

Pg 23, 25, 34

3/8/14. Clevelays Conference Call.

Present : ✓ Jan Holmes POA
 ✓ Keith Barnes POA Commercial
 ✓ Mandy Talbot POA Legal Services
 ✓ Suzanne Helliwell Weightman Vigars
 ✓ David Barker Masons
 ✓ Skoptan Lewinsky POA Council.

GRO

GRO

Subject : How POA can support POA in their defence against J. Holstenhorne.

St. Trial in near future.

Some sort of joint expert's report
 FS helpful responses but expert not changed mind
 his view was that system was defective in terms of number.

Too late for expert evidence to be brought in
 Records not in existence.

Difficult to analyse records
 Had if gone to dispute likely to find that computer system let JW down.

DB. Date of trial? - 16-18 August.

St. Tricky position -

We say she had difficulty operating ad calls to HSTL were part of dealing with problems

Beyond point of analysing her system.

Aiming to say that 'potentially implied team to provide system that worked ad systems is

place to support her
Extra evidence that can be introduced to support
this claim.

How she was helped

- If problem found what was done to sort out problems.
- If we can provide that then can say:
 - no computer system is perfect
 - reasonable difficulties that we provided such assistance as was available.

KB Can go some way towards that. In this case
will depend on what records we (Fs) can provide

- Specified support requirements

SL Comparative evidence

JH Explained what we had. - no transaction data
HSH transcripts
Call analysis

SL Not to go through transcripts one by one but
to provide overall perspective.
Expect can we show traceability of fault
HSH back to 3rd/4th line support

KB During acceptance satisfied that if crashes
happened then transactions would not be lost.

SL Can we describe general approach to support.

KB Explanation of 4 levels including Service Levels.

JH KEL me in 2nd line if any can be found.

SL How many people involved at each level of support.

JH Have evidence of clean start

KB Useful information. ↑

SL Cannot say that there were no glitches. Will be candid about that but what did we do to help it.

DB How will evidence be admitted

SL Make approaches to have it allowed but it might not be allowed.

DB Evidence from POL or POA

SL Best placed person

DB Who are witnesses

SH KB, Elaine Tags, ^{Rebecca} ~~Anna~~ Robinson.
Regional Mgr ← HR

KB could provide some but not all
- what FS had contacted to do not necessarily what had been provided.

DB. Do we need to go beyond what Pol had contracted to do. Might be difficult to introduce new witness (me) at this late stage.

SL.

- See point but to simply contact without assuming that might not be provided.
- Need stuff from FS even if we do not present this.
- Intending to make some admissions in order to hone down to important points. Should make case move quickly. Could reduce issues - judge might take application for new evidence.
- Can some factual information against experts report?

JH. Starting of and report. Not forwarded to Coyne.
KB and I need to get our act together. KB agreed.

SL. Need info as soon as possible. Email stuff to solicitors asap.

JH. Im in Feroi Wed/Thu/Fri. KB and me to operate independently with target of Wed COP.
Send the stuff to KB.

MT. Have Adducing why PM would not negotiate how much she paid or could charge for services.

SL. Does she sell stuff on behalf of Po.

DB NH will take up with KB.
Turning info into written statement - NH & KB liaise with SH
DB would like visibility
SH agreed.

- * HSH number would be increasing to reflect increased population of outlets rolled-out.
 - * Probably same for 2nd & 3rd line.
- 3.2.5.7 Schedule 15

Original application obligation.