy Talbot, and you say there that
 9 is to attend a hearing on 6 December. Now, that's not
 10 a hearing for the default judgment application to be
 11 heard, was it, because it was still being prepared at
 12 this point?
 13 **A.** I don't know but there is a file note on the file that
 14 I read in preparing for hearing this that that hearing
 15 gets vacated. I don't know what it is. Maybe you do,
 16 I don't know.
 17 **Q.** Then as we carry on, if we go down, Mandy Talbot asked
 18 a question at the meeting on Friday to ask whether
 19 rebooting the system will change the cash accounts, and
 20 then asked for a copy of the expert reports.
 21 Would you accept that the conversation -- I know you
 22 said this is about default judgment and preparation for
 23 default judgment but it's also forward looking to the
 24 substance of the case as a whole.
 25 **A.** I -- yes, I suspect, yeah, I -- I think I agree with you

23

1 **A.** No, I wouldn't agree with that, because -- do you want
 2 me to say why?
 3 **Q.** Yes, please do.
 4 **A.** So the witness statements at (3), John Jones, Helen
 5 Hollingsworth and Cath Oglesby, were the set aside
 6 witness statements, I think. You've got to remember
 7 we're going back 18 years here. I think those were the
 8 witness statements in support of the set aside
 9 application and so I think, in these early stages -- so
 10 the question was: do all five relate only to the forward
 11 facing actions in the case? The answer to that is no.
 12 I think some probably do.
 13 **Q.** So as I understand what you're saying is the --
 14 admittedly it is a long time ago --
 15 **A.** A long time.
 16 **Q.** -- but, presumably for the purpose of overcoming the
 17 merits test of setting aside a default judgment, rather
 18 than simply putting the solicitor's witness statement,
 19 your evidence is that you're going to obtain witness
 20 evidence of fact --
 21 **A.** Yes.
 22 **Q.** -- from the actual witnesses --
 23 **A.** Yes.
 24 **Q.** -- in the substantive case --
 25 **A.** Yes.

22

1 but what I think is going on here is Mandy and me
 2 desperately trying to get up to speed. I think my first
 3 substantive involvement is on 21 November, I think. when
 4 I sent that note that you've shown me to Bob Heckford
 5 after my first conversation with Mandy, when she told me
 6 off. Mandy then says, "I want a full set of papers";
 7 I say, "I want the same".
 8 We've had a call with Stephen, I think it's
 9 certainly in part -- and I probably would say in large
 10 part -- about understanding what we can know with two
 11 days' worth of exposure to this case about the merits.
 12 At 3 we have the witness statements that I think are
 13 going to be prepared to support the set aside
 14 application and, at 9, we're talking here about
 15 Mr Castleton's expert reports.
 16 It was the Bentley Jennison one and the White
 17 Hoggard or something like that, that had come in in
 18 September before my involvement, I believe, and they
 19 must have been mentioned on this call. So Mandy is
 20 asking here for those expert reports that Mr Castleton
 21 sent on a without-prejudice basis. We didn't have any
 22 expert reports at this point.
 23 **Q.** Before we turn the page, was it your usual practice in
 24 making an application to set aside default judgment to
 25 lead witness evidence from some or all of the witnesses

24

1 you actually intended to call in the litigation, rather
 2 than simply rely on a solicitor's witness statement?
 3 **A.** I'm going to say something that I don't mean to be
 4 jocular: I hope I don't have a usual practice in setting
 5 aside default judgments but, at this distance, I don't
 6 know, I just don't know. But this was our mistake, and
 7 and me being the way I'm wired, the kitchen sink was
 8 going to go at this to get that default judgment set
 9 aside for what was an important client of our firm.
 10 **Q.** If we can turn the page, please, it says:
 11 "Tom made it clear that we were to get counsel
 12 involved at an early stage as [Bond Pearce] were picking
 13 up the tab for rectifying the default judgment and he
 14 wanted to go for a sledge-hammer approach."
 15 Do you recall using the term "a sledge-hammer
 16 approach"?
 17 **A.** Not at all.
 18 **Q.** Is it wording you would use?
 19 **A.** In that circumstance, probably.
 20 **Q.** What do you mean by that?
 21 **A.** I mean my firm has made a mistake and, as a partner of
 22 my firm, I'm going to get that mistake rectified.
 23 **Q.** Did the sledgehammer approach go to the overall conduct
 24 of the case, not just the default judgment?
 25 **A.** Not at all, and I've pondered that and I can answer that
 25

1 attempts at settlement and there was no desire for
 2 litigation.
 3 **Q.** Well, let's just look at this point. You're told at
 4 this point that there's a potential class action in the
 5 background; in your own words in the email before
 6 a default judgment was "very bad news"?
 7 **A.** Very bad news.
 8 **Q.** I assume that, at this stage, Post Office or Mandy
 9 Talbot was saying that the Horizon system is -- has --
 10 it's an -- sorry. Was Mandy Talbot saying to you that
 11 there were any difficulties or problems with the Horizon
 12 IT System?
 13 **A.** Not at all.
 14 **Q.** Presumably, Post Office wished to defend any class
 15 action at this stage?
 16 **A.** Yes, I assume.
 17 **Q.** In this conference, it appears that you do touch on the
 18 merits of the case?
 19 **A.** Yes, because we are collating evidence to put in, in
 20 support of the set aside.
 21 **Q.** So standing back from all that, in that context, is it
 22 really your evidence that the sledgehammer approach was
 23 purely limited to the default judgment or to dealing
 24 with these Horizon claims generally?
 25 **A.** It is my evidence that it was purely limited to default
 27

1 more fully if you'd like me to.
 2 **Q.** Please do.
 3 **A.** We can see from later emails that maybe we will go to,
 4 that, after the default judgment is set aside, there is
 5 a definite pause and "What shall we now do", both with
 6 Mandy and from the Bond Pearce side. So, once the case
 7 is regularised, what shall we now do to take this
 8 forward? And so the sledgehammer approach or the
 9 kitchen sink approach isn't a comment about the action
 10 in general and, in fact, it's worth just remembering
 11 that, in November 2005, Stephen Dilley had already
 12 suggested mediation to Mr Castleton's lawyers and, in
 13 January 2006, before the default judgment was set
 14 aside -- I think that's right, in terms of timeline --
 15 a Part 36 offer had already been made. The offer of
 16 mediation was rejected the very next day by
 17 Mr Castleton's lawyers back in November 2005.
 18 So there wasn't a set plan to have litigation here
 19 at all. There was a set plan in my mind to get rid of
 20 a default judgment, absolutely, yes. But sledgehammer,
 21 call it what you will, I was going to do everything that
 22 I could to rectify my firm's mistake for my client. But
 23 there was definitely post-post-set aside of default
 24 judgment, which happened by consent, but quite late in
 25 the day. There was a step back and reflect, further
 26

1 judgment. I'm absolutely sure of that.
 2 **Q.** Could we look at, please, POL00119895. This is
 3 a document that was sent to you relatively recently by
 4 the Inquiry.
 5 **A.** It was.
 6 **Q.** It's a note of a meeting this Inquiry has seen on
 7 numerous occasions. My understanding is the attendance
 8 list, there's no one from Bond Pearce on that list; is
 9 that correct?
 10 **A.** That's what it shows to me. I hadn't seen this document
 11 before and I hadn't seen it come up in the Inquiry. It
 12 was a new document to me completely when you sent it to
 13 me.
 14 **Q.** I appreciate at this distance: can you recall Mandy
 15 Talbot referring to a meeting such as this to discuss
 16 Post Office's approach to cases that involve challenges
 17 to the integrity of Horizon?
 18 **A.** No.
 19 **Q.** If we turn to page 3, please, we see paragraph 14
 20 there's a reference to Mr Castleton's case, scheduled
 21 for 7 February. Your evidence is that, at this stage,
 22 you weren't consulted, in respect of Mr Castleton's
 23 case, about it being part of this broader strategy
 24 meeting?
 25 **A.** No, this is -- when is this, 2006?
 28

1 Q. 2005, sorry.
 2 A. 2005?
 3 Q. 6 December 2005, so shortly after the conference note we
 4 just --
 5 A. So this is Mandy saying, on 7 February 2006, because the
 6 date is not there, is it, so -- because this is December
 7 2005.
 8 Q. Yes, it'll be --
 9 A. So that must be something to do with --
 10 Q. I think it's a case management conference?
 11 A. Was it, or is it to do with the set aside? Anyway.
 12 Nothing turns on it.
 13 Q. Your evidence is that you cannot recall being consulted
 14 about this meeting?
 15 A. No.
 16 Q. Thank you. Can we turn, please, to POL00070910. If you
 17 could turn to page 3, please, that's perfect. Thank
 18 you.
 19 So now, further on in the chronology, this is
 20 an email from Stephen Dilley to Mandy Talbot with you in
 21 copy on 20 February 2006. If we look at number 1, it
 22 says:
 23 "[Post Office's] view of pursuing the claim in the
 24 light of the favourable evidence from John Jones, Cath
 25 Oglesby and Helen Rose ..."

29

1 A. Yeah.
 2 Q. -- which is suggesting pursue the claim --
 3 A. Yes.
 4 Q. -- and, on the other hand, balanced against that, or not
 5 pursuing it, are broader concerns over Horizon issues?
 6 A. Yes, it says that but I can't be put that into context
 7 for you.
 8 Q. You can't recall because, obviously, you were dealing
 9 with this case to provide reassurance to Post Office?
 10 A. Yes.
 11 Q. You presumably discussed it with Mandy Talbot since
 12 November --
 13 A. Yes.
 14 Q. -- and February?
 15 A. Absolutely.
 16 Q. Can you recall being told anything about concerns about
 17 Horizon issues, broader concerns about Horizon issues,
 18 which would, in your view, lean the Post Office in
 19 favour of not pursuing Mr Castleton?
 20 A. No, I know Mandy Talbot was concerned that there was
 21 a case that was an issued case that had a counterclaim
 22 for £250,000 that had a challenge to Horizon in the
 23 defence, and so that might be the broader concern. She
 24 was absolutely concerned about that. But that's against
 25 the background of my understanding and I believe Mandy's

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1 So causing there, those are witness statements in
 2 relation to Mr Castleton's case in particular --
 3 A. And they were the ones in support of the set aside
 4 application.
 5 Q. Mr Dilley's view is that's in favour, in effect, of
 6 pursuing the claim against Mr Castleton?
 7 A. Yes. He's saying -- I mean, the Inquiry has heard from
 8 Mr Dilley already but my understanding from reading the
 9 file is his view of the merits of the case improved in
 10 the collation of the evidence for the set aside, and
 11 what he's saying here is, in his view, there's
 12 favourable evidence from those three witness statements
 13 that was got in support of the set-aside application so
 14 I think his view -- my reading of the file -- improved
 15 on the merits of the case.
 16 Q. He says:
 17 "... balanced against any broader concerns over
 18 Horizon issues ..."
 19 Is that talking about the potential class action?
 20 A. I suppose the straight bat answer is I don't know what
 21 was in his mind but that may be. That may be.
 22 Q. Sorry, I'm not asking you about what's in his mind. Let
 23 me rephrase it in another way. At this point, reading
 24 this, do you suggest that, on the one hand, there's the
 25 evidence in the case --

30

1 understanding that Horizon was robust, to use a word
 2 that we've heard many times.
 3 Q. Can we turn to page 1, then, please. This is Stephen
 4 Dilley to Julian Summerhayes on 24 February and says:
 5 "Since my last email, I have spoken to Mandy to
 6 agree the strategy moving forward."
 7 Do you recall if you were involved in that
 8 conversation as well?
 9 A. I don't know.
 10 Q. "Internally, the [Post Office] feel conflicted about the
 11 Castleton case. The [Post Office] believes to be the
 12 Horizon system is robust but the downside is the cost
 13 (in [Post Office] time and money) of proving a negative
 14 (ie that there are no faults) is expensive."
 15 It goes on at (2):
 16 "However, her view is that the [Post Office] must
 17 not show any weakness and, even if this case will cost
 18 a lot, there are broader issues at stake other than just
 19 Castleton's claim: if the [Post Office] are seen to
 20 compromise on Castleton, then 'the whole system will
 21 come crashing down' ie it will egg on other
 22 subpostmasters to issue speculative claims. She knows
 23 that Castleton is talking to Bajaj (the other
 24 subpostmaster bringing a Horizon based claim). Her
 25 clear message is that we must be seen to take a firm

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1 line. With this in mind, our instructions are as
 2 follows ..."

3 Can you recall if, at this point, you thought there
 4 was a change in approach to Castleton based on wider
 5 concerns to do with Horizon, from -- I should say,
 6 sorry, change in approach from Post Office?

7 **A.** No, no, and so we tried to mediate in November, we'd
 8 issued the Part 36 in January 2006 and there were --
 9 absolutely right, Mandy had broader concerns, as is
 10 displayed quite clearly here. But once a case is issued
 11 and once a counterclaim is issued, you can't get rid of
 12 it unless you settle it or unilaterally walk away.

13 **Q.** I think we're talking at cross purposes. So, in the
 14 first email from Stephen Dilley, we had, on the one hand
 15 the evidence in the case from the witness statements was
 16 suggesting go ahead --

17 **A.** Yes.

18 **Q.** -- and, in his view, on the other hand, broader Horizon
 19 concerns --

20 **A.** Yeah.

21 **Q.** -- saying try to settle it?

22 **A.** Yes.

23 **Q.** Here we have an email saying, well, actually, at
 24 number 2, the broader concerns is a reason to pursue the
 25 case, even if it costs a lot. Was that a change in

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1 counterclaim. What do we do? We've got to get rid of
 2 this. We've got to try to settle it.

3 **Q.** If someone is trying to simply settle a case, just
 4 because, for the reasons I think you said earlier,
 5 publicity or whatever it might be, you adopt a different
 6 litigation strategy to those types of cases, than you do
 7 to, for example, a test case where you're trying to make
 8 a point irrespective of the cost. Would you accept
 9 that?

10 **A.** As a proposition, yes, I would accept that, I think --
 11 I think.

12 **Q.** So, in this case, are we seeing here a change from your
 13 firm thinking this may be a case to settle to, "Well,
 14 now we're going to litigate it and treat it as a test
 15 case"?

16 **A.** We tried to settle it throughout, all the way through.
 17 The Inquiry has Stephen Dilley's long witness statement
 18 and I can picture the table in it that sets out every
 19 attempt at settlement. Post Office wanted to settle
 20 this case. The counterclaim, the £250,000 counterclaim
 21 that sat there as a poison pill was only stepped away
 22 from and dropped to about £11,000 on 7 November 2006,
 23 and that was about a month before trial, and so that was
 24 held on to all the way through, which created huge
 25 problems: how do we get rid of this? Mr Castleton held

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1 position from Post Office?

2 **A.** I don't read it as that. They're sort of veins of
 3 thought that go through this difficult situation. We
 4 have some issue proceedings. You can't magic them out
 5 of existence. Unless you settle it, which of course
 6 is -- it needs consent of both parties or unless you
 7 unilaterally discontinue -- pay the costs -- you're
 8 still left with the counterclaim of £250,000.

9 This is a difficult situation that the Post Office
 10 has become locked into and, in fact, if we read on, the
 11 very next step, "With this in mind, our instructions are
 12 as follows: Please can you draft a Part 18 request", now
 13 that Part 18 request was March 2006 and was, I think,
 14 completely directed at what is the problem, what's the
 15 defence, what is the allegation over Horizon, because we
 16 didn't know. We wanted further information. We weren't
 17 trying to avoid engaging with that in any way. We
 18 actually wanted that information. So the very next
 19 thing Mandy says is "Go and get information. Let's try
 20 and get some clarity here".

21 We wanted to move this case forward. It's
 22 a problem. We as a firm have had a default judgment
 23 entered against our client. That's now sorted. That
 24 still lurks in this case as a sensitivity. There are
 25 issued proceedings. There's a vastly inflated

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1 on to that overinflated counterclaim, which I think
 2 actually sat in the hands of a company, really, if one
 3 looks at legal entities.

4 **Q.** Well, we have your evidence on that. Let's look at how
 5 the strategy developed in those months, in March. Can
 6 we look at POL00071202, please. Can we turn to page 9.
 7 I think this is a hard copy document, which is why it's
 8 presented like this, but we see there's an email, top
 9 left, from Mandy Talbot, is date is 1 March 2006.
 10 There's Post Office addressees there and then, in the cc
 11 list, this has been sent to you and Stephen Dilley?

12 **A.** Yeah.

13 **Q.** It says:

14 "I write further to the meeting in December 2005
 15 which most of us attended to bring you up to date with
 16 the current state of play."

17 I think that refers to the note we showed earlier
 18 but you weren't in attendance at?

19 **A.** No.

20 **Q.** Do you recall receiving this email?

21 **A.** No, I don't think -- I only saw this very recently when
 22 the Inquiry sent it to me. So it's a new one to me,
 23 other than it was sent to me 18 years ago. I've only
 24 seen it recently.

25 **Q.** Can we look at, then, page 6, please. This is further

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1 on in the chain, it appears to have been printed by
 2 Stephen Dilley at the top --
 3 **A.** Yes.
 4 **Q.** -- from Mandy Talbot to him and you. If we go down,
 5 please, to where it says, "Both", it says:
 6 "I copied you into my epic email on 1 March 2006 but
 7 the response to the same has been limited in the
 8 extreme."
 9 It goes on to say:
 10 "I have also been contacted by John Cole asking for
 11 assistance in preparing a spec for an external expert or
 12 experts but I think that this is of limited use until we
 13 have reports completed by Fujitsu on the system and [the
 14 Post Office] on the data provided. However in respect
 15 of an external expert from the field of computer systems
 16 and accounting can you suggest any names or firm who may
 17 be suitable?"
 18 Can you recall at this time being involved or
 19 instructed by Post Office to find an expert to assist
 20 with Horizon claims generally, not just in relation to
 21 Mr Castleton?
 22 **A.** No.
 23 **Q.** Can we please bring up POL00070850. This is
 24 a conference note on 7 April 2006. You're in attendance
 25 and Ian Herbert of Hugh James, the firm we heard from
 37

1 **A.** I'm not sure because I think, at the early stage of the
 2 Castleton case -- and I'm going to class April as
 3 an early stage -- I think there was a -- there's
 4 a letter that Stephen wrote to Fujitsu in the early
 5 stages that suggests they might give an expert report.
 6 Now, with hindsight, that's misconceived because Fujitsu
 7 is too close to be an independent expert, so --
 8 **Q.** Just pausing there, you say "with hindsight", if you
 9 look at the fourth paragraph, it says:
 10 "Tom Beezer explained that if Fujitsu were not going
 11 to put forward an expert, we would need to take Fujitsu
 12 through questions we have for them."
 13 **A.** Okay, so I have already got there: they're not going to
 14 be an independent expert. Okay, that's right, but there
 15 had been a notion early in this case that Fujitsu could
 16 be a Part 35 expert and I think that was misconceived
 17 and I've clearly got to that place here. So, yes, that
 18 must have been attending to get witness statements of
 19 fact from Fujitsu.
 20 **Q.** So it says:
 21 "The information we get from Fujitsu will not be
 22 an independent expert report ..."
 23 It says:
 24 "We will need to obtain a separate independent
 25 report as well, but this will be easier if we have
 39

1 earlier, dealing with what was described as the
 2 embryonic class action. So was this conference to deal
 3 with strategy or consistent strategy on how to deal with
 4 Horizon related claims?
 5 **A.** I think this is the call that Mandy has asked the two
 6 firms to have. I think that's what's going on. What
 7 date is this?
 8 **Q.** 7 April 2006.
 9 **A.** Mandy wanted there to be some interaction between the
 10 two firms in dealing with cases of a similar nature.
 11 That's absolutely right.
 12 **Q.** So it refers to a discussion between you, Stephen Dilley
 13 and Ian Herbert, before Mandy Talbot joined. It
 14 referred to Post Office having:
 15 "... difficulty obtaining information from Fujitsu
 16 and that the strategy should be to identify key
 17 individuals at Fujitsu who could provide the relevant
 18 information we require in terms of evidence and then for
 19 Stephen Dilley of Bond Pearce and Ian Herbert of Hugh
 20 James to make an appointment to visit those individuals
 21 ... to take Proofs of Evidence. Each solicitor could
 22 prepare witness statements for their respective cases
 23 for Fujitsu to sign, thereby making it easy for them."
 24 In broad terms, was this proposition here to get
 25 evidence of fact from Fujitsu witnesses?
 38

1 Fujitsu's evidence first because then we will be able to
 2 focus the independent expert's report (which [the Post
 3 Office] will need to pay for) on relevant issues."
 4 Then it goes on to refer to more generic issues of
 5 negotiation between Slaughter and May relating to the
 6 Horizon Online contract.
 7 Now, where you're talking about a separate
 8 independent expert report here and it says, "We will
 9 need to obtain", is that across the board as
 10 an independent expert report, generic report, going to
 11 the integrity of Horizon?
 12 **A.** No. I don't believe that. That's a new concept on me.
 13 So, with 18 years passing, it's hard to be absolutely
 14 definitive but at no point have I ever thought we would
 15 get a one-size-fits-all. I don't believe I ever thought
 16 that. I think the "we" here in Stephen Dilley's note --
 17 remember it's his note -- is us, Womble Bond, not
 18 a joint -- I believe that's right.
 19 **Q.** Were you involved in -- because you obviously had client
 20 care responsibilities in oversight?
 21 **A.** Yes.
 22 **Q.** Were you involved in discussing evidence in the
 23 Castleton case with any representatives of Fujitsu?
 24 **A.** Me?
 25 **Q.** Yes.
 40

1 A. No.

2 Q. Were you involved in discussions with any representative
3 of Fujitsu about the Horizon IT system generally?

4 A. Before preparing for this Inquiry, I would have said no.
5 I see from the file I did attend a meeting at counsel's
6 chambers where Anne Chambers was present and there must
7 have been a discussion but, before preparing for this
8 event, I would have denied that even took place. So
9 I've got no memory of it. I clearly met Anne Chambers
10 once. I don't believe I ever spoke to anybody from
11 Fujitsu at any other time.

12 Q. Just on that, so I cover this off, I take it from your
13 evidence that if were to ask you any questions about
14 a meeting with Anne Chambers you would simply point me
15 to the attendance note of that?

16 A. I would.

17 Q. Could we look at one of the draft --
18 Actually, sir, looking at the time it may be a good
19 time to take our first morning break.

20 **SIR WYN WILLIAMS:** *(Microphone muted)*

21 **MR STEVENS:** Sir, I think you're on mute, I think.

22 **SIR WYN WILLIAMS:** How much longer have we got on
23 Mr Castleton?

24 **MR STEVENS:** Not very long at all.

25 **SIR WYN WILLIAMS:** Well, let's finish Mr Castleton and then
41

1 double entry is not being put through."
2 You say in your witness statement that you were
3 initially concerned by this?

4 A. Yes.

5 Q. Why were you concerned?

6 A. Because if there is a problem with the system, that is
7 concerning in the case.

8 Q. These are small numbers.

9 A. Yes.

10 Q. But the fact that Horizon wasn't adding transactions or
11 the allegation appears to be that double entry
12 accounting wasn't being put through, that's quite
13 a significant issue for Horizon integrity altogether,
14 isn't it?

15 A. It would be.

16 Q. Can we look at POL00069612. This is a note of
17 a telephone call on 6 September 2006, so two days after
18 that report has been received. Again, I understand this
19 is Stephen Dilley's note?

20 A. Yes.

21 Q. It refers to a conversation with you and says:
22 "Also Tom [expressed] his concerns that the expert
23 said that they found some early indications of possible
24 problems ..."
25 It refers to the problem we've just described. It
43

1 we'll have a break.

2 **MR STEVENS:** Of course. Can we look at POL00081490_008.
3 This a letter of 5 September 2006 to Stephen Dilley from
4 Michael Mason of BDO Stoy Hayward LLP. They had been
5 instructed to provide expert evidence subsequently not
6 relied on in the proceedings.

7 A. Yes.

8 Q. Yes. Can we turn to page 3, please, and if we could go
9 to the bottom, please. Under "Early indications of
10 problems with the Horizon system", it says:
11 "We have found that there is some indication of
12 possible problems with Horizon from our initial review
13 of the electronic information you sent us. You sent the
14 transaction summaries for January, February and
15 March 2004. In theory the system should reflect the
16 double entry nature of each transaction, eg the system
17 should show the sale of a stamp and the receipt of the
18 cash paid by the customer. Therefore the Horizon
19 transaction entries for a period (whether day or month)
20 should total zero. From our initial review we can see
21 that March balances but January is out by £2.47 and
22 February by £4.05. We have found which transactions
23 cause the differences and will investigate them in due
24 course. Although these are very small amounts they do
25 indicate that some problems may exist, ie that the
42

1 says:
2 "My comment to Tom is that I thought those amounts
3 were quite small and that there will probably turn out
4 to be a rational explanation because I have met with
5 Fujitsu and they are utterly convinced of the integrity
6 of their system and really it is just an electronic
7 calculator so it is only as good as the person who
8 inputs information into it."
9 Did that assuage your concerns at the time?

10 A. To a degree. We've got to remember the 5 September
11 letter 2006 from BDO was their initial letter; they
12 hadn't done their work; they hadn't prepared a report.
13 It was more than a passing comment but it wasn't their
14 concluded view. They had yet to do their work and so,
15 in this case, as you may know if you've looked into the
16 history of it, there were lots of blind alleys and lots
17 of issues that were chased down unbelievably diligently
18 by Stephen Dilley, for example the Greg Booth
19 screen-freezing issue.

20 Q. Well, let's focus on this one?

21 A. Yeah, for sure, but what I'm saying is we chased down
22 issue, after issue, after issue. We were diligent and
23 forensic. This was a comment from BDO before they'd
24 done any work and it's against that background that
25 I would have been thinking about these things.
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1 Q. Well, let's assume this analogy or comparison with
2 Horizon being an electronic calculator, let's be
3 favourable to Mr Dilley and assume that's accurate.
4 Would you agree that for an electronic calculator to be
5 fit for purpose, it should be able to add up numbers
6 accurately?

7 A. Yes.

8 Q. So the fact that addition errors were potentially found
9 by BDO, Mr Dilley's point about it being an electronic
10 calculator doesn't really take anything anywhere, does
11 it?

12 A. I think you're probably reading too much into
13 an internal file note but I agree with you: an electronic
14 calculator would have to work.

15 Q. If we look at the third paragraph, it says:

16 "Agreeing with Tom that the strategy should be that
17 we pick up the phone to Lee Castleton's solicitors,
18 point out to them that Castleton has made an error
19 analysing the cash account ... tell them what our
20 accountancy expert alone is going to cost and invite
21 them to ADR before we instruct an expert."

22 Was this a strategy to try to dissuade Mr Castleton
23 from obtaining expert evidence on the basis of how much
24 it would cost?

25 A. No, we wanted to understand the defence being put.

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1 A. It does.

2 Q. Over the page, 6.2.4:

3 "I do not have an explanation for these errors but
4 my review of the transaction listings for the three
5 months has given no indication of any other errors."

6 Can we then go to page 4, please, and
7 paragraph 2.1.2(a), summarising the conclusion:

8 "The only indications of possible computer problems
9 that are apparent from the accounting records are three
10 very small differences in the cash account (trial
11 balance) but each are less than £5. This is discussed
12 in section 6.2."

13 So you get the draft report on 29 November and this
14 addition issue is still raised?

15 A. Yes.

16 Q. So the problem is still there. It's possible or it's at
17 least raised that Horizon in this case wasn't
18 implementing double entry bookkeeping?

19 A. It's possible.

20 Q. Did you discuss the BDO report with anyone at Post
21 Office?

22 A. I don't remember but I suspect the answer is yes.

23 Q. Who would you have discussed it with?

24 A. Mandy Talbot.

25 Q. Anyone else?

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1 There was a real desire to get information from
2 Mr Castleton. We'd Part 18ed in March 2006 on exactly
3 that point, to try and get information.

4 Q. Well, let's focus here though, you'd received
5 an additional letter from an expert that raises
6 potential problems and the immediate response appears to
7 be to raise the costs of an expert and go to ADR. Was
8 it actually the strategy that you didn't want to dig any
9 further into --

10 A. Not at all.

11 Q. -- into what BDO had found?

12 A. Not at all. Not at all.

13 Q. Can we look at the draft report, this will be the last
14 question we ask on this. POL00069955, please. This is
15 a draft report dated 29 November 2006.

16 A. Yes.

17 Q. Did you receive this?

18 A. Yes, I will have done.

19 Q. Would you have reviewed it?

20 A. At a high level, given the circumstances and the
21 imminence of the trial, but yes, I will have looked at
22 it yes.

23 Q. Can we turn to page 18, please, and if we could go down
24 to 6.2. We see "Addition errors", and it refers to the
25 same addition errors as before.

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1 A. I doubt it. No, I would have been speaking only to
2 Mandy at this time.

3 Q. Did you discuss the BDO report with anyone at Bond
4 Pearce?

5 A. Stephen Dilley.

6 Q. After the Castleton case had come to an end, did you
7 speak about the BDO report with anyone at Bond Pearce or
8 Womble Bond Dickinson?

9 A. No. So that BDO report, just to give you some context
10 around it, contained one huge glaring error that I knew
11 about, which has become called the 3,500 point, that was
12 a glaring error, and that BDO report was a draft report.
13 It was dreadfully late. It was after all evidence --
14 expert evidence has been debarred. It had a huge error
15 in it and it was six days before trial.

16 There was no time to have the normal toing and
17 froing that would happen on a draft expert report to
18 bottom out issues. I simply don't know what would ever
19 have happened to those small addition errors, as to
20 whether they would have remained in that report or not,
21 but no work was done to find out because it was
22 pointless. The report was privileged, there was no time
23 to do it. I'd lost confidence in the report, because it
24 had a huge error in it already, the duplication error,
25 the 3,500 point, and we were debarred by the order of

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1 Mr Justice Seymour QC (*sic*) on 27 November, at which
 2 point we had still been wanting to try to get some
 3 expert evidence in. We were not running away from
 4 expert evidence at all. That expert report was meant to
 5 be in reply to something Mr Castleton was meant to have
 6 served on 10 November. He never served it, although we
 7 know he had it because his solicitors told us, on
 8 17 November, that he had an expert report but they were
 9 not instructed to send it to us.

10 And so that draft document was meant to be
 11 sequential. It was never meant to be a standalone
 12 document. It was late, it was debarred. It was wrong.
 13 I know it was wrong, in huge degree, and so it was
 14 debarred. We couldn't use it.

15 **Q.** You said you know it was wrong in huge degree. You're
 16 referring to a point about £3,500 --

17 **A.** Yes --

18 **Q.** -- at trial and a balanced snapshot?

19 **A.** Something like that, yes.

20 **Q.** You didn't know that the addition errors raised -- their
 21 position --

22 **A.** No, we didn't but there was no time to bottom out those
 23 kind of issues as you would do with any normal expert
 24 report.

25 **Q.** At this stage, you were aware that Post Office was

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1 **A.** I just don't know.

2 **MR STEVENS:** Sir, that's a good time to break and we'll move
 3 on to the recusal next.

4 **SIR WYN WILLIAMS:** Right, thank you very much. I make it
 5 11.05. Do we need to be as limited as ten minutes,
 6 given that we have just got one topic to cover before?
 7 What's the timetable, Mr Stevens? Is Mr Lenton coming
 8 in this afternoon or is he available before that, so to
 9 speak?

10 **MR STEVENS:** I understand he's available before that.

11 **SIR WYN WILLIAMS:** Right, I see.

12 **MR STEVENS:** I'm in your hands, sir. I'm happy to take ten
 13 minutes or happy to take 15, whichever you prefer, but
 14 I don't think we're pressed for time.

15 **SIR WYN WILLIAMS:** Right. So let's take 15 minutes but it's
 16 on the basis that we might jiggle the day, so to speak.
 17 We'll take 15 minutes and then, if we complete Mr Beezer
 18 before 1.00, we'll make a decision about whether we
 19 start Mr Lenton or have an early lunch then. All right?

20 **MR STEVENS:** Yes, sounds good. Thank you, sir.

21 (11.06 am)

(A short break)

23 (11.20 am)

24 **MR STEVENS:** Good morning, sir.

25 **SIR WYN WILLIAMS:** Good morning.

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1 relying on Horizon data for civil and criminal claims?

2 **A.** Yes. Well, certainly civil. Certainly civil. I don't
 3 know what they were doing in criminal claims.

4 **Q.** You were aware that there were other cases where
 5 subpostmasters were challenging the integrity of the
 6 Horizon IT System?

7 **A.** At a high level. I mean, I knew of them. I didn't know
 8 any detail.

9 **Q.** You had a report that raised a potential issue with
 10 double entry bookkeeping in the Horizon IT System?

11 **A.** Yes, but for all the reasons I've just been through it
 12 went one we were confident in.

13 **Q.** But on the addition error, you couldn't say that was
 14 an incorrect opinion?

15 **A.** Nor could I say it was correct but, yes, I agree with
 16 you.

17 **Q.** Do you accept that it was incumbent on you to advise the
 18 Post Office to investigate that issue further because
 19 there were other -- it would have started a train of
 20 inquiry as to whether the Horizon IT System lacked
 21 integrity?

22 **A.** I don't know that I didn't say that, I don't remember.
 23 I will have discussed it with Mandy.

24 **Q.** Let me ask you, is your evidence that you did advise
 25 that or can you not remember?

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1 **MR STEVENS:** On timetabling, I anticipate that we will
 2 finish well in advance of 1.00. Whether we have
 3 an early lunch or plough straight on, I think we'll need
 4 to decide when the evidence is finished. I have spoken
 5 to Ms Hodge and there's a couple of logistical matters
 6 that need to be seen to.

7 **SIR WYN WILLIAMS:** Yes. Whatever, Mr Stevens. All I'm
 8 indicating is my willingness to be flexible in the way
 9 we deal with these things.

10 **MR STEVENS:** Thank you, sir.

11 I will carry on, then. I want to turn to the
 12 recusal application and, at this point, I'm going to
 13 make a point, almost word for word, that was made by
 14 Mr Beer yesterday. The authoritative legal position in
 15 relation to the issues addressed in the Group Litigation
 16 are set out in the judgments of Mr Justice Fraser -- now
 17 Lord Justice Fraser but, for historical purposes, I'll
 18 refer to Mr Justice Fraser -- so, for the purpose of
 19 your evidence, those judgments include the Common Issues
 20 judgment of 15 March 2019; the recusal judgment, 9 April
 21 2019; and, insofar as relevant, the Court of Appeal's
 22 decisions refusing permission to appeal those. I'm not
 23 going to be exploring the factual legal position
 24 definitively established in Mr Justice Fraser and the
 25 Court of Appeal's judgment.

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1 A. Understood.
 2 Q. You say in your witness statement that you were broadly
 3 aware of the GLO proceedings but that you didn't have
 4 any material involvement until the recusal application?
 5 A. Yes.
 6 Q. Now, this was Andrew Parsons' case, effectively, wasn't
 7 it, the GLO proceedings?
 8 A. Yes.
 9 Q. You hesitate there. Why wasn't it Andrew Parsons' case,
 10 as solicitor?
 11 A. Yes, it was but there were other people involved -- the
 12 run in to the GLO was -- took some time and there were
 13 other people involved. So was Andrew Parsons the lead
 14 person? Yes, I think he was, if that's the question
 15 you're asking.
 16 Q. Yes, he was the partner with responsibility for the
 17 conduct of the case?
 18 A. Yes -- sorry, yeah, I was talking about a different
 19 issue.
 20 Q. In terms of the management structure of Womble Bond
 21 Dickinson, during the currency of the Group Litigation,
 22 where did Mr Parsons sit in relation to you?
 23 A. So the Group Litigation started in 2016?
 24 Q. It did, yes.
 25 A. So I was a partner in the Southampton office. I was the

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1 a huge surprise to the internal team at Womble Bond. So
 2 the mood music about the Common Issues trial pre-8 March
 3 was not negative.
 4 Q. I take it from that that no concerns had been raised
 5 with you about the impartiality, apparent or otherwise,
 6 of the judge, before 8 March?
 7 A. No.
 8 Q. In your second witness statement -- we don't need to
 9 have it up but it's page 5, paragraph 9 -- you say:
 10 "I understood from the Womble Bond Dickinson GLO
 11 team that the draft Common Issues trial judgment was
 12 very unfavourable to Post Office, that the Womble Bond
 13 Dickinson team and Post Office were dismayed by the
 14 outcome and that there was talk of a possible urgent
 15 appeal."
 16 Who within Womble Bond Dickinson told you about the
 17 Common Issues trial judgment?
 18 A. It would have been Andrew Parsons, Amy Prime, those kind
 19 of people. I can kind of picture them sitting, the
 20 judgment on their knees, turning the pages getting more
 21 and more distraught, as it were. So I can picture that.
 22 It was --
 23 Q. What did they say to you?
 24 A. Oh, I don't know. I don't know in detail, "This isn't
 25 good", "He's got that wrong", "Oh, my God", you know,

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1 team leader of the Commercial Disputes Team and he was
 2 a partner in the Commercial Disputes Team.
 3 Q. Did you have any oversight of Andrew Parsons's work at
 4 this stage?
 5 A. Not his work. I mean, I had oversight of the team and
 6 the things going on the team but day-to-day work, no;
 7 concern over day-to-day work, yes, absolutely. So I'm
 8 not using that answer to try to step away from anything
 9 but would I check another partner's work? No.
 10 Q. For background, Mr Justice Fraser distributed a draft
 11 judgment in common issues on 8 March 2019?
 12 A. 8 March, yes.
 13 Q. The Horizon Issues trial was due to start on 11 March
 14 2019?
 15 A. Agreed.
 16 Q. What had you heard from members of Womble Bond Dickinson
 17 who worked on the GLO about how the GLO proceedings were
 18 going, in effect, prior to the common issues draft
 19 judgment being distributed?
 20 A. I had heard positive -- I was going to say positive
 21 signs. You can't hear a positive sign. The mood music
 22 was okay. It wasn't -- if the question you're asking
 23 is, from a management perspective, me, was this a case
 24 that was flagging up as a difficulty pre-Common Issues
 25 draft judgment, it was not, and so the judgment was

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1 those kind of comments. But those aren't verbatim
 2 quotes.
 3 Q. When was the first time you were aware of the
 4 proposition to issue or potentially issue an application
 5 for an order that the judge recused himself?
 6 A. So the first it was either the 11 or 12 March but which
 7 one, I don't know. I was provided some papers on
 8 11 March, I think in that tranche of papers was the
 9 David Cavender note on 10 March, I think, and I think
 10 that included a paragraph on recusal so I'm going to say
 11 11 March.
 12 Q. I think in your witness statement you say -- we don't
 13 need to have it up -- at paragraph 14, page 7, to the
 14 best of your understanding, the idea of recusal came
 15 from David Cavender KC?
 16 A. I think that's right. There's an email of 9 March,
 17 where I think its first raised by him. I'm not copied
 18 in on that, I'm not involved at that stage. But that,
 19 to my knowledge, that's the first time in this matter --
 20 reading in and preparing for this Inquiry, that's the
 21 first time I've seen that the recusal is mentioned.
 22 Q. You were brought in to assist on the recusal application
 23 because the rest of the GLO team in Womble Bond
 24 Dickinson were preparing for the Horizon Issues trial;
 25 is that right?

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1 **A.** Yes, not all of them. Some were working on the further
 2 issues trial. So a nucleus of the Womble Bond Dickinson
 3 team absolutely was preparing for the Horizon because
 4 8 March was a Friday, there was an intervening weekend,
 5 the 11 was the Monday, when Horizon Issues trial
 6 started. So there was no time at all in which to do
 7 anything, hence me being brought in as a senior person
 8 in a point of difficulty for the client with a judgment
 9 that's gone against them.

10 **Q.** To what extent, if at all, do you think your lack of
 11 familiarity with the GLO proceedings limited your
 12 ability to advise on the recusal application?

13 **A.** It must be a factor. I don't -- I did not have
 14 familiarity with the GLO proceedings. That's absolutely
 15 right. Was it an impediment? With what I was asked to
 16 do rapidly, which is to get independent advice, it was
 17 not an impediment to carrying out that instruction. As
 18 I got more up to speed, I think comment was passed and
 19 advice was given, although I have to say the client was
 20 not after our advice, Womble Bond's advice, my advice.

21 They did not want that advice, they wanted new
 22 voices -- you will have seen from the file, the phrase
 23 "new voices" comes up quite a lot -- and independent
 24 advice. So it must be an impediment on hour zero
 25 because I know nothing about it but, as we go forward

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1 Neuberger equals insight?

2 **A.** Yes.

3 **Q.** "Only 2 days off SA", and this is, presumably, the note
 4 you took of the conversation at the time?

5 **A.** It will be scribbled notes. It's not verbatim, it's
 6 scribbled notes. Obviously this was done out of habit
 7 as a lawyer. This isn't a verbatim note but, yes, these
 8 are my notes of that conversation.

9 **Q.** Was this the first conversation you had with Jane
 10 MacLeod?

11 **A.** There might have been an earlier one, if you tell me
 12 this is the first one I'll say yes to that but I can
 13 picture one in blue ink that says "in-depth advice",
 14 I thought that was the first conversation, but if you
 15 tell me this is a later one.

16 **Q.** Well, we'll come to another note. Let me rephrase my
 17 question. On 12 March, was that the first time you'd
 18 had some material conversation with Jane MacLeod?

19 **A.** Must have been. I've got documents on the 11th. I was
 20 reading in on the 11th, trying to get up to speed and
 21 the 12th is when I suspect I began to interact with
 22 Jane.

23 **Q.** Can you recall on this conversation, we see you're
 24 talking about the instructing counsel --

25 **A.** Yes.

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1 over the intense few days, I knew more. In any event,
 2 what the client wanted from me was organisation and
 3 logistics to get independent advice from, as it turned
 4 out, Lord Neuberger, and then Lord Grabiner.

5 **Q.** I want to look at some of your early conversations with
 6 Jane MacLeod in organising the recusal application. Can
 7 we look at a conversation you had with her on 12 March
 8 2019 and I want to bring up your handwritten note and
 9 your transcript of it, just for ease. So can we have at
 10 the same time, please, WBON0001734 and also WBON0001735.

11 Now, this is the first time -- we'll see a few of
 12 these. We'll see this is a handwritten note, this is
 13 taken from a notebook of yours --

14 **A.** Yes.

15 **Q.** -- and there are parts which are covered out in yellow,
 16 which are redacted and the Inquiry understand that those
 17 have been redacted for either privilege or relevance
 18 reasons.

19 **A.** Agreed. And the redaction, I should say, is nothing to
 20 do with Post Office. It'll be other clients or -- so
 21 none of the redactions at all relate to Post Office.
 22 Just so that's an issue we cover off.

23 **Q.** Yes. So we see there 12 March 2019, it says "Jane
 24 MacLeod" and then a redacted bit. Further down we then
 25 kept, your note which says, "Neub = insight", presumably

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1 **Q.** -- what, if anything, did Jane MacLeod say about her
 2 view of whether the Post Office should bring a recusal
 3 application at this stage?

4 **A.** I think they were interested in the concept of
 5 an application but trepidatious. That's reconstructing
 6 what I think was going on. This is some good few years
 7 ago now. It was a topic that had to be investigated if
 8 there was legal purpose in doing it. That's my
 9 impression.

10 **Q.** Did, at this stage, Jane MacLeod say anything about Post
 11 Office's motivation in investigating the recusal
 12 application?

13 **A.** I don't know if it was in this conversation but my
 14 impression -- one of the main planks of their
 15 motivation, I think, was to get to a legally correct
 16 Common Issues judgment. That's what I think was going
 17 on. Whether that was said in this conversation or in
 18 later conversations, I don't know. But that's my
 19 impression of their motivations.

20 **Q.** So we'll come to the later conversations but, just
 21 taking that there, on what basis did you form that
 22 impression from why that was Jane MacLeod's motive?

23 **A.** Because I suppose, and this me reconstructing, so on the
 24 11th I'm reading in, there are two topics knocking
 25 around. They're intertwined but not necessarily

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1 intertwined, being appeal of Common Issues judgment and
 2 recusal, and the interconnection with those two topics
 3 is large parts of the Common Issues judgment was
 4 perceived to be wrong and perceived to be the judge, as
 5 we've heard from Lord Grabiner, had gone too far. The
 6 apparent bias point.

7 So in any early conversations with Jane, I must have
 8 been talking about why we're doing any of this. Why
 9 we're on this journey, to look at appealing, to look at
 10 recusing the judge.

11 **Q.** You say then "Neuberger = insight, only 2 days off SA",
 12 and then it says "can assist but not be briefed in
 13 person". What does that mean, "Can assist but not be
 14 briefed in person"?

15 **A.** He either had gone, or was about to go, I don't know, to
 16 what we now know to be South America, Argentina, but at
 17 times we thought was South Africa.

18 **Q.** So that's referring to whether or not he could attend in
 19 person?

20 **A.** Yes.

21 **Q.** Thank you.

22 **A.** Yes, face to face.

23 **Q.** Could we please then turn to WBON0001739. So this is
 24 your email to Andrew Parsons and Amy Prime --

25 **A.** Yeah.

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1 like a recusal, you've got to get on with it, especially
 2 with the Horizon Issues trial under way. This is urgent
 3 and I remember being frustrated that -- I simply wanted
 4 to know who we were instructing and to get on with it.
 5 And there was prevarication about who to instruct and
 6 I remember being really quite frustrated by that, and
 7 I wanted, personally, to instruct -- and we might come
 8 on to these topics later -- the advocate who could do
 9 the advocacy, the barrister who could do the advocacy.
 10 This two-staged approach, whilst, with hindsight, makes
 11 sense, at the time it frustrated me because it's a time
 12 impediment as to what I see as being urgent.

13 **Q.** Just to be sure I've got your evidence right on this,
 14 your frustration is a decision on who to instruct. Was
 15 there any hesitancy from Ms MacLeod at this time as to
 16 whether or not Post Office should even investigate --

17 **A.** No.

18 **Q.** -- the recusal application?

19 **A.** No, I don't believe so. I don't believe so. There
 20 wasn't a dead set plan to do it, the Board were nervous
 21 but there was, I felt, some prevarication as to who to
 22 instruct and I just wanted to get on with it, to find
 23 out what the independent advice would say, yes/no, and
 24 so there wasn't a concrete plan of any sort at this
 25 point.

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1 **Q.** -- on 12 March at 8.23. You referred to a "Good chat
 2 with GC Jane", and just timing it, you see the third
 3 para down, you say:

4 "Issue I raised is inability to brief N QC ..."
 5 Presumably that's Lord Neuberger?

6 **A.** Yes.

7 **Q.** "... in person."

8 So do I take it that this email follows the note
 9 that we just saw then?

10 **A.** Yes. Yes.

11 **Q.** It says:

12 "Think she begins to agree -- Grab."

13 **A.** Yes.

14 **Q.** Is that referring to Lord Grabiner?

15 **A.** It is.

16 **Q.** When you say, "Think she begins to agree", what is that
 17 referring to?

18 **A.** Instructing Lord Grabiner.

19 **Q.** That reads almost like she needed to be persuaded into
 20 it or she had a view and, you know, begins to agree to
 21 the instruction of Lord Grabiner. Why is it written in
 22 that way?

23 **A.** What I think is going on here is this is on day two of
 24 my involvement. I'm -- knowing how I'm wired, I'm
 25 perceiving urgency. If you're going to do something

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1 **Q.** Could we then turn, please, to WBON0001745. Fortunately
 2 you've got a typed version, WBON0001747, on the same
 3 screen, please. So this is a note on the 14 March 2019.

4 I'm going to work from the left one. It says, "Jane and
 5 DCQC call", so that's Jane MacLeod and David Cavender?

6 **A.** Agreed.

7 **Q.** When it says, "CC Gideon" is that referring to Gideon
 8 Cohen?

9 **A.** Yes, but I don't know what the "CC" means because,
 10 obviously, this wasn't a letter, so I don't know if he
 11 was there or not. I've no idea.

12 **Q.** Briefly looking at the document on the right, we have
 13 black pen and then blue pen. The blue pen, it sort of
 14 fits around the text that's already been written in the
 15 black. Are both entries made by you?

16 **A.** Yes.

17 **Q.** Presumably, the blue pen is made later?

18 **A.** Maybe not. I have many pens, a slight fascination of
 19 mine, and multiple colours are habitual and changing pen
 20 is a habit. So I can't say that that didn't happen on
 21 that call.

22 **Q.** If we look down, I'm looking at the left again, we see
 23 halfway down two bullet points. It says, "Had LN note",
 24 so that's referring to Lord Neuberger's note of advice,
 25 I assume?

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1 A. Yes.
 2 Q. So the call happens after that?
 3 A. Yes.
 4 Q. It says, then "Stages: 1. What does POL want to do?",
 5 and "3. [Post Office Limited] not able to make
 6 a decision by 12 tomorrow".
 7 A. Yes.
 8 Q. At this call, do you recall if there was any discussion
 9 of what the Post Office directors thought about whether
 10 or not they should bring in application for recusal?
 11 A. At this point, no, but this -- you will see that this
 12 builds into the narrative that I'm frustrated -- "What
 13 do you want to do?"
 14 Q. Did you have any impression at this stage of the Board's
 15 position?
 16 A. 14th? No, I don't think I would have done.
 17 Q. If we could go further down, please. Thank you. So at
 18 the bottom, it says "Board call", presumably that's
 19 referring to the need to set up a board call?
 20 A. It will have been, yes.
 21 Q. Now, help us with how this is structured, because we've
 22 got a second bullet point saying, "Real possibly Board
 23 to speak Neuberger -- possible outcomes?"
 24 A. Yes.
 25 Q. Does that mean there's a real possibility that the Board

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1 A. Yes.
 2 Q. It records, I assume, what she said, "Tom Cooper,
 3 Chairman, setting up Board call [for] Monday night?"
 4 A. Yes.
 5 Q. "Board to form a view"?
 6 A. Yes.
 7 Q. Do you recall whether anything else was said, at that
 8 stage, on the Board's view or individual director's
 9 views?
 10 A. No, this is me, I think, probably, in that way lawyers
 11 do, jotting down bits of information, as they're given.
 12 This is Jane MacLeod speaking to me, telling me things
 13 and I'm scribbling them down out of habit.
 14 Q. It says, "Tom C", so that's Tom Cooper?
 15 A. Yes.
 16 Q. Tom Cooper was a UKGI official?
 17 A. I believe so.
 18 Q. He was the Non-Executive Director appointed to represent
 19 the Government Shareholding interest?
 20 A. I believe so.
 21 Q. It says, "Tom [Cooper] will struggle to get this through
 22 Shareholder". So in that, "shareholder" means
 23 Government?
 24 A. I think so, yes.
 25 Q. Do you recall what Jane MacLeod said to you that led you

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1 want to speak to Lord Neuberger about his advice?
 2 A. I suspect this is Jane speaking, saying, well, to take
 3 this forward, we're going to have to have a -- POL will
 4 have to have a Board call. POL will need to take this
 5 issue to the Government but -- that's little number 2 --
 6 and there's a real possibility POL's Board will want to
 7 speak to Lord Neuberger about possible outcomes. So
 8 that -- my impression, as I sit here now, is that's me
 9 capturing what Jane is saying.
 10 Q. Okay. What was said at this stage, if you can recall,
 11 about government's involvement in the decision to -- of
 12 whether or not to issue the recusal application?
 13 A. I think at this stage, Jane is saying, "I will need to
 14 get the Government involved". I think that's all that's
 15 going on at this stage.
 16 Q. Could we --
 17 A. This is the 14th, yeah?
 18 Q. 14th, yes. We'll look at the next day now, please,
 19 WBON0001749 and, at the same time, could we have
 20 WBON0001752, please. So assuming that means telephone
 21 call in --
 22 A. Yes.
 23 Q. -- from Jane?
 24 A. Yeah, she's called me.
 25 Q. She's called you?

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1 to make this note?
 2 A. I think that's what she will have said. This is me
 3 scribbling down -- I will not have really known at this
 4 point, who Tom Cooper was. I probably, had I turned my
 5 mind to it, would have understood the ownership
 6 structure but this is Jane saying things to me and me
 7 writing them down.
 8 Q. You've said that you were -- I think frustrated was the
 9 word you used --
 10 A. Yes.
 11 Q. -- it may not have been but it conveyed that meaning --
 12 of getting a decision.
 13 A. Yes.
 14 Q. This presumably, then, wasn't welcome news, if there's
 15 going to be a difficulty to get it through the
 16 shareholder?
 17 A. It's only unwelcome news if you're going to go for it.
 18 If you're not going to go for it, it doesn't matter
 19 either way.
 20 Q. Did you enquire as to why she formed that view that Tom
 21 Cooper would struggle to get it through the
 22 shareholder?
 23 A. No, the Post Office relations with the Government and
 24 its shareholder, being the Government, were something
 25 I didn't get involved in. We never had substantive

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1 discussions about that, beyond these kind of, I suppose,
 2 why is she telling me this? I suppose it's a timing
 3 conversation this, isn't it? This is all about timing.
 4 **Q.** Then it seems it refers to a brief note over the
 5 weekend. That's a note to the Board that you assisted
 6 in preparing to explain --
 7 **A.** She is asking us. It became called -- she wanted
 8 a plain English note, I think she called it. So I think
 9 Jane is saying to me "I'm going to need a note over the
 10 weekend for the Board", and that's indeed what happened.
 11 Yes. So this is about timing and steps on the way.
 12 **Q.** I want to just cover the timing of the note a bit
 13 because I think it's relevant to understanding how that
 14 note was formed and what your instructions were. Can we
 15 look, please, at WBON0001499 and page 4, please. Thank
 16 you. If we could go down the page slightly. Thank you.
 17 So your email to David Cavender and Andrew Parsons
 18 is included in copy, "See attached":
 19 "I may be on Jane's wavelength -- I may not be ..."
 20 So this is attaching your initial draft of that
 21 note --
 22 **A.** Yes.
 23 **Q.** -- that she asked for. You said:
 24 "... be as harsh as you like."
 25 **A.** Yes.

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1 know there are competing views around the Board so
 2 I don't want us looking fully partisan."
 3 At that stage, what were you aware of the competing
 4 thing views around the Board?
 5 **A.** I don't remember and so, reading this, I must that have
 6 known something to write it. I cannot recall what
 7 I knew about competing views. I just don't know.
 8 **Q.** Can you assist with this and if this is a fair reading
 9 of that email: what you appear to be saying there is
 10 your current feeling was not to expressly set out, "We
 11 recommend you do this"?
 12 **A.** Yeah.
 13 **Q.** But your view was the substance of the note as
 14 drafted --
 15 **A.** Yeah.
 16 **Q.** -- pushed them in a direction to recuse anyway?
 17 **A.** Yes, because -- we mentioned earlier the interconnection
 18 between the appeal on the law of the Common Issues
 19 judgment and the connection with recusal, which is
 20 driven by the procedural unfairness point. So if they
 21 were going to go forward with a head of appeal based on
 22 procedural unfairness, for reasons we might not need to
 23 go into but you'll be aware of, that there had to be --
 24 or it was felt at the time there had to be
 25 an application to recuse.

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1 **Q.** You're inviting comments, basically?
 2 **A.** Yes.
 3 **Q.** If you go to the bottom of page 3, please.
 4 **A.** I'm inviting comments because I'm aware of my paucity of
 5 information and background on this. So I have broken
 6 the back of -- everybody's busy, I thought I've broken
 7 the back of this task and got something down on paper
 8 and got it out to people to finesse.
 9 **Q.** Then it's Andrew Parsons's email to you, he attaches
 10 another version. It says:
 11 "Did Jane want us to offer a recommendation on
 12 whether to do this or not? It seems like we are sitting
 13 on the fence slightly, but sometimes she prefers that."
 14 If we then go up to your response -- so just for
 15 timing, that was Andrew Parsons sent at 11.50 pm on the
 16 15th; your response is just before 4.00 in the
 17 morning --
 18 **A.** It was a busy time.
 19 **Q.** -- on the 16th. You refer to the drafting and then you
 20 say:
 21 "As to recommendations ... I am unsure. My current
 22 feeling is we simply set matters out and then let [Post
 23 Office] Board discuss rather than pushing them one way
 24 (which the note already does to be fair, as it has to as
 25 we have to point out the 'inconsistency' risk etc) as we

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1 And so that's what I mean by the inconsistency
 2 point. If you appeal on procedural unfairness but don't
 3 try and recuse, the Court of Appeal may later say, well,
 4 that's an inconsistent position to adopt. That's what
 5 the inconsistency phrase is there. And I am saying,
 6 because I know that Jane wants independent advice,
 7 I know that she doesn't want our advice, hence me
 8 drafting a neutral note, but it does have to push them
 9 one way, because, if they do want to go down the route
 10 of procedural unfairness, it's inevitable that you have
 11 to promote the concept of a recusal.
 12 **Q.** If you could turn to page 1, please. So this is David
 13 Cavender's email to you and Andrew Parsons. It's at
 14 11.05 on 16 March, and the final substantive paragraph
 15 says:
 16 "On the issue of giving" --
 17 Sorry, before I ask that: had you spoken, on the
 18 telephone, not in email, to Jane MacLeod in between your
 19 email of just before 4.00 on 16 March and David
 20 Cavender's email?
 21 **A.** I've no idea. If we don't have a note, I have no idea.
 22 **Q.** So Mr Cavender says:
 23 "On the issue of giving [Post Office] a steer
 24 I understand the sensitivity but [it should be
 25 'I think'] that advisers should advise and not simply

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1 leave it to the Board to come up to their own untutored
2 view. Surely we should be setting out the options but
3 making our recommendation?"

4 We can go to the documents if you wish but, as
5 I understand it, that advice was accepted and the note
6 sent following that said that Mr Cavender and Womble
7 Bond Dickinson recommended that the application be made
8 as soon as possible?

9 A. Yes.

10 Q. So you accepted that advice from Mr Cavender,
11 effectively?

12 A. Yes, and the amendments that the document were taken in,
13 and sent to Jane in mark-up, so she could see who had
14 done what.

15 Q. Could we please turn to POL00022969. If we could turn
16 to page 4, please. So we have here an email from Jane
17 MacLeod, 16 March 2019 to you and Andrew Parsons. So
18 this is just before, I think a matter of ten minutes or
19 so, before Mr Cavender's email?

20 A. Yeah, okay, yeah.

21 Q. It says, "Many thanks". It refers to a call with the
22 Chairman, Al Cameron, and the Minister, Kelly Tolhurst
23 MP:

24 "... although I don't believe that recusal will be
25 part of the discussion. I have been advised by the UKGI

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1 has formed any views on this yet, and if so what they
2 are?

3 "The Board is highly nervous of this strategy (our
4 Chairman has already said to our Minister that while he
5 recognises that the Board has a fiduciary duty to act in
6 the best interests of the company, he feels it is
7 unlikely that they would want to adopt this course of
8 action)."

9 Just pausing there, the talk of fiduciary duty, had
10 there been any discussion of there being a fiduciary
11 duty on the directors to act, prior to this being
12 raised?

13 A. At that point -- because I know it came up later but
14 forcefully from Lord Grabiner.

15 Q. Well, I want to come to that in due course?

16 A. I don't know if it had come up already. I don't recall.

17 Q. It says:

18 "So we need to be very clear on both why doing it is
19 the best course of action, and what our prospects of
20 success are."

21 You said:

22 "Jane

23 "I'll call in 20 minutes."

24 Now, you recently and helpfully provided another
25 note --

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1 [General Counsel] that 'government' will not express
2 an opinion on recusal as they will not want the
3 'executive' to be seen as criticising the 'judiciary'.

4 "This will put more pressure on our Board, and the
5 Chairman is acutely conscious that such an application
6 will not sit well with the perception that [the Post
7 Office] is arrogant, whereas we are trying to edge
8 towards 'contrition'.

9 "The effect of that is we need to be very clear what
10 the risks will be of not proceeding with the application
11 ..."

12 It goes on to set out what she wants.

13 A. Yes.

14 Q. Had you communicated the content of that email to David
15 Cavender before he sent his email recommending that
16 a position should be taken on how to advise?

17 A. If the -- I don't know, is the straight bat answer. If
18 the file doesn't show I did, I simply don't know. It's
19 the kind of information I would have circulated but I'm
20 unsure as to the timing.

21 Q. Can we move on actually, please, to POL00330036. If we
22 go down, thank you. So this is an email later on that
23 day:

24 "... it would be helpful to have a call on this, and
25 in particular ... to understand whether Lord Grabiner

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1 A. Yes.

2 Q. -- which I want to go to now. For our Core
3 Participants, it won't be on CPview(?) yet, it was very
4 recently provided. That's no criticism but can we turn,
5 please, to WBON0001899, please, and the typed version
6 that you've created, WBON0001900. Is this a note of the
7 call that we were referring to in the email just now?

8 A. I suspect so but I don't time these scribbles so, I'm
9 sorry, but I suspect it may well be.

10 Q. Do you recall what, if anything, Jane MacLeod said about
11 the Board or the Chair's concerns about the recusal
12 application?

13 A. No, other than as I've said, they were trepidatious
14 about -- they were nervous about making it.

15 Q. Do you recall if anything was said about the
16 Government's position on the recusal application?

17 A. Beyond the emails that we've seen saying that they would
18 be neutral, no.

19 Q. Please could we -- it's either scroll down or turn over
20 the page. I don't have a printed copy.

21 A. I think it's scroll down on my note.

22 Q. Sorry, is there a second page to that document? Yeah,
23 thank you.

24 So it says here "BIG PIC": big picture, presumably?

25 A. Big picture.

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1 Q. "Told Jane to Jane", what does that mean?
 2 A. If we can get the handwritten one up, I might be ...
 3 Q. Yes, of course it's on the right. If we could turn to
 4 page 2, please.
 5 A. "Told Jane", so I suspect they're two different blocks
 6 of conversation "Told Jane" and "to Jane loss all the
 7 way through". So I think they're bits of different
 8 jottings, if you see what I mean. So it's not one
 9 sentence that says, "Told Jane to Jane".
 10 Q. I see. So would it be "Told Jane" --
 11 A. PR --
 12 Q. -- "PR v Trial"?
 13 A. Yeah, and "To Jane loss all the way through". I think
 14 if you can draw a line mentally down the centre of the
 15 page in that part, anyway.
 16 Q. It says "PR v Trial loss all the way through."
 17 A. Yes.
 18 Q. "If not, recuse."
 19 A. Yes.
 20 Q. So is this what you were saying, you were advising or
 21 telling Jane MacLeod?
 22 A. By this stage, we'd had the Lord Neuberger note,
 23 I believe, on the 14th. We were developing our note
 24 that became the note of the 17th, and there was
 25 a process of mutual drafting with Andrew, David Cavender

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1 that time, we had decided on Lord Grabiner -- and she
 2 wanted information in from those people. So even our
 3 note that was drafted between the 15th and the 17th,
 4 what she really wanted was what's Lord Grabiner's view
 5 on that note? That's all she wanted.
 6 Q. Well, I am going to turn now to a conference with Lord
 7 Grabiner. Now, you set out your recollection of that
 8 conference in your statement. You've exhibited typed
 9 and handwritten notes?
 10 A. Yes.
 11 Q. We heard from Lord Grabiner yesterday and I don't
 12 propose to deal with lengthy issues on that. I want to
 13 cover two points, briefly. Could we please have
 14 POL00006397. So this is a note of a conference on the
 15 18 March 2019, and then this is the version that's
 16 updated to include 20 March Board dial-in as well?
 17 A. Yes, Jane wanted a compendium note, as it were, in the
 18 end.
 19 Q. Can we turn to page 2, please? Thank you. So we have
 20 "Duty to act":
 21 "Lord Grabiner explained that in his view if there
 22 is no recusal application made then Post Office will
 23 lose the series of trials set up in this matter.
 24 Without a recusal application Post Office is stuck with
 25 this judge. An appeal on the law may correct some of

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1 and Jane herself, and there was the view that, if the
 2 judge remained in place, there was risk to the coming
 3 trials due to the view of apparent bias and entrenched
 4 views.
 5 Q. So it then says:
 6 "High tempo step.
 7 "Jane warned."
 8 A. Yeah.
 9 Q. What does that mean?
 10 A. So that's -- so -- and, if you recall, the red ink note
 11 that we saw earlier, that also had the "PR" bit in it.
 12 So this is my shorthand to myself. I'm warning Jane
 13 about the risk of -- in doing this, "This is a really
 14 aggressive step, Jane, the PR of doing this. So it's
 15 a high tempo step. I've never done this. I've never
 16 had cause to do this in my whole career, Jane. This is
 17 unusual step to take, its high tempo"; that's me warning
 18 Jane.
 19 Q. At this stage, what was your impression of Jane
 20 MacLeod's view of whether or not to pursue the recusal
 21 application?
 22 A. I think she was -- well, I know she was seeking
 23 independent views. To be blunt, she couldn't care what
 24 I thought. She wanted the views of Lord Neuberger and
 25 Lord Grabiner, or whoever we went on to instruct -- by

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1 the very significant errors in the [Common Issues trial]
 2 judgment but then the case will be sent back to this
 3 judge, who has demonstrable apparent bias against Post
 4 Office and hence the firm conclusion that Post Office
 5 will lose and the financial impact of that will be
 6 substantial. Recusal is therefore essential and Lord
 7 Grabiner asserted that in the face of legal advice from
 8 Lord Neuberger that recusal should be applied for and
 9 the quantum of damages that Post Office will pay out on
 10 a loss, then it was Lord Grabiner's view that there was
 11 a duty on Post Office to seek recusal."
 12 What did you understand from that point: that there
 13 was a duty on Post Office to seek recusal?
 14 A. So to act in the best interests of the company is what
 15 I think I will have taken at that point, from that word,
 16 "Duty to act".
 17 Q. Was your understanding of the advice given by Lord
 18 Grabiner that there was a legal duty to apply for
 19 recusal, or something else?
 20 A. I don't know and I don't know how hard I would have
 21 turned my mind to that question. Duty to act in the
 22 best interests, did that tip over into the legal meaning
 23 of that in that conference? I don't know. I don't
 24 know.
 25 SIR WYN WILLIAMS: Can you tell me, Mr Beezer, this note is

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1 on Womble Bond Dickinson notepaper?
 2 **A.** Yes.
 3 **SIR WYN WILLIAMS:** Someone obviously composed it. Do you
 4 know who actually composed this minute or note?
 5 **A.** Me.
 6 **SIR WYN WILLIAMS:** It was you, right.
 7 **A.** Absolutely, it was me, yes. Yes.
 8 **SIR WYN WILLIAMS:** Right.
 9 **MR STEVENS:** Sir, we have on the documents a series of
 10 emails of it being amended, which --
 11 **SIR WYN WILLIAMS:** Yes, that's fine. I just wanted to have
 12 it clear in my mind while we were discussing it. That's
 13 all.
 14 **MR STEVENS:** Thank you, sir.
 15 **THE WITNESS:** So this, whilst not absolutely verbatim, it
 16 will be not far off and the Inquiry has the
 17 contemporaneous handwritten notes that I produced this
 18 from.
 19 **SIR WYN WILLIAMS:** Yes.
 20 **MR STEVENS:** I want to turn to that now for a second point.
 21 Could we please bring up WBON0001776 and, sorry,
 22 I should orientate ourselves, so could we also get up
 23 WBON0001737. So we see this is referring to the
 24 handwritten note of the conference call you were just
 25 referring to.

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1 stuff, lawyers, as if we're going to go. I still need
 2 to get the board over the line". So we are preparing as
 3 if we are going to -- or, more to the point, the counsel
 4 team is preparing as if it is going to go; she is going
 5 to need to still get the Board over the line.
 6 **Q.** So at this stage, did you have any impression of what
 7 Jane MacLeod thought of the merits of the recusal
 8 application?
 9 **A.** No, I don't think I did. What she thought personally?
 10 **Q.** Yes.
 11 **A.** I don't think I did.
 12 **Q.** Your evidence is that wasn't discussed in this
 13 conference?
 14 **A.** No. If this note doesn't -- I mean, whilst this is not
 15 an absolutely verbatim note, I will have tried to
 16 capture the salient points. So, no, I don't think so.
 17 **Q.** I want to ask one brief question on the call of 20 March
 18 2019. If you want to see the note, we can bring it up.
 19 As the note reads, it appears that you and Lord Grabiner
 20 attended the call, Lord Grabiner gave advice and then
 21 you and Lord Grabiner left the call?
 22 **A.** Yes. That's exactly what happened.
 23 **Q.** From that call on 20 March 2019, did you get any
 24 impression of any of the Directors' views on the merits
 25 of the recusal application or whether it should be

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1 **A.** Yes.
 2 **Q.** Can we please go to page 5 of both notes. Thank you.
 3 You see there's, towards the bottom, "JANE" underlined;
 4 that's Jane MacLeod, isn't it?
 5 **A.** Yes.
 6 **Q.** I read this as, tell me if I am wrong, instructions to
 7 prepare on the basis that the recusal application will
 8 go ahead?
 9 **A.** Yes.
 10 **Q.** Then it says, "Need to get Board over line"?
 11 **A.** Yes.
 12 **Q.** What did Jane MacLeod say that led you to make that
 13 note?
 14 **A.** That is what she will have said. I mean, that is what
 15 she will have said, that "I need to get the Board over
 16 the line, there's going to be a Board call today and we
 17 are going to schedule a Board call for next Monday". So
 18 that's what she said.
 19 **Q.** So, at this stage, was it Jane MacLeod's position that
 20 the right decision was to issue the recusal?
 21 **A.** No, no, no. Okay, I understand what you're asking. So
 22 she was saying -- because I'm saying, "It's urgent,
 23 Jane. We're waiting. This is -- you know, it's
 24 annoying me".
 25 So she's saying, "Okay, press on, draft, do your

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1 brought?
 2 **A.** No. It was -- no. There wasn't free-flowing discussion
 3 at all. As the handwritten contemporaneous note will
 4 probably sort of give you the impression, Lord Grabiner
 5 said his bit. There were three or four questions from
 6 unknown voices, unknown to me at the time. So the Board
 7 asked, you know, "Is there a middle way?", I don't know
 8 who, and then we left the call. And so Lord Grabiner
 9 and I were not there for any of the -- what I assume
 10 must have followed as being discursive, "Should we do
 11 it? Shouldn't we do it?" We weren't there for any of
 12 that, if that, in fact, occurred. I wasn't there;
 13 I don't know.
 14 **Q.** Last document or two documents from me. Please can we
 15 bring up WBON0001792 and, at the same time, please,
 16 WBON0001795. So on the handwritten note we see it says
 17 20 March 2019.
 18 **A.** Yes.
 19 **Q.** There's a "17" on the typed copy. Is that an error?
 20 **A.** Yeah, that shouldn't be there. I think that's someone
 21 putting a page number on, isn't it?
 22 **Q.** Fine.
 23 **A.** So sorry about that.
 24 **Q.** No need to apologise. Just so we're clear, it's
 25 20 March 2019.

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1 A. Yeah.
 2 Q. It says, "Jane" and in quotes "go". Is that go on the
 3 recusal application?
 4 A. Yes.
 5 Q. Yes. Then we get this:
 6 "Uncomfortable [regarding] tone in Judgment."
 7 A. Yes.
 8 Q. "Board really uncomfortable."
 9 What did Jane MacLeod say to you that led to that
 10 note?
 11 A. I mean, it's probably exactly what -- this is my
 12 scribbles during a phone call and so that is what she
 13 will have said. She'll have said, "The Board is really
 14 uncomfortable, they're really sensitive around tone.
 15 You've got to tell the counsel team. I don't want any
 16 high tempo language. I want calm". So that's what she
 17 will have been saying to me in that call.
 18 Q. So what was she saying the Board were uncomfortable
 19 about: was it the language or the making of the
 20 application itself?
 21 A. "Re tone in judgment". So no, the Board is
 22 uncomfortable with how Post Office is portrayed as
 23 aggressive in the Common Issues judgment and she's
 24 saying, "I want these documents that support any recusal
 25 and any witness statement to be calm". So the

1 MR STEVENS: Sir, I have just been handed a note. That may
 2 be the end of my questions but, if I may just have
 3 a moment to discuss it with Ms Price?
 4 SIR WYN WILLIAMS: Yes, of course.
 5 MR STEVENS: Thank you. *(Pause)*
 6 Sir, there's no further questions from me but I will
 7 just check the room to see if there's --
 8 Ms Page has asked for one issue to be dealt with.
 9 Ms Page has asked for five minutes, sir.
 10 SIR WYN WILLIAMS: Well, I'm sure that we can accommodate
 11 that, Ms Page.
 12 MR STEVENS: Thank you, sir.

Questioned by MS PAGE.

14 MS PAGE: Thank you.
 15 Mr Beezer, I am going to ask you about a particular
 16 note which is to do with the relationship between the
 17 Bates litigation and the criminal appeals. If I could
 18 ask, please, to bring up WBON0001511, and if we go to
 19 page 4. As far as I've been able to work out, the blue
 20 typing is you chipping in to these emails?
 21 A. That's right, yes.
 22 Q. There's this paragraph in the middle. It reads:
 23 "Also on the topic of settlement it is necessary to
 24 remember that 30 out of the 557 claimants have been
 25 convicted for shortfalls. Those 30 are relevant to the

1 uncomfortable is how the Post Office is portrayed in the
 2 Common Issues judgment. That's what's going on here.
 3 Q. Did Jane MacLeod say to you anything else about her view
 4 on the application itself?
 5 A. I don't think she did and, since you asked that
 6 question, I've been pondering. I don't think I ever
 7 knew what Jane's own position on it was.
 8 Q. At this point, did you have any understanding of what
 9 the Board's motivation was in making the application?
 10 A. My understanding of why Post Office wanted to do this is
 11 about the desire to get a legally correct judgment in
 12 the Common Issues, the desire to avoid what seemed to be
 13 a near inevitable series of losses of trials going
 14 forward. They were the motivations, and I can only
 15 speak from my impression that I got from Jane, because
 16 that's all I -- the only person I really interacted with
 17 substantively on any of this, and all of those
 18 motivations seemed, based on the understanding that we
 19 had at the time, proper.
 20 Q. To what extent, if at all, was there any discussion when
 21 concerning the recusal application, that it should be
 22 made to put pressure on the claimants or the litigation
 23 funders?
 24 A. Not at all, from within my visibility, not at all.
 25 Yeah, not at all.

1 process currently under way at the CCRC. Post Office
 2 cannot therefore currently simply settle with the entire
 3 claimant group as that would throw serious doubt on
 4 safety of those 30 convictions."

5 First of all, you obviously came in to the Bates
 6 litigation relatively fresh. Can you remember how you
 7 came to find out that some of the claimants had been
 8 convicted?

9 A. I will have picked up this information -- and this is
 10 probably the totality of my knowledge on this -- by
 11 osmosis, by being in the office around people who were
 12 dealing with this case. And I don't have deep knowledge
 13 on that, but it seemed a relevant point to put in this
 14 email, because it seems an impediment to settlement,
 15 based on what I was picking up that other people might
 16 be dealing with.

17 Q. Do you have recollection of others having this sort of
 18 issue, in other words the interrelationship between the
 19 civil and the criminal proceedings being something that
 20 was at the forefront of minds?

21 A. I don't believe so. I just knew from conversations in
 22 the office that, in the claimant group, there were
 23 people who had been convicted and that would be an --
 24 how do you pay someone who's been convicted, if you want
 25 to settle? As to detail of who was dealing with that,

1 where that was being dealt with, I'm really not sure.

2 **Q.** Do you think that the GLO was contested, in that very

3 vigorous way that it was, partly because to settle would

4 have been to concede that past convictions were unsafe?

5 **A.** I can't answer that. I don't have enough information

6 but I really shouldn't think that was the case but

7 I don't know.

8 **MS PAGE:** Thank you. Those are the questions I ask, sir.

9 **SIR WYN WILLIAMS:** Can you just show me the date when this

10 observation is made, please?

11 **MR STEVENS:** That will be coming up shortly, sir.

12 **SIR WYN WILLIAMS:** That's fine, yes.

13 **A.** 19 March.

14 **SIR WYN WILLIAMS:** 19th. So it's still in the same period

15 as you are dealing with the logistics for the recusal

16 application?

17 **A.** Absolutely. I had a sort of short, three-week burst,

18 and then drifted out.

19 **SIR WYN WILLIAMS:** Yes, I follow. That's fine, thanks.

20 **A.** Yeah.

21 **MS PAGE:** Thank you, sir.

22 **SIR WYN WILLIAMS:** Is that it, Mr Stevens?

23 Thank you, Ms Page.

24 **MR STEVENS:** Yes. I'm just doing a final check and that

25 seems to be everything.

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1 is Ms Hodge and I ask questions on behalf of the

2 Inquiry. Please state your full name.

3 **A.** Matthew Guy Lenton.

4 **Q.** You should have in front of you a hard copy of your

5 witness statement dated 14 May 2024; is that right?

6 **A.** Yeah.

7 **Q.** That statement should run to 54 pages, including

8 an index of documents; is that correct?

9 **A.** Correct.

10 **Q.** Could I ask you, please, to turn to page 51 of your

11 statement.

12 **A.** Yeah.

13 **Q.** You should see there in the middle of the page

14 a statement of truth and a signature. Is that your

15 signature?

16 **A.** Yes, it is.

17 **Q.** Is the content of this statement true to the best of

18 your knowledge and belief?

19 **A.** Yes, it is.

20 **Q.** Thank you. I'm going to begin just by asking some short

21 questions about your academic and professional

22 background, please.

23 **A.** Okay.

24 **Q.** In 1987, you obtained a bachelor's degree in film

25 studies and philosophy from the University of Kent; is

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1 **SIR WYN WILLIAMS:** All right.

2 Well, then thank you very much, Mr Beezer, for

3 making two witness statements dealing with two, in

4 effect, discrete issues and I'm grateful to you for

5 giving oral evidence before the Inquiry this morning.

6 **THE WITNESS:** Thank you.

7 **MR STEVENS:** Thank you, sir. I have heard from Ms Hodge.

8 We think that the best approach, subject to you

9 agreeing, is to take an early lunch now.

10 **SIR WYN WILLIAMS:** Yes.

11 **MR STEVENS:** So if we could come back for Mr Lenton's

12 evidence at 1.20.

13 **SIR WYN WILLIAMS:** Yes, by all means, Mr Stevens. We will

14 resume at 1.20.

15 **MR STEVENS:** Thank you, sir.

16 (12.21 pm)

17 (The Short Adjournment)

18 (1.20 pm)

19 **MS HODGE:** Good afternoon, sir, can you see and hear us?

20 **SIR WYN WILLIAMS:** Yes, I can, thank you.

21 **MS HODGE:** Thank you, sir. Our next witness is Matthew

22 Lenton. Please could the witness be sworn.

23 **MATTHEW GUY LENTON (affirmed)**

24 **Questioned by MS HODGE**

25 **MS HODGE:** Good afternoon, Mr Lenton. As you know, my name

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1 that right?

2 **A.** Correct.

3 **Q.** Before joining Fujitsu in 2006 you worked for various

4 companies in the field of document control; is that

5 right?

6 **A.** Correct.

7 **Q.** Could you please explain for those who are unfamiliar

8 with the term, what document control entails?

9 **A.** Yes, so, basically, it's -- somebody doing that role is

10 normally employed by, obviously, an organisation that

11 generates large volumes of normally technical but -- or

12 otherwise formal documentation. So I worked for Arup,

13 the consulting engineers, also for British Gas, and that

14 was before working for Fujitsu. And, obviously, those

15 companies all produce large volumes of technical

16 drawings, specifications, et cetera.

17 It's clearly important that people using those

18 documents know what version they're using, et cetera,

19 and that old documents are preserved and records are

20 correctly kept, basically and, because of the volume,

21 they employ somebody specifically, or often a team, in

22 fact, specifically to do that.

23 And it also involves things such as formal reviews

24 and approvals of documents with other parties, and

25 internal peer reviewers.

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1 Q. Thank you. When you joined Fujitsu in November 2006,
2 that was the role of Document Manager; is that right?
3 A. Correct.
4 Q. You initially worked on several different accounts,
5 albeit temporarily on the Post Office Account, as
6 well -- is that right --
7 A. Correct, mm-hm.
8 Q. -- before you were employed permanently as a Document
9 Manager in May 2009?
10 A. Yeah, before being employed permanently as a Document
11 Manager on Post Office Accounts, I was actually
12 recruited by Fujitsu to work on the NHS Account.
13 Q. Thank you. You remain in that role to the present day;
14 is that right?
15 A. Correct.
16 Q. Is there more than one Document Manager on the Post
17 Office Account or are you the Document Manager?
18 A. No, that is me and I have an assistant. That's it.
19 Q. Who is your assistant?
20 A. So currently, it's somebody called Ashwini Vishian(?),
21 who works in Chennai.
22 Q. And previously?
23 A. Previously we had somebody called Hanifa Thariq
24 Mohammed, who also works in Chennai, and, before that,
25 there have also been various other people who have

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1 the [Post Office Account] is the responsibility for
2 ensuring that design documentation and key process
3 documentation is controlled. The basis of that control
4 is the use of a single repository for such
5 documentation, which is a configuration management
6 database known as Dimensions. The database provides the
7 [Post Office Account] clarity on the latest versions of
8 current documents, and that previous (superseded)
9 versions, as well as obsolete documents, are retained."

10 Would it be right to say that here you're
11 emphasising the need for there to be one place where all
12 design and key process documentation are held?

13 A. Correct.

14 Q. One of the reasons for that would be to ensure that such
15 documents are distributed or disclosed appropriately; is
16 that right?

17 A. Disclosed -- um, mm, so the original purpose of it is
18 not for that purpose. It's so that people using the
19 documents in terms of the staff in the company can know
20 that they are referring to the correct version of
21 a document, so that we don't have, you know, multiple
22 versions of documents in various places on local hard
23 drives, et cetera, that people are looking at that may
24 be out of date.

25 Q. So the principal purpose would be an internal one?

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1 worked with me from 2008 until about 2015 or 2016.

2 Q. Thank you. We may come on to identify some of those
3 shortly?

4 A. Sure.

5 Q. So far as you're aware, for how long had the role of
6 Document Manager existed in the Post Office Account?

7 A. Since around 1998, I think.

8 Q. Just some small points of clarification, please. Is it
9 right you don't have any formal qualifications or
10 training in information technology?

11 A. Um ... mm, I'm not sure about that. I think I do
12 actually have a formal qualification in IT. I think
13 it's what used to be known as an NVQ but I'm not sure
14 that exists any longer, so it's probably not recognised.

15 Q. Okay, thank you. Would it be correct that you don't
16 have any legal qualifications or training?

17 A. Correct.

18 Q. I'd like to ask you, please, some questions about the
19 core part of your role as Document Manager for the Post
20 Office Account. Please can we show the witness's
21 statement WITN00530100.

22 Thank you. On page 3, please, you describe the Post
23 Office Account Document Manager role, and in your
24 statement, you say at paragraph 8:

25 "The core part of my role as Document Manager for

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1 A. Correct.

2 Q. But it would equally be --

3 A. It could -- can therefore be used --

4 Q. -- useful --

5 A. -- for other purposes --

6 Q. -- externally?

7 A. -- such as you suggest, yeah.

8 Q. Another reason for having a single repository would be
9 to ensure that they're retained appropriately; is that
10 fair?

11 A. Correct, yeah.

12 Q. Is it right that, during the period with which we are
13 concerned, the Post Office Account did not adhere to
14 this key principle of document control?

15 A. It may -- well, mm, no, I'm not sure that's true,
16 actually. So, in terms of the documentation that is
17 stored within Dimensions, as far as I am aware, all of
18 the documents that have been placed into Dimensions
19 since, I think, before 2000 are still there and are
20 still version controlled.

21 Q. I'm going to ask you, Mr Lenton, about another
22 repository which is the SSC website?

23 A. Sure.

24 Q. We may explore whether or not that contains key process
25 documentation, as you've defined there?

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1 A. Mm-hm, mm-hm.
 2 Q. Now, one of the repositories to which you refer in your
 3 statement is a dedicated website that was used by the
 4 SSC for incident management and support documentation;
 5 is that right?
 6 A. Right, yes, correct.
 7 Q. That website you say contained work instructions
 8 relating to the reporting and management of bugs, errors
 9 and defects; is that right?
 10 A. Sorry, can you just repeat the last bit of that?
 11 Q. Yes, work instructions relating to the reporting and
 12 management of bugs, errors and defects?
 13 A. I'm not sure that it did contain work instructions for
 14 that. I mean, certainly there may be some overlap with
 15 processes that do deal with that issue.
 16 Q. So if we could look, please, at page 6. At paragraph
 17 20, please. The final sentence there reads:
 18 "There are also internal SSC-specific work
 19 instructions that relate to the reporting and management
 20 of [bugs, errors and defects] which are stored" --
 21 A. Sure. So reporting and management, yes. So at a low
 22 level, I would say. So they're work instructions rather
 23 than procedures and processes.
 24 Q. Thank you. What's also contained on the website are
 25 PEAKs and KELs; is that correct?

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1 Q. When did you first attain access to the website?
 2 A. In 2016.
 3 Q. Before you were granted access to the SSC website, so
 4 far as you are aware, was it accessed and controlled
 5 solely by members of the SSC?
 6 A. That is my understanding, yeah.
 7 Q. Why was that the case; do you know?
 8 A. I'm not totally sure. My understanding is that, for
 9 historic reasons, the SSC were originally part of
 10 a division in Fujitsu, which wasn't directly part of the
 11 Post Office Account. So they would have dealt with
 12 other accounts as well as the Post Office. So it's kind
 13 of like a shared services support team. So, because of
 14 that, they would have had their own repository for
 15 dealing with incidents across the various accounts, so
 16 it would be owned by that division rather than by the
 17 Post Office Account itself.
 18 Q. Do you know who within the SSC was responsible for
 19 administering the website?
 20 A. In the time since I've worked there, I believe it is --
 21 has been administered by John Simpkins and Mark Wright
 22 and probably with the assistance of various other
 23 people.
 24 Q. Did you consider it was appropriate, in your role as
 25 Document Manager, for the SSC to have exclusive control

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1 A. Correct, yes.
 2 Q. Now, would it be fair to characterise those documents as
 3 key process documents, and Known Error Log?
 4 A. A Known Error Log isn't really a process document; it's
 5 actually a record of an incident or of the symptoms of
 6 certain incidents, whereas a process document would be
 7 one that tells you how to actually record or manage
 8 incidents generally. So I think -- I mean, I see the
 9 point you're making but I think that KELs are very
 10 specific to individual incidents, whereas when I am
 11 referring to process documents about how to manage
 12 incidents, I'm talking about much higher level, such as
 13 incident management procedure, for example, which
 14 wouldn't in itself contain any details of any BEDs.
 15 Q. Thank you. When did you first learn about the existence
 16 of the SSC website?
 17 A. I suspect I probably heard of it shortly after joining
 18 the account, maybe in 2009 or 2010.
 19 Q. What did you understand the website to contain at that
 20 stage?
 21 A. It's hard to say what I understood at that time.
 22 I mean, I think I knew that it contained PEAKs and
 23 I think I had a fairly vague idea of what PEAKs were but
 24 I didn't regularly come across them, to be honest, as
 25 I wasn't really involved in that area of work.

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1 over this website and its content?
 2 A. I'm not sure whether -- so that probably is a question
 3 that I had debated with my learned friend at certain
 4 times and I think it -- I just accepted it as being the
 5 way that it was and had been for many years. And so --
 6 I mean, I think if I'd questioned it, I'm not sure that
 7 I would necessarily have changed anything, shall we say.
 8 Q. Why were you granted access to the website in 2016?
 9 A. I can't remember now, actually, what the specific reason
 10 was that prompted it but I think it was possibly looking
 11 at wanting to look at PEAKs, which related to document
 12 updates, so that occasionally, if it had been noticed
 13 that during something like testing, for example, that
 14 a document that an incorrect statement in it, then the
 15 testers may raise a PEAK that says the document needs to
 16 be updated and, therefore, I think when I was being
 17 asked whether a document had been updated correctly or
 18 not or whether progress had been made on that update,
 19 then it was useful to look at PEAK. But I think that
 20 possibly -- well, as I say, I'm not sure why
 21 particularly in 2016 that came up.
 22 Q. Thank you.
 23 A. I'll just say I don't think it's in any way related to
 24 the issues that we're discussing here. I think it's
 25 something unrelated.

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1 Q. Part of your role as Document Manager involved liaison
2 with the Post Office; is that correct?
3 A. Yes, correct, yeah.
4 Q. If we could turn to page 3, please, of your witness
5 statement at paragraph 8. You say there in the final
6 sentence:
7 "Document issues and receipts between Fujitsu and
8 Post Office Limited, as well as other parties, are
9 controlled via a central mailbox owned by me, and those
10 transactions are recorded and the emails stored."
11 You seem here to be referring to the present tense;
12 is that fair, they "are" controlled by you?
13 A. Correct.
14 Q. Has that central mailbox been used throughout the time
15 on which you've worked on the Post Office Account?
16 A. Yes, it has.
17 Q. Are you only the member of the account who has access to
18 the central mailbox?
19 A. No, so the person I mentioned who assists me at the
20 moment, she has access and, over -- since I've worked
21 there, all the other people that have worked with me
22 have also had access to it.
23 Q. Would it be right to understand that this is an internal
24 Fujitsu mailbox, to which those outside the organisation
25 wouldn't have access?

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1 Gareth Jenkins on the subject of data integrity; is that
2 right?
3 A. Correct.
4 Q. What caused these particular documents to stand out in
5 your memory?
6 A. Well, only -- well, mainly the fact that they relate to
7 the issues that we're discussing here. So, obviously,
8 when I'm asked about them, then that's effectively the
9 first documents that I remember dealing with that
10 directly related to this issue. I mean, they were
11 obviously also slightly unusual documents, in that they
12 didn't -- most of the documents that I would have dealt
13 with related to the implementation of the solution, or
14 processes relating to the implementation, whereas these
15 clearly are reports on an aspect of it, rather than
16 being design documents, as it were.
17 Q. Were they documents that you held in Dimensions?
18 A. Yes.
19 Q. But they were of a different character to the other
20 documents that you held there; is that what you're
21 saying, in essence?
22 A. Well, I'm saying that, because of the nature of them,
23 there's -- they were perhaps somewhat memorable in terms
24 of being different from most of the other documents,
25 which are things like high-level designs, test reports,

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1 A. Correct.
2 Q. Did you respond to or oversee all requests for access to
3 documents from the Post Office from the date of your
4 appointment as Document Manager?
5 A. Well, only as far as I know. So if people -- if other
6 people received -- other people on the Account received
7 requests directly from people within Post Office, then
8 it was expected that they would pass them to me, but
9 it's perfectly possible that people may have answered
10 them directly without me knowing.
11 Q. If you did not obtain access to the Account until July
12 2016, does it follow that you did not provide to the
13 Post Office any documents that were held solely on that
14 site before that date?
15 A. That sounds likely. I mean, I can't say that that's
16 definitely the case because it's possible that somebody
17 may have sent me something internally that I then passed
18 on but that sounds unlikely to me because there wouldn't
19 have been any need for me to record it.
20 Q. From quite an early stage in your tenure as Document
21 Manager you started to handle requests relating to
22 Horizon data integrity; is that correct?
23 A. Yes.
24 Q. In your statement you say you recall processing and
25 disclosing to the Post Office two reports produced by

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1 et cetera.
2 Q. At the point when you first came to handle and pass on
3 these documents to the Post Office, what, if anything,
4 did you know about Gareth Jenkins' role in the Post
5 Office Account?
6 A. Yeah, um, I already knew who he was. I mean, he was
7 a -- one of the most senior architects on the Account.
8 He sat just upstairs from me, I'd spoken to him before,
9 so I knew perfectly well who he was.
10 Q. Do you recall being asked in October 2013 to set up
11 a SharePoint site on which to store documentation
12 relating to data integrity?
13 A. Yes.
14 Q. This became known as the data integrity SharePoint; is
15 that right?
16 A. Correct.
17 Q. Did you know why you were asked to set up that
18 SharePoint?
19 A. I suppose, in general terms, I did, but I wasn't
20 particularly aware at that time of the investigations
21 going on within Post Office or of the Mediation Scheme
22 or Second Sight, et cetera. So not in detail,
23 basically.
24 Q. What did you understand in general terms?
25 A. Well, obviously, only that there was some question over

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1 the integrity of the data and that various work was
 2 being done between Fujitsu and the Post Office and,
 3 I think, various other parties to investigate that
 4 issue.

5 **Q.** Who was granted access to the data integrity SharePoint?

6 **A.** So I don't think I'd be able to give you the full list
 7 but my recollection is that it's about ten people within
 8 the Post Office Account only. So people such as James
 9 Davidson, Torstein Godeseth, Gareth Jenkins and about
 10 five or six other people, I think.

11 **Q.** How did you determine who ought to have access to the
 12 SharePoint?

13 **A.** I'm sure I was just asked to provide access to those
 14 people.

15 **Q.** So far as you're aware, would any Post Office employees
 16 have had access to that SharePoint?

17 **A.** No.

18 **Q.** How did you decide which documents were to be stored on
 19 the SharePoint?

20 **A.** I was asked to download them from Dimensions and put
 21 them on there so, again, I can't really remember who it
 22 was who asked me to do it but, one of those same people
 23 that I mentioned earlier.

24 **Q.** Who would have identified to you which documents were
 25 relevant?

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1 **A.** Yeah.

2 **Q.** You're not either the recipient or copied in to this
 3 email?

4 **A.** Mm-hm.

5 **Q.** But what it confirms, we can see at the second bullet
 6 point, is that you, Matthew Lenton, are in the process
 7 of setting up the site for all documentation relating to
 8 data integrity and for that to be stored. He goes on to
 9 say:

10 "Gareth has a lot of data which is on his laptop and
 11 on [his] server share currently but this will proved us
 12 [presumably 'provide us all'] with a place to keep
 13 drafts/WIP, [work in progress] and historical
 14 documentation."

15 So I think it's your evidence you weren't
 16 specifically told that by Mr Davidson; is that correct?

17 **A.** No, I don't think I was and I actually don't think that
 18 happened either. So I don't think we did end up storing
 19 a lot of data from Gareth into that SharePoint site.

20 **Q.** Thank you. So far as you can recall, did you have any
 21 contact or communication with Gareth Jenkins at this
 22 time about what he held on issues of data --

23 **A.** No, I don't think so. As I say, I think the SharePoint
 24 site only contained documents that I added to it from
 25 Dimensions, as far as I recall.

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1 **A.** Yeah, so probably either Gareth Jenkins or Torstein
 2 Godeseth.

3 **Q.** Did you take any steps to consult with members of the
 4 SSC about what could or should be stored on the
 5 SharePoint relating to data integrity?

6 **A.** No.

7 **Q.** Why not?

8 **A.** I don't think there's any reason to do that. So I was
 9 really only doing what I was asked to do to set up the
 10 site, give access to certain people, add certain
 11 documents to it.

12 **Q.** Did you obtain any documents from sources other than
 13 Dimensions?

14 **A.** As far as I recall, no.

15 **Q.** Were you aware that Gareth Jenkins held a lot of
 16 relevant data on his laptop and on his server share at
 17 that time?

18 **A.** I don't think I knew that as a fact, no. I mean, I may
 19 have guessed that. It was common that people did hold
 20 lots of data on their laptops and on file shares at that
 21 time.

22 **Q.** Perhaps it might help if we just look at that email.
 23 FUJ00156902, please. Thank you. So this is an email
 24 from James Davidson. Is that who you believe asked you
 25 to set up the SharePoint site?

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1 **Q.** Thank you. When did you first start liaising with
 2 Mr Jenkins directly over issues of data integrity?

3 **A.** I'm sure it was probably the two reports, so the Horizon
 4 and the HNG-X data integrity reports.

5 **Q.** Because you obtained those directly from him?

6 **A.** Well, I know they were written by him. So it seems
 7 perfectly possible -- even likely -- that they would
 8 have checked with him that they were the latest versions
 9 and that he hadn't made any other changes to them.

10 Yeah, before that, I don't think I would have had any
 11 reason to discuss it with him.

12 **Q.** When you say you would have checked, this is from the
 13 point of view of version control --

14 **A.** Mm.

15 **Q.** -- rather than in relation to the content of the
 16 documents; is that right?

17 **A.** Yeah, I mean, simply I might have, say, version 1 and
 18 I would perhaps check with him that there wasn't a more
 19 recent version that I didn't yet have that he wanted to
 20 provide to Post Office instead.

21 **Q.** Thank you. I'd like to move on to a new topic, please,
 22 which concerns your involvement in the Group Litigation
 23 brought by subpostmasters and others against the Post
 24 Office?

25 In your statement you explain that your role was to

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1 field requests for information and evidence from the
2 Post Office's lawyers, Womble Bond Dickinson; to direct
3 those requests to the appropriate subject matter expert
4 within Fujitsu; and to provide responses back to Womble
5 Bond Dickinson. Is that a fair summary?

6 **A.** Yes.

7 **Q.** You identify in your statement six individuals from whom
8 you obtained information about Horizon; is that correct?

9 **A.** Yes.

10 **Q.** Perhaps if we could just turn up your statement, please,
11 where that is addressed at page 18, paragraph 47. Can
12 you tell us, please, for the benefit of those following
13 your evidence, who each of those individuals were, and
14 their roles? You've dealt already with Mr Jenkins.

15 **A.** Okay. So Pete Newsome was -- his job title was often
16 something like Consulting Manager or something like that
17 but he was somebody who worked on the Post Office
18 Account and I believe had worked quite closely with Post
19 Office themselves, in terms of actually working in their
20 offices on some occasions. But he was also kind of in
21 charge of commercial change, at a kind of high level, so
22 in terms of discussing and fielding changes that the
23 Post Office wanted to implement. So, effectively, he
24 was a kind of senior kind of commercial change manager.

25 Stephen Parker was the Manager of the SSC.

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1 from being provided by various Architects, for example,
2 or Service Managers. So I would know who was subject
3 matter expert in certain areas.

4 **Q.** Who within Fujitsu was responsible for determining what
5 was or was not disclosed to the Post Office's lawyers?

6 **A.** I suppose, ultimately, in terms of this exercise, it was
7 Pete Newsome, I guess, as he was effectively managing
8 this kind of small virtual team of people mentioned
9 here, plus me.

10 **Q.** What were you told about the role that Gareth Jenkins
11 was to play in supporting the Post Office's defence in
12 the Group Litigation?

13 **A.** I'm not sure I was told anything specifically in those
14 terms. I think it was simply that, when we were looking
15 at providing answers to questions as it came to us from
16 WBD, then I think it had been determined that this team
17 of people would help to analyse the information in order
18 to answer those questions. And he was one of those
19 people, because of his longstanding expertise and
20 knowledge on Horizon. So I don't think I was told
21 anything specifically about what his role would be,
22 other than in those terms.

23 **Q.** We know that some of the individuals named there gave
24 witness statements in support of the Post Office's
25 defence. Who was responsible for determining which of

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1 John Simpkins and Mark Wright were both Team Leads
2 in the SSC. So I think, basically, they were kind of
3 Steve Parker's deputies. I think they had kind of half
4 a dozen or so people working under them.

5 And Torstein Godeseth was the Senior Architect on
6 the Account. So I think he was -- yeah, effectively he
7 was senior to Gareth Jenkins, I think.

8 **Q.** Thank you. Would it be right to say that these would
9 not be the only individuals from whom you obtained
10 information; you say they are the principal ones?

11 **A.** That's right, yeah. So sometimes we would ask other
12 members of the Account for help with obtaining certain
13 bits of information, so various subject matter experts,
14 from various teams.

15 **Q.** How did you determine to whom within Fujitsu a request
16 for information should be directed?

17 **A.** So, often, that would just be simply by discussion with
18 other the people. I mean, so the staff on the Account
19 are kind of -- so all of the people listed here were on
20 the Account for quite a long period of time and,
21 obviously, I had also been on the Account for, you know,
22 about 10 years, by this time, so we obviously knew who
23 dealt with which types of issues and who had expertise
24 in certain areas.

25 Personally, I would have seen many document updates

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1 Fujitsu's employees were to give witness evidence?

2 **A.** I suspect that was between -- probably, conversations
3 between Pete Newsome, possibly Chris Jay, the Fujitsu --
4 I think he's a lawyer, I'm not quite sure what his
5 qualifications are -- and with WBD, I suspect.

6 **Q.** Did you know why Mr Jenkins was not asked to provide
7 a witness statement?

8 **A.** I believe I wasn't directly involved in that, so I'm not
9 sure. I think it may be because of the fact that he was
10 no longer a Fujitsu employee by that time.

11 **Q.** Did you know why he was being asked to feed information
12 and evidence to other witnesses, such as Mr Godeseth?

13 **A.** Feed, mm. So, I mean, I think he's providing analysis,
14 so he's being asked his opinion on various issues. So
15 I'm not sure that I would necessarily have seen it as
16 being characterised in that way but I'm aware that other
17 people have characterised it like that.

18 **Q.** Did you have any concerns at the time about this
19 approach to the preparation of the witness evidence that
20 was being provided by Fujitsu?

21 **A.** Personally, no.

22 **Q.** The next topic I would like to address with you, please,
23 concerns the very late disclosure by Fujitsu of
24 a substantial number of Known Error Logs. Is it right
25 that you were informed in late November 2017 that the

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1 Post Office was required to declare the locations in
 2 which documents relevant to the operation of Horizon
 3 were held?
 4 **A.** Yes, I was indirectly made aware of that by being
 5 presently with the EDQ, yes. When I say "indirectly",
 6 I wasn't told that that was what needed to be done in
 7 the terms in which you've just expressed it.
 8 **Q.** You were asked, were you not, by Womble Bond Dickinson,
 9 to attend a conference call on 30 November 2017 --
 10 **A.** Yes.
 11 **Q.** -- the purpose of that call being to assist them to
 12 understand which documents were held by Fujitsu and
 13 where they were stored; is that right?
 14 **A.** Yes.
 15 **Q.** You attended that call with two other Fujitsu employees;
 16 is that right?
 17 **A.** I believe so.
 18 **Q.** Could you confirm their names and roles?
 19 **A.** I think that was probably Pete Newsome and Chris Jay.
 20 **Q.** You understand Chris Jay to be an internal Fujitsu
 21 lawyer; is that right?
 22 **A.** So he's a member of the Fujitsu Legal Team at that time,
 23 yeah.
 24 **Q.** To assist you, please could we turn up FUJ00158114.
 25 Thank you. In the second half of the page, please, we

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1 discussions that took place.
 2 **Q.** A week later, you were sent by Womble Bond Dickinson
 3 a draft appendix to the Post Office's Electronic
 4 Directions Questionnaire -- is that right --
 5 **A.** Yes.
 6 **Q.** -- in which they had attempted to summarise the
 7 documents held by Fujitsu?
 8 **A.** Yes.
 9 **Q.** So if we just scan up while we're on this document,
 10 please, to the top, thank you, this is an email now from
 11 Michael Wharton, again to the same recipients:
 12 "As discussed on Thursday's call, I have attached
 13 our draft appendix to the EDQ [the Electronic Directions
 14 Questionnaire], summarising the documents held by
 15 Fujitsu -- please could I ask you [first] to:
 16 "review it generally and confirm you are happy with
 17 it; and [second]
 18 "confirm the specific points highlighted in yellow
 19 in the attached."
 20 He goes on to say:
 21 "Please accept our apologies for the delay in
 22 getting this over to you such that it is now urgent,
 23 however, please can I ask you to come back to me with
 24 your comments by 14.30 this afternoon, as the EDQs need
 25 to be exchanged today. Your help is greatly

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1 have an email here dated 28 November 2017 from Amy
 2 Prime, an employee of Womble Bond Dickinson. It's
 3 addressed to you, Pete Newsome and Chris Jay, who is
 4 referred there as Defence Legal --
 5 **A.** Yes.
 6 **Q.** -- and others copied:
 7 "Chris, Matthew, Pete.
 8 "Post Office are required to inform the court of the
 9 location in which potentially relevant documents are
 10 located. 'Relevant document' is a very broad term and
 11 will encompass pretty much all dealings which Fujitsu
 12 have had with Post Office in relation to Horizon and
 13 HNG-X spanning emails (with both POL and internally),
 14 documents stored in Dimension, Transaction and Event
 15 data, HSD logs, PEAKs system and any other document
 16 produced by Fujitsu which relates to Horizon.
 17 I appreciate that this may be a large volume of
 18 documents.
 19 "So as we can understand the documents held by
 20 Fujitsu and where they are stored, it would be helpful
 21 if we could have a call."
 22 Now, do you have any recollection of what was
 23 discussed at that meeting?
 24 **A.** I must admit I don't really remember the meeting.
 25 I remember that I did attend it. I don't recall the

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1 appreciated."
 2 Now, obviously that email is timed at 10.18 am on
 3 the Wednesday, so you were given just over four hours?
 4 **A.** Yes.
 5 **Q.** Could we please look at the document attached to that
 6 email, so this is the draft appendix, which is at
 7 FUJ00158115.
 8 Now, you make the point in your statement you didn't
 9 have very long to review the document. It wasn't very
 10 lengthy though, was it, it ran to just over two pages?
 11 **A.** That's true.
 12 **Q.** Would it be fair to say that you did have sufficient
 13 time to consult with your colleagues on a number of
 14 points that you raise in the statement?
 15 **A.** Yes. Although, yeah, I mean, my recollection and what
 16 I see when I look back at the comments on it now are
 17 that, basically, I consulted with colleagues on the
 18 points which had been highlighted, as I think Michael
 19 Wharton mentions in his email and then, if I spotted any
 20 other things that I knew to be incorrect, then
 21 I commented on those as well. So I think if I saw -- if
 22 I read the rest of it and didn't either see
 23 highlighted -- sections of it highlighted to be queried
 24 or spot that there was something wrong myself, then I'm
 25 not sure that I'd -- I'm pretty sure I didn't generally

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1 send this on a review to other people as a whole.

2 **Q.** Thank you.

3 **A.** If that makes sense.

4 **Q.** Just to look at what we have here, this is obviously one

5 of several appendices dealing with databases of

6 electronic documents but these specifically are

7 Fujitsu's databases; is that right?

8 **A.** Correct.

9 **Q.** Now, if we look just above the table, it states:

10 "This information has been provided by Fujitsu to

11 Post Office."

12 **A.** Yeah.

13 **Q.** Now, presumably that was in the meeting that you had on

14 30 November?

15 **A.** Um --

16 **Q.** Sorry, not attended solely by you but by Pete Newsome

17 and Chris Jay, as well?

18 **A.** Yes, correct, yeah, although it is possible -- I have

19 reflected on this and it does seem to me possible that

20 Pete Newsome had separate either conversations or emails

21 with WBD. But I -- as I say, I don't recall the details

22 of the meeting and, certainly, information relating to

23 KELs wouldn't have come from me, so it's not clear to me

24 whether it was in that meeting or not.

25 **Q.** When you say it's possible he had other communications,

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1 within the meeting but, certainly, not from me and it

2 possibly came from elsewhere, is that I don't think he

3 would have necessarily known -- come up with that

4 definition on his own. So that sounds like something

5 that somebody from the SSC would have provided him with.

6 **Q.** Was that something that you knew, that you had knowledge

7 of at that time, what is described there in relation to

8 the KEL?

9 **A.** No, not without asking somebody else to provide that

10 information, no.

11 **Q.** The next entry, please, in the column entitled

12 "Comments" reads:

13 "The KEL only contains the current database entries

14 and is constantly updated and so the current version

15 will not necessarily reflect the version that was in

16 place at the relevant time."

17 Now here:

18 "The previous entries/versions of the current

19 entries are no longer available."

20 Again, do you recall providing that information?

21 **A.** No.

22 **Q.** By whom do you think that information was provided?

23 **A.** So, again, I suspect that went to -- I mean, I'm

24 guessing really but I could only assume that that went

25 to WBD from Pete Newsome but I would also expect that he

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1 were you copied in to those?

2 **A.** I don't think so because I think I actually have looked

3 to see whether that is the case or not. So ...

4 **Q.** You haven't found anything?

5 **A.** No.

6 **Q.** The first row in the table concerns the Known Error Log

7 and, in the middle column, it provides a description of

8 it to this effect:

9 "The KEL is a proprietary database with

10 approximately 4,000 entries containing information which

11 is used by Fujitsu to explain how to deal with or work

12 around minor issues that can sometimes arise in Horizon

13 for which (often, because of their triviality)

14 system-wide fixes have not been developed and

15 implemented."

16 Now, do you recall providing that information to the

17 Post Office's lawyers during your call?

18 **A.** No.

19 **Q.** By whom do you think that information was provided?

20 **A.** So, if there was only three of us on the call, I could

21 only assume that it would be Pete Newsome but, again,

22 I would have -- so the reason that I say I think it's

23 seems possible perhaps even likely that he got that

24 information from elsewhere and provided it to WBD

25 separately from that meeting is that -- or possibly

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1 had got that information from somebody in SSC. I mean,

2 I have to say, we know that that last statement that you

3 just read out is incorrect. But I don't know why it's

4 incorrect and I don't -- you know, I've looked to see

5 whether we can trace the source of that error but

6 I haven't been able to and, I mean, it strikes me now

7 that it's possibly even just been heard by somebody

8 incorrectly. Perhaps it doesn't mean "available" but

9 means "valid", or something like that.

10 **Q.** When you read that, when you reviewed the document, as

11 you were asked to do by Womble Bond Dickinson, that

12 didn't jump out at you?

13 **A.** No, I don't think that I was -- well, I know that

14 I wasn't familiar enough with KELs at that time to have

15 had an opinion on that actioning.

16 **Q.** In March 2018, so several months later, you provided to

17 Womble Bond Dickinson approximately 8,300 KEL entries;

18 is that correct?

19 **A.** I think that's right, yes.

20 **Q.** Who would supply those entries to you?

21 **A.** So those would have come from the SSC and I think it was

22 probably John Simpkins who obtained them and provided

23 them.

24 **Q.** At the time that you provided those entries, you were

25 asked by Womble Bond Dickinson to confirm whether the

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1 documents you had provided contained all historic and
 2 current KEL entries; is that right?
 3 **A.** Sounds correct, yeah.
 4 **Q.** Let's take a look at that email, please. FUJ00220950.
 5 On page 3, please -- thank you. So we have an email
 6 from Amy Prime again, of Womble Bond Dickinson, dated
 7 23 March 2018, to you, and copied in to Chris Jay at
 8 Defence Legal, Pete Newsome and, I think, some other
 9 lawyers from Womble Bond Dickinson.
 10 **A.** Yes.
 11 **Q.** It reads:
 12 "Matthew
 13 "Thank you, we have safely received the documents.
 14 "There is also a file named 'KELComplete' uploaded
 15 to the data room. Please could you confirm if this
 16 contains all historic and current KEL entries."
 17 So that was a question that was raised specifically
 18 to you?
 19 **A.** Yes.
 20 **Q.** So what did you understand historic KEL entries to mean?
 21 **A.** I think my interpretation of that was, and actually
 22 still is now, that it means KEL entries that are no
 23 longer applicable. So rather than old versions of KELs
 24 that have since been updated, it means old KELs that are
 25 no longer current KELs. So no longer applicable to the
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1 **A.** Sure, mm-hm.
 2 **Q.** -- which said the KEL database only holds current
 3 entries of KELs. Now, here we have an email from Amy
 4 Prime, March 2018, which says, "Have we got all historic
 5 and current KEL entries?" So what I'm asking you is, at
 6 the time, did you ask yourself from where are these
 7 historic entries, if the database only holds current
 8 KELs?
 9 **A.** I'm not sure that I did ask that but I may well have
 10 discussed it with John Simpkins but I think I took the
 11 KELs that he had provided me with, but again, I think
 12 this is the distinction between historic KEL and
 13 a superseded version of a KEL.
 14 **Q.** Okay we'll come on to that terminology shortly. Now, to
 15 answer this question that Ms Prime had raised about the
 16 upload that had been made in March, as you say, you
 17 sought some clarification from John Simpkins; is that
 18 correct?
 19 **A.** I think I probably did.
 20 **Q.** If we scroll up, please, to page 1. Thank you. So your
 21 email to him of 23 March 2018 is at the bottom.
 22 "John, I uploaded the KELs to [Womble Bond
 23 Dickinson's] site and let Pete know I'd done it, but it
 24 sounds like maybe he hasn't told them, so they are
 25 checking -- Amy Prime asking 'Please could you confirm
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1 current system.
 2 **Q.** So obsolete but for a different reason?
 3 **A.** Obsolete because they -- the KEL as a whole is no longer
 4 valid, rather than them being superseded versions of
 5 KELs, yeah.
 6 **Q.** We'll come on in a bit to the terminology, it gets
 7 a little bit complicated but thank you. Now, bearing in
 8 mind what the electronic directions questionnaire had
 9 said, if the KEL only contained current database
 10 entries, from where had the historic entries been
 11 obtained?
 12 **A.** So I think I go on to explain all of that, actually, in
 13 another email to Amy Prime, probably after this,
 14 I guess. So there are various statuses that KELs could
 15 have. So they could either be the currently applicable
 16 KELs, in other words the ones that the SSC would consult
 17 that were deemed to relate to the current version of
 18 Horizon.
 19 **Q.** Sorry, can I pause you because we will come to that
 20 email.
 21 **A.** Okay.
 22 **Q.** That's quite some time later though. What I want to ask
 23 you about is what you thought at the time that you
 24 received this email. So we dealt firstly with
 25 a questionnaire in late November 2017 --
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1 if this contains all historic and current KELs?'
 2 "The answer presumably is yes, and am I okay to
 3 repeat the info you gave to Pete below as the answer to
 4 Amy?"
 5 He answers "Yes, and Yes".
 6 For information below related to the distinction
 7 between a Legacy Horizon KEL and a Horizon Online KEL;
 8 is that correct --
 9 **A.** Yes, mm-hm.
 10 **Q.** -- how to distinguish the two.
 11 **A.** That's right. I think he includes a screenshot, doesn't
 12 he, showing the difference. Yeah.
 13 **Q.** Is that the answer which you gave to Womble Bond
 14 Dickinson, to the effect that, yes, they had all of --
 15 **A.** I assume it is, yes.
 16 **Q.** Approximately six months later, you received a further
 17 request from the Post Office's lawyers to provide any
 18 KEL entries relating to the Callendar Square bug; do you
 19 recall that?
 20 **A.** Yes.
 21 **Q.** You initially provided to them some statements and
 22 material relating to the bug; is that correct?
 23 **A.** Yes.
 24 **Q.** You told them that you didn't believe that there was
 25 a KEL relating to that particular bug; is that right?
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1 **A.** So I think it transpired that there wasn't one in the
 2 set that we had given to them and, therefore, it looked
 3 like there wasn't one available.
 4 **Q.** Is that the basis on which you said, "I believe there
 5 isn't one?"
 6 **A.** I'm not quite sure but I suspect that if I -- I may well
 7 have checked with either John Simpkins or Mark Wright
 8 and, if it wasn't in the set that we provided to WBD,
 9 then I expect that, if they went and looked for it, they
 10 wouldn't have found it.
 11 **Q.** Just to assist you, the relevant email chain is at
 12 FUJ00179779, please. Thank you. The original requests
 13 can be found on page 4, please. Forgive me, if we just
 14 scroll down a little bit, please, to the email from Lucy
 15 Bremner, thank you.
 16 So this is dated 11 September, addressed to you and
 17 Pete Newsome, this email not copied to Mr Jay on this
 18 occasion, the lawyer. It reads:
 19 "Matthew, Pete,
 20 "You may recall a while ago I asked you to provide
 21 information on Callendar Square, Falkirk. Apologies if
 22 I have missed your response, however I think this CEO
 23 may still be outstanding."
 24 So chasing up an earlier request, it would appear;
 25 is that fair?

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1 **A.** So it is actually a subsite within that site, yeah,
 2 that's correct. So it contained all of the KELs. So
 3 this is basically a means of keeping a record of what we
 4 had provided to WBD. So it seems perfectly possible
 5 that I would have searched that and then not found it
 6 but it also be the case, and seems very likely, that
 7 I would have spoken to John Simpkins about it or Mark
 8 Wright and they may have looked for it as well.
 9 **Q.** Is this, you say, before this email --
 10 **A.** Um ...
 11 **Q.** Because we will come on to see that you did seek some
 12 clarification from John Simpkins?
 13 **A.** Yes.
 14 **Q.** But it's the basis of your assumptions?
 15 **A.** So it's not completely clear from this because one thing
 16 you have to remember is that not all of the
 17 conversations I had with people, such as John and Mark,
 18 were done by email, since they sat on the floor directly
 19 above me. So I may well have gone and spoken to them.
 20 **Q.** If we scroll up, please. So, essentially, forgive me,
 21 we can keep going up through, there's some back and
 22 forth between you and Ms Bremner over what materials
 23 held relevant to Callendar Square --
 24 **A.** Yes.
 25 **Q.** -- and you provide some additional material, including

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1 **A.** It sounds like it, yes.
 2 **Q.** "Please could you provide me with any information you
 3 have on this. Could you also confirm whether KELs exist
 4 for this bug?"
 5 If we follow up to your initial response, please.
 6 You initially reply, 12 September:
 7 "Lucy,
 8 "The attached email I sent to you in July included
 9 the zip file that was originally provided to Second
 10 Sight, and which includes information relating to the
 11 Callendar Square case.
 12 "I don't believe there is a related KEL but I will
 13 check for other information."
 14 My question was what the basis of that assertion was
 15 and I think your answer is that it wasn't contained
 16 within the original batch and, therefore, you'd assumed
 17 that it didn't exist.
 18 **A.** So I think it's -- looking at that now, I think it's
 19 quite likely that, when the -- when we provided WBD with
 20 the set of KELs, I believe we also uploaded the same set
 21 on to our SharePoint site, which, therefore, was
 22 separate from the SSC's original database, but then,
 23 in --
 24 **Q.** Can I just clarify, which SharePoint site are you
 25 referring to? Is this the data integrity --

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1 statements from Gareth Jenkins; is that correct?
 2 **A.** Yes, I believe, so.
 3 **Q.** Then -- thank you -- on 24 September Ms Bremner says:
 4 "On our call last week you said you were waiting for
 5 Gareth to confirm whether there is a KEL for Callendar
 6 Square -- can you let me know?
 7 "Kind regards,
 8 "Lucy."
 9 Now, is that something you recall raising with
 10 Gareth Jenkins at the time?
 11 **A.** I don't recall it, no.
 12 **Q.** It seems as though you've told Ms Bremner that that was
 13 something you were doing?
 14 **A.** It seems likely that -- yeah, possibly. Or she may have
 15 thought that I -- I mean, it seemed to me from this
 16 email thread that I was talking to Gareth about other
 17 aspects of what they were looking at, at this point. So
 18 it may be that she thought I was waiting for him to
 19 confirm that as well, although that may not be the
 20 case -- it kind of seems more likely to me that I would
 21 have spoken to SSC about it, rather than Gareth, as to
 22 whether there was a KEL.
 23 **Q.** Why is that?
 24 **A.** Because they're the custodians of that system.
 25 I suppose it is possible that -- I mean, because we got

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1 into the point of whether -- so I believe that Callendar
 2 Square was a Horizon issue rather than HNG-X issue, so
 3 it seems possible that the KEL may have been deleted,
 4 but since Gareth was working there at the time,
 5 I suppose it's possible in theory that he may have had
 6 a local copy of it that hadn't been deleted. But,
 7 I mean, that's speculating in some ways and I'm not --
 8 don't think that is the discussion I was having with
 9 him.
 10 **Q.** When you say a local copy, you mean stored on a laptop
 11 or --
 12 **A.** Indeed.
 13 **Q.** Thank you. Can we scroll up, please. So you contact
 14 John Simpkins, having been pressed again by Ms Bremner
 15 for an answer on this issue as to whether there exists
 16 a KEL for Callendar Square. You say:
 17 "John,
 18 "I am being asked if we can confirm if there is/was
 19 a KEL for the 'Callendar Square' issue. Are you able to
 20 confirm that definitively please?"
 21 You say:
 22 "Please see the attachment which describes it
 23 (points 1-4); it seems that it was a known issue that
 24 was fixed in S90 ..."
 25 Do you recall what that is?
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1 say that I think it shouldn't have been deleted.
 2 **Q.** That's your opinion as a Document Manager?
 3 **A.** Yeah.
 4 **Q.** If we turn, please, to first page, we can see -- forgive
 5 me, at the bottom of the first page -- we can see the
 6 initial response you received from John Simpkins on
 7 25 September 2018. He says:
 8 "... Matthew,
 9 "I have spent some time trying to track this down
 10 via the branch name, date range, release, problem
 11 description etc.
 12 "However I have yet to find a matching KEL.
 13 "I think that the best fitting PEAK is [and he gives
 14 a reference] which is for the branch [named] but the
 15 branch is in Falkirk."
 16 He references another PEAK, which has:
 17 "... a good description of the problem, which is in
 18 the Escher product, fixed in the new version at S90."
 19 He then says:
 20 "This KELJSimpkins338Q appears to apply which should
 21 have been in the extract supplied to [you]."
 22 **A.** To them.
 23 **Q.** Forgive me, to them, being the Post Office's lawyers.
 24 **A.** Mm.
 25 **Q.** If we scroll up the page, please, we can see your
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1 **A.** So that's a major release in Legacy Horizon.
 2 **Q.** A software release?
 3 **A.** Correct, yeah.
 4 **Q.** "... and that in this context was of interest because it
 5 was brought up in connection with the West Byfleet case.
 6 "If it was fixed, and therefore the bug wouldn't
 7 arise again, would a KEL, had it existed, have been
 8 deleted?"
 9 So did that reflect an understanding you had at the
 10 time about the processes relating to the deletion of
 11 KELs or is this simply an assumption that you --
 12 **A.** Yeah, I'm not sure. I mean, it seems from the way I've
 13 asked the question that I didn't know that at the time
 14 and that's why I was seeking clarification, yeah.
 15 I mean, I may have either started to suspect it, or --
 16 yeah. I mean, logically, it seems possible, doesn't it?
 17 So again, bearing in mind the fact that this
 18 Callendar Square was a Legacy Horizon issue, that
 19 related to Riposte. So by the time we got, you know,
 20 several years into operation of HNG-X then it would have
 21 had no operational relevance any longer.
 22 **Q.** What was your understanding at this stage about
 23 Fujitsu's internal policy in relation to the retention
 24 or deletion of KELs?
 25 **A.** In terms of KELs specifically, I don't know but I would
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1 response. You say:
 2 "John,
 3 "Thanks for this. It looks like [the KEL]
 4 JSimpkins338Q no longer exists, it wasn't in the set
 5 that we sent them. Do KELs get deleted?"
 6 So, as you said before, some uncertainty on your
 7 part as to what the correct procedures were.
 8 **A.** Yes.
 9 **Q.** The response you received from John Simpkins:
 10 "Yes KELs can get deleted.
 11 "I will see if I can dig out the deleted KEL
 12 details, or would you prefer that it is just stay as
 13 'deleted'.
 14 Presumably that was meant to read that "it just
 15 stays as deleted"?
 16 **A.** I think so.
 17 **Q.** What did you understand Mr Simpkins to mean when he
 18 wrote, "would you prefer that it just stay as deleted"?
 19 **A.** Yeah, I'm not sure. I mean, to be honest, I'm not
 20 really sure why he said that but, you know, I think I'd
 21 interpret it in the same way that I guess anyone would,
 22 which is that do you want me to not reveal it? I guess.
 23 **Q.** Essentially, was he asking you whether or not he should
 24 be concealing the existence of a deleted KEL, even if it
 25 could be retrieved?
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1 A. It certainly does sound like that. I don't really know
 2 what his intention is, to be honest.
 3 Q. What did you make of that suggestion at the time?
 4 A. I think that it -- I mean, I wouldn't agree with doing
 5 that and I don't think I did at the time, and I think
 6 that that we didn't follow or even discuss following
 7 that proposal, as it were.
 8 Q. Just going back, please, to your email, that you sent
 9 him, beginning on the 26th, in that, you said it looks
 10 like that particular KEL no longer exists. Do you know
 11 how you established that, namely that the KEL no longer
 12 existed?
 13 A. So, again, as I said before, I would guess that was by
 14 looking it up in the repository of KELs that I had on
 15 the SharePoint site and possibly also looking in the SSC
 16 website at the KEL repository. So the fact that it had
 17 been deleted does mean that it would no longer exist if
 18 you did a search in either of those places. You
 19 wouldn't find it.
 20 Q. By deletion, did you understand at that stage that we
 21 were talking about data that was irretrievable?
 22 A. I don't think that I was sure, because I think I was --
 23 as you can see here, that I wasn't even clear at that
 24 stage whether they could be deleted or not. So I'm not
 25 sure that I would have known what "deleted" meant,

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1 "I have managed to retrieve this from the deleted
 2 Horizon KELs table."
 3 Then he proceeds to, in the body of the email he has
 4 copied and pasted the information that he has
 5 recovered --
 6 A. Yes.
 7 Q. -- in relation to that KEL. Now, so far as you're
 8 aware, from where had Mr Simpkins retrieved this
 9 information?
 10 A. From something called the deleted Horizon KELs table
 11 I mean, yeah, that's all I knew at that stage.
 12 Q. Did you know where that table resided?
 13 A. Not -- not from that email, no. I mean, I think I found
 14 out later that it's somewhere within the SSC database.
 15 Q. Was this the first time that you became aware that there
 16 existed deleted Horizon KELs which could be retrieved by
 17 Fujitsu?
 18 A. Yeah, I think so.
 19 Q. Were you concerned to discover that there existed
 20 a repository of KELs of which you'd not previously been
 21 aware?
 22 A. Well, I think the answer is yes and I think from -- in
 23 the same email chain, you can see me asking whether
 24 we've told WBD that before and raising some issues
 25 around the fact that we have now some -- effectively

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1 necessarily. But you're right, deletion could be
 2 deletion but retrievable or deletion but not
 3 retrievable.
 4 Q. But that's not something to which you addressed your
 5 mind at the time, you don't think?
 6 A. Not immediately.
 7 Q. A short time later, so after confirming that he would
 8 make some enquiries and querying with you whether he
 9 should provide anything if he finds it, he writes to
 10 confirm that he has, in fact, retrieved the details of
 11 the deleted KEL; is that correct?
 12 A. Yes, it looks -- that's what he says, yes.
 13 Q. Could we please take a look at that email chain, which
 14 is at FUJ --
 15 A. Sorry, just one sec. So "I will see if I can dig out
 16 the deleted KEL details". So he's not, actually, at
 17 that stage saying that he has found it, I don't think.
 18 Q. No, we're going to move on to another chain. It's
 19 a different chain so we don't see that reference to
 20 whether it should stay deleted?
 21 A. Right.
 22 Q. This is at FUJ00179940, please, on page 2. So this is
 23 on the same day, about an hour later, after the email we
 24 have just looked at. He says:
 25 "Matthew,

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1 some more KELs that we haven't previously referred to.
 2 Q. We'll come to that. Just staying where we are for now,
 3 it would have occurred to you, would it not, that the
 4 previous assurance which you had given to Womble Bond
 5 Dickinson about having provided all historic and current
 6 KELs, was incorrect?
 7 A. I'm not sure that it did occur to me immediately in the
 8 context of the EDQ, no. I mean, this is like several
 9 months later, isn't it?
 10 Q. Sorry, not in the context of the EDQ but you were asked
 11 by Womble Bond Dickinson to give a specific assurance --
 12 A. Oh, right, yeah.
 13 Q. -- that you had disclosed all historic and current KELs
 14 and, on the basis of what John Simpkins had told you,
 15 you confirmed that was correct. I think you confirmed
 16 that was correct?
 17 A. Yes. Yes, correct. Yeah.
 18 Q. Now, what I'm saying is, it would have occurred to you,
 19 wouldn't it, that, if there existed deleted KELs which
 20 could be retrieved, you had not, in fact, provided all
 21 historic and current KELs to the Post Office's lawyers?
 22 A. Correct, yeah. So again -- well, I mean I don't think
 23 it occurred to me in terms of that statement but I think
 24 I go on to raise that question in this chain.
 25 Q. We will come to it.

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1 A. Yeah.

2 Q. Did you go back to Womble Bond Dickinson to notify them
3 that your earlier assurance about the disclosure of all
4 historic and current KELs was wrong?

5 A. Well, again, I think not immediately. But then, I think
6 we discuss it in this email chain and then I think
7 eventually we do go back and tell them that. Again,
8 I don't know about specifically referring back to that
9 email in which they asked that question and got that
10 response but I think we did provide them.

11 Q. Well, let's look now at how the issue was handled by you
12 and your colleagues. We're on the same document,
13 please, at page 1. At the bottom of that page we see --
14 this is your email to Dave Ibbett. Could you just
15 confirm his role, please?

16 A. So Dave Ibbett was a Project Manager, a Fujitsu Project
17 Manager, who had been tasked with helping to project
18 manage this exercise, basically.

19 Q. He was someone with whom you worked; is that correct?

20 A. Correct, yeah.

21 Q. So he was supporting you in the management of requests
22 for information from the Post Office's --

23 A. Correct, yes.

24 Q. There's also Pete Newsome and John Simpkins. So this is
25 following on from John's email to you; is that right?

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1 possibility that you would not share the KEL and the
2 associated PEAKs with the Post Office's lawyers; is that
3 fair?

4 A. It is fair to say that. I mean, I -- I think when
5 I wrote this email, I was assuming that we were going to
6 share it, hence "when", and then I think I considered
7 that someone else may have a different view, bearing in
8 mind that Pete Newsome is, effectively, the manager of
9 this exercise, and he may have taken a different view.
10 So, in a way, it's not really my decision but I think
11 I'm pretty clear that it's going to happen, actually.

12 Q. So your evidence is, essentially, you're looking to Pete
13 for direction on how to deal with it --

14 A. Yes.

15 Q. -- did you consider that consider providing relevant
16 information to the Post Office was optional?

17 A. Err --

18 Q. Was it your own view that it was optional?

19 A. I don't think it was, no.

20 Q. You do express here some concerns that the existence of
21 deleted KELs appears to be inconsistent with information
22 you've already provided to the Post Office's lawyers; is
23 that fair?

24 A. Yeah, I think so.

25 Q. If we scroll up to the top of the page, please. We can

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1 A. I believe so.

2 Q. If we scroll down, please, sorry, slightly, we can
3 see -- thank you. So you're forwarding John's email
4 now, copying in Pete Newsome and Dave Ibbett?

5 A. Yeah.

6 Q. You say:

7 "Pete, in looking into Lucy Bremner's questions
8 about whether there is a KEL for Callendar Square, John
9 has identified two PEAKs which he believes describe the
10 same issue, even if they were not raised in direct
11 relation to that same branch, and from that a KEL, which
12 has been deleted and was therefore not in the set of
13 KELs that we have shared with [Womble Bond Dickinson].
14 John has managed to retrieve the content of the KEL as
15 shown in the email below.

16 "When (if?) I share this KEL, indeed the PEAKs since
17 they reference the KEL, I'll need to raise the subject
18 of there being KELs which have been deleted. Is that
19 okay, have we previously mentioned to them that there
20 are deleted KELs?

21 "If we have to explain that then I suppose we need
22 to know why; John, do you know the criteria? Was this
23 a Horizon System only KEL that once fixed by S80, or
24 once superseded by HNG-X, was no longer required?"

Now, here you appear to be considering the

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1 see the first response you received to your query from
2 Pete Newsome. He says:

3 "Matthew
4 "I think we should send to [Womble Bond Dickinson]
5 saying how we identified the KEL and that it was deleted
6 from the database by John ..."

7 Sorry, presumably it should read 'but John'?

8 A. Mm-hm.

9 Q. "... was able to find a copy on a local drive.
10 "Pete."
11 So what Mr Newsome appears to say is, yes, we do
12 disclose the deleted KEL; is that fair?

13 A. Yes.

14 Q. But, by way of explanation for the late disclosure, he
15 suggests that you tell Womble Bond Dickinson that it was
16 found on a local drive?

17 A. Yes.

18 Q. Did you consider that statement to be true?

19 A. No, because I think John had -- I think in his -- well,
20 in his email beneath this he had said that he'd found it
21 in the deleted table and I think I probably had
22 a discussion with him in which he said that it was
23 a table within the database. So that, to me, would
24 immediately sound like it wasn't a local drive but was
25 a table within the SSC website somewhere.

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- 1 Q. From where do you think Mr Newsome obtained the
2 information that John had been able to find a copy on
3 a local drive?
4 A. I think -- well, I mean, I can only assume he's making
5 an incorrect assumption.
6 Q. Do you think it's possible that that was simply made up
7 by Mr Newsome to avoid any further questions about
8 deleted KELs?
9 A. It's possible.
10 Q. Please could we look at the response you received from
11 John Simpkins to your query about why the KEL had been
12 deleted. This can be found in a separate chain, please,
13 at FUJ00179952.

14 Thank you. At the bottom of that first page,
15 please, we can see an email from John Simpkins dated
16 26 September, in which he says, in answer to your
17 question:

18 "Yes, I would expect that once S90 was released the
19 proved that this was fixed the KEL was deleted."

20 So, obviously, some grammatical errors there but
21 essentially saying that it was his expectation that it
22 was deleted once the release was thought to have fixed
23 the problem; is that fair?

- 24 A. Yes, well, he's saying he -- it looks like he's assuming
25 that. He doesn't know that for a fact but --

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- 1 why it was there; is that what you're asking?
2 Q. No, forgive me. I'm simply making the point that here,
3 a short time later, he's advancing a further
4 explanation.
5 A. Mm-hm.
6 Q. But forgive me, he's instructing you to give a different
7 explanation as to why the KEL had been -- as to why the
8 deleted KEL had been discovered.
9 A. Well, no, I'm saying that's too separate things though,
10 isn't it? So the reason it's been discovered is not the
11 same as the reason it was deleted.
12 Q. Forgive me.
13 A. Yeah, he's providing the reason why it was deleted, not
14 how or why it was found.
15 Q. But providing an explanation as to why it wasn't
16 disclosed in the first place; isn't that the
17 underlying --
18 A. Um, yeah, I guess so. It's -- yeah. I mean, the fact
19 that it was deleted is the reason that it wasn't
20 disclosed in the first place, not why it was deleted
21 though. I mean, why it was deleted, in some ways, could
22 be another reason, couldn't it? But it's connected but
23 it's not the same thing.
24 Q. No, I agree with that. But it's all part of, is it not,
25 an attempt to explain away why Fujitsu has discovered

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- 1 Q. He's making an assumption?
2 A. Yeah.
3 Q. Do you know why Mr Simpson would have been making
4 an assumption rather than knowing the reason for the
5 deletion of the KEL?
6 A. I mean, I think unless somebody had made a note as to
7 why the KEL was deleted, then there wouldn't be any
8 other explanation recorded anywhere. So I think he
9 would just -- he's just kind of logically deducing that
10 that is almost certainly the case, in his opinion.
11 Q. If we scroll up to the top of that first page, please,
12 we now see a further instruction from Pete Newsome. So
13 very shortly after the email we looked at earlier, in
14 which he suggested providing explanation about a local
15 drive. He now says:
16 "Matthew
17 "Include this as to why we deleted the KEL."
18 Now, this explanation didn't rely on a purported
19 discovery of the KEL and a local drive but upon
20 an assumption that Mr Simpkins had made that the KEL had
21 been deleted; is that fair?
22 A. So that's two separate things, though, isn't it?
23 Q. Forgive me, I'm saying so we've moved on from the
24 original explanation, which was --
25 A. So one of them is how he found it and the other one was

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- 1 a KEL that wasn't previously disclosed?
2 A. I guess so, yeah.
3 Q. This is the explanation which you provided to Womble
4 Bond Dickinson, is it not, when you handed over the
5 deleted KEL; do you recall that?
6 A. The explanation as to why it was deleted, I believe that
7 is what I told them.
8 Q. Can we look at FUJ00159985. Thank you. Your email is
9 at the bottom of page 1, on to page 2. Thank you. So
10 it's dated 28 September. You say:
11 "Lucy,
12 "We have looked into this, and it appears that the
13 relevant PEAKs are [give the references] attached.
14 "The two related KELs were deleted, due to the fact
15 that the S90 release was proven to have fixed the issue,
16 and they so would not be included in the set of KELs
17 which you have.
18 "We have been able to retrieve the text from one
19 [of] them [it should presumably read] however, as
20 attached [and you provide that as KEL JSimpkins338Q]."
21 Now, in this email, you assert as fact that the two
22 related KELs had been deleted because it was shown the
23 issue had been fixed by a software release, do you not?
24 A. Yes.
25 Q. You didn't know whether that was, in fact, the reason

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1 why they'd been deleted, did you?
 2 **A.** Well, I was given that explanation by John Simpkins, and
 3 assumed, therefore, that it was true, since that was his
 4 view, and I'm not sure what other explanation -- I mean,
 5 yeah, I -- I'm not --
 6 **Q.** Forgive me, the point I'm trying to make is that you had
 7 an assumption that he'd made and you accepted that that
 8 was an assumption and you assert it here as a fact?
 9 **A.** Okay. Yes.
 10 **Q.** If you were being entirely accurate, you would have
 11 said, "We don't know why they were deleted but we assume
 12 it was because the problem had been fixed by a software
 13 release", would you not?
 14 **A.** I could have stated it in that way. I'm not sure that
 15 it was clear to me how sure John Simpkins was of that --
 16 his view. So, I mean, I -- if what I'm saying --
 17 **Q.** If he wasn't sure if his view, how could you be sure --
 18 **A.** Well, I'm not sure that I had any particular reason to
 19 doubt it but you're right though: maybe this is
 20 overstated in terms of sounding like it's a 100 per cent
 21 certainty.
 22 **Q.** Were you hoping to shut down any further enquiries into
 23 the existence of deleted KELs?
 24 **A.** I don't think so, no. I mean, to be honest, I am not
 25 sure that I would have had any interest in doing that.

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1 the corresponding issues are fixed ..."
 2 She then lists four questions. Firstly:
 3 "Is that procedure a general rule?
 4 "If so, is it enshrined in a formal process?"
 5 Thirdly:
 6 "If so, which -- and do we have the corresponding
 7 documentation?"
 8 Fourthly:
 9 "Are all deleted KELs available in a searchable
 10 archive? I assume that text could, in principle, be
 11 retrieved from other KELs."
 12 She asked for an urgent response because they are
 13 having a call with the experts that morning.
 14 Now, you refer these queries to John Simpkins; is
 15 that right?
 16 **A.** I think so.
 17 **Q.** It appears you carry out some research yourself into the
 18 processes for deletion of KELs; is that right?
 19 **A.** I think so.
 20 **Q.** On the basis of that research and the responses you
 21 received from Mr Simpkins, you respond to Ms Bremner.
 22 We can see that response, please, at FUJ00160063, at
 23 page 2, please. So we see a list of the original
 24 questions and your responses in bold; is that correct?
 25 **A.** Correct, yeah.

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1 **Q.** Do you think you were being entirely transparent in the
 2 explanation that you gave?
 3 **A.** I think possibly more information could have been given
 4 but, I mean, to be honest, I think I thought I was being
 5 helpful and providing them with an answer to the
 6 question that they had given. I mean, I don't -- to be
 7 honest, I just don't think -- no -- it's of no interest
 8 to me to hide whether there were deleted KELs or not.
 9 It makes no difference to me.
 10 **Q.** Would you have been concerned, though, about the
 11 reputation of Fujitsu and how it had handled the
 12 disclosure of KELs to date?
 13 **A.** Not really.
 14 **Q.** Two weeks later, you receive a number of queries from
 15 Womble Bond Dickinson about the deletion of KELs; is
 16 that right?
 17 **A.** I think so, yeah.
 18 **Q.** Can we take a look at that email, please, at
 19 FUJ00181400. Thank you. If we could scroll down,
 20 please, to page 4. So this is an email of 11 October
 21 from Lucy Bremner. She says:
 22 "Matthew,
 23 "We have sent the two KELs for Callendar Square to
 24 our IT experts. They have come back with the following
 25 questions for you relating to KELs being deleted when

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1 **Q.** In square brackets, you've written "Matthew Lenton" to
 2 indicate you're the author of the text?
 3 **A.** Yes.
 4 **Q.** So you answer the first two questions in the
 5 affirmative, that's correct?
 6 **A.** Yes.
 7 **Q.** The third you provide some documentation that you've
 8 managed to source; is that from Dimensions?
 9 **A.** Correct.
 10 **Q.** Finally, the fourth question, about whether or not
 11 deleted KELs are searchable and can be retrieved, you
 12 state:
 13 "They are not text searchable in their current
 14 location, but all deleted KELs can potentially be
 15 retrieved, although this would require additional time
 16 and effort to do, after which those retrieved would then
 17 be searchable. It is believed that all deleted KELs are
 18 still in the archive table."
 19 Now, from where had you obtained that information?
 20 **A.** Almost undoubtedly from John Simpkins.
 21 **Q.** Did you make any specific enquiries of Mr Simpkins as to
 22 whether or not all deleted KELs could in fact be
 23 retrieved?
 24 **A.** Well, I was going to say I think it transpires later on
 25 that that's not correct and that there were deleted KELs

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1 that were retrievable and deleted KELs that were not
 2 retrievable.
 3 **Q.** Thank you. We will come on to that shortly.
 4 Now, I think within minutes of sending this response
 5 to Womble Bond Dickinson, you receive a further email
 6 asking you to confirm how many KELs have been deleted --
 7 **A.** Right.
 8 **Q.** -- is that right?
 9 **A.** I think so.
 10 **Q.** We can look at that, please, FUJ00160063. I think that
 11 may be where we are anyway. On the first page, please.
 12 Thank you. So she follows up with that query, which you
 13 refer to John Simpkins, please, at FUJ00181400. Thank
 14 you. So, at the bottom of the first page, please, we
 15 can see your email to John Simpkins:
 16 "John, do you know how many KELs have been deleted
 17 to date?
 18 "That's [Womble Bond Dickinson's] question for now,
 19 are you able to provide an answer please?
 20 "I think I know what's coming next."
 21 What did you mean by that?
 22 **A.** Well, once we tell them, they'll ask for all of them.
 23 **Q.** We can see Mr Simpkins' response, in the middle of the
 24 page, please, at 16.01. He says:
 25 "Horizon deleted KELs -- [there are] 1,281.
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1 **Q.** I think it transpires in early November, you do provide
 2 a tranche of deleted KELs, 1,491, in response to their
 3 request; do you recall that?
 4 **A.** I believe so, yeah.
 5 **Q.** Now, in early February 2019, you receive several queries
 6 from Womble Bond Dickinson which were prompted by the
 7 claimants' technical expert. Do you have any
 8 recollection?
 9 **A.** I'm sure I do. If you show me --
 10 **Q.** Yes, of course.
 11 **A.** -- more specifically what we're talking about.
 12 **Q.** That email is at FUJ00086758, please. Thank you,
 13 page 3, please. If we could scroll down, please, to the
 14 bottom of page 3, thank you, so this is 6 February from
 15 Lucy Bremner, she says:
 16 "Matthew,
 17 Jason Coyne", who was the claimant's technical
 18 expert. Do you recall him as such?
 19 **A.** Yes, yeah.
 20 **Q.** "... has referred to a number of PEAKs/KELs in his
 21 supplemental report that he states have not been
 22 disclosed. Can you let me know why they are not in the
 23 PEAK/KEL extracts that we have received from you? Is it
 24 because they were all from the system 'PiniCL'? If you
 25 can provide any dates relating to them that would be
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1 "HNG-X [Horizon Online] deleted KELs -- 212."
 2 He goes on to say:
 3 "Please note however that come KELs would have been
 4 deleted because they were wrongly raised as well as
 5 those out of date. So we cannot confirm that all the
 6 information in these is valid, ie if the SMC raised
 7 a KEL wrongly the SSC may well have deleted it as such.
 8 Therefore I have reservations about supplying an export
 9 of deleted KELs."
 10 What we appear to see here, do we not, is some
 11 reluctance by John Simpkins to consent to the disclosure
 12 of the deleted KELs; is that fair?
 13 **A.** Yeah, I mean, I'm not completely clear what he means
 14 about reservations. I mean, I don't know whether he
 15 means reluctance to supply them at all or just those are
 16 his reservations, in that there may well be
 17 a significant number of deleted KELs that are actually
 18 not valid as KELs at all. I mean, I think I recall
 19 there was a fairly, fairly regular problem with SMC
 20 raising KELs for which there were already KELs. So you
 21 would end up with a duplicate. And I think he's
 22 referring to those also being included in that set.
 23 So I'm -- it's possible that his reservation is more
 24 about we can't just send the whole load over because
 25 some of them just simply aren't valid and never were.
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1 appreciated."
 2 We can see here you have again adopted the method of
 3 putting your responses in the body of the email in bold.
 4 In relation to the KELs, you say several of them are
 5 deleted, not deactivated, and they cannot be retrieved.
 6 Now, that, of course, was different to what you'd
 7 said previously, which was that you'd understood them
 8 all to be retrievable.
 9 **A.** Yes, although, as I say, later it transpired that some
 10 deleted KELs were not retrievable. I'm not quite clear
 11 whether this is before or after that statement. I mean,
 12 I think you can see from this that there's a kind of
 13 lack of knowledge on my part about whether -- about the
 14 status of deleted KELs.
 15 **Q.** If we go to page 2, please --
 16 Forgive me, sir, I may have an erroneous reference.
 17 In any event, I think we're due to give the transcriber
 18 a break, so I wonder if we could, please, briefly break
 19 now, whilst I make sure I have the correct reference
 20 when we come back and I can take Mr Lenton to the
 21 relevant email.
 22 **SIR WYN WILLIAMS:** Certainly. When you say "briefly", do
 23 you mean we take a 15-minute afternoon break or just --
 24 **MS HODGE:** Yes, please. Our regular break, thank you.
 25 **SIR WYN WILLIAMS:** Fine. So it's 2.50, so 3.05.
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1 **MS HODGE:** Thank you sir, yes.
 2 **(2.50 pm)**
 3 **(A short break)**
 4 **(3.05 pm)**
 5 **MS HODGE:** Good afternoon, sir, can you see and hear us?
 6 **SIR WYN WILLIAMS:** Yes, thank you.
 7 **MS HODGE:** Sir, thank you for the time.
 8 The reference, please, is FUJ00086758.
 9 Mr Lenton, you mentioned more than once in your
 10 evidence there was some ambiguity in the terminology
 11 used but that you did clarify that in an email to Womble
 12 Bond Dickinson. This is your email of the 13th -- well,
 13 it's Ms Prime's email of 13 February. We can see at the
 14 very top there you confirm that you've inserted your
 15 comments into the body of the email --
 16 **A.** Yes.
 17 **Q.** -- as you'd done on previous occasions. So if we scroll
 18 down, please, to Ms Prime's email, where we have her
 19 questions and your answers in bold. The first related
 20 to the PinICL system which was the predecessor to PEAK;
 21 is that right?
 22 **A.** Yes, that's correct.
 23 **Q.** The second point relating to deleted KELs. She asks:
 24 "... are [these] not retrievable? Or were [they]
 25 provided to us on 5 November 2018 ..."

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1 **Q.** You go on to confirm that that is the set of KELs that
 2 had been provided to the Post Office's lawyers in
 3 November 2018.
 4 Then we have another category which you describe as
 5 deactivated KELs. She says:
 6 "... these were provided to us in the extract in
 7 [March or November]?"
 8 You say:
 9 "These are KELs that have not been deleted into the
 10 'deleted table' but are excluded from the SSC's default
 11 searches which focus on live KELs, but can be included
 12 easily by changing the search criteria."
 13 They formed part of the original March batch, so
 14 they were presumably the historic KELs that you did
 15 provide in March 2018; is that correct?
 16 **A.** I believe so, yes.
 17 **Q.** Then a fourth category is deprecated KELs, is that the
 18 correct pronunciation?
 19 **A.** Yes.
 20 **Q.** She said:
 21 "... these were provided to us in the extract in
 22 March 2018, or on 5 November 2018?"
 23 So asking "Have we had them?"
 24 You say:
 25 "When a KEL is updated, the old version of that same

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1 So this is triggered by some confusion as to whether
 2 or not deleted KELs were or were not retrievable?
 3 **A.** Yes.
 4 **Q.** You explained that there are two categories. Firstly,
 5 deleted KELs that are no longer retrievable because
 6 they've been completely deleted. You said:
 7 "This was before the SSC started saving them into
 8 a 'deleted table'.
 9 I think you said in your evidence that that was not
 10 something you would approve of from a document
 11 management perspective; is that correct?
 12 **A.** Correct, yeah.
 13 **Q.** You say:
 14 "These cannot be provided, and if a KEL is referred
 15 to by us as not being retrievable, and, I believe, all
 16 KELs that are referred to in [the Claimants' expert's]
 17 report as not having been disclosed, then they fall into
 18 this category", so deleted KELs which you cannot
 19 retrieve.
 20 The other category of deleted KELs are those which
 21 are retrievable due to being deleted into a deleted
 22 table, to which Mr Simpkins originally referred you in
 23 response to the Callendar Square bug query; is that
 24 correct?
 25 **A.** I believe so, yeah.

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1 KEL is deprecated, so these are superseded versions of
 2 live or deactivated KELs. We have only provided the
 3 most recent versions, so we have not separately provided
 4 these superseded versions. Note that there are no
 5 deprecated versions of KELs in the category 2a, that
 6 being KELs which were deleted before to the introduction
 7 of the deleted KEL table and which fall within your
 8 definition of irretrievable; is that right?
 9 **A.** Correct.
 10 **Q.** The final category she has are live KELs. You confirm
 11 these were provided in March and you confirm when she
 12 says, "Are there any other ... KELs", no, all KELs are
 13 covered by categories 2 to 5 above.
 14 Now, the fourth category of deprecated KELs, this
 15 was another category of historic KELs which hadn't been
 16 disclosed; is that right?
 17 **A.** So, rather than using the word "historic KELs", because
 18 that has possibly the implication that they're no longer
 19 current KELs, so deprecated KELs could be just
 20 superseded versions of any KELs that exist.
 21 **Q.** So both current and historic?
 22 **A.** Well, I'm assuming that deactivated KELs could be
 23 regarded as historic but, from what it says here there
 24 would be deprecated or superseded versions of those.
 25 **Q.** Of the deactivated ones?

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1 A. Yeah, as well as the live ones, yeah, of course.
 2 Q. Now, as earlier iterations of either a current or
 3 a deactivated KEL -- sorry, these were earlier
 4 iterations, that's essentially the point you're making?
 5 A. Yes.
 6 Q. They would have contained information relating to the
 7 symptoms of the fault, it's underlying causes, the
 8 solution and related PEAKs, would it not?
 9 A. Possibly.
 10 Q. Be consistent with what we see in other KEL documents?
 11 A. Yeah, mm-hm.
 12 Q. If they contained that information, would they not have
 13 provided valuable evidence about the detection,
 14 diagnosis, and remedial action which had been taken
 15 previously in response to the --
 16 A. Potentially.
 17 Q. Possibly?
 18 A. Yes. I mean, bearing in mind of course that the most
 19 recent versions were provided.
 20 Q. The current versions?
 21 A. Yeah.
 22 Q. Now, I think the point you make later is that here in
 23 this email, perhaps not advertising, but you were
 24 drawing to the attention of the Post Office's lawyers
 25 that there is yet a further category which Fujitsu holds

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1 relation to KELs ..."
 2 That's the passage of course which we looked at
 3 earlier. She said:
 4 "Can you confirm that this is definitely the correct
 5 position ... We need to respond to Freeths ..."
 6 Now, your response a little further up,
 7 unsurprisingly, was that that was not entirely correct.
 8 You say:
 9 "The second sentence is not correct, [that being]:
 10 'The previous entries/versions of the current entries
 11 are no longer available'.
 12 You say:
 13 "You may recall that there are three status
 14 categories of KEL: current, deprecated and deleted. For
 15 those that are current or deprecated, they have been
 16 updated in such a way that previous content is not
 17 permanently overwritten, but instead a new version is
 18 created, with the previous versions being retained and
 19 accessible. For those that have been deleted, only the
 20 last version at the point of deletion has been
 21 retained."
 22 Now, you had disclosed a batch of deleted KELs in
 23 November, that's correct, isn't it? We've covered that.
 24 A. Yes.
 25 Q. But you hadn't disclosed any of the KELs falling into

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1 which hasn't been disclosed?
 2 A. Correct, yeah, and yeah, as I'm sure you're leading to
 3 already, this is contrary to what was stated in the EDQ,
 4 yeah.
 5 Q. So we come, then, to a further query in late September
 6 2019 and this relates to the accuracy of the Electronic
 7 Document Questionnaire. Do you recall that being raised
 8 with you by the Post Office's lawyers?
 9 A. I do. It's -- did you just tell me the date just then
 10 it.
 11 Q. This is late September?
 12 A. Yeah, I mean, it was after this email, isn't it,
 13 I believe?
 14 Q. That chain, please, is FUJ00166835.
 15 A. Yeah, so it's considerably after that last email,
 16 I think, in fact, isn't it?
 17 Q. Thank you. Pages 9 to 10. Bottom of page 9 on to
 18 page 10, please. Sorry, if we scroll down, please,
 19 a little further, we'll have the original email from
 20 Ms Bremner. Thank you. So that's 30 September 2019.
 21 She says:
 22 "Matthew,
 23 "Post Office is seeking to closed from its
 24 Electronic Documents Questionnaire submitted back in
 25 2017. It's seeking to rely on the following quote in

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1 the deprecated category?
 2 A. That's correct, yeah.
 3 Q. Do you recall how many deprecated KELs existed?
 4 A. I believe a figure of something like 5,000.
 5 Q. Could we, please, turn to FUJ00166835. Thank you. So
 6 this is in early October. You've been asked to provide
 7 an entirely refresh extraction of KELs; is that correct?
 8 A. Yes.
 9 Q. Here you provide a breakdown of the different
 10 categories. We see there against deprecated KELs there
 11 were 6,155; is that right?
 12 A. Right.
 13 Q. Does that sound correct?
 14 A. Yes.
 15 Q. Is that the number of KELs which were disclosed by
 16 Fujitsu after the conclusion of the Horizon Issues
 17 trial?
 18 A. That's the total number of new documents that were
 19 disclosed, yeah, because it says that there were 14,365
 20 disclosed, of which about 8,000/9,000, had already been
 21 disclosed.
 22 Q. I think you've accepted that these 6,155 documents might
 23 have provided valuable evidence about the detection,
 24 diagnosis and remedial action taken to address known
 25 errors in the system; is that right?

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1 A. Potentially.
 2 Q. I'd like to move on to a new topic, please, which
 3 relates to your knowledge of and information which you
 4 provided about remote access. In your statement, you
 5 say you were not aware until the Group Litigation that
 6 Fujitsu staff had the ability to insert transaction data
 7 into branch accounts without the express knowledge or
 8 consent of the subpostmaster; is that right?
 9 A. Correct. Yeah.
 10 Q. It appears, from the documents we have, that this issue
 11 was brought to your attention in or around May 2018
 12 because of a request for information made by the
 13 claimants' technical expert; is that right?
 14 A. Right. I think so.
 15 Q. If we look, please, at FUJ00222620. Now, I think,
 16 please, if we could scroll to the very bottom of that
 17 document, we see the original request from Womble Bond
 18 Dickinson. Thank you. So this is just for reference.
 19 This was the genesis of the request that came in,
 20 requests for information from the claimants' experts.
 21 You were asked, were you not, to identify documents
 22 which were responsive to that request?
 23 A. Yes.
 24 Q. One of the topics covered by the claimants' expert in
 25 his request for information was remote access; do you

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1 following page -- forgive me, and one on, please. Thank
 2 you.
 3 So the other questions relating to remote access
 4 1.14 to 1.16. 1.14 states:
 5 "Can it be described what privileges and
 6 capabilities administrators had in relation to branch
 7 remote access and the relevant processes and
 8 procedures?"
 9 1.15:
 10 "Please describe how transaction amendments
 11 (including reversals and balancing transactions) can be
 12 identified for those which were not carried out by the
 13 SPM in the audit/transaction data/logs ..."
 14 So if we can, please, briefly look at the comments
 15 on the followed page, these are comments from the Post
 16 Office's lawyers. J14 and J15 indicate their
 17 understanding that the query relates both to balancing
 18 transactions and privileged user access; do you see
 19 that?
 20 A. Mm-hm, yeah.
 21 Q. Now, I think it's right, is it not, you took steps to
 22 identify documents which you understood to be responsive
 23 to those requests; is that right?
 24 A. I believe so, yeah.
 25 Q. You also sought information from a subject matter

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1 recall that?
 2 A. I believe so, yeah.
 3 Q. I wonder, please, if we could show the information
 4 request, it bears the reference FUJ00222364. Thank you.
 5 The relevant section relating to remote access, please,
 6 is on page 2, under the heading "In relation to Issue
 7 7". Forgive me, this contains the comments. It will be
 8 the following page. Thank you.
 9 If we scroll down, please, "In relation to 7", thank
 10 you. So at question 1.13, the claimants' expert asked:
 11 "When Fujitsu accessed branch accounts to modify or
 12 insert data, can it be described what the need for that
 13 access was and what modifications were performed? Can
 14 it be confirmed how many times this occurred?"
 15 Now, we can see some small boxes with the letters
 16 and numbers J9, J10, J11. Do you recall what they were?
 17 A. So I think these are comments by Jonathan Gribben from
 18 WBD.
 19 Q. Thank you. So just dealing first with question 1.13,
 20 essentially, what you're being asked there is what
 21 records you hold or what records Fujitsu hold indicating
 22 for what reason and how often Fujitsu had inserted data
 23 into branch accounts; is that fair?
 24 A. Right. Yes.
 25 Q. Thank you. Could we scroll down, please, to the

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1 expert, which, in this case, was Stephen Parker; is that
 2 right?
 3 A. Yes, I think so.
 4 Q. Let's look briefly at that exchange, please. It can be
 5 found at FUJ00222620. Thank you. Your email to
 6 Mr Parker can be found at the top of page 2, please.
 7 Thank you. It's dated 24 May 2018. You explain to him
 8 the documents which you've attached to your email. They
 9 comprised the request for information, which we've just
 10 looked at, as well as a table of documents, that you'd
 11 prepared that you understood to be responsive to the
 12 request; does that sound right?
 13 A. Yes.
 14 Q. You then say this, the third paragraph:
 15 "Questions 1.13 to 1.16 all relate to issues around
 16 remote access to the live system and corrections ...
 17 Something I've tried to point out is that there are two
 18 different processes both named 'Transaction
 19 Correction' -- one is the TPS/POL Finance Systems
 20 corrections generated wholly within POL which are
 21 delivered via the file described in [you state the
 22 reference], and I understand this happens regularly.
 23 The other is the 'Transaction Correction Tool' which is
 24 described in [you state document reference] which
 25 happens very rarely (once?); this is where I'm getting

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1 referred to SSC. Are you able to provide additional
2 information in response to the questions in the comments
3 labelled 'JONATHANG' for 1.13 to 1.16? Are there logs
4 of it being requested, being done, and what is the
5 procedure for authorising and doing it ..."

6 In that section we've just read, you identify two
7 tools by which corrections can be made to branch
8 accounts, the first is in the Post Office's back end
9 accounting systems; is that correct?

10 A. I believe, so, yeah.

11 Q. The second being a transaction correction tool developed
12 for the use in Horizon Online?

13 A. Yes.

14 Q. You don't make any mention there of privileged access
15 rights; is that fair?

16 A. I don't, no.

17 Q. Why is that?

18 A. Well, I'm not sure. I'm just simply not commenting on
19 it. I suppose it's sort of covered by the last sentence
20 in that paragraph in a way, since that includes asking
21 about the procedure for authorising and doing it.

22 Q. Were you aware at that stage of what those rights were
23 and what they entailed?

24 A. I don't think so.

25 Q. You receive a response from Mr Parker on 25 May and, if

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1 Q. "These systems will contain full details of the required
2 correction, method of execution, approval, etc."

3 Now, to which tools or methods of access did you
4 understand Mr Parker to be referring here?

5 A. When he says "These systems", you mean?

6 Q. Yes?

7 A. So he's referring to MSC or OCP.

8 Q. But, specifically, MSC and OCP were not tools, were
9 they, to insert data into a branch account?

10 A. Okay, so sorry, you're asking about --

11 Q. The method --

12 A. The methodology.

13 Q. -- of the record?

14 A. Okay, sure, um --

15 Q. To what method did you understand him to be referring?

16 A. So he's talking about the balancing transactions, so the
17 HNG-X tool, that is referred to, the second one referred
18 to in my previous email. So he's saying, not the
19 POL-TC.

20 Q. You didn't understand him to be referring to privileged
21 access rights?

22 A. He's not overtly referring to that, is he? But the ...

23 he's not but, again, I think it's kind of -- in his
24 mind, I'm sure it's contained in that last sentence

25 where he talks about approvals, et cetera. So yeah.

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1 we scroll back to the top of the first page of this
2 document, please, thank you. He says:

3 "Matthew,

4 "Starter for 10 as follows ..."

5 In response to that first query, question 1.13, he
6 states:

7 "There is no functionality in Horizon for either
8 a branch, Post Office or Fujitsu to modify or remove
9 transaction data once it has been recorded in a branch's
10 accounts. It is only possible to post auditable
11 correcting transactions to a branch's accounts."

12 He then states:

13 "In the very rare circumstances where an accounting
14 error cannot be corrected by POL's use of a TC
15 [transaction correction, presumably] and it is necessary
16 for support to make such a correction it has been
17 subject to whatever change approval process is in use at
18 that time. Currently MSC ..."

19 What is that referring to, please?

20 A. That's a system. It stands for Managed Service Change.

21 Q. "... latterly, OCP."

22 Which was?

23 A. Operational Change -- I'm struggling to remember what
24 the P stands for -- process. Proposal, sorry. That's
25 right.

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1 He's not explicitly referring to it, though, I agree.

2 Q. Did you make any further enquiries with him at this
3 stage, do you know?

4 A. I don't remember off the top of my head.

5 Q. The issue of remote access arose again in January 2019,
6 so quite some time later, when the Post Office's lawyers
7 requested disclosure of logs relating to the auditing of
8 privileged user access.

9 A. Right.

10 Q. Do you have any recollection of that?

11 A. I think so, yeah.

12 Q. If we could look, please, at FUJ00188147. Thank you.

13 Page 5 and on to page 6, we can see the original
14 request, please. Thank you. So it arose in connection
15 with, I think on this occasion, the evidence of Torstein
16 Godeseth, and it was a query relating to managed service
17 change, which we saw referenced in Mr Parker's previous
18 email, and to what we call sign-off documents. What
19 were they, please?

20 A. Well, managed service change involves a method of
21 proposing and planning a change to a live system and
22 then sign off means somebody approving it.

23 Q. So it was suggested at the time these provided an audit
24 log of the use of privileged access; is that fair?

25 A. Correct, yeah. They're like a manual audit log though,

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1 so somebody actually --

2 **Q.** It requires an individual --

3 **A.** Yeah, correct.

4 **Q.** Now, is it right you carried out some enquiries to

5 locate relevant logs of the type we see here, the

6 managed service change logs; do you recall doing that --

7 **A.** I think so, yeah.

8 **Q.** -- searching the system, which produced only nine

9 positive results.

10 **A.** Err, yeah --

11 **Q.** If we scroll up please to page 3 --

12 **A.** I think so, yeah. I think I recall this, yeah.

13 **Q.** Thank you. So you email Mr Parker, Mr Ibbett and

14 Mr Godeseth to say that you've, I think, run some

15 searches on the MSC data archive and this has

16 produced -- there are ten listed, you say, that match

17 the search that you've run, the last one being the only

18 MSC with APPSUP in its title?

19 **A.** Right.

20 **Q.** That being the Application Support privileged access; is

21 that right?

22 **A.** Yeah, correct.

23 **Q.** You then cite one of the logs entitled "LIVE -- Remote

24 access to APPSUP database role from SSC users". You say

25 that one isn't relevant; that leaves nine examples --

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1 logs?

2 **A.** Yes, that's right, yeah, so -- yes, indeed.

3 **Q.** If we scroll down to the bottom of his email, he says:

4 "Not sure if this is an issue with the dataset or

5 the search method?"

6 That is to say he's not agreeing that nine could be

7 the right number --

8 **A.** It sounds --

9 **Q.** -- and he's querying why it is --

10 **A.** Yeah.

11 **Q.** -- that your search has thrown up that number?

12 **A.** Yeah, mm-hm.

13 **Q.** I think you then carried out some further searches, is

14 that right, in which you established an additional 61

15 instances in which the privileged access rights have

16 been used; is that correct?

17 **A.** I think so, yeah.

18 **Q.** When you referred those results back to Mr Parker, he

19 suggested again that that appeared to be low, did he

20 not?

21 **A.** Yeah, he did, yeah.

22 **Q.** Could we please take a look at his response, and the

23 reasons which he gives, and that's at page 1, please, of

24 this document. It's in the middle of the page, please,

25 Mr Parker's email of 4 January. He says:

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1 **A.** Mm-hm.

2 **Q.** -- five of which are from 2010. You're saying to

3 Mr Parker, Mr Ibbett, Mr Godeseth, "Does that sound

4 realistically like it might be all there are?" So nine

5 instances --

6 **A.** Mm-hm, yeah.

7 **Q.** -- of manually recording the use of the access right --

8 **A.** Yeah.

9 **Q.** If we scroll up a bit, please. You have a response back

10 from Mr Parker, in which he says:

11 "For the use of APPSUP with full MSCs, that's

12 a reasonable number BUT I'm surprised that the search is

13 not throwing up any subtasks."

14 Can you translate that for us, please?

15 **A.** I think so, yeah, I think there's a concept within MSC

16 of having an individual MSC for a task or a change and

17 then there's also having -- I think it's called possibly

18 a master MSC. So where it's effectively an MSC covering

19 off a whole series of separate but possibly identical or

20 similar tasks that are carried out under that

21 authorisation, I think. That's what it's referring to.

22 **Q.** He then cites an example of where he's found such

23 a subtask, is that right --

24 **A.** I think that's right, yeah.

25 **Q.** -- which hasn't been picked up by your search of the MSC

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1 "It still seems low. The trouble is the systems

2 were not designed for this kind of retrospective

3 interrogation and just don't support it. There is no

4 tag on an incident or change control which classifies

5 the kind of remedial action needed, the description of

6 any remedial action can be in a number of places."

7 Then he cites two examples of how a user might have

8 recorded the use of the tool but not done so explicitly;

9 is that fair?

10 **A.** Correct, yeah.

11 **Q.** He says:

12 "I think we need to give the claimants the results

13 of this search while:

14 "(a) Clearly telling them the criteria used to

15 search.

16 "(b) Caveatting that we do not believe it is

17 complete and that it is not practical to return

18 a complete list because they would require applying

19 a mark one eye ball to all 220,000 PEAKs."

20 What did you understand Mr Parker to mean by

21 applying a mark one eyeball to all 220,000 PEAKs?

22 **A.** I think he means that somebody is going to have to look

23 at literally each one of them to determine whether that

24 role was used in order to close out that PEAK or as part

25 of that PEAK. I mean, I think, generally, my

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1 understanding of this is when he says there is no tag,
 2 which classifies the kind of remedial action needed, he
 3 means there isn't a tick box, for example, that says,
 4 use APPSUP, tick, and therefore you'd be able to
 5 retrieve them more easily knowing that it had been used.
 6 **Q.** So unless somebody went through each one of the PEAKs,
 7 you couldn't say definitively --
 8 **A.** That's my understanding of what he's saying, yeah.
 9 **Q.** -- how many times it had been used or why --
 10 **A.** Correct.
 11 **Q.** -- and what had been done with it?
 12 **A.** Yes.
 13 **Q.** Three days later you respond to Mr Parker, it appears
 14 following a conversation with the Post Office's lawyers,
 15 and we see that, please, at the very top of this page.
 16 You say:
 17 "Steve, I think you are right -- we haven't yet
 18 covered off the MSC question, despite what Jonny just
 19 said."
 20 Can you confirm who the reference to Jonny is?
 21 **A.** Jonathan Gribben from WBD.
 22 **Q.** You then say:
 23 "Below is where we are up to in the discussion. As
 24 he has said he is happy, shall we let it lie for a bit
 25 and see if it comes up again? Or shall we provide what
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1 Parker, yeah, but I'm asking him to make the decision.
 2 **Q.** Now, approximately two months later, you received
 3 a further query from WBD concerning the ability of SSC
 4 users to grant themselves privileged access without
 5 prior authorisation. Could we look at that, please, at
 6 FUJ00089798.
 7 Thank you. It's on page 2, please. We can see the
 8 original request. So this one's from Andrew Parsons,
 9 a partner at Womble Bond Dickinson. He says:
 10 "One follow-up question on APPSUP, which I think may
 11 be for Dave Haywood(??)"
 12 Who was Dave Haywood, please?
 13 **A.** So he is the -- well, he was and is the Lead Security
 14 Architect at Fujitsu, for Post Office Account.
 15 **Q.** He says:
 16 "I have attached the relevant PEAK. Could Dave (or
 17 someone at [Fujitsu]) explain why it took 4 years for
 18 this issue to get resolved?
 19 "We suspect that Cs [a reference to the claimants]
 20 will attack [Fujitsu] on this PEAK saying that [Fujitsu]
 21 knew SSC had more access permissions than they should
 22 have had and that [Fujitsu] were dilatory in fixing that
 23 issue. If there is an explanation for why it took so
 24 long that would be good? Or an explanation for why it
 25 doesn't matter that it took so long?"
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1 we've worked out below?"
 2 In his earlier email Mr Parker had stated that the
 3 results ought to be disclosed but that the disclosure
 4 should be accompanied by a caveat as to the scope of the
 5 searches that had been carried out; is that fair?
 6 **A.** Yeah.
 7 **Q.** By contrast, here you're suggesting that it might be
 8 simply better to let it lie for a bit, in the hope that
 9 the issue goes away; is that fair?
 10 **A.** I'm not sure I'm saying it might be better. I'm just
 11 offering him -- basically, I'm asking him to make the
 12 decision on what we do.
 13 **Q.** Were you concerned that the response which Mr Parker had
 14 provided raised more questions than it answered?
 15 **A.** No, I don't think so. I mean, I must admit, the thing
 16 that is missing from this email that I don't recollect
 17 is what Jonny just said. So I'm assuming it's a phone
 18 call that we've just been involved with. So I don't
 19 know what was actually said and it could -- yeah, I just
 20 don't know.
 21 **Q.** The implication seems to be that he's not pressing you
 22 for an answer?
 23 **A.** It sounds like it, doesn't it? Yeah.
 24 **Q.** So the opportunity is taken to let the issue slide?
 25 **A.** I guess I'm offering that as a possibility to Steve
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1 If we look at your response to that query, please,
 2 on page 1 -- thank you -- so that's dated 8 March 2019.
 3 You begin by clarifying what appeared to be some
 4 contradictory statements that you and your colleague,
 5 Mr Ibbett, had made; is that right?
 6 **A.** Yes.
 7 **Q.** Then you go on to say this, this the second paragraph
 8 under points 1 and 2:
 9 "The ability for SSC users to switch themselves into
 10 the APPSUP role without prior authorisation was removed
 11 from existing users in August 2016; as to the reasons
 12 why this took so long, we don't have an explanation for
 13 the delay between the recognition of the preference for
 14 removing the role from being a permanent role for SSC,
 15 and that change actually being executed. Two things to
 16 note about [the relevant PEAK] however are [firstly]
 17 that was not originally raised in order to cover off
 18 this particular issue, and that original purpose of the
 19 PEAK was indeed closed off, [secondly] that it appears
 20 that it was closed incorrectly, so that instead of it
 21 being routed to Unix DBA as suggested by the penultimate
 22 ended, it was instead closed. Following an audit in
 23 August 2016 a new PEAK was raised ... in order to follow
 24 up the task to remove the APPSUP role."
 25 Finally you say:
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1 "As has been stated on previous occasions, even when
2 SSC had the ability to switch into the role themselves,
3 it was always a conscious decision to do so (so the role
4 was never a permanently applied state) and the switch
5 into it was always audited."

6 What did you mean when you said the switch into it
7 was always audited?

8 **A.** Presumably it's recorded that they've used that
9 permission or that role.

10 **Q.** You had established, had you not, in your earlier
11 discussions with Stephen Parker that you, in fact, had
12 no way of accurately establishing how often the role had
13 been used without reviewing every single PEAK?

14 **A.** That sounds correct, yeah, although -- yeah. I'm not
15 sure what happened in between that and this, so there
16 may have been some other discussion about it.

17 **Q.** But are you not here giving false assurance that the use
18 of the right is fully audited and can be accounted
19 for --

20 **A.** On the face of it, yes --

21 **Q.** -- when, in fact, you can know that that wasn't the
22 case?

23 **A.** I suppose so, yes.

24 **Q.** Now, you received a further query from Womble Bond
25 Dickinson in early March 2019, concerning the accuracy

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1 end up probably going into the statement so, arguably,
2 you could say that I did but, I mean, I wasn't actively
3 involved in actually deciding what they would say,
4 I don't think.

5 **Q.** I would like to ask you some questions about the wording
6 of a statement provided by Andrew Dunks in the Group
7 Litigation, please. Do you recall being asked to obtain
8 a witness statement for the Post Office's lawyers
9 concerning the extraction of audit data?

10 **A.** So I must admit I didn't recall it until you disclosed
11 the emails to me in the last couple of days.

12 **Q.** Do you know why the request was directed to you?

13 **A.** Not really, no. I mean, only in that many of the
14 requests did come through to me, and it's possibly just
15 one that I was able to answer. I'm not quite sure now.

16 **Q.** Do you recall providing a draft statement to Womble Bond
17 Dickinson, now that you've read those emails?

18 **A.** So the draft statement in this case, I believe, was the
19 standard ARQ witness statement, so it was effectively
20 like a templated statement used by the security
21 Operations Team.

22 **Q.** From where had you obtained that draft statement?

23 **A.** I think it was provided to me by Jason Muir.

24 **Q.** Did you know by whom the standard form of words had been
25 drafted?

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1 of the evidence provided by Stephen Parker; do you
2 recall that?

3 **A.** Not immediately. But --

4 **Q.** That reference is FUJ00089798, please. Can we go to
5 page 9, please.

6 Forgive me, sir, I think on this occasion I do have
7 the wrong reference so if I have an opportunity I'll
8 return to it but we'll leave the subject of Mr Parker's
9 evidence for the moment, please.

10 **SIR WYN WILLIAMS:** All right.

11 **MS HODGE:** My next topic, please, is the preparation of
12 witness evidence.

13 Please could you describe your role in the
14 reparation of witness statements provided by Fujitsu
15 employees?

16 **A.** My role. Yes. So similar to what we've seen in the
17 rest of the work that I did on this. It's largely
18 around assisting people with finding information,
19 answering questions or helping to answer questions or
20 finding information for -- to answer questions put by
21 WBD.

22 **Q.** Do you recall whether you had input into the drafting of
23 statements?

24 **A.** I don't believe that I did but there are questions that
25 I'm asked which I then obtained information for, which

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1 **A.** No.

2 **Q.** Did you know in what context that statement had been
3 prepared?

4 **A.** If I didn't -- I may not have known at that time but,
5 I mean, since then, I do have an understanding of what
6 it's for but I can't recall whether that was the first
7 time that I was aware of it or not.

8 **Q.** Can we please look at some of the wording contained in
9 that statement at FUJ00160508. Thank you.

10 This is a copy of the draft statement which you
11 provided to the lawyers of the Post Office; is that
12 right?

13 **A.** Yes.

14 **Q.** We can see it's dated 13 November 2018.

15 **A.** Mm-hm.

16 **Q.** So that's, I think, just the day before you provided it,
17 so presumably you inserted that date?

18 **A.** I'm not sure. Possibly not.

19 **Q.** Just to orient ourselves, please, if we look at the
20 first paragraph of the draft statement, it reads:

21 "I have been employed by Fujitsu Services Limited,
22 on the Post Office Account, since 11 March 2002 as
23 an Information Technology Security Analyst responsible
24 for audit data extractions and IT Security. I have
25 working knowledge of the computer system known as

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1 Horizon, which is a computerised accounting system used
2 by Post Office Limited. I am authorised by Fujitsu
3 Services Limited to undertake extractions of audit
4 archived data and to obtain information regarding system
5 transactions recorded on the Horizon system."

6 Now, the statement goes on to provide an explanation
7 of the Horizon system, as well as what might be
8 described as controls around the extraction of data; is
9 that correct?

10 **A.** Right. I think so. Mm-hm.

11 **Q.** The section of the statement I'd like to ask you about
12 can be found at the bottom of page 4, please, and on to
13 page 5. So the last two paragraphs read:

14 "A request was received on 3 October 2018 and asked
15 for information in connection with the post offices at
16 Caddington, Spencefield, Newport and Fleckney.
17 I undertook extractions of data held on the Horizon
18 System and followed the procedure outlined above.
19 I produced a CD containing the required data."

20 Now, was that information that you inserted, do you
21 recall?

22 **A.** No, I don't think so. So I think that WBD specified
23 what they were asking for and this was basically
24 inserted in order to provide the information requested.
25 Whether I inserted that in there or not, I don't know.

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1 **Q.** It's at FUJ00160649, please. Thank you. If we could go
2 down to page 2, please. To the bottom of that page,
3 please. So here, this is just one example, but here you
4 say:

5 "Lucy,

6 "Section now reads as follows (and as attached)."

7 You proposed effectively some amended wording to the
8 paragraph we just looked at:

9 "Does that need to be signed today, or can it be
10 done on Monday?"

11 **A.** Right.

12 **Q.** Now, was that redrafting done by you or by someone else?

13 **A.** So I think it's at the -- I think either below this or
14 another email that specifies what it is that they're
15 looking for, so I think this is effectively just putting
16 into the statement what's being requested.

17 **Q.** I think what -- I'm not suggesting that you were
18 necessarily making a decision as to what information
19 should be contained in it but you were actually doing
20 the drafting, is that fair --

21 **A.** Um --

22 **Q.** -- based on the information that you had been fed?

23 **A.** I must say it is not what I would refer to as "doing the
24 drafting" but, you know, I inserted some words into it
25 at somebody else's request, yeah.

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1 It may well have been Jason Muir.

2 **Q.** It goes on to say:

3 "There is no reason to believe that the information
4 in this statement is inaccurate because of the improper
5 use of the system. To the best of my knowledge and
6 belief at all material times the system was operating
7 properly, or if not, any respect in which it was not
8 operating properly, or was out of operation was not such
9 as to affect the information held within it."

10 What did you understand that statement to mean?

11 **A.** So my understanding of that is that it's referring to
12 the audit retrieval system.

13 **Q.** When it refers to the system was operating properly?

14 **A.** Yeah.

15 **Q.** You didn't understand it to be a generalised comment
16 about the integrity of the Horizon system?

17 **A.** No.

18 **Q.** After providing this initial draft, you liaised with
19 Womble Bond Dickinson to clarify the wording of the
20 statement; do you agree with that?

21 **A.** I believe, so.

22 **Q.** You proposed some amendments?

23 **A.** Um --

24 **Q.** You can look at the email chain --

25 **A.** Did I?

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1 **Q.** Before we move on, please, to our final topic, at the
2 top of this page we have an email from you -- forgive
3 me, at the top of page 1 we have an email from you to
4 Ms Bremner, about the extraction -- forgive me, we can
5 see the middle of the page, 16 November 2018. You say:

6 "Lucy,

7 "Attached is the scan of the witness statement
8 signed by Andrew Dunks, and the same in word format.

9 "Just to clarify, Andy has confirmed to me that the
10 first retrieval was supplied to WBD on CD and to Gareth
11 by loading to a laptop; the second request was supplied
12 to Gareth on a CD, but not to WBD. So factually the
13 statement is correct ..."

14 This is in relation to the method by which the data
15 was supplied.

16 **A.** Right.

17 **Q.** What I want to ask you is this: why was it that Gareth
18 Jenkins was being supplied with the audit data extracted
19 in relation to the lead claimants?

20 **A.** I assume it's because he was being asked to carry out
21 some analysis on it.

22 **Q.** Thank you.

23 Final topic, please, before a couple of
24 clarifications. You've indicated in your statement that
25 the process of disclosure by Fujitsu was not supported

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1 by appropriate legal advice and oversight; is that
 2 right?
 3 **A.** In my opinion. Correct.
 4 **Q.** Now, we've seen in the documents to which I've referred
 5 you today that Chris Jay, a senior member of Fujitsu's
 6 Legal Team, attended meetings and was copied into emails
 7 to requests for information and to responses; is that
 8 fair?
 9 **A.** Yes. But I think a relatively small number, from what
 10 we can see in many of the other emails that we've looked
 11 at, he's not included.
 12 **Q.** He was quite closely involved in the early stages of
 13 disclosure; is that right?
 14 **A.** In the early stages --
 15 **Q.** Particularly --
 16 **A.** -- more so.
 17 **Q.** -- involving issues around the claimants' access to KEL
 18 software and Fujitsu's intellectual property rights?
 19 **A.** I think that's right. I think he was involved in the
 20 discussion around the non-disclosure agreement, for
 21 example, yeah.
 22 **Q.** He continues to be copied into emails -- I accept not
 23 all emails, but he continues to be copied into emails
 24 throughout the period, does he not?
 25 **A.** I'm not sure whether that's true. I mean, without
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1 was an email where he said he was handing over to
 2 somebody else, I think. So I can't quite remember the
 3 name of the person but --
 4 **Q.** Was the concern that you -- sorry, I interrupted.
 5 **A.** Yeah, so I mean, as I say, I can't quite remember now
 6 but, in some ways, that's actually almost, you know,
 7 indicative of the fact that I don't think there was that
 8 much oversight, is that I don't quite remember what
 9 happened to him in the end and whether he was replaced
 10 by someone else. But I'm fairly sure that I saw
 11 an email from him earlier in which he said he was
 12 handing over to another person -- Julia someone,
 13 possibly -- anyway.
 14 **Q.** Was this a concern which you had at the time?
 15 **A.** I think it's -- I think it was much less clear to me at
 16 the time and I'm not sure that it particularly worried
 17 me at the time but I think, looking back on, that's
 18 quite clear.
 19 **Q.** What prompted you to look back on it, to conclude in
 20 hindsight there wasn't sufficient advice and oversight?
 21 **A.** I think particularly, for example, the amount of
 22 oversight that there has been in dealing with this
 23 Inquiry, for example, has been much greater than it was
 24 over our interaction with WBD for the trial.
 25 **Q.** How do you think you would have acted differently, had
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1 looking at it and investigating it, I couldn't give you
 2 a definite answer off the top of my head, but I -- my
 3 impression is that he wasn't closely involved with the
 4 process.
 5 **Q.** Some --
 6 **A.** Latterly, particularly.
 7 **Q.** -- not all? Sorry, I didn't mean to interrupt you. He
 8 was copied into some but not all, I think, is your --
 9 **A.** That's my recollection and that's what I believe I see
 10 from emails I look at, including many of the ones we've
 11 looked at here today and that you've shown me over the
 12 last few weeks, yeah, correct.
 13 **Q.** When you say that you feel that you weren't given
 14 appropriate advice and oversight, is that specifically
 15 directed at Mr Jay?
 16 **A.** No, I mean, I don't think it would have mattered who it
 17 was, but maybe the Fujitsu Legal Department generally.
 18 So it's not about a specific person, it's about a --
 19 **Q.** I didn't mean to imply it's personal but he obviously
 20 had some oversight. You're saying it wasn't sufficient
 21 oversight?
 22 **A.** Um -- that's --
 23 **Q.** So does responsibility for that fall on him, do you
 24 think?
 25 **A.** I don't know. I mean, I recall recently seeing there
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1 you had better advice and oversight?
 2 **A.** I think, probably, there would have been a lot more
 3 resource, for one thing and, as I think I explain in my
 4 witness statement, effectively, many of the people
 5 involved in this were kind of doing it as well as their
 6 normal day-to-day jobs. In fact, I don't think it was
 7 really -- I suppose, probably apart from Dave Ibbett,
 8 but even then I'm not sure about him, whether anyone was
 9 actually doing it as their sole task.
 10 And there would have been more resource, perhaps, in
 11 terms of tools, and just the ability to actually do
 12 greater amount of investigation and information
 13 gathering and to be sure that we had all of the
 14 information that was available.
 15 I mean, in some ways -- yeah. No. That's ...
 16 **Q.** Thank you. I have some very short points of
 17 clarification which I've been asked to raise and which
 18 I'll do briefly now, if I may.
 19 During and after the Group Litigation, did you
 20 liaise with external lawyers other than Womble Bond
 21 Dickinson?
 22 **A.** After the Group Litigation? Um ...
 23 **Q.** The reason I ask this specifically is --
 24 **A.** In any context, do you mean?
 25 **Q.** So did you receive and deal with the requests for
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1 disclosure from a Scottish law firm known as BTO
 2 Solicitors; do you have any recollection of that?
 3 **A.** Possibly. I vaguely think I've heard of them, so I may
 4 have done but I don't recall.
 5 **Q.** You're not able to provide any details in relation to
 6 that disclosure?
 7 **A.** Not without looking it up, potentially, no. I don't
 8 remember that.
 9 **Q.** Do you recall whether you disclosed any documents
 10 directly to the Crown Office or the Procurator Fiscal
 11 Service in Scotland?
 12 **A.** I don't believe so. So I have been asked questions in
 13 relation to those bodies but via Peters & Peters,
 14 I think, for Post Office.
 15 **Q.** Whilst you were dealing with document disclosure in the
 16 context of the Group Litigation, did you receive any
 17 advice or instruction about retaining documents for any
 18 of the following purposes: firstly, use by the Criminal
 19 Case Review Commission?
 20 **A.** Not directly no.
 21 **Q.** Secondly, compliance with the ongoing duty of disclosure
 22 in criminal proceedings, whether by the CPS or to --
 23 **A.** No, I don't think so.
 24 **Q.** Do you recall there being any discussions about
 25 documents which you provided to the Post Office's

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1 **MR STEIN:** Sir, I have one question for the witness and it
 2 will take less than a minute.
 3 **SIR WYN WILLIAMS:** All right, well, that's easy.
 4 **MR STEIN:** I hope so sir, in terms of a break, I have
 5 a personal matter, that I need to deal with at 4.15, so,
 6 even if there is going to be a break would you allow me
 7 permission to ask that single question?
 8 **SIR WYN WILLIAMS:** Of course. We'll have that in a second.
 9 Who is wanting to ask questions which will take longer
 10 than Mr Stein's one minute-ish?
 11 **MS PAGE:** I also would like to ask some questions, sir.
 12 I could keep it to ten minutes.
 13 **SIR WYN WILLIAMS:** Right. Anyone else?
 14 **MS OLIVER:** Sir, yes, I would like to ask some questions, if
 15 possible. I can also keep it to ten minutes, please.
 16 **SIR WYN WILLIAMS:** Right. So we will have Mr Stein's minute
 17 or so now, then we will have a short break and then we
 18 will have two 10-minute sessions. All right. I think
 19 that's reasonable, in all the circumstances.
 20 Everyone at least content?
 21 Fine.
 22 So, Mr Stein. Ask your questions and then we'll
 23 have a short break.

Questioned by MR STEIN

24 **MR STEIN:** Mr Lenton, in my 60-second countdown, can I ask

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1 lawyers being used in connection with any criminal
 2 proceedings or appeals?
 3 **A.** No.
 4 **Q.** In your role as Document Manager, have you been asked to
 5 locate and retain the scripts that were used by Fujitsu
 6 helpline?
 7 **A.** I have been involved in that question, yeah, but
 8 I recall not being able to do that. So yeah,
 9 unsuccessfully, if I was asked to be involved in it.
 10 **MS HODGE:** Thank you, sir.
 11 With the exception -- sorry, excuse me one minute.
 12 **SIR WYN WILLIAMS:** Yes.
 13 **MS HODGE:** Forgive me, sir. With the exception of Stephen
 14 Parker's evidence, that would conclude my questions.
 15 **SIR WYN WILLIAMS:** Yes.
 16 **MS HODGE:** Some of the recognised legal representatives
 17 would like to ask questions. I'm conscious of the time.
 18 It's 4.00, sir, and I think we will need to give our
 19 transcriber, one additional break, perhaps a short break
 20 of ten minutes, so it's really a question of whether we
 21 can get things wrapped up today within the time
 22 available.
 23 **SIR WYN WILLIAMS:** Well, that's -- who wants to ask
 24 questions and how long are they going to take? Let's
 25 see where we are?

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1 you just this: you've just been asked by Ms Hodge
 2 questions that relate to the location and retention of
 3 scripts --
 4 **A.** Right.
 5 **Q.** -- from the Fujitsu helpline. Your answer was you
 6 recall not being able to do that. Why were you not able
 7 to do that?
 8 **A.** Because I wasn't able to locate them or find anybody who
 9 knew where they were but I'm also aware of the fact that
 10 I wasn't the only person asked that question and it was
 11 also, fairly certain, investigated by some other people
 12 in Fujitsu. So I didn't -- I mean, I don't think
 13 I reached a definitive conclusion on it and others may
 14 have done.
 15 **Q.** Right, the others being?
 16 **A.** Other people working for the Fujitsu Legal Team.
 17 **Q.** Okay. Do you know their names?
 18 **A.** Um, God, I do. What are their names? Um --
 19 **Q.** To assist us, would you put that in writing and provide
 20 that answer to the Inquiry?
 21 **A.** I can do.
 22 **MR STEIN:** Thank you.
 23 Thank you, sir.
 24 **SIR WYN WILLIAMS:** Right, we'll resume again at 4.15, and we
 25 will aim to conclude by 4.35.

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1 **MS HODGE:** Thank you, sir.

2 (4.05 pm)

3 (A short break)

4 (4.15 pm)

5 **MS HODGE:** Sir, can you see and hear us?

6 **SIR WYN WILLIAMS:** Yes, I can, thanks.

7 **MS HODGE:** I'm not sure who is going to go first.

8 Ms Page, thank you.

9 **Questioned by MS PAGE**

10 **MS PAGE:** Thank you.

11 My first topic is short and I want to ask you about

12 your recollection to do with the providing of the

13 Jenkins reports on data integrity. In your witness

14 statement, you appeared to have quite a clear memory of

15 those reports and putting them on to your Dimensions

16 system; is that fair?

17 **A.** Right, yes.

18 **Q.** Is there a reason why, given that this goes back,

19 I mean, many years -- the first email correspondence is

20 from 2010 and, presumably, a little earlier when you

21 actually put them on the system -- is there any reason

22 why you can remember these reports so clearly?

23 **A.** I think it really is because, obviously, subsequently

24 their significance has become much more apparent to me

25 but then, also, there's the limited number of times in

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1 technical.

2 **Q.** Yes. All right. Thank you. Then, in that case, what

3 I'd like to move on to is the disclosure around remote

4 access. You've described how the disclosure process was

5 really iterative and responsive.

6 **A.** Yeah.

7 **Q.** But when it came to the issue of remote access, there

8 did come a time when it became quite a structured

9 approach, didn't it? With a long table, and various

10 different issues relating to it that you were responding

11 to?

12 **A.** Um -- yeah --

13 **Q.** We can come to it in due course.

14 **A.** I was going to say I'm not completely sure what you're

15 referring to but I think there was a -- I think you're

16 referring to there's an Excel file I think which has --

17 effectively is a big table showing all the different

18 types of what could be regarded as remote access and who

19 would be able to do them, et cetera?

20 **Q.** Yeah. All right --

21 **SIR WYN WILLIAMS:** Before you go any further, Ms Page, so

22 that I'm not being slow, we're talking about disclosure

23 relating to remote access in the GLO, are we?

24 **MS PAGE:** Yes, that's absolutely right, sir. Sorry.

25 **SIR WYN WILLIAMS:** Yes. That's fine.

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1 which we have provided them to Post Office, which we've

2 done on more than one occasion, I think, and in the fact

3 that there's only two of them, and there's one for each

4 version of Horizon. So it's a kind of -- yeah. I mean,

5 that's it really. They're just quite unusual, as I said

6 earlier, in terms of the types of documentation that we

7 hold.

8 **Q.** Was there a sense that there was a concern around data

9 integrity and that these reports sort of highlighted

10 that and something, something around that?

11 **A.** Well, clearly when you read them, then it's apparent

12 that someone at least does have some concern about it,

13 yeah, because that's clearly what they're about.

14 I mean, they're not very long, either of them, and

15 they're clearly attempting to address a question --

16 **Q.** Did you read them at the time? Do you have a memory of

17 that?

18 **A.** I think I probably -- yeah, I think so. I mean, they're

19 only, like, six pages, aren't they, I think?

20 **Q.** Indeed and that might be why they stick out because they

21 are about these concerns; is that fair?

22 **A.** Possibly, and I think the other thing is that, unlike

23 many of the documents I see, they're actually just

24 written in kind of what you might call normal prose that

25 anybody might understand, rather than being highly

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1 **MS PAGE:** So, as part of that process, you looked into the

2 history of the SSC team using what they call the change

3 control process, in order to record occasions when they

4 inserted transactions into branch accounts; do you

5 remember that?

6 **A.** Yeah, I'm not sure that I did personally but I might

7 have done some of the work contributing to that, yeah.

8 **Q.** All right. Well, let's look at a document. It's

9 FUJ00189522. If we can scroll to page 3 when it comes

10 up, please. So on this page here, perhaps if we just go

11 up a little we can see what is going on. This is from

12 Steve Parker to you, 24 January, various other people

13 copied in, and he describes the -- it's sort of slightly

14 in shorthand but it seems that the subject is in

15 relation to Richard Roll, "Roll 2", and there seems to

16 be a sort of a further subject heading in the sense that

17 he says:

18 "Review a sample of OCPs to give an indication as to

19 how frequently transaction data was injected."

20 **A.** Yeah.

21 **Q.** Then he addresses you:

22 "Matthew,

23 "Has become very difficult to provide.

24 "The original plan was to examine sample months of

25 change control data and produce rough figures. This led

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1 me to the realisation/remembering that support did not
2 use change control in the earlier years for [Business As
3 Usual] support actions. We relied on the audit trail
4 within the incidents (PEAKs) to document support
5 actions. We had auditability of the work done but no
6 change control entries. Reasoning behind this was:
7 implementing support actions ASAP, nobody around to sign
8 off overnight anyway, audit trail is enough where no
9 financial impact."

10 He then goes on to talk about trying to sample PEAK
11 records.

12 **A.** Yeah.

13 **Q.** So one of the reasons -- well, the reason behind this,
14 not using the proper change control process, was
15 evidently a sort of a needs must; is that fair?

16 **A.** It sounds like it, doesn't it? Yeah.

17 **Q.** If we could please keep a sort of an eye on that wording
18 and go to how it was then communicated by you in
19 document FUJ00163098. This is quite a long email train.
20 If we go down to, first of all, page 3, just to give us
21 some location of where we are. So that email at the
22 bottom, 24 January, from you to Jonathan Gribben,
23 various other people copied in, including Gareth Jenkins
24 and Andrew Parsons.

25 This is the sort of table that I was talking about,
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1 control in the earlier years. Do you think that was
2 properly communicated?

3 **A.** I must admit, to me, I'm not sure if there's a big
4 difference in those two things. I mean, it became
5 apparent to us, looking at this question, as a result of
6 Steve Parker remembering or whatever it was that he
7 said.

8 **Q.** All right, well, let's go a little further down.

9 "We relied on the audit trail within the incidents
10 (PEAKs) to document support actions. We had
11 auditability of the work done but no change control
12 entries."

13 Then:

14 "We assume that the reasoning behind this was to
15 allow implementation of support actions ASAP, and the
16 audit trail being good enough where there was no
17 financial impact."

18 So that really is a slight softening, if you like,
19 of the needs-must wording that we saw in Mr Parker's
20 email; do you think that's fair?

21 **A.** Well, possibly. I mean, the meaning is almost the same,
22 I would have said, isn't it?

23 **Q.** What we don't see there is the reference to there just
24 simply being no one around on the overnight desk. There
25 is still this attempt to assure and provide assurance,
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1 it looks like it probably did come from Excel or
2 something but it's --

3 **A.** Okay, it's not the one I was thinking of but, anyway.

4 **Q.** Right. Well, there's a long table with various aspects
5 of disclosure that are being looked into. If we scroll
6 all the way down, please, to page 10, we can look at the
7 bit which follows the email that we were just looking at
8 from Steve Parker. If we scroll a little further we can
9 see that chunk in the middle that says "Matthew Lenton"?

10 **A.** Mm-hm.

11 **Q.** The header there is the same as we saw in the email from
12 Steve Parker, "Review a sample of OCPs to give
13 an indication as to how frequently transaction data was
14 injected", and then you've inserted the description but
15 slightly different wording:

16 "This is proving difficult to provide [the same].

17 The original plan was to examine sample months of change
18 control data and produce rough figures."

19 Then, slightly different:

20 "As Pete Newsome already discussed with you, this
21 led to it becoming apparent that support did not use
22 formal change control in the earlier years for [Business
23 As Usual] support actions."

24 So that's gone from Mr Parker saying that he
25 actually remembered that they didn't use formal change
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1 but there is a sort of a softening; would you accept
2 that or not?

3 **A.** Possibly. I mean, yeah.

4 **Q.** All right. Well, then just this: the answers that you
5 received from Mr Parker about what the SSC team were
6 doing and those needs-must actions that they were
7 taking, the wording that you've used was more or less
8 conveyed to Mr de Garr Robinson KC and that was in the
9 context of him having said that answers around this
10 issue and if it were true that the SSC were not using
11 change control processes, it would be "disastrous for
12 the case". I'll give the reference so that those
13 interested can look it up -- we don't need to go there
14 now -- POL00416010.

15 So, evidently, this answer was considered important
16 by the person in charge of the litigation. Was there
17 ever any comeback, ever anything further to you, or
18 anything that you know of to Mr Parker on this subject?

19 **A.** Not that I recall specifically, no.

20 **MS PAGE:** No. All right. Well, thank you very much,
21 Mr Lenton. Those are my questions.

22 **A.** Thank you.

23 **SIR WYN WILLIAMS:** Thank you, Ms Page.

24 **Questioned by MS OLIVER**

25 **MS OLIVER:** Thank you, sir. I ask questions on behalf of
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1 Gareth Jenkins and I want to ask you some questions
 2 about Fujitsu's work in the context of the GLO
 3 proceedings, if I may.
 4 You've been asked some questions earlier today about
 5 Mr Jenkins' role and you said, essentially, that there
 6 was a team of people who would help to analyse the
 7 information in order to answer questions from Womble
 8 Bond Dickinson --
 9 **A.** Right.
 10 **Q.** -- and he was one of these people because of his
 11 longstanding expertise and knowledge in Horizon.
 12 **A.** Yeah.
 13 **Q.** Is that right; have I paraphrased that correctly?
 14 **A.** I think so, yeah.
 15 **Q.** Thank you. But you weren't told anything specifically
 16 about his role, other than in those terms; is that
 17 correct?
 18 **A.** No, not really. I mean, obviously I knew him fairly
 19 well, in any case, so yeah, I mean, I just accepted that
 20 that's what he was doing. He was analysing information
 21 that we were providing to him when he was asked to.
 22 **Q.** Does it follow that you weren't informed as to why
 23 Mr Jenkins was not called as a witness in the GLO
 24 proceedings?
 25 **A.** I don't believe so no.

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1 and KELs, answering questions from WBD on discrete
 2 technical issues -- sorry, you're nodding.
 3 **A.** Correct, yes.
 4 **Q.** Thank you. Providing commentary on witness statements
 5 and expert reports, such as the Coyne Report, the Jason
 6 Coyne reports that had been served by the claimants in
 7 the proceedings?
 8 **A.** Yes.
 9 **Q.** Preparing technical analysis of bugs, errors and defects
 10 that had been identified?
 11 **A.** Correct, yeah.
 12 **Q.** And, indeed, commenting on the draft witness statements
 13 that were produced by the Fujitsu witnesses who were to
 14 be called by POL?
 15 **A.** Yes. I believe so. Yeah.
 16 **Q.** You, as you've said, identified six individuals who were
 17 part of that team but I think you've made clear that
 18 that wasn't an exhaustive list?
 19 **A.** No, that's right. There were other people who also
 20 worked on the Post Office Account who were consulted
 21 about various matters, correct.
 22 **Q.** So is it fair to say that Mr Jenkins was one of a number
 23 of Fujitsu personnel or, to use your phrase, a team of
 24 people, who performed these tasks including commenting
 25 on witness statements?

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1 **Q.** Were you ever told by WBD or POL not to direct queries
 2 to Mr Jenkins unless this was unavoidable?
 3 **A.** No.
 4 **Q.** You've also been asked about why Mr Jenkins, who was not
 5 himself a GLO witness, was being asked to feed
 6 information and evidence to individuals who were
 7 witnesses from Fujitsu --
 8 **A.** Right.
 9 **Q.** -- and I think Mr Godeseth was mentioned in particular
 10 in the context of that question.
 11 **A.** Yeah.
 12 **Q.** I think your answer was that you would not necessarily
 13 characterise it in that way; do you recall that?
 14 **A.** Correct. Yeah.
 15 **Q.** Was the position that there were multiple individuals
 16 within Fujitsu who assisted the Post Office with
 17 technical input into the expert and witness evidence
 18 that transpired as part of the GLO proceedings?
 19 **A.** Yeah, and, in fact, there were people in that immediate
 20 virtual team who weren't witnesses, such as John
 21 Simpkins and Mark Wright.
 22 **Q.** Yes, indeed, within the six that you have identified.
 23 **A.** Yeah.
 24 **Q.** Is this right: that these individuals were performing
 25 tasks such as providing analysis on material like PEAKS

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1 **A.** Correct. Yeah.
 2 **Q.** Indeed, is this right: that it would have been
 3 practically impossible for one person in Fujitsu to
 4 perform that role because of its sheer scale but also
 5 the multiplicity of expertise that it demanded?
 6 **A.** That's correct. So I recall, for example, that I think
 7 we'd split up all of the -- I'm trying to remember the
 8 phrase that was used but all of the issues that came out
 9 of the supplemental report of Jason Coyne were split
 10 among the members of that virtual team, yeah.
 11 **Q.** You've identified one of the two examples I'm going to
 12 come to, the 22 bugs that Jason Coyne identified?
 13 **A.** Right, and I think there your more than that originally,
 14 actually that they were asked to analyse, yeah.
 15 **Q.** Thank you. Before I come on to those examples: is this
 16 also right: that this process that was going on within
 17 this team was collaborative; people were working
 18 together on these tasks?
 19 **A.** Correct, yeah.
 20 **Q.** I say it was collaborative, partly because there was
 21 a fundamental principle of peer review within that team:
 22 people would review each other's output?
 23 **A.** That's correct, yeah.
 24 **Q.** Also, there was sometimes something in the form of
 25 a dialogue between people of different expertise within

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1 Fujitsu. So, for example, someone might say this is
 2 a question that's better placed within the SSC, it would
 3 be forwarded to someone like John Simpkins, he would
 4 feed back --

5 **A.** Yes.

6 **Q.** -- and it would all enter the mix.

7 **A.** I think that's definitely true, yeah, because, I mean,
 8 I think the issues items weren't just kind of randomly
 9 divided up among people, they were depending on who was
 10 seen as on being more expert in that area, yeah.

11 **Q.** Thank you very much if we can go to two examples. I'll
 12 take your example first, if I may, I think what you're
 13 referring to was the exercise that was conducted in May
 14 2019 of effectively dividing up the 22 -- or I think it
 15 then transpired 29 -- bugs that had been identified by
 16 Mr Coyne --

17 **A.** Right.

18 **Q.** -- amongst individuals within this team.

19 **A.** Right.

20 **Q.** Do you recall that?

21 **A.** Yes.

22 **Q.** I'm not going to take you to the email, just because of
 23 time but, for everyone else's note, it's FUJ00081836.
 24 But do you recall an instruction from Pete Newsome,
 25 which was communicated to the likes of Dave Ibbett,

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1 "Alan, Gareth S and Gareth J,
 2 "Please see attached Torstein's draft witness
 3 statement. He has asked that the three of you review it
 4 and provide any feedback/clarifications."
 5 Moving down:
 6 "Note that currently the draft has been provided to
 7 Torstein by WBD based on a previous statement with
 8 yellow highlighted sections where WBD are asking
 9 specific questions and, as you can see, Torstein has
 10 made amendments as tracked changes, and added comments."
 11 If we go to the next email in that change, please,
 12 thank you. The following day, 21 September, Pete
 13 Newsome says:
 14 "WBD have asked for a response today if at all
 15 possible.
 16 "Let me know if you can't do this ..."
 17 Just as a side note, was it often the case that
 18 Fujitsu were being asked to respond to requests by WBD
 19 within very tight and pressurised time frames?

20 **A.** Yeah, that happens -- happened quite often, yeah.

21 **Q.** Thank you. Also, of course, this is an example, isn't
 22 it, where technical input is being asked for but from
 23 Alan Holmes and Gareth Seemungal, who aren't in your
 24 shortlist of six people?

25 **A.** Correct, yeah.

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1 Steve Parker, Mark Wright, John Simpkins, Torstein
 2 Godeseth and Mr Jenkins, effectively saying we need to
 3 divide up this list of bugs, each one needs a lead
 4 person.

5 **A.** Yeah.

6 **Q.** Do you recall that? There will then be a process of
 7 consolidation and peer review; do you recall that being
 8 the process?

9 **A.** I believe so, yeah, and I believe that I actually
 10 tracked the progress on each of them, yeah. So yeah.

11 **Q.** I'm grateful. So you were effectively administering
 12 that process, were you?

13 **A.** Helping to keep track of what was going on, yeah.

14 **Q.** Thank you. Can I then go to a second example which
 15 I suggest is indicative of this collaborative way of
 16 responding to the GLO proceedings and, if we go to this
 17 document, please, it's FUJ00179541. Just while that is
 18 being brought up, this is in the context of Torstein
 19 Godeseth's first draft statement in September 2018. If
 20 we can go to the bottom of this chain, please.

21 Thank you. Sorry, can we just go up a little bit so
 22 I can -- thank you very much, that's perfect.

23 So this is an email from you to Alan Holmes, Gareth
 24 Seemungal and Gareth Jenkins, copying in Pete Newsome
 25 and Dave Ibbett:

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1 **Q.** Thank you. If we can scroll up, then, please, to the
 2 next email in the chain, so we see Alan Holmes provides
 3 a version of the document with comments and then, if we
 4 scroll up, please. I think the two Gareths are being
 5 asked to build on that as a base so add their comments
 6 in to Alan Holmes' document?

7 **A.** Yeah.

8 **Q.** If we can go up then, please, an email from Gareth
 9 Jenkins:
 10 "I've just got back in.
 11 "I'll certainly add to Alan's comments. Not sure if
 12 I can finish this afternoon -- depends how long it is.
 13 "I'll look after lunch".
 14 Then up please, Gareth Seemungal, I think, at this
 15 stage, has added his comments so asks Gareth Jenkins:
 16 "Are you okay to build on top of this version ...
 17 please?"
 18 Then, if we go up to the next email, please, from
 19 Gareth Jenkins, later that same day:
 20 "I've finally gone through it all. Attached is the
 21 version with everybody's comments.
 22 "There are a couple of my comments that suggest that
 23 Gareth S may like to add clarifications, but I see he
 24 had not picked up on those areas."
 25 Then the final email in this chain, from Gareth

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1 Seemungal:
 2 "Gareth
 3 "Responded to your questions -- attached."
 4 The reason I suggest this might be typical is
 5 because what we see here is a multiplicity of
 6 individuals commenting on a draft statement; is that
 7 right?
 8 **A.** Certainly that's what there is here, yes.
 9 **Q.** Also, something of that dialogue that I mentioned
 10 between the two Gareths, posing questions and answering
 11 questions between each other?
 12 **A.** That's true. Yeah.
 13 **Q.** Would you have said that this process that we see here
 14 with Torstein Godeseth's statement was relatively
 15 typical of the way that Fujitsu worked on these draft
 16 witness statements?
 17 **A.** So, yeah, well -- I must admit I'm not quite -- so
 18 I think in terms of -- I'm trying to think of how many
 19 there were. So, obviously, this is Torstein's and then
 20 there was Steve Parker's. I mean, I assume that Steve
 21 Parker's was looked at in considerable detail,
 22 particularly by his SSC colleagues, and I think the Andy
 23 Dunks witness statement we've already looked at and that
 24 was very short and was more or less pre-written, as it
 25 were. Then I think the other one was Bill Membery and
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1 I have to admit I don't really recall the content of
 2 that one.
 3 So, certainly, in the case of this witness
 4 statement, it was done like that but there were only
 5 four witnesses, I think.
 6 **SIR WYN WILLIAMS:** Can I shortcut it, in terms of the two
 7 technical witnesses, Mr Godeseth and Mr Parker, it seems
 8 clear from even this limited line of questioning that
 9 there was a good deal of collaboration before the
 10 witness statements were finalised?
 11 **A.** Yes.
 12 **SIR WYN WILLIAMS:** Fine. I think you've made your point.
 13 **MS OLIVER:** Thank you, sir. No further questions.
 14 **SIR WYN WILLIAMS:** Thank you. Right. Well, that brings the
 15 session to a close today.
 16 Thank you very much, Mr Lenton, for your witness
 17 statement and for answering the questions of a number of
 18 people throughout the afternoon. I'm grateful to you.
 19 So we'll break off now and resume again tomorrow
 20 morning with Mr Parker -- sorry, Mr Parsons, not
 21 Mr Parker. I shouldn't confuse those two people,
 22 I don't think.
 23 All right. Thanks very much.
 24 **MS HODGE:** Good afternoon, sir.
 25 **(4.39 pm)**
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(The hearing adjourned until 9.45 am the following day)

I N D E X

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