

# OPUS 2

## INTERNATIONAL

Horizons Issues - Alan Bates & Others v Post Office Limited

Day 8

March 21, 2019

Opus 2 International - Official Court Reporters

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1 Thursday, 21 March 2019  
 2 (10.30 am)  
 3 MR TORSTEIN OLAV GODESETH (continued)  
 4 Cross-examination by MR GREEN (continued)  
 5 MR DE GARR ROBINSON: My Lord, we are both standing up.  
 6 I wonder if your Lordship wishes to discuss housekeeping  
 7 matters or shall we leave it until after Mr Godeseth has  
 8 finished?  
 9 MR JUSTICE FRASER: Absolutely. We will do it at the end.  
 10 MR GREEN: I'm grateful.  
 11 Mr Godeseth, just to clarify, yesterday -- and to  
 12 correct a point I put to you yesterday -- I suggested to  
 13 you that PEAK 0175821 at page {F/485} was  
 14 Horizon Online. It's clearly legacy.  
 15 MR JUSTICE FRASER: Was this the one that because of the  
 16 dates could have been either?  
 17 MR GREEN: It could have been either. I will come back to  
 18 that but I just wanted Mr Godeseth not to be worried  
 19 that --  
 20 MR DE GARR ROBINSON: My Lord, it was 2009, in fact, not  
 21 2010.  
 22 MR GREEN: I'm going to try and take this in a condensed  
 23 way, Mr Godeseth, if I can, and see what we can agree is  
 24 clear. Can we just -- what I'm proposing to do is take  
 25 you to the position under the legacy system separately

1

1 so there's no room for confusion by me or you and then  
 2 deal with Horizon Online after that and just briefly, if  
 3 we look first please at {F/323}. Now, this is  
 4 PEAK 0130275. Do you see that at the top?  
 5 A. I do.  
 6 Q. And the target date there is June 2006, but you can see  
 7 that from the progress narrative that it's initiated  
 8 in December 2005. Do you see that?  
 9 A. I do.  
 10 Q. And if you come down into the yellow box and you look  
 11 towards the bottom you will see 21/12/05 at 17.22.  
 12 A. I do.  
 13 Q. Can you see the figure of £18,000 there just below that?  
 14 It says:  
 15 "Contacted: contacted pm - pm states rolling over tp  
 16 with no items, 0 figures showing but allowed to rollover  
 17 and on the next rollover into bp there was a £18,000  
 18 discrepancy gain."  
 19 Do you see that?  
 20 A. I see that.  
 21 Q. So this is a problem that's caused a gain to the SPM?  
 22 A. Agreed.  
 23 Q. On the face of the Horizon system?  
 24 A. On the face of it, yes.  
 25 Q. And if we go over the page please to page 2 {F/323/2},

2

1 in the middle box you can see 22 December 2005 at  
 2 16.05.15 and if you come down to "Stock unit BB" halfway  
 3 down, do you see that?  
 4 A. Yes.  
 5 Q. "Stock unit BB was rolled over in an effectively empty  
 6 state. The PM then declared the correct amount of cash,  
 7 and adjusted the stock levels up to the correct volumes.  
 8 This has resulted in a gain of approximately £18,000.  
 9 "We are unable to correct the system figures safely.  
 10 We can however provide accurate figures for what should  
 11 have been in the final balance for BB, to enable POL to  
 12 make the correction perhaps by using a Transaction  
 13 Correction."  
 14 Now, that's one of the ways of dealing with  
 15 a situation like this, isn't it?  
 16 A. It would be, yes.  
 17 Q. "POL need to make a decision on whether they are able to  
 18 correct the problem in this way, however we do not see  
 19 any other alternative. Corrective action should be  
 20 taken before 11 January when the branch is due to  
 21 rollover into TP10."  
 22 Do you see that?  
 23 A. I do.  
 24 Q. So at that stage, what's been identified is that it is  
 25 really probably for POL to make the correction using

3

1 a transaction correction, and it needs to be done before  
 2 11 January because that's the next trading period  
 3 rollover, yes?  
 4 A. Okay, understood.  
 5 Q. And if we go over to page 3 please {F/323/3}, 3 January,  
 6 David Seddon, he says there:  
 7 "If we get to the problem before the office is  
 8 rolled we are able to change objects in the messagestore  
 9 to reset the stockunit back to the CAP (TP) rollover  
 10 trailer. The PM can then rollover. PM should get  
 11 a large shortage which cancels out the large gain.  
 12 "We don't want to be having to do this as making  
 13 manual changes to the messagestore is open to error and  
 14 each time we have to seek authorisation from [Post  
 15 Office Limited] to make the changes."  
 16 Now, pausing there, can we agree that it was  
 17 possible to change the objects in the messagestore in  
 18 the way described here?  
 19 A. I have -- yes, that would be possible.  
 20 Q. And that doing so would cause a large shortage which  
 21 would cancel out the large gain, as expressly stated  
 22 here?  
 23 A. Yes.  
 24 Q. And you would agree that making manual changes to the  
 25 messagestore is open to error?

4

1 A. It certainly is.  
 2 Q. And were you aware that each time it was done,  
 3 authorisation was sought from Post Office Limited to  
 4 make the changes, or was that not something you were  
 5 involved in?  
 6 A. At this stage I was working elsewhere, so -- 2006, early  
 7 2006 I would have been involved interfacing with Horizon  
 8 but certainly not at this operational level.  
 9 Q. So pausing there, just to get that very precise for  
 10 the court. Early 2006, which is the date of this  
 11 particular PEAK, you were interfacing with Fujitsu with  
 12 regard to Horizon in your job at Post Office?  
 13 A. I'm pretty sure I would have been because Impact was  
 14 going live in 2005, so I can't be -- but certainly  
 15 I wasn't involved in operational issues of this type.  
 16 Q. So you're not really the person to ask about those  
 17 authorities being sought?  
 18 A. Certainly not the -- Post Office would have given  
 19 authority through other parties. Certainly I --  
 20 I wouldn't have been involved in giving authority for  
 21 this sort of thing.  
 22 Q. Thank you. Then can we move forward then please to  
 23 {F/432}. Now, this is 10/12/2007 and it is PEAK number  
 24 0152014 and you will see that there's an OCP listed  
 25 there, OCP 17510 and an OCR listed there, 17532.

5

1 There's also an additional OCR listed below. Do you see  
 2 that?  
 3 A. I do.  
 4 Q. Now, just so you have a fair context to this question,  
 5 Mr Godeseth, it's accepted on behalf of the claimants  
 6 that we do see references behind some of these documents  
 7 to subpostmasters being made aware of changes being made  
 8 of this sort. So just so you're clear, it's not being  
 9 put to you that they were never made aware, but I want  
 10 you to look and see if you would agree with what this  
 11 PEAK shows.  
 12 Let's go over the page please {F/432/2}. If we look  
 13 at the top of the page, the yellow box, halfway down it,  
 14 do you see:  
 15 "Am currently retrieving the messagestore for this  
 16 branch [and] will then be inserting a new message on the  
 17 counter to remove the effects of this."  
 18 Do you see that sentence?  
 19 A. Yes, and I read this overnight.  
 20 MR JUSTICE FRASER: Sorry, can you tell me where it is?  
 21 MR GREEN: I'm so sorry, in the yellow box at the top,  
 22 my Lord.  
 23 MR JUSTICE FRASER: Oh, the yellow box at the top. I was  
 24 looking halfway down the page.  
 25 MR GREEN: Sorry, my mistake.

6

1 So this is one you have had the opportunity to look  
 2 at overnight and it clearly states there that Andy Keil,  
 3 who we see on the previous page, just to give you  
 4 context {F/432/1}, 10 December 2007, 12.36, Andy Keil --  
 5 or is it Andy Keil?  
 6 A. I don't remember him.  
 7 Q. Okay. So he is saying -- go over back again {F/432/2},  
 8 he is talking about a line written -- if we look at the  
 9 top of that yellow box -- he is talking about a problem  
 10 which is:  
 11 "... due to a single SC line written for \$1,000  
 12 (£484) with no settlement in the middle of two RISP  
 13 transactions."  
 14 Can you tell the court what RISP transactions are?  
 15 A. I'm not -- RI is remit in; I can't remember what the SP  
 16 bit stands for.  
 17 MR JUSTICE FRASER: And SC line?  
 18 A. Sorry? SC would be "serve customer", my Lord, so that's  
 19 a sale.  
 20 MR JUSTICE FRASER: So it looks as if it they are selling  
 21 foreign currency?  
 22 A. This one is all related to selling foreign currency and  
 23 there's a bit of confusion as to whether it is American  
 24 or Canadian dollars.  
 25 MR JUSTICE FRASER: In the happy days when £484 sterling

7

1 bought 1,000 of either US or Canadian dollars.  
 2 A. And there was a change in exchange rates the last --  
 3 over the couple of days, yes.  
 4 MR GREEN: When we see halfway down that top yellow box:  
 5 "Am currently retrieving the messagestore for this  
 6 branch, we will then be inserting a new message on the  
 7 counter to remove the effects of this."  
 8 What's being considered there is making a change on  
 9 the counter messagestore, isn't it?  
 10 A. Yes, my Lord.  
 11 Q. And halfway down you can see a double star, double  
 12 asterisk followed by:  
 13 "Again, this may also have caused a receipts and  
 14 payments error ..."  
 15 So they are trying to work out whether there's  
 16 a gain or a loss at the counter and the amount, yes?  
 17 A. Yes, my Lord.  
 18 Q. And then if we go down to the bottom of this page,  
 19 12 December 2007, Andy Keil says:  
 20 "Worth noting that the branch did not have any  
 21 issues with the mismatched transactions because this was  
 22 fixed before they did the roll. The branch is not aware  
 23 of this and it's best that the branch is not advised."  
 24 Now, at that stage you would fairly accept, wouldn't  
 25 you, that although there are documents elsewhere that

8

1 show that sometimes SPMs were advised, this shows an  
 2 occasion when the SPM at this stage has not been  
 3 advised, doesn't it?  
 4 A. I don't know that it shows that, but it's a fair  
 5 inference from it. I think I would say that Post Office  
 6 were well aware of this and I would argue that it's  
 7 a Post Office decision whether or not to tell  
 8 a subpostmaster.  
 9 Q. So you are saying -- just clarify what you just said.  
 10 A. This was written by Andy Keil who is a Fujitsu employee  
 11 and I think he is recording things as he saw it, but in  
 12 the background to this there was a dialogue with  
 13 Post Office, from my reading of the PEAK.  
 14 Q. Yes, so Post Office would have been aware of what was  
 15 being done by Fujitsu in this respect?  
 16 A. Correct, my Lord.  
 17 Q. And then what seems to happen, if we go over the page to  
 18 {F/432/3}, in the big yellow box at the top:  
 19 "The counter problem which caused the first issue  
 20 has been corrected by inserting a message into the  
 21 messagestore, for equal but opposite values/quantities,  
 22 as agreed with POL ..."  
 23 Yes?  
 24 A. Yes.  
 25 Q. And that refers there to an OCP, 17510. Do you see

9

1 that?  
 2 A. I do.  
 3 Q. And if we could just look at that for a moment please,  
 4 it's at {F/432.2}, "Write corrective bureau message for  
 5 FAD 183227."  
 6 MR JUSTICE FRASER: Where are you reading?  
 7 MR GREEN: That's the heading of --  
 8 MR JUSTICE FRASER: The bold heading.  
 9 MR GREEN: The bold heading, my Lord, yes. Then it says:  
 10 "A single SC message ... was written in error on  
 11 26th November ... selling 1,000 US dollars, with no  
 12 corresponding settlement line. To remove the effects of  
 13 this message at both the branch and on POLFS, we will  
 14 inset a new message to negate the effects of the  
 15 original message."  
 16 Yes?  
 17 A. Yes, my Lord.  
 18 Q. "Justification: If the change is not made in the counter  
 19 messagestore (before the stock unit is balanced on  
 20 Wednesday), the branch will have an unexpected gain of  
 21 £484 (or thereabouts - [depending] on exchange rate),  
 22 and a receipts and payments mismatch. This gain would  
 23 have to be resolved at the branch. There would also be  
 24 an inconsistency between the branch and POLFS to be  
 25 resolved. By correcting the problem locally, the branch

10

1 may not be aware of the problem, and there will be no  
 2 inconsistency between the branch and POLFS."  
 3 Yes?  
 4 A. Agreed, yes.  
 5 Q. So this is the reason for doing it, and it is planned  
 6 for 10 December 2007 at 5 o'clock with a duration of  
 7 ten minutes.  
 8 A. Yes.  
 9 Q. And then the extra detail provided says:  
 10 "The original message had Product [ID]: 5129,  
 11 [quantity 1], Sale value ~... 484, [quantity]~...  
 12 1,000~..."  
 13 The new message will have quantity --  
 14 MR JUSTICE FRASER: Quantity minus 1.  
 15 MR GREEN: Sorry:  
 16 "[Quantity]: -1, SaleValue: -484, PQty: -1,000 with,  
 17 other attributes (including exchange rate) as before."  
 18 So the OCP is the front-end fix, isn't it?  
 19 A. Yes, this is going into messagestore.  
 20 Q. This is going into the counter messagestore at the  
 21 branch?  
 22 A. Yes.  
 23 Q. And we can see that if we go over the page {F/432.2/2},  
 24 because at "Change at location" we see "Counter"?  
 25 A. Yes.

11

1 Q. And when the location at which the change is effected  
 2 for the back-end in an OCR, we tend to see location  
 3 BRAO1 or one of the terminals within Bracknell or --  
 4 yes?  
 5 A. Understood.  
 6 Q. When we look at the relevant OCR, which is OCR17532  
 7 which is on page {F/434.1}, we can see there that the  
 8 change at location code is BRAO1, as agreed already.  
 9 MR JUSTICE FRASER: Where are you looking?  
 10 MR GREEN: In the middle of the page under "Other details".  
 11 MR JUSTICE FRASER: Yes.  
 12 MR GREEN: And if we look under "Comments" we can see  
 13 Andy Keil wrote at 12/12, he is updating the POLFS feed  
 14 for the branch with a sale value of 1,014.73 and PQty of  
 15 2,080. Now, there's a difference between the updated  
 16 value that we saw on 432.2, which was a \$1,000  
 17 transaction being inserted at the counter, and what we  
 18 see at {F/434.1} which is just over \$2,000 being  
 19 inserted in the Post Office system, yes?  
 20 A. Yes.  
 21 Q. When we go back to the underlying PEAK at {F/432} --  
 22 hopefully you've got hard copies as well?  
 23 A. I believe I have.  
 24 Q. And if you want to look at those, please take your time.  
 25 If we look at page {F/432/3}, so the third page of that

12

1 PEAK, on 14 December 2007 Anne Chambers, in the large  
 2 yellow box at the top, towards the top of the page, she  
 3 writes, in the second paragraph there:  
 4 "The counter problem which caused the first issue  
 5 has been corrected by inserting a message into the  
 6 messagestore, for equal but opposite values/quantities,  
 7 as agreed with POL."  
 8 Which we have already looked at and there's the  
 9 reference to the OCP:  
 10 "As a result of this corrective action, the net  
 11 effect on POLFS is zero, and POLFS figures are in line  
 12 with the branch. POLMIS received both the original  
 13 message and the corrective message.  
 14 "Once the problem was corrected, there should have  
 15 been no impact on the branch. However, it has been  
 16 noted that the stock unit BDC had a loss of \$1,000,  
 17 which was generated after the correction was made."  
 18 Now, that's of roughly the same amount as the  
 19 difference between what was entered in the front-end and  
 20 the back-end, wasn't it?  
 21 A. Yes.  
 22 Q. "We have already notified Gary Blackburn at POL ... this  
 23 appears to be a genuine loss at the branch, not  
 24 a consequence of the problem or correction."  
 25 Would you accept that it's a fair possibility that

13

1 the additional loss was in fact a result of the  
 2 difference in the two corrections made by the OCP and  
 3 OCR?  
 4 A. Having read this PEAK in more detail overnight then yes,  
 5 clearly that is what appears to have been the case.  
 6 Q. Can we move forward now to the 2009 PEAK at {F/485}.  
 7 This is PEAK 0175821 and this has a target date of  
 8 22 February 2009, and you can see that if we come down  
 9 to 19 February you can see there's an OCR reference  
 10 there, OCR 21847. And if we go down, just to give you  
 11 context -- hopefully you have had a chance to look at  
 12 this. At the bottom of the page, 19 February 2009 -- we  
 13 touched on this -- at 17.39.40, Catherine Obeng:  
 14 "There are two sides to the problem relating to  
 15 these transactions. The first is where all five SC  
 16 [transactions] missing core data as described in the  
 17 above-mentioned KEL. Second is absence of equal but  
 18 opposite (ie settlement) lines. See [another PEAK]  
 19 PC0152014 for a similar problem and how problem was  
 20 resolved.  
 21 "For the first problem, I have used the TRT ..."  
 22 That's the transaction repair tool?  
 23 A. Correct.  
 24 Q. "... to insert the missing data ie Region, Margin,  
 25 Margin Product and EffectiveEXRate."

14

1 Yes?  
 2 A. Yes.  
 3 Q. Now, when we look over the page, please, at page 2  
 4 {F/485/2}, it is reasonably complicated to follow but  
 5 just to trying to take out a few simple points from it.  
 6 If we look at the second light blue box,  
 7 20 February 2009, Garrett Simpson, this is -- he says:  
 8 Following the investigation shown in another related  
 9 PEAK he has analysed the:  
 10 "... TPS\_POL\_FS\_Summaries\_Incomp where article ~...  
 11 =USD?"  
 12 This is another one where there seems to be an  
 13 exchange rate issue, is that fair?  
 14 A. Certainly dealing with bureau is complicated by the fact  
 15 that there are exchange rates, there are margins, there  
 16 are quite a few components to the transaction.  
 17 Q. Indeed. And we can see the difference between the two  
 18 figures that have been recorded is 378.42 but the total  
 19 non-zero value for the branch is £989.96. So he says:  
 20 "So I have not found the proper exception".  
 21 What does "I have not found the proper exception"  
 22 mean?  
 23 A. I think this may well be the one where there was -- it  
 24 appeared to me to be confusion as to whether people were  
 25 talking about American dollars or Canadian dollars.

15

1 Q. Yes.  
 2 A. And I think further on in the PEAK, he identifies that  
 3 he has found the correct element to look at.  
 4 Q. Yes. If we go -- well, can I ask you this shortly: it  
 5 seems that there are two attempts to remedy this, is  
 6 that fair?  
 7 A. I think that was the previous one. Sorry, I think there  
 8 were two components to fixing this, in that there was  
 9 a change using the TIP repair tool to get the feed into  
 10 POLFS correct and then there was a change to the  
 11 messagestore to get the branch aligned.  
 12 Q. Yes. There are two aspects to it, the first using the  
 13 TIP repair tool and the second is the change to the  
 14 branch messagestore?  
 15 A. And I would see that as a way of keeping the branch and  
 16 POLFS aligned. The repair had to go two ways.  
 17 MR JUSTICE FRASER: Can you just remind me which  
 18 three-letter abbreviation are we using for TIP repair  
 19 tool?  
 20 A. That is probably TRT -- no, sorry --  
 21 MR GREEN: It is TRT.  
 22 A. TRT on OCR17532, it says "Change type TRT" which I take  
 23 to mean TIP repair tool.  
 24 MR GREEN: And your Lordship will also find a reference to  
 25 it at {F/485} on the first page.

16

1 MR JUSTICE FRASER: I saw the reference, it is just we had  
 2 been using TRT, although I know you mentioned yesterday  
 3 that's what you called the TIP repair tool, I think.  
 4 A. I have forgotten, my Lord.  
 5 MR JUSTICE FRASER: All right, don't worry.  
 6 MR GREEN: And just for completeness, if we look very kindly  
 7 at {F/485.2}, we can see that this is the OCP, 21918,  
 8 this is the change to branch messagestore OCP and if we  
 9 go over the page --  
 10 MR JUSTICE FRASER: Can we just go back a second.  
 11 MR GREEN: Sorry.  
 12 MR JUSTICE FRASER: Under "Extra detail", Mr Godeseth, is  
 13 that just an explanation in prose of what you said were  
 14 the two components to remedying it?  
 15 A. I'm reading that as saying that we tested what we were  
 16 about to do on the live system. We tested in a test  
 17 system what we were about to do on a live system to  
 18 ensure that this was going to work.  
 19 MR JUSTICE FRASER: Yes, but in other words, that includes  
 20 the two components, does it? In other words, are your  
 21 two components together, as far as you can tell --  
 22 A. I can't tell from this I'm afraid, my Lord.  
 23 MR JUSTICE FRASER: You can't, okay, that's fine.  
 24 MR GREEN: My Lord, I think I can help Mr Godeseth with  
 25 that, if that assists.

1 If we look -- the OCP is normally for the front-end,  
 2 the branch messagestore, and the OCR is normally the  
 3 back-end and if we look at {F/485.1} we have 21847. We  
 4 can see the deletion of transactions and updating of  
 5 transactions, extracts from some of the scripts used  
 6 there, can't we?  
 7 A. Yes.  
 8 Q. So the OCR relates to the POLFS system records?  
 9 A. Correct.  
 10 Q. And that's 485.1, and then the {F/485.2} is the OCP for  
 11 the branch messagestore?  
 12 A. Yes.  
 13 Q. And we can see there -- it's actually at the second half  
 14 of this page, we can see Gaby Reynolds of Post Office  
 15 Limited wrote --  
 16 A. Gaby Reynolds was Fujitsu.  
 17 Q. POL -- okay. So it says "POL" is that she is on the  
 18 Post Office account or ...?  
 19 A. Certainly the Gaby Reynolds I knew worked for Fujitsu  
 20 and never worked for Post Office.  
 21 Q. Okay, very good. So it seems to be between  
 22 Gaby Reynolds of Fujitsu -- sorry, received by  
 23 Gaby Reynolds of Fujitsu, from julie.edgeley@postoffice,  
 24 on behalf of duty\_manager@royalmail.com,  
 25 27 February 2009 to Anne Chambers, who we see a lot in

1 in these.  
 2 A. Yes.  
 3 Q. And it says:  
 4 "~... malformed currency transactions ~...  
 5 "As discussed, POL are happy for you to make the  
 6 necessary system adjustments. From speaking to Wendy,  
 7 the manager in the branch, first thing on Tuesday  
 8 morning (between 9am and 10am) is the quietest time for  
 9 them.  
 10 "I have advised Wendy that you will call her as you  
 11 are about to start and as you finish.  
 12 "Thank you."  
 13 We can see over the page that that's then forwarded  
 14 on {F/485.2/2}. Or you've got a separate one from  
 15 Nicola Watson, Post Office, saying that:  
 16 "POL approve this change."  
 17 A. Yes.  
 18 Q. So effectively the agreement has come from two people at  
 19 Post Office and we have also seen from this particular  
 20 one that the SPM must have been made aware of it?  
 21 A. Yes.  
 22 Q. Because they're doing it at a time convenient for the  
 23 SPM. So that subpostmaster would have known that  
 24 changes could be effected at the branch messagestore, or  
 25 maybe not in those words, but certainly at the counter?

1 A. Certainly changes made to the messagestore. I don't  
 2 know whether we are discussing whether it was injected  
 3 at the counter or in the correspondence server here,  
 4 I can't remember the detail of this.  
 5 Q. Okay. Let's move forward, if we may --  
 6 MR JUSTICE FRASER: Yes, before we do I would like to go  
 7 back to {F/485.2/1} because Mr Green said he was going  
 8 to help you with something and I'm not necessarily sure  
 9 he did.  
 10 MR GREEN: My Lord, sorry.  
 11 MR JUSTICE FRASER: No, that's all right.  
 12 As I understand it, OCP deals with the front-end, is  
 13 that right?  
 14 A. It appears so, certainly, my Lord.  
 15 MR JUSTICE FRASER: As far as you know?  
 16 A. Yes.  
 17 MR JUSTICE FRASER: And OCR deals at the back-end?  
 18 A. That seems consistent, my Lord.  
 19 MR JUSTICE FRASER: Yes. So when you were saying there are  
 20 two components to this correction, did you mean one  
 21 component was the OCP and one component was the OCR?  
 22 A. Yes, my Lord.  
 23 MR JUSTICE FRASER: But that will be the case in all  
 24 corrections, won't it? There will always have to be  
 25 a correction at the front-end and the back-end.

1 A. No, not necessarily. The TIP repair tool was used quite  
 2 a lot to repair stuff which had gone through from the  
 3 branches -- or from the counters fine but it was missing  
 4 some attribute which POLFS or something else further up  
 5 the line needed and so therefore it would fail  
 6 validation at the point when it was hitting TIP and it  
 7 would be parked until it was repaired.  
 8 MR JUSTICE FRASER: I see. So your two components were one  
 9 of them was the OCP and one of them was the OCR?  
 10 A. Correct.  
 11 MR JUSTICE FRASER: All right.  
 12 A. For this particular problem we needed to change in two  
 13 places -- or they chose to change in two places.  
 14 Possibly it could have been done in a different way.  
 15 MR JUSTICE FRASER: Understood. And when you look under  
 16 "Extra detail", the last sentence -- and I understand  
 17 this relates to foreign currency which is why it is  
 18 said:  
 19 "The gain may not be precisely the same as the  
 20 original loss ..."  
 21 Would there have been another component as well to  
 22 correct that, so far as you know, or do you not know?  
 23 A. It is tied up in exchange rates and margins, so there is  
 24 a mechanism in place to account for changes in currency  
 25 rates which would have to be replicated through this, so

21

1 that it would be taken into account.  
 2 MR JUSTICE FRASER: And would that be another OCP then?  
 3 A. I don't imagine so. I think it would all be dealt with  
 4 in one go.  
 5 MR JUSTICE FRASER: In the same OCP?  
 6 A. Correct.  
 7 MR JUSTICE FRASER: Mr Green, over to you.  
 8 MR GREEN: Can we move forward now to 2010 and we've got  
 9 PC0195561 which is 7 March 2010.  
 10 Now, we have seen this before?  
 11 A. Sorry, I'm not seeing it yet, my Lord.  
 12 Q. Sorry, {F/590}. Have you not seen this one before?  
 13 A. Sorry, it was --  
 14 MR JUSTICE FRASER: No, it wasn't on the screen, Mr Green.  
 15 MR GREEN: I'm so sorry.  
 16 MR DE GARR ROBINSON: It wasn't given last night either.  
 17 MR GREEN: This is the one that Mr Godeseth himself refers  
 18 to at paragraph 58.8 as the balancing transaction that  
 19 he is aware of.  
 20 If we look in the yellow box below the second line  
 21 of equals signs:  
 22 "~... pm was trying to transfer out 4,000 pds. The  
 23 system crashed. Pm was issued with 2 x 4,000pds  
 24 receipts."  
 25 Yes?

22

1 A. Yes.  
 2 Q. So this is one you are familiar with?  
 3 A. Yes.  
 4 Q. And if we go to page 3 {F/590/3}, 10 March 2010 at  
 5 8.51.33, almost the top yellow box:  
 6 "After discussion with Gareth Jenkins, the suggested  
 7 correction is to negate the duplicate transfer out by  
 8 writing 2 lines to the BRDB\_RX\_REP\_SESSION and  
 9 BRDB\_RX\_EPOSS\_TRANSACTIONS tables ..."  
 10 Yes?  
 11 A. Sorry, I missed -- sorry, could I just confirm that this  
 12 does relate to the one use of BT?  
 13 Q. This is -- if we have a look at your witness  
 14 statement --  
 15 MR JUSTICE FRASER: Do you have your hard copy witness  
 16 statement?  
 17 A. I do. Which?  
 18 MR JUSTICE FRASER: I think it might be the one you are  
 19 being asked about at {E2/1/16}, but if that's an  
 20 incorrect reference, Mr Green will tell you.  
 21 MR GREEN: If we look at paragraph 58.8 {E2/1/17}, you say:  
 22 "The PEAK incident ticket raised in relation to the  
 23 BT ..."  
 24 A. Is 1955 ~... yes.  
 25 Q. Yes?

23

1 A. Yes, my Lord.  
 2 Q. So who have you got this information from about this?  
 3 A. I will have got this information -- this information  
 4 will have come from the guys who knew about the PEAK,  
 5 knew about the balancing transaction, the occurrence of  
 6 it.  
 7 Q. So who were the guys?  
 8 A. I can't remember, but I got a lot of information about  
 9 this it from Steve Parker.  
 10 Q. From Steve Parker?  
 11 A. So I imagine it came from -- via his team.  
 12 Q. So you got the information from Steve Parker and you  
 13 imagine it came from his team?  
 14 A. Yes.  
 15 Q. And let's go back to the PEAK, if we can, {F/590/1}. We  
 16 have seen that it is basically doubling the £4,000 of  
 17 receipts and we have moved on to page 3 {F/590/3} and  
 18 we've got the discussion with Gareth Jenkins at the top  
 19 suggesting writing two lines to the transaction tables,  
 20 yes?  
 21 A. Yes, my Lord.  
 22 Q. And those tables are tables which record transaction  
 23 data, aren't they?  
 24 A. Yes.  
 25 Q. And there it says:

24

1 "An OCP approved by POL will be needed."  
 2 It says:  
 3 "[It] should be done using the Transaction  
 4 Correction Tool. An OCP approved by POL will be  
 5 needed."  
 6 Yes?  
 7 A. Yes.  
 8 Q. Do you know of any reason why the £4,000 difference  
 9 couldn't have been corrected by a transaction correction  
 10 being issued?  
 11 A. Yes, because this was a double entry -- this is on the  
 12 new system. This is not messagestore, so the only way  
 13 to actually change the branch database so that I had two  
 14 entries was to insert a record using the branch  
 15 transaction tool, or the balancing transaction tool.  
 16 Sorry, that is the only -- that is the chosen way to do  
 17 it, it was a way that we had anticipated dealing with  
 18 this type of problem.  
 19 Q. That's the way that had been planned for?  
 20 A. We obviously planned never to do it, but this was the  
 21 contingency should a problem arise in the branch  
 22 database which left us with an unbalanced transaction,  
 23 ie one side had been written but the other side had not.  
 24 Q. If we can go please for {F/590/9}, so page 9 of the same  
 25 PEAK, 22 April 2010 at 15.35.[54]. You are reasonably

25

1 familiar with this PEAK, I think?  
 2 A. Yes.  
 3 Q. What we see in this box if I can just summarise it, is  
 4 there had been two transactions with the same JSN number  
 5 and the second transaction should have been rejected as  
 6 a duplicate, but in fact, the data from the second entry  
 7 had in fact been committed to the database when it  
 8 shouldn't have been, and that was a bit puzzling. Is  
 9 that a fair summary?  
 10 A. I can agree it's all puzzling. I'm not sure that this  
 11 would be a totally accurate reflection of what happened.  
 12 This is an interpretation put together by a developer  
 13 who is investigating the problems and the --  
 14 Q. Well, if -- sorry.  
 15 A. The log files will still exist.  
 16 MR JUSTICE FRASER: Well, let's go on what's on the face of  
 17 the page. As I understand it, your answer is that  
 18 you're not sure that what's on the screen is totally  
 19 accurate, is that right?  
 20 A. Correct, my Lord.  
 21 MR JUSTICE FRASER: Let's now work on the hypothesis that it  
 22 is, and Mr Green, continue.  
 23 MR GREEN: On that basis, what this shows is that there were  
 24 two entries with the same JSN number presented. The  
 25 second one should have been rejected because the

26

1 database should not accept data from duplicate JSN  
 2 numbers --  
 3 A. Yes, my Lord.  
 4 Q. -- but in fact what's being said here is the data had  
 5 nonetheless been committed to the database when it  
 6 should not have been?  
 7 A. That's what I cannot understand, because the Oracle  
 8 database -- since the JSN is part of the primary key  
 9 into the message table, I cannot see how an Oracle  
 10 database would allow that to happen.  
 11 MR JUSTICE FRASER: Because the fact it has accepted one  
 12 means it wouldn't accept the other?  
 13 A. Correct, that's the whole --  
 14 MR JUSTICE FRASER: That's how it is supposed to work.  
 15 A. The primary key in the Oracle database is there to say  
 16 "this is the one and only record" and trying to  
 17 overwrite that would be rejected by the branch database.  
 18 MR JUSTICE FRASER: But if this is right -- and this is  
 19 obviously something I will decide in due course after  
 20 hearing the experts, but if this is right, that doesn't  
 21 appear to have happened.  
 22 A. That would have to be a bug in Oracle, and it was  
 23 certainly not the bug that I was looking -- it was not  
 24 the bug that I was looking at for the red alert.  
 25 MR JUSTICE FRASER: Yes, all right.

27

1 MR GREEN: This is a different one?  
 2 A. If this in fact happened as written down here then it  
 3 would have had to have been a bug in Oracle and  
 4 I certainly don't remember any such bug.  
 5 Q. Let's move forward if I may --  
 6 A. Sorry, could I just bring your attention to the line  
 7 which says:  
 8 "I have requested for the journal table dump, to  
 9 check whether duplicate JSN entries exists in the table.  
 10 But from the DB dump, I couldn't find any duplicates."  
 11 I see that as highly significant.  
 12 MR JUSTICE FRASER: Can you just tell me where that is?  
 13 A. Sorry, it is just above 2010-03-05 -- sorry, 15.05.  
 14 15.05.18, it is the two lines just above that.  
 15 MR JUSTICE FRASER: I'm struggling, I'm afraid.  
 16 MR DE GARR ROBINSON: My Lord, it is halfway down the big  
 17 yellow box.  
 18 MR JUSTICE FRASER: I was going to say, let's start with  
 19 a colour.  
 20 A. Sorry, I'm just seeing all of this in green.  
 21 MR JUSTICE FRASER: Okay.  
 22 A. So if we go down to the line --  
 23 MR JUSTICE FRASER: Which box? The big box at the bottom?  
 24 A. It is the big box which starts on -- 15.35.54.  
 25 MR JUSTICE FRASER: Got that.

28

1 A. If we carry on down, the next line with a date on it is  
 2 2010/03/02, two chunks up from that it says:  
 3 "I have requested for the journal table dump, to  
 4 check whether duplicate JSN entries exists in the table.  
 5 But from the DB dump, I couldn't find any duplicates."  
 6 MR JUSTICE FRASER: And then "Even I have requested ..." is  
 7 that "OSR logs"?  
 8 A. Yes, my Lord.  
 9 MR JUSTICE FRASER: And OSR stands for?  
 10 A. It is online service routing, it is part of the BAL. It  
 11 is effectively a synonym for the BAL.  
 12 MR JUSTICE FRASER: And then does it say:  
 13 "I didn't get any clue on the request ... I could  
 14 only able to see the following in the osr.log file."  
 15 A. Yes.  
 16 MR JUSTICE FRASER: And do I take it that the code -- or the  
 17 language that follows after that is what the OSR log  
 18 file would say?  
 19 A. The OSR log is saying that there was a basket settlement  
 20 transaction, it has timed out but is executing, so there  
 21 was an attempt to write a message to the BRDB, but it  
 22 has timed out.  
 23 MR JUSTICE FRASER: And am I right that everything on those  
 24 two and a half lines that starts with 2010-03-02 appears  
 25 to be an extract from the OSR log?

1 A. That -- yes.  
 2 MR JUSTICE FRASER: From the use of the words "The  
 3 following", in the preceding --  
 4 A. Yes, that's a fair summary, my Lord.  
 5 MR JUSTICE FRASER: Thank you very much. Mr Green.  
 6 MR GREEN: Could we just go over the page to follow that  
 7 through to give you context {F/590/10}. You can see  
 8 that what's being looked at is -- you see the words  
 9 "I suspect" at the top:  
 10 "I suspect there must be something gone wrong with  
 11 this request ..."  
 12 Identifying the request:  
 13 "~... unfortunately no clue on this. I am not sure  
 14 why this might have happened. Normally, since this is  
 15 a retried one it should have failed at the Journal  
 16 filter stage."  
 17 So there's a retried transaction which should have  
 18 failed at the journal filter stage.  
 19 A. I think we're getting into fairly complicated territory  
 20 here, my Lord.  
 21 MR JUSTICE FRASER: I think the whole case is fairly  
 22 complicated territory.  
 23 A. Sorry.  
 24 MR JUSTICE FRASER: But I think I can follow it.  
 25 A. Fine. It is quite a normal situation -- or it will

1 happen that you will get the same message come from the  
 2 counter to the BAL, because something has gone wrong if  
 3 the counter is retrying whether it's a manual  
 4 button-press to say please retry this, or it is an  
 5 automated press, the same message will come up to the  
 6 BAL, the BAL will say: I have had this message before,  
 7 the answer last time was this, it will send the same  
 8 response back down and that should take care of  
 9 situations where you are having to retry because  
 10 something has simply failed on the comms channel.  
 11 In this situation the symptoms, as I'm reading them,  
 12 are that because there was a bug in Horizon and this is  
 13 in the new system, it was pretty early days of the  
 14 Horizon Online, because there was a problem, we had  
 15 something coming through which got through the journal  
 16 filter but then failed at the branch database and so  
 17 therefore, as far as the branch database is concerned,  
 18 it has not happened.  
 19 MR JUSTICE FRASER: I understand that. I think what  
 20 Mr Green is putting to you is that this shouldn't have  
 21 got past the journal filter.  
 22 A. It's a bug, so certainly the way that the system should  
 23 have worked, a JSN -- the same JSN coming up would be  
 24 just a simple repeat of the message for -- because there  
 25 was some sort of glitch.

1 MR JUSTICE FRASER: Yes. Over to you, Mr Green.  
 2 MR GREEN: And just to clarify a small point on that: is it  
 3 fair that this box read as a whole shows that the person  
 4 looking into it was surprised that the second lot of  
 5 data had got into the BRDB, but there appeared to be no  
 6 duplicate JSN entry found in the JSN dump?  
 7 A. My Lord, you couldn't have two records in the Oracle  
 8 database with two JSNs unless there is an Oracle bug.  
 9 Q. So that's what they were looking for because the  
 10 duplicate -- there were two lots of data had been  
 11 entered in, so they looked to see if there had been  
 12 a duplicate JSN entry to try and find that out?  
 13 A. Somebody may have been trying to look for a duplicate  
 14 JSN entry. I can't really comment on what the guy was  
 15 doing at the time who was trying to investigate. I am  
 16 simply asserting that barring an Oracle bug, which would  
 17 have been huge, you cannot have two entries with the  
 18 same JSN.  
 19 Q. Let's move forward please now. You will be pleased to  
 20 know I think we only have two more PEAKs to go just by  
 21 way of illustration. {F/611} please.  
 22 So this is just moving forward in time, we are now  
 23 in April 2010, so this is a month after the acknowledged  
 24 balancing transaction that you have referred to in your  
 25 statement, yes?

1 A. Yes, my Lord.  
 2 Q. And we can see the problem there in the summary is FAD  
 3 code "314642 unable to rollover".  
 4 A. Yes, my Lord.  
 5 Q. And this is PEAK 0197592 and if we look just below the  
 6 second equals sign in the box you will see:  
 7 "When rolling over and doing branch trading  
 8 statements site gets message - unable to connect to data  
 9 centre."  
 10 Do you see that?  
 11 A. I do.  
 12 Q. And then there is a discussion that we see at 11.42 at  
 13 the foot of {F/611/2}. This is Anne Chambers and if we  
 14 go on to the next page {F/611/3}, you can see the third  
 15 paragraph she says:  
 16 "The bal osr log shows an exception while executing  
 17 statement insertOpeningBalanceForRollover ...  
 18 "I suspect this may be because there is already  
 19 a single entry in BRDB\_SU [stock unit] \_OPENING\_BALANCE  
 20 for DEF TP 12 BP 1 [trading period 12, balancing period  
 21 1] inserted during migration. The entry is for cash,  
 22 zero value.  
 23 "I'm wondering if this branch could be sorted out by  
 24 changing the TP in BRDB\_BRANCH\_INFO (this would have to  
 25 be done by OCP by development/ISD). The PM already has

1 several printed copies of the TP1 11 BTS. From the logs,  
 2 I can see that suspense and cash/currencies awaiting  
 3 collection are all zero -- so no office opening figures  
 4 are required for TP 12??  
 5 "This needs looking at urgently for a workaround for  
 6 this branch, and longer term to see if this can be  
 7 avoided at other migrating branches."  
 8 So that's the context, isn't it?  
 9 A. Yes.  
 10 Q. If we look at 14 April 2010 at 1 o'clock and 9 seconds,  
 11 you see Gareth Jenkins again:  
 12 "I've had a look at this PEAK and agree that we need  
 13 an OCP to tidy up BRDB to ?un-stick? this Branch. Note  
 14 that what I am proposing here is slightly different from  
 15 what Anne has suggested above.  
 16 "What we need to do is the following:  
 17 (I know the SQL is wrong, but BRDB Host team can  
 18 correct it and fill in the gaps)."  
 19 So just pausing there, he doesn't seem to be going  
 20 to use the template SQL code that had already been  
 21 prepared at this stage, because he is going off piste  
 22 a bit in some sense here, isn't he?  
 23 A. He is -- the balancing transaction tool is designed, or  
 24 is intended to introduce the balancing part of a double  
 25 entry item. This is not, in my mind, a double entry

1 item. This is the opening balance for a trading period,  
 2 or for a period --  
 3 Q. Yes.  
 4 A. -- and there is no second entry to it, there is nothing  
 5 to balance that against. The only thing you could  
 6 balance it against would be the closing balance of the  
 7 previous thing. The way the system is designed, this is  
 8 a number in a table which represents the opening balance  
 9 of a particular period.  
 10 Q. Yes. So he is using SQL code to set that correctly so  
 11 that the problem we have seen above can be overcome at  
 12 rollover?  
 13 A. Technically what is about to happen is an item is going  
 14 to be deleted under careful -- so an entry in the branch  
 15 database is about to be deleted.  
 16 Q. Yes, the --  
 17 A. It is not transaction data.  
 18 Q. Yes, I think there are two things that are happening,  
 19 just to be absolutely precise. One is an update to  
 20 a stock unit entry, yes, which we see at the fourth  
 21 paragraph at the top of the page? There's there are  
 22 a single entry inserted during migration, this is for  
 23 cash zero value, so it looks like there's a stock unit  
 24 entry being updated in number 1 and then a deletion to  
 25 that opening figure of cash, is that right?

1 A. That's what that's saying, yes.  
 2 MR JUSTICE FRASER: And the second one is in respect of  
 3 trading period 12, I think.  
 4 A. The second one is to remove an item which is saying it's  
 5 the cash position in trading period 12, yes.  
 6 MR JUSTICE FRASER: The first one is in respect of trading  
 7 period -- is setting it to trading period 11?  
 8 A. Yes, I must admit I hadn't sort of picked up on that  
 9 nuance, but that would be saying that this is  
 10 effectively a flag to say, or an indication as to  
 11 which -- where you're at with that particular stock  
 12 unit.  
 13 MR JUSTICE FRASER: I'm not making any findings or anything,  
 14 but it's not exactly a nuance, is it, if they're two  
 15 different trading periods?  
 16 A. Oh, sorry, no. I must admit I had missed in my sort of  
 17 reading through this that there was a problem with  
 18 a stock unit being flagged as being in period 12.  
 19 MR GREEN: Can we move on now please to {F/594}. This  
 20 is October 2010. It is PEAK number 0195962.  
 21 MR JUSTICE FRASER: I wonder if we could keep the murmuring  
 22 backstage down a little bit please. Carry on, Mr Green.  
 23 MR GREEN: Thank you very much, my Lord.  
 24 This is later on in 2010, and if we look halfway  
 25 down underneath Gareth Seemungal's name we can see that

1 it appears to be created -- or the Impact statement is  
 2 set at August 2010 and we can see underneath from the  
 3 progress narrative that the actual PEAK is opened  
 4 in March 2010. Do you see those two dates?  
 5 A. I do.  
 6 Q. So this spans across the period we have been looking at,  
 7 yes? And what's said there is:  
 8 "The proposed fix would correct and update the BRDB  
 9 transaction correction tool templates, making it less  
 10 likely that mistakes will occur when SSC are trying to  
 11 resolve problems with transactions in BRDB."  
 12 Yes?  
 13 A. Yes.  
 14 Q. And if we go down to Cheryl Card, 12 March 2.04.46:  
 15 "The Transaction Correction tool has now been used  
 16 in live. The templates for use with this tool need to  
 17 be updated to correct some details. Gareth Seemungal is  
 18 aware of the corrections needed."  
 19 A. Yes.  
 20 Q. Were you aware when you moved to Fujitsu what changes  
 21 were being made to the templates for this tool or not?  
 22 A. No.  
 23 Q. If we look at the bottom box, "Fix impact", if you look  
 24 at "Impact on user", well, let's look at "Impact on  
 25 test", first:

37

1 "Regression test ... with the new templates would be  
 2 required and necessary as this tool directly inserts  
 3 individual records into the branch database transaction  
 4 tables ..."  
 5 Yes?  
 6 A. Yes.  
 7 MR JUSTICE FRASER: What type of file is a .sh file?  
 8 A. Sorry, which line are we at?  
 9 MR JUSTICE FRASER: The one which says "Regression test  
 10 of ...?"  
 11 A. Sh -- I think it is a shell script.  
 12 MR GREEN: "Impact on user:  
 13 "Benefit of making the fix."  
 14 If you go over {F/594/2}:  
 15 "Corrects and updates the [transaction] correction  
 16 tool templates, makes it less likely that mistakes will  
 17 occur when fixing/resolving problems with transactions  
 18 in BRDB."  
 19 And then "Impact on operations":  
 20 "Benefit of fix that may not be visible to end user.  
 21 "SSC will be able to fix BRDB transactions quicker  
 22 and with more confidence."  
 23 Under "Risks":  
 24 "SSC will have to make a note of the shortcomings of  
 25 the existing templates and alter accordingly.

38

1 "What are the risks of this fix having unexpected  
 2 interactions with other areas?  
 3 "Possible, if the templates are incorrect then  
 4 branch totals, [transactions] ~... would be  
 5 incorrect - hence the required regression testing."  
 6 So that's the reason the regression testing is being  
 7 undertaken, to try to avoid unintended consequences of  
 8 the use of this tool. That's right, isn't it?  
 9 A. Yes.  
 10 Q. What this shows us is that the continued use of the tool  
 11 was at least anticipated at this time otherwise there's  
 12 no point in updating the templates.  
 13 A. Agreed, yes.  
 14 Q. Can we look at {F/768} please. This is PEAK number  
 15 0208119 and you can see this is in 2012 and if we go --  
 16 MR JUSTICE FRASER: Well, the target date is 2012.  
 17 MR GREEN: Sorry, your Lordship is quite right. The target  
 18 date is 2012. If we look at the progress narrative, it  
 19 is created in February 2011, so again, spanning across  
 20 the period that we have been looking at.  
 21 Now, can we go down please just to get some context,  
 22 can we go please to page 4 {F/768/4} and if we look at  
 23 the second box, do you see the second paragraph there:  
 24 "The SSC role has execute permissions to the  
 25 Host-Dev delivered packages mentioned in the PEAK and

39

1 resource, monitor (and hence connect and select any  
 2 table) and select any dictionary."  
 3 Now, pausing there, a select permission is not the  
 4 same as an insert, delete or update permission, is it?  
 5 A. That's correct.  
 6 Q. Now, if we go up please to page {F/768/3} and look at  
 7 the bottom of this, this is 30 September 2011:  
 8 "As per the previous PEAK comments, the role  
 9 'APPSUP' is extremely powerful and should only be used  
 10 under extreme circumstances and under MSC supervision.  
 11 As such the Branch Database design was that 3rd line  
 12 support users should be given the 'SSC' role which is  
 13 effectively read access ..."  
 14 That's the select table and catalogue, yes?  
 15 A. Yes.  
 16 Q. "SSC team members should only have to ..."  
 17 It looks as if it is access but it has got  
 18 a little --  
 19 A. Yes.  
 20 Q. "... [access] BRSS for normal support investigations,  
 21 unless the information has not replicated in time. SSC  
 22 should only given the optional 'APPSUP' temporarily ...  
 23 if required to make emergency data amendments in BRDB  
 24 live."  
 25 A. Correct.

40

1 Q. So pausing there, what was meant to happen was that SSC  
 2 should only be given the optional APPSUP role  
 3 temporarily, yes?  
 4 A. That's right, yes.  
 5 Q. And if we go up, please, to page 2 {F/768/2}, you can  
 6 see Anne Chambers, halfway down the page -- do you see  
 7 Anne Chambers?  
 8 A. I do.  
 9 Q. You know she has been involved in a lot of these PEAKs,  
 10 hasn't she?  
 11 A. She has, certainly .  
 12 Q. And she is writing to Andrew Gibson; who is he?  
 13 A. Andrew Gibson is the guy in Ireland -- I can't remember  
 14 his exact title , but he is certainly a key person in the  
 15 operations area.  
 16 Q. And what she says is :  
 17 "Unfortunately development write their scripts  
 18 explicitly to use SSC. So I think we're stuck with it  
 19 unless they deliver new scripts (which would not be  
 20 a popular or quick option).  
 21 "When we go off piste we use appsup. Can we have  
 22 both??"  
 23 Do you know from your knowledge what she meant by  
 24 going off piste in that context?  
 25 A. It would be having to fix a problem that is not catered

1 for by a script that is available to these people.  
 2 Q. Do you know that, or are you speculating?  
 3 A. I'm very confident in that.  
 4 Q. Finally in relation to these matters, you are aware that  
 5 Ernst & Young in 2011 expressed concern about  
 6 permissions -- privileged access permissions?  
 7 A. I am.  
 8 Q. And that was at the end of -- the Opus date on that  
 9 document is 9 December 2011, yes? And just pausing  
 10 there, that is a very proper point for someone auditing  
 11 these sorts of issues to be concerned about, isn't it?  
 12 A. Absolutely.  
 13 Q. I won't take you to it, but that letter is at {F/869}.  
 14 If we now turn please to {H/196/9}, this is a part  
 15 of a letter of 11 February 2019 and is from Wombles to  
 16 Freeths and this user IDs point is being dealt with at  
 17 paragraph 8.2 onwards:  
 18 "We have taken further instructions from Fujitsu in  
 19 it respect of additional USERIDs in your schedule and  
 20 set out descriptions of each user below ... there are  
 21 some usernames that: 1) do not exist today and never  
 22 existed in the past as far as Fujitsu are aware. These  
 23 are identified in the classification column of the list  
 24 as 'unknown', and 2) do not exist today but did exist in  
 25 the past."

1 So let's just take this in stages, if we may. We  
 2 can see COBEN01 is Cath Obeng but she also has  
 3 a different entry below. And she is "Person-SSC", yes?  
 4 A. Yes.  
 5 Q. And we can see a number of "Person SSC"s. And then if  
 6 we go halfway down we can see Andy Gibson is "Person-POA  
 7 UNIX". Do you see that?  
 8 A. Yes.  
 9 Q. And we can see that Ed Ashford is also "POA UNIX" on the  
 10 next page, {H/196/11}, four down.  
 11 A. Yes.  
 12 Q. We can see at the bottom of the page Paul Simpson. If  
 13 we go over the page {H/196/12}, we can see Paul Stuart  
 14 and Wayne Calvert, halfway down, "POA UNIX", and if we  
 15 go please to page 14 of that letter , so two  
 16 pages further on {H/196/14}, the explanation is given:  
 17 "In respect of SSC user privileges , SSC users ..."  
 18 That's "Person SSC":  
 19 "... will typically have the following  
 20 privileges ..."  
 21 And then we can see what's said there. For example  
 22 at 8.6.3 a "Select" privilege . But if we go to 8.7  
 23 {H/196/15):  
 24 "In respect of POA Unix user privileges , POA Unix  
 25 users (those identified as 'PERSON - POA UNIX' under

1 classification ) will typically have the following  
 2 privileges /roles ."  
 3 And 8.7.7 is :  
 4 "Granted the 'UNXADM' role which contains the  
 5 following role:  
 6 "(a) granted the 'DBA' role. This is an Oracle  
 7 supplied role for use by database administrators ...  
 8 lots of privileges are granted to this role so users  
 9 have the ability to update/delete/insert into any of the  
 10 branch database tables ."  
 11 A. Yes.  
 12 Q. You would agree that those people have the role which  
 13 allows them privileges to update, delete, or insert into  
 14 branch database tables whether they are using the  
 15 correction tool or not?  
 16 A. Those people could log on to the database and do an  
 17 awful lot of damage.  
 18 Q. And the only audit of that that we have prior to 2015  
 19 was log on and log off; that's correct, isn't it?  
 20 A. Correct.  
 21 MR GREEN: My Lord, that's the end of that section of the  
 22 cross-examination. Would that be a convenient moment  
 23 for a break?  
 24 MR JUSTICE FRASER: Yes.  
 25 MR GREEN: All I have left to deal with is Mr Godeseth is

1 the bugs.  
 2 MR JUSTICE FRASER: Okay. We will have ten minutes.  
 3 Mr Godeseth, another short break.  
 4 A. Thank you, my Lord.  
 5 MR JUSTICE FRASER: If you could come back at 11.50, same as  
 6 before, but you know the form: don't discuss the case  
 7 with anyone.  
 8 (11.41 pm)  
 9 (Short Break)  
 10 (11.51 am)  
 11 MR GREEN: Mr Godeseth, I would now like to deal with the  
 12 key bugs that you deal with in your second witness  
 13 statement, if I may, at paragraph 3 at {E2/7/1} you  
 14 explain that this witness statement is prepared in  
 15 response to the witness evidence submitted by the  
 16 claimants and the report submitted by Mr Coyne. Is that  
 17 right?  
 18 A. Yes.  
 19 Q. And at the end of paragraph 3 you say you have consulted  
 20 with various colleagues and you have identified them  
 21 below.  
 22 Mr Bansal was involved in problem management; was he  
 23 involved in these bugs, do you know?  
 24 A. I certainly haven't spoken to Steve about any of these  
 25 bugs.

45

1 Q. You haven't spoken to him?  
 2 A. No.  
 3 Q. Let's look at Callendar Square, which you deal with from  
 4 paragraph 12 onwards at {E2/7/3}. And you say at  
 5 paragraph -- you are dealing with this in the context of  
 6 the trial of Seema Misra which you have referred to at  
 7 paragraph 7, because you are responding to  
 8 Mr McLachlan's witness statement as well, yes?  
 9 A. Yes.  
 10 Q. And at paragraph 8 you say:  
 11 "I understand from Post Office's solicitors  
 12 that ..."  
 13 So some of this is just what you have been told by  
 14 Post Office's solicitors?  
 15 A. Absolutely, yes.  
 16 Q. And at 8.3:  
 17 "Post Office was represented [in that case] by  
 18 Cartwright King ~..."  
 19 Who informed Post Office's solicitors in turn about  
 20 what you then say at 8.3, that's correct?  
 21 A. Yes.  
 22 Q. And you didn't really know about any of that yourself?  
 23 A. No.  
 24 Q. You have just effectively been asked to put it in your  
 25 statement. And at paragraph 10 {E2/7/3} you say you

46

1 understand from Gareth Jenkins, halfway down:  
 2 "... that Professor McLachlan requested information  
 3 that was not necessary and/or obtainable."  
 4 That's what Mr Jenkins told you about what  
 5 Professor McLachlan had requested in that trial? You  
 6 didn't have any knowledge of it yourself?  
 7 A. The Misra trial -- I was in -- sorry, I was in Fujitsu  
 8 so I have -- we would have had fleeting conversations  
 9 about it but it was certainly not going down into any  
 10 detail at that time, but I do remember the -- I do  
 11 remember that we had been asked for an awful lot of  
 12 information.  
 13 Q. But the characterisation --  
 14 A. And, you know, specifically the fact that people were  
 15 wanting to keep the old Horizon system which just wasn't  
 16 a viable option.  
 17 MR JUSTICE FRASER: What do you mean "keep"?  
 18 A. Basically to have a Horizon system up and running, an  
 19 old Horizon system up and running, so that people could  
 20 go and try to play with it to replicate errors or  
 21 whatever.  
 22 MR JUSTICE FRASER: So you mean retain at least one part of  
 23 it so that it would be available --  
 24 A. And --  
 25 MR JUSTICE FRASER: Will you just let me finish.

47

1 A. Sorry.  
 2 MR JUSTICE FRASER: When you say keep, you don't mean keep  
 3 it for use across the network?  
 4 A. Certainly not, my Lord.  
 5 MR JUSTICE FRASER: You mean in respect of an operating  
 6 version that was still available to be inspected?  
 7 A. Correct.  
 8 MR JUSTICE FRASER: Right. And in your view, that wasn't  
 9 viable?  
 10 A. You need to go beyond the counter to supporting  
 11 components behind it in order to have anything that is  
 12 likely to be of any use in trying to sort out how the  
 13 whole system works, my Lord.  
 14 MR JUSTICE FRASER: Right.  
 15 MR GREEN: To your knowledge were there other requests made  
 16 by Professor McLachlan for information, or is that not  
 17 something you know about?  
 18 A. I don't know about the detail of that certainly.  
 19 Q. But what you do know you've got from Gareth Jenkins  
 20 there, that Professor McLachlan requested information  
 21 that was not necessary and/or obtainable, that's what  
 22 you've got from Gareth Jenkins?  
 23 A. Yes.  
 24 Q. If we go to paragraph 12 onwards, you are specifically  
 25 dealing with Callendar Square, yes?

48

1 A. Yes.  
 2 Q. And you very fairly say that you don't have first-hand  
 3 knowledge of the issue, yes?  
 4 A. Correct.  
 5 Q. But you say you have reviewed the documents relating to  
 6 the issue and discussed it with Gareth Jenkins.  
 7 A. Yes.  
 8 Q. So you have both undertaken a review of the documents  
 9 and spoken to Mr Jenkins, that's correct?  
 10 A. Yes.  
 11 Q. That's what you say.  
 12 A. Yes, yes, I have certainly spoken to Gareth, but -- and  
 13 I have re-clarified a couple of things just to make sure  
 14 that my understanding was correct.  
 15 Q. Let's just start with Callendar Square. Just very  
 16 briefly, if I can take these reasonably quickly,  
 17 firstly, it is a Legacy Horizon problem not  
 18 a Horizon Online problem?  
 19 A. Correct.  
 20 Q. Secondly, it was a problem with Riposte?  
 21 A. Correct.  
 22 Q. Thirdly, it is sometimes referred to as the Riposte lock  
 23 or unlock problem?  
 24 A. Yes, I'm happy with that, yes.  
 25 Q. And, fourthly, it affected balancing in branches?

1 A. It could affect balancing in branches.  
 2 Q. And let's start, if we may please, at {F/243}. This is  
 3 the KEL ending in 1359R and we can see that the KEL was  
 4 raised on 24 November 2000. Do you see under the  
 5 "Raised" --  
 6 A. Yes.  
 7 Q. And you see it says "Time out waiting for lock agents  
 8 and correspondence"?  
 9 A. Yes.  
 10 Q. If you look under "Solution - ATOS":  
 11 "Needs investigating ... if we get an occasional one  
 12 of these events, when Riposte is busy (such as Riposte  
 13 starting up which was the occurrence on the 04/04/2003)  
 14 then this can be ignored. The original error type that  
 15 this call was raised for was when the Riposte service  
 16 hung following archiving and continuously output these  
 17 messages."  
 18 Yes?  
 19 A. Yes.  
 20 Q. This is a type of problem that could arise with Riposte  
 21 lock agents, yes? And on the face of --  
 22 MR JUSTICE FRASER: You are moving on before you got  
 23 an answer.  
 24 A. Sorry, my Lord, yes.  
 25 MR GREEN: I thought I heard him say yes.

1 And on the face of this, what's being said is if we  
 2 get an occasional one of these events, this can be  
 3 ignored.  
 4 A. Yes, an occasional time out when one thing is trying to  
 5 talk to another is something that you could say is okay,  
 6 but that's a highly subjective thing because you have to  
 7 work out what "occasional" means.  
 8 Q. Okay. Let's go forward to {F/565} please and look at  
 9 page 2 {F/565/2}. And if we look at February 2003, this  
 10 is the J Simpkins 338Q KEL.  
 11 A. Yes.  
 12 Q. And if we look at February 2003:  
 13 "We are seeing a few of these each week, on  
 14 Wednesdays during balancing. This can lead to problems  
 15 if the PM is balancing on the counter generating the  
 16 events, as it may not have a full view of transactions  
 17 done on other counters. PC0086212 sent to development."  
 18 And then if we look at June 2004 further -- this is  
 19 a year and a bit later on:  
 20 "This event can also give rise to Transfer problems,  
 21 where the eventing Node was not replicating and so  
 22 allowed Clerk to Transfer in ... of a [transaction]  
 23 which had already been TI [transferred in] on another  
 24 Node for the second time or an Existing Reversal ..."  
 25 Now, do you know if on the occasion being referred

1 to there, there was a discrepancy in the branch or not?  
 2 A. I don't know, my Lord.  
 3 Q. It's not apparent from this KEL anyway. Do you want to  
 4 go over the page {F/565/3}:  
 5 "This problem is still occurring every week, in one  
 6 case at the same site on 2 consecutive weeks."  
 7 It doesn't actually tell us whether there is  
 8 a discrepancy at the branch, does it?  
 9 A. No.  
 10 Q. And this final entry of September 2005 is actually the  
 11 Callendar Square branch so we can see that although  
 12 Callendar Square experienced this bug in 2005, the  
 13 genesis of it appears to go back to February 2003 and  
 14 similar lock agent problems back in November 2000, is  
 15 that fair?  
 16 A. I think that's fair.  
 17 Q. And if we go forward, please, to another KEL at {F/354}.  
 18 This is raised in June 2004:  
 19 "Transfer in accepted Twice, thus causing  
 20 a Discrepancy".  
 21 Now, we saw in June 2004 that there was a problem of  
 22 a duplicate transfer in on the other previous KEL,  
 23 didn't we, and this seems to be the June 2004 branch  
 24 referred to in the previous KEL. It says under  
 25 "Problem", discrepancy of £22,290. Do you see that

1 figure about five lines down?  
 2 A. Yes.  
 3 Q. So that's the discrepancy. Then if you look under  
 4 "Solution", it is:  
 5 "... currently with [Escher] for investigation."  
 6 A. Yes.  
 7 Q. Yes? At the end of that solution. From this KEL we  
 8 don't know if this problem was sent to Escher in 2004  
 9 when it was first raised, or some time thereafter,  
 10 or October 2006 when this KEL was last updated, do we?  
 11 A. I don't know, I don't know when it was actually sent to  
 12 Escher.  
 13 Q. You can't tell from the KEL?  
 14 A. No.  
 15 Q. And then if we look at the Callendar Square branch  
 16 itself more closely, {F/297}, this is PEAK 0126042 and  
 17 you can see the Callendar Square branch FAD code of  
 18 160868.  
 19 A. Yes.  
 20 Q. And the problem is in the summary, just after the FAD  
 21 code:  
 22 "SU cash amounts vary on counters."  
 23 Yes?  
 24 A. Yes.  
 25 Q. And if we look -- we can see first of all

53

1 15 September 2005, there's a call from Alan Brown. If  
 2 we go over the page {F/297/2} and it is the fifth box  
 3 I think, 15 September 2005 at 16.12.27. Do you see  
 4 there:  
 5 "Due to the Riposte errors on 14/09/05 from 15.30  
 6 onwards ... messages were not replicated on counter 3.  
 7 As a result, 3 transfers in to stock unit AA were done  
 8 twice, initially on other counters then again on counter  
 9 3. The transfers in were for ..."  
 10 And we can see the figures there:  
 11 "This has resulted in a loss of 3,489.69 in CAP 25  
 12 to the outlet, which POL may need to correct via an  
 13 error notice."  
 14 Do you see that?  
 15 A. Yes.  
 16 Q. And then underneath that:  
 17 "Phoned the PM to explain what the problem was. He  
 18 is concerned about other transactions which he has input  
 19 twice (3 Giro deposits and another cheque) because of  
 20 the replication problem. Have advised him to contact  
 21 the NBSC as this is a business issue."  
 22 Now, it's clear that there is an underlying -- well,  
 23 we know the Callendar Square bug is a bug, don't we?  
 24 A. Yes.  
 25 Q. And if we move forward please to {F/298}. This is PEAK

54

1 0126376, and we can see it's the same FAD code, 160868,  
 2 and over the page on page 2 {F/298/2} he has called back  
 3 on 21 September 2005 at 17.09 and if you look under --  
 4 MR JUSTICE FRASER: 21 September at when? 17.09?  
 5 MR GREEN: At 17.09, just the top of the page.  
 6 MR JUSTICE FRASER: Yes.  
 7 MR GREEN: "Information: pm experienced similar problems  
 8 last week and wants us to investigate why this is  
 9 happening.  
 10 "PM stated he has not had any disconnected node  
 11 messages or any online issues."  
 12 Do you see that?  
 13 A. Yes.  
 14 Q. And immediately below that, information at 5.14:  
 15 "Another transfer of £45.40 approx."  
 16 And then if we go down further can you see:  
 17 "This transfer appeared on both nodes 3 & 4."  
 18 A. Yes -- sorry, no.  
 19 Q. You can see "Transfer out - node 2", and then we go  
 20 below that to "Transfer in node 3 & 4"?  
 21 A. Yes.  
 22 Q. And then that tells us -- that's the information to  
 23 which the observation "This transfer appeared on both  
 24 nodes 3 & 4", is made?  
 25 A. Yes.

55

1 Q. And:  
 2 "When clerk accepted transfer in it accepted it.  
 3 After she had accepted it she went back into transfers  
 4 and node 4 transaction for £608.13 appeared."  
 5 So I think this is actually an assistant at the  
 6 branch, but it's the same branch.  
 7 A. Yes.  
 8 Q. And if we look on page 3 please {F/298/3},  
 9 22 September 2005, 16.13.08, which is about four down  
 10 from the top -- five down from the top.  
 11 A. Yes.  
 12 Q. Cheryl Card:  
 13 "This is another occurrence of last week's  
 14 problem ..."  
 15 With a PEAK reference there:  
 16 "... where messages were not replicated due to  
 17 Riposte errors. Last week the PM did some duplicate  
 18 transfer in transactions which caused reconciliation  
 19 errors - fortunately this week he has not done so. The  
 20 PM wants to know why these problems have occurred twice  
 21 within 2 weeks. I will pass the call to development for  
 22 comment."  
 23 Yes?  
 24 A. Yes.  
 25 Q. And you can see there that the -- it is a pending

56

1 incident, yes? Category 40, "Under investigation?"  
 2 A. Yes.  
 3 Q. If we move forward, please, to {F/300.1}, this is now  
 4 from the SPM's point of view what's happening and he is  
 5 actually getting some support on this particular one  
 6 from his manager apparently here. There are visits  
 7 noted at 20th, 21st and 28th September 2005 and if we  
 8 look at page 2, please, {F/300.1/2} you can see under  
 9 "Expand on any letter requested ..." can you see:  
 10 "This office had severe problems balancing on [week]  
 11 25, resulting in a shortage of £6,414.46. After  
 12 checking various reports I am satisfied that the error  
 13 is made up of ..."  
 14 And they are then broken down carefully there and  
 15 you can see that the SPMR is saying there is a Horizon  
 16 software problem and so forth, giving the history, also  
 17 a problem with transfers from one stock to another, they  
 18 have doubled up. Then speaking to the Horizon support  
 19 centre at the bottom of the page. If we go over the  
 20 page please {F/300.1/3}:  
 21 "They told the SPMR that they would report to NBSC  
 22 that they had identified and rectified the problem and  
 23 that the amount could be held in the suspense account.  
 24 However, as part of the shortage relates to transfers,  
 25 and no error notice will be issued, then the

57

1 Suspense Account Team are not prepared to authorise the  
 2 entry."  
 3 So it wasn't easy for the subpostmaster, was it, you  
 4 can see here?  
 5 A. No, indeed, a horrible position to be in.  
 6 Q. And we can see the concern about follow up if you look  
 7 at the penultimate paragraph:  
 8 "No follow-up was received from Service Support  
 9 regarding this call."  
 10 Now that's the Horizon service desk, isn't it?  
 11 A. It would not be Fujitsu. Service Support, I think,  
 12 would be a Post Office business function.  
 13 Q. Was it? Okay, thank you.  
 14 Let's move forward please to {F/301.2}. This is  
 15 another log, "Area Intervention Manager Visit Log",  
 16 dated 7 October 2005, and if we go over the page  
 17 {F/301.2/2}:  
 18 "Telephoned Alan as requested. He is concerned that  
 19 he has still not heard anything regarding the loss that  
 20 he is rolling."  
 21 Yes?  
 22 A. Yes.  
 23 Q. Just tracing through the chronology. If we go to  
 24 {F/302} please, this is five days later,  
 25 12 October 2005, and if you look on this first page you

58

1 will see at 17.26, which is just below the second lot of  
 2 equal signs:  
 3 "PM is transferring a stock unit from node 7 to node  
 4 2, it has been accepted on node 2 but has not been  
 5 transferred."  
 6 Do you see that?  
 7 A. I do.  
 8 Q. And then at 17.39:  
 9 "PM was trying to transfer £2,490 from node 7 onto  
 10 node 2. She states that she has accepted the transfer  
 11 on node 2 but the system is not showing this.  
 12 "On node 7 it is showing pending transfer but it is  
 13 not showing on node 2.  
 14 "It appears on her transfer sheet as completed."  
 15 So that would be very anxious-making for the SPM,  
 16 wouldn't it?  
 17 A. Agreed, yes.  
 18 Q. If we go to {F/310.1/2}, 4 November 2005, page 2 please.  
 19 "Spoke to Alan about the ongoing issue of his  
 20 Horizon problems. He now has received the error notice  
 21 for the Girobank duplicate transactions. This still  
 22 leaves a loss of around £3,500. I told Alan that this  
 23 was still being investigated and as soon as I had some  
 24 news I would get back to him.  
 25 "Alan worried about this, because he has read an

59

1 article in the Subpostmaster which makes him think that  
 2 he will be held liable, and he has no intention of  
 3 making this good. He again said that the transfers had  
 4 been sorted, but he needed paperwork to back this up in  
 5 order to correct the loss."  
 6 Yes? Now, if we go back to the PEAK to see how this  
 7 is being dealt with at {F/298/5} please. We are now  
 8 at -- this is part of PEAK 0126376, and if we look at  
 9 10 November 2005 at 11.58.30, user Jez Murray, do you  
 10 see there:  
 11 "1. This problem is the root cause of the  
 12 reconciliation error closed in [previous PEAK].  
 13 "2. Presumably the root cause is deemed to be  
 14 software not hardware.  
 15 "3. The Postmaster has a workaround in place which  
 16 is not to duplicate transactions (eg Transfer In) just  
 17 because the original attempts were successful but not  
 18 showing on all nodes."  
 19 And then 4, you can see:  
 20 "POA CS MSU have a workaround in place which is that  
 21 if 3 above is not followed and [it] recurs, a BIMS will  
 22 be issued advising POL to issue a Transaction  
 23 Correction."  
 24 Then 5:  
 25 "There is no SLT for software fixes as they are

60

1 delivered based upon the priority or severity of the  
 2 issue and could remain open until both businesses decide  
 3 a fix is necessary or the workaround is adequate.”

4 So just unpacking paragraph 5 for a moment, there’s  
 5 no service level time for a software fix of this type,  
 6 is that right?

7 A. I’m -- it says it there so I’m -- yes, I would -- I have  
 8 no reason to doubt it .

9 Q. Sorry, service level target I should have said.

10 Now, if we move forward, please, from that being  
 11 left as a workaround to {F/312.1}. This is another log  
 12 of 167 November 2005. If we look at page 2 of that one  
 13 please {F/312.1/2} you can see there are two things  
 14 referred to there:

15 “Discussed ongoing issues of loss due to Horizon  
 16 misbalance. SPMR concerned that he has now made  
 17 a fraudulent entry in that he has rolled over to the  
 18 next trading period and put the loss into local  
 19 suspense. He has then gone on to state that the cash  
 20 has been made good, which it hasn’t. This was done on  
 21 the advice of the Helpdesk.”

22 Now, when you were at Post Office were you aware of  
 23 that sort of advice being given to people who were  
 24 suffering software or balancing problems?

25 A. No.

61

1 Q. 18 November 2005:

2 “I have contacted Jennifer Robson, who has confirmed  
 3 that the loss has to be put into Emergency Suspense.  
 4 I have now asked when this will be done as the SPMR is  
 5 worried about doing something that is totally contrary  
 6 to his contract.”

7 You can understand those worries, can’t you?

8 A. I certainly can.

9 Q. Now, did any of the Callendar Square matters really  
 10 bubble up to you, any of the aspects of this at the  
 11 time, or not?

12 A. I think I was probably aware of Callendar Square as --  
 13 but that would have been 2010 when I went into Fujitsu,  
 14 so I cannot remember ever having heard of  
 15 Callendar Square or Falkirk --

16 Q. Post Office .

17 A. -- Falkirk Post Office as an issue before that.

18 Q. Okay. Let’s look at {F/324.1} please. We have 5 and  
 19 6 January, it’s another log:

20 “Telephoned the office and Allan said that he was  
 21 having problems again with transfers. He has contacted  
 22 the Horizon helpdesk who have subsequently come back to  
 23 him to say that there is no system problem and that he  
 24 should contact NBSC.”

25 Now, the Horizon help desk, was that one run by

62

1 Fujitsu or Post Office?

2 A. My recollection is that the Fujitsu help desk would have  
 3 been dealing with hardware issues and the NBSC would  
 4 handle the process and business queries, so I think  
 5 there was a Fujitsu help desk which was where the  
 6 subpostmaster would ring to say he thought he had  
 7 a problem with his hardware.

8 Q. Didn’t the Fujitsu help desk also deal with queries  
 9 about software problems?

10 A. Not talking to the Post Office -- not talking to the  
 11 subpostmaster, as far as I can recall .

12 Q. Okay:

13 “He did this and from what I can understand the NBSC  
 14 have told him that he is trying to balance on two  
 15 different terminals. Allan disputes this and is adamant  
 16 that there is a system error.”

17 Do you see that?

18 A. Yes.

19 Q. Now, given the history, it’s quite likely that there was  
 20 a system error, isn’t it?

21 A. I think it’s -- it has been established that there was  
 22 a bug.

23 Q. Yes. If we then move forward please to {F/333.1} and we  
 24 go to page 3 first , please {F/333.1/3}. This is part of  
 25 an email chain and if we look at the email of

63

1 23 February 2006 from it Anne Chambers at Fujitsu to  
 2 Mike Stewart, you see that halfway down, Anne Chambers  
 3 to Mike Stewart about Callendar Square.

4 A. Yes.

5 Q. If you look, please, at the second paragraph:

6 “Haven’t looked at the recent evidence, but I know  
 7 in the past this site had hit this Riposte lock problem  
 8 2 or 3 times within a few weeks. This problem has been  
 9 around for years ...”

10 That’s consistent with the related KELs we have  
 11 already looked at, isn’t it?

12 A. Yes.

13 Q. “... and affects a number of sites most weeks, and  
 14 finally Escher say they have done something about it.  
 15 I am interested in whether they really have fixed it  
 16 which is why I left the call open - to remind me to  
 17 check over the whole estate once S90 is live - call me  
 18 cynical but I do not just accept a 3rd party’s word that  
 19 they have fixed something!”

20 Yes? So it had been open, we know, for years as  
 21 a known problem affecting sites for years, and Escher  
 22 are hopefully fixing it, although Anne Chambers is  
 23 doubtful about that, in February 2006?

24 A. She is cynical, yes.

25 Q. Yes? She goes:

64

1 "What I never got to the bottom of, having usually  
 2 had more pressing things to do, was why this outlet was  
 3 particularly prone to the problem."  
 4 So that doesn't suggest that she gave the problem of  
 5 this outlet a particularly special priority to sort out  
 6 its problems, does it, because she had more pressing  
 7 things than an outlet being affected by significant  
 8 discrepancies from a known bug?  
 9 A. Yes.  
 10 Q. "Possibly because they follow some particular  
 11 procedure/sequence which makes it more likely to happen?  
 12 This could still be worth investigating, especially if  
 13 they have continuing problems, but I don't think it is  
 14 worthwhile until we knew the S90 position."  
 15 So she doesn't seem to be going to investigate it at  
 16 that stage. And then she says:  
 17 "Please note that KELs tell SMC that they must  
 18 contact sites and warn them of balancing problems if  
 19 they notice the event storms caused by the held lock,  
 20 and advise them to reboot the affected counter before  
 21 continuing with the balance. Unfortunately in practice  
 22 it seems to take SMC several hours to notice these  
 23 storms by which time the damage may have been done."  
 24 Now, this isn't something you knew about at the  
 25 time, but from what she is saying there it doesn't seem

1 that the SMC information "watch out" is getting to the  
 2 branches in time, is that fair?  
 3 A. That's a fair assumption, yes.  
 4 Q. And you say in your witness statement that release S90  
 5 was distributed in March 2006. That's paragraph 14.2 at  
 6 {E2/7/5}.  
 7 A. Yes.  
 8 Q. So stepping back, we have had related problems since --  
 9 directly related at least since February 2003 and other  
 10 related ones we saw in the earlier KEL from 2000, and it  
 11 takes them until 2006 to distribute the fix that deals  
 12 with it, yes?  
 13 A. Yes.  
 14 Q. In circumstances where many branches had been affected,  
 15 including their branch accounts.  
 16 Now, can I ask you to look at {H/2/96} please. This  
 17 is part of a letter sent by Post Office's solicitors on  
 18 28 July 2016. If we look, this is dealing with  
 19 Callendar Square, paragraph 2.1:  
 20 "This defect, which was discovered in 2005 and fixed  
 21 in March 2006, involved Horizon failing to recognise  
 22 transfers between different stock units."  
 23 Now, we have seen that it's not correct that the  
 24 actual underlying defect was only discovered in 2005,  
 25 haven't we?

1 A. I would agree that the bug underlying it -- the  
 2 Callendar Square manifestation was discovered in 2005  
 3 but --  
 4 Q. The one at Callendar Square?  
 5 A. Yes, and I would agree that the underlying bug had been  
 6 there for a considerable time, probably since the  
 7 Horizon went in.  
 8 Q. And if we look at the following -- sorry, if we look at  
 9 {H/6/3}, this is part of a letter from Post Office's  
 10 solicitors on 11 January 2017 and if we can look at  
 11 page 3 of that letter very kindly, if you look at  
 12 paragraph 7.8.1:  
 13 "The Falkirk/Callendar Square issue was only known  
 14 to have affected that one branch."  
 15 That's also incorrect, isn't it?  
 16 A. Certainly there is a spreadsheet which actually talks  
 17 about where we found this lock problem and how many had  
 18 had a -- had discrepancies in there -- how many we  
 19 thought would have had -- there would have been an  
 20 impact of this type.  
 21 Q. That's wrong, isn't it?  
 22 A. On the face of it, yes.  
 23 MR JUSTICE FRASER: Well, you might want to look also at --  
 24 it is a PEAK that Mr Green took you to, but he didn't  
 25 draw your attention to the entry that I'm going to draw

1 your attention to, just out of fairness. It is at  
 2 {F/298/3} -- actually it starts at {F/298/1} so you can  
 3 see it is one of the PEAKs that Mr Green has been asking  
 4 you about and he took you to different entries, but if  
 5 we go now to page 3 of that {F/298/3} you will see in  
 6 the bottom half of the page in the light blue, entry  
 7 22 September 2005 from Cheryl Card, and in parentheses  
 8 at the bottom of that entry she says:  
 9 "A few of these errors seem to occur every week at  
 10 different sites."  
 11 Does that help you answer Mr Green's question?  
 12 A. I think that -- the "timeout occurred waiting for lock",  
 13 so this is a generic -- I would read that as a fairly  
 14 generic problem which is probably the one which goes  
 15 right back to the ATOS KEL -- sorry, the KEL which says  
 16 that if you see this occasionally, that might be okay,  
 17 but it's really when you get a storm of them that you  
 18 have effectively got one counter not being able to talk  
 19 to another and that is the underlying technical issue is  
 20 that a counter is simply not being able to get a message  
 21 across to another one.  
 22 MR JUSTICE FRASER: Mr Green.  
 23 MR GREEN: And I think you fairly accept that there is  
 24 a spreadsheet, which we will come to, with a significant  
 25 number of branches that were affected by the

1 Falkirk/Callendar Square bug.  
 2 A. Yes.  
 3 Q. And that spreadsheet includes more than one entry,  
 4 doesn't it?  
 5 A. It does.  
 6 Q. Let's look at your witness statement, please, at  
 7 {E2/7/3}. You say the Callendar Square bug occurred in  
 8 2005. It would be more complete to cover the history  
 9 that we have covered now, wouldn't it?  
 10 A. That's a fair comment, yes.  
 11 Q. At paragraph 15 {E2/7/5} you say:  
 12 "I understand from Matthew Lenton (Fujitsu's  
 13 Post Office Account Document Manager) that this bug  
 14 affected thirty branches, resulting in mismatches at  
 15 twenty, and that Fujitsu has established this for the  
 16 purposes of this statement using the event logs  
 17 described above."  
 18 Is that really what Matthew Lenton told you?  
 19 A. I didn't speak to Matthew about it. I got ... so the  
 20 answer is no, that's not what Matthew told me.  
 21 Q. Did Matthew communicate directly with you in any way on  
 22 this point?  
 23 A. I think I got the spreadsheet from him.  
 24 Q. Directly from him, or from someone else?  
 25 A. I can't remember.

69

1 MR JUSTICE FRASER: I think to be fair, you actually  
 2 corrected that number in-chief, didn't you?  
 3 A. I did indeed, my Lord.  
 4 MR GREEN: Yes, I will come to that.  
 5 And just to clarify, is it your understanding from  
 6 the information that's found its way to you from  
 7 Matthew Lenton that there has been a specific process  
 8 for the purposes of your statement of analysing the  
 9 event logs historically across all the branches that may  
 10 have been affected by this to see how many were?  
 11 A. No, the spreadsheet is something that was done at the  
 12 time, as I understand it by Anne Chambers, to actually  
 13 investigate what had happened when we had had these  
 14 locks.  
 15 Q. Because the statement there would suggest that we can be  
 16 completely confident that Fujitsu have established  
 17 what's happened because they have looked at all the  
 18 event logs, and that's not right, is it?  
 19 A. I am comfortable that Anne will have done her job  
 20 correctly and she will have investigated all of those  
 21 issues at the time, resulting in the spreadsheet which  
 22 I believe we found in Steve Parker's -- he had -- he  
 23 still had it in his audit trail.  
 24 Q. I will just put the question one more time: the  
 25 statement that's made there is not right, is it?

70

1 A. I agree, it's not right.  
 2 Q. Now let's look at {F/322.1} please. We can download  
 3 that. This appears to be the statement that you have  
 4 referred to in oral evidence now but that was not  
 5 referred to in your witness statement and we will see in  
 6 a minute that the properties identify Anne Chambers as  
 7 the author on 22 December 2015 and --  
 8 MR JUSTICE FRASER: Maybe just pause while we wait for it to  
 9 come up.  
 10 MR GREEN: Could we just make it a little bit bigger, very  
 11 kindly.  
 12 Now, this is the spreadsheet you are referring to?  
 13 A. Correct.  
 14 Q. That you have just told the court about. We located  
 15 this and it was disclosed to us on 27 February 2019 and  
 16 if we look at the file tab at the top, please, and go  
 17 into -- just pause there. Can you see "Created", on the  
 18 right-hand side, 22/12/2015 and "Anne Chambers", do you  
 19 see that?  
 20 A. Yes.  
 21 Q. Is that how you identified it was from Anne Chambers, or  
 22 did Mr Parker give you an email or tell you about that?  
 23 A. Steve -- yes, Steve and I discussed it so I -- I think  
 24 I originally got the information that it was  
 25 Anne Chambers' spreadsheet from John Simpkins when I was

71

1 asking him for -- because I lost my copy of it so  
 2 I asked him for another copy and he explained to me that  
 3 it was from Anne Chambers originally.  
 4 Q. So you have always known that the actual source of the  
 5 information that you're talking about in your witness  
 6 statement was this Anne Chambers spreadsheet, haven't  
 7 you, because you say you lost your copy of it?  
 8 A. Yes. I certainly became aware of this spreadsheet and  
 9 it was available to me. I at first did not know it was  
 10 Anne Chambers who had created it.  
 11 Q. Well, let's go to the content of it please. If we look  
 12 at the box at the top under D2 -- 2D:  
 13 "NB many other branches had multiple events,  
 14 preventing replication, but these are the majority of  
 15 those which came to PEAK, having either reported  
 16 a problem or it caused a reconciliation report entry.  
 17 "From Sept 2005, cash accounts were replaced by  
 18 branch trading statements and the TPSC256 report was no  
 19 longer populated. I can't remember how we then knew  
 20 about receipts and payments mismatches and if we would  
 21 have picked up on further issues."  
 22 You said -- first of all, it's clear that this is  
 23 not a document which mirrors or reflects the accuracy  
 24 which one might have understood from your paragraph 15;  
 25 that's fair, isn't it?

72

1 A. Fair comment.  
 2 Q. And secondly, you said it's a document she made at the  
 3 time, but we can see it was created in 2015 from the  
 4 properties.  
 5 A. She created it in 2015, yes. Sorry, 2005.  
 6 MR JUSTICE FRASER: She created it in 2005?  
 7 A. Well, sorry, I can't remember the exact -- I'm accepting  
 8 the date of creation that was shown to me earlier --  
 9 sorry, it's 2015, sorry -- I had misinterpreted that  
 10 entirely. My understanding is that this was created at  
 11 the time by Anne Chambers. Sorry, I was misreading that  
 12 and seeing it as 2005.  
 13 Q. Let's move on to the receipts and payments mismatch bug  
 14 if we may now. Let's look please at E2/7 --  
 15 MR JUSTICE FRASER: Just before you move off ...  
 16 (Pause).  
 17 Just one question. Was it the number of branches  
 18 shown on this document that led to you correcting the  
 19 figure of 20 to 19 in your evidence-in-chief?  
 20 A. I personally didn't -- I think it was a -- I certainly  
 21 did not correct that. We realised that my statement was  
 22 out of line with what this spreadsheet said, and so it  
 23 was somebody else who noticed it.  
 24 MR JUSTICE FRASER: Understood, all right.  
 25 Right, Mr Green, go on.

73

1 MR GREEN: Let's move to receipts and payments mismatch, if  
 2 we may. You would fairly accept, I think, that this is  
 3 a shorthand for a number of different versions of a bug,  
 4 or a number of different bugs that can be helpfully  
 5 grouped together, is that fair?  
 6 A. I'm trying to get my head into the receipts and payments  
 7 one.  
 8 Q. Well, it's -- if it helps, it seems to become  
 9 a shorthand for a specific bug in Horizon Online which  
 10 arose in 2010.  
 11 A. Horizon Online 2010, I think was local suspense.  
 12 Q. Well, let's just have a look. Your paragraph 36  
 13 {E2/7/10} is in the section that begins on the previous  
 14 page at {E2/7/9}. You are dealing with --  
 15 A. Sorry, yes, it was Horizon Online, yes.  
 16 Q. Yes. Just to orientate you, let's go back to your  
 17 paragraph 36 {E2/7/10} you say:  
 18 "In September 2010 a bug in HNG-X (Horizon Online)  
 19 caused a receipts and payments mismatch in some  
 20 branches."  
 21 Do you see that?  
 22 A. Yes.  
 23 Q. Then you say:  
 24 "I understand from Gareth Jenkins that the issue was  
 25 initially identified as a result of Fujitsu's monitoring

74

1 of Horizon Online system events and not as a result of  
 2 calls from branches. Fujitsu's Software Support Centre  
 3 ~... which provides 2nd and 3rd line support, monitors  
 4 system events as a matter of course."  
 5 A. Correct, yes.  
 6 Q. So your evidence is that it arose in September 2010,  
 7 yes?  
 8 A. Yes.  
 9 Q. And Fujitsu identified it in September 2010?  
 10 A. I have not checked the detail, but I'm comfortable with  
 11 that, yes.  
 12 Q. Is this something that you actually know about yourself,  
 13 or have you got all this from Gareth Jenkins, as seems  
 14 to be the case from --  
 15 A. Gareth explained to me how the problem had occurred and  
 16 also -- yes, we went through the logic of what was  
 17 happening when a branch was going through this sequence  
 18 and why there would be a receipts and payments mismatch.  
 19 Q. So is it something you actually know about yourself, or  
 20 is it only -- is your knowledge derived really from what  
 21 Gareth Jenkins has told you?  
 22 A. It is knowledge derived from what Gareth told me, plus  
 23 further looking at some detail.  
 24 Q. And the document you repeatedly refer to, for example,  
 25 at paragraph 39, 40 and 41, is 29 September 2010. Let's

75

1 look at that. It's at {F/1000}. It is a document  
 2 written by Gareth Jenkins, do you see that?  
 3 A. Yes.  
 4 Q. And if we go forward, please, to the document at  
 5 {F/1001}, this is the receipts and payments mismatch  
 6 issue notes.  
 7 A. Yes.  
 8 Q. And we can actually see Mr Jenkins' name there, but not  
 9 yours?  
 10 A. Correct.  
 11 Q. You weren't involved in this at the time, were you?  
 12 A. No.  
 13 Q. And you don't refer to that document, even though  
 14 Mr Jenkins would have known about it?  
 15 A. Agreed.  
 16 Q. And at {F/777}, this is a receipts and payments mismatch  
 17 document, Fujitsu document, and you can see the author  
 18 is Mr Jenkins again.  
 19 A. Yes.  
 20 Q. That's not a document that you refer to in your witness  
 21 statement either, and this time there's been a BBC  
 22 documentary broadcast on Monday 7 February 2011, yes?  
 23 A. Yes.  
 24 Q. So I think that's separate to the later Panorama  
 25 programme we get in 2013.

76

1 Did Mr Jenkins draw your attention to either of  
 2 those two documents that we have just seen to help you  
 3 get a fuller picture, or not?  
 4 A. No.  
 5 Q. No. It's clear who actually knows about this; it's not  
 6 you, is it?  
 7 A. Gareth certainly understands the detail.  
 8 Q. If we can go back to {F/1001}, this appears in fact to  
 9 be somewhere between 29 September 2010 and  
 10 4 October 2010, this document. Page 1 says in the  
 11 second paragraph, underneath "What is the issue?" which  
 12 explains that:  
 13 "Discrepancies showing at the Horizon counter  
 14 disappear when the branch follows certain ~... steps but  
 15 will still show within the back end branch account ...  
 16 impacting circa 40 branches since migration ... with an  
 17 overall cash value of ~... £20K loss."  
 18 And:  
 19 "This issue will only occur if a branch cancels the  
 20 completion of the trading period, but within the same  
 21 session continues to roll into a new balance period."  
 22 Then you see:  
 23 "At this time we have not communicated with branches  
 24 affected and we do not believe they are exploiting this  
 25 bug intentionally."

77

1 Yes?  
 2 A. Yes.  
 3 Q. So this was a known problem, wasn't it? And you can see  
 4 Mr Winn of POL Finance is there and Fujitsu are there?  
 5 A. Yes.  
 6 Q. Are you surprised that this had not been communicated so  
 7 people would just be warned about it?  
 8 A. There was obviously a fear that subpostmasters may be  
 9 looking to exploit this because it gave -- there was  
 10 a fear that people could see this as a way of defrauding  
 11 the Post Office.  
 12 Q. So concealing it from SPMs who were honest was justified  
 13 because of the expectation of dishonesty of  
 14 subpostmasters in the network, in a nutshell?  
 15 A. In my view, this was a decision made by Post Office on  
 16 how to manage this particular bug. You could interpret  
 17 it the way that you have put it.  
 18 Q. Do you agree with the way that I have put it to you?  
 19 A. I think I'm agnostic. I can see the -- I can see  
 20 a rationale for not broadcasting this, but equally, if  
 21 the objective is to be totally open and honest and take  
 22 the risk of causing more chaos in the network then yes,  
 23 I would have to agree with that.  
 24 Q. Let's look at page 2, please {F/1001/2}.  
 25 MR JUSTICE FRASER: Have you seen this document before

78

1 today?  
 2 A. I have.  
 3 MR GREEN: At the top of the page:  
 4 "Note at this point nothing into feeds POLSAP and  
 5 Credence ..."  
 6 And then if you just look at the end, Credence --  
 7 "~... so in effect the POLSAP and Credence shows the  
 8 discrepancy whereas the Horizon system in the branch  
 9 doesn't."  
 10 So there's information in POLSAP and Credence that's  
 11 not available to the SPM, isn't there?  
 12 A. Yes, that's clearly the case.  
 13 Q. And so the branch will then believe they have balanced;  
 14 yes? Let's look at page 3 please {F/1001/3}:  
 15 "The Receipts And payment mismatch will result in an  
 16 error code being generated which will allow Fujitsu to  
 17 isolate branches affected this by this problem, although  
 18 this is not seen by the branches. We have asked Fujitsu  
 19 why it has taken so long to react to and escalate an  
 20 issue which began in May. They will provide feedback in  
 21 due course."  
 22 So given that we are either at the very end  
 23 of September or the beginning of October, this document  
 24 which you said you have seen before clearly shows that  
 25 it wasn't only in September 2010, was it?

79

1 A. No.  
 2 Q. And therefore the statement in your witness statement at  
 3 paragraph 36 that in September 2010 a bug caused  
 4 a receipts and payments mismatch in some branches is  
 5 materially wrong, isn't it?  
 6 A. On the basis of what we have just been through I think  
 7 I have to agree.  
 8 Q. And you can see that the roll-out is planned for  
 9 21 October, yes?  
 10 A. Sorry ..?  
 11 Q. "~... full roll-out to the network completed by 21st of  
 12 October?"  
 13 A. Sorry, where are we looking now?  
 14 Q. This is on page 3:  
 15 "Fujitsu are writing a code fix which stop the  
 16 discrepancy disappearing ..."  
 17 Do you see?  
 18 A. Yes.  
 19 Q. "... from Horizon in the future. They are aiming to  
 20 deliver this into test week commencing 4th October.  
 21 With live proving at the model office week commencing  
 22 11th October. With full roll-out to the network  
 23 completed by the 21st of October. We have explored  
 24 moving this forward and this is the earliest it can be  
 25 released into live."

80

1 So just pausing there, it has taken since May,  
 2 from May to October to be corrected and in the  
 3 meanwhile, branches appear to be kept in the dark, at  
 4 least up to the date of this document.  
 5 A. Yes.  
 6 Q. And then what is being considered is which of three  
 7 solutions to apply to the impacted branches. The  
 8 group's recommendation at the time is that solution 2  
 9 should be progressed. Now, just pausing there, do you  
 10 know which of these solutions was in fact progressed?  
 11 A. My understanding is that TCs were issued.  
 12 Q. Let's look at what the considerations were. Option 1,  
 13 solution 1 was:  
 14 "Alter the Horizon Branch figure at the counter to  
 15 show the discrepancy. Fujitsu would have to manually  
 16 write an entry value to the local branch account."  
 17 Yes?  
 18 A. Yes.  
 19 Q. So this was being openly discussed between Fujitsu and  
 20 Post Office, that it was possible to manually write an  
 21 entry to the local branch account, wasn't it?  
 22 A. Clearly, yes.  
 23 Q. "Impact - when the branch comes to complete next Trading  
 24 Period they would have a discrepancy, which they would  
 25 have to bring to account."

81

1 A. Yes.  
 2 Q. "Risk - this has significant data integrity concerns and  
 3 could lead to questions of 'tampering' with the branch  
 4 system and could generate questions around how the  
 5 discrepancy was caused. This solution could have moral  
 6 implications of Post Office changing branch data without  
 7 informing the branch."  
 8 So on any view, the moral implications of changing  
 9 branch data without informing the branch were recognised  
 10 there, weren't they?  
 11 A. Yes.  
 12 Q. Solution 2:  
 13 "P&BA will journal values from the discrepancy  
 14 account into the customer account and recover/refund via  
 15 normal processes. This will need to be supported by an  
 16 approved POL communication. Unlike the branch 'POLSAP'  
 17 remains in balance albeit with an account  
 18 (discrepancies) that should be cleared.  
 19 "Impact - Post Office will be required to explain  
 20 the reason for a debt recovery/refund even though there  
 21 is no discrepancy at the branch.  
 22 "Risk - could potentially highlight to branches that  
 23 Horizon can lose data."  
 24 That sounds defensive, doesn't it?  
 25 A. Agreed.

82

1 Q. Solution 3:  
 2 "It is decided not to correct the data in the  
 3 branches (ie Post Office would prefer to write off the  
 4 'lost'.  
 5 "Impact - Post Office must absorb ~... 20K loss.  
 6 "Risk - huge moral complications to the integrity of  
 7 the business, as there are agents that were potentially  
 8 due a cash gain on their system."  
 9 Go over the page -- that appears to be the end of  
 10 that solution. Now, this does not suggest, does it,  
 11 being open and transparent to SPMs about the problem  
 12 with Horizon?  
 13 A. Again, if -- I can accept that I can also understand the  
 14 reason to want to manage this carefully.  
 15 Q. And in fact, this problem became so well-known that in  
 16 the end, Post Office did communicate with SPMs, are you  
 17 aware of that?  
 18 A. No. I -- I will take your word for it.  
 19 Q. At paragraph 42, at {E2/7/11}, you said 60 branches were  
 20 affected and you said:  
 21 "... we can be sure that all instances of the bug  
 22 were identified ..."  
 23 Yes? That's now been corrected to 62, hasn't it?  
 24 A. Yes.  
 25 Q. And at paragraph 45 {E2/7/12} you refer to a spreadsheet

83

1 of affected branches which we had to seek disclosure of.  
 2 That's at {F/754}. If we could just make that larger  
 3 please. If we look at the "Affected branches" tab  
 4 first, there's a list of affected branches there, and if  
 5 we go back to the "Check for duplicate branches",  
 6 there's a total at the bottom of 64 but we can see the  
 7 number 2 in row 34 and the number 2 in row 41, can't we?  
 8 A. Yes.  
 9 Q. So if you subtract both those from 64 you get the 60  
 10 number in your original witness statement, don't we? Is  
 11 that a calculation that you made or someone else made?  
 12 A. No, no, I didn't do a calculation to come up with the  
 13 60. I was quoting from other people.  
 14 MR JUSTICE FRASER: Someone just gave you the 60, did they?  
 15 A. I thought I was quoting from other people. I -- Gareth  
 16 even said to me that in my statement I had said  
 17 "approximately 60", so I was not -- clearly I didn't  
 18 because the statement here doesn't contain that word.  
 19 I had rather hoped it had when this was first brought to  
 20 my attention, but no, I certainly did not do any  
 21 specific calculation to come up with the 60 that I put  
 22 into my original statement.  
 23 MR GREEN: Did Gareth explain the change to you from 60 to  
 24 62?  
 25 A. No.

84

1 Q. But how did he come to tell you what was in your  
 2 original statement? What was that conversation?  
 3 A. I picked up the number -- to be -- my objective in this  
 4 was to explain to the court the symptoms of the bug and  
 5 how -- the technical aspect of it. I did not pay  
 6 particular attention to getting the detail on how many  
 7 branches were affected, correct.  
 8 Q. Okay. So you have spoken to Gareth since your  
 9 statement?  
 10 A. I don't think I have spoken to him about this in  
 11 particular. I was -- as I say, when Gareth had said  
 12 I had originally said "approximately 60" I was thinking  
 13 that was quite neat, but that's not the case.  
 14 Q. Well, you said "Gareth even said to me that in my  
 15 statement I had said 'approximately 60'", so he must  
 16 have said that to you after your statement had been  
 17 filed?  
 18 A. It was a comment in a document that we were exchanging.  
 19 Q. But you hadn't spoken to him about remote access since  
 20 your first statement?  
 21 A. No.  
 22 Q. Why have you stayed off that topic with him?  
 23 A. Oh, sorry, this was just a comment. We have been  
 24 exchanging documents, we have been commenting on  
 25 documents, so it was not a particular conversation. It

85

1 is merely a case of Gareth had commented on this when it  
 2 was pushed back to us that I had originally said 60 and  
 3 actually the answer was different.  
 4 Q. If we look please at the "Affected Branches" spreadsheet  
 5 for a moment please and if you look at line 7, do you  
 6 see there minus 777 in July 2010?  
 7 MR JUSTICE FRASER: I'm sorry, which line are we on?  
 8 MR GREEN: I'm so sorry, row 7.  
 9 MR JUSTICE FRASER: Row 7?  
 10 MR GREEN: 16 July 2010. That's long before Mr Jenkins has  
 11 written any notes about this at the end  
 12 of September 2010, isn't it?  
 13 A. The event certainly happened before Gareth's -- yes.  
 14 Q. And presumably at that time the branch has got an  
 15 unexplained discrepancy in its accounts, yes? Because  
 16 that was the point?  
 17 A. The branch wasn't actually seeing the discrepancy,  
 18 was it?  
 19 Q. There is a discrepancy in the branch's accounts at that  
 20 time.  
 21 A. Sorry, yes, yes, there has to be, because there's a  
 22 receipts and payments mismatch yes.  
 23 Q. At paragraph 43 of your witness statement which is at  
 24 {E2/7/11}, you say that you understand transactions were  
 25 not injected to resolve this problem.

86

1 A. Correct.  
 2 Q. Can we look at {H/2/25} please, paragraph 5.16.3 says --  
 3 if you can see the bottom three lines of 5.16.3:  
 4 "As far as Post Office is currently aware  
 5 a balancing transaction has only been used once to  
 6 correct a single branch's accounts (not being a branch  
 7 operated by one of the Claimants)."  
 8 And if we look at footnote 57 it says there:  
 9 "This was in relation to one of the branches  
 10 affected by the 'Payments Mismatch' error described in  
 11 Schedule 6."  
 12 Does that accord with your understanding?  
 13 A. I don't know the detail.  
 14 Q. If we look at {H/2/97}, "Payments mismatch" is referred  
 15 to there.  
 16 A. Yes.  
 17 Q. But you don't know whether the balancing transaction was  
 18 used in relation to that or not, is that your evidence?  
 19 A. I don't know.  
 20 Q. And then if we look please at {C4/2/15} -- my Lord,  
 21 I will be two minutes, if that's all right --  
 22 question 39:  
 23 "Please explain the reason(s) why this Balancing  
 24 Transaction was made."  
 25 And if we go over the page please {C4/2/16},

87

1 "Defendant's response 39":  
 2 "The Subpostmaster affected is not a Claimant and  
 3 the Claimants do not require the information sought in  
 4 order to understand Post Office's generic case or to  
 5 plead a Generic Reply. Post Office repeats the General  
 6 Response. However, the Balancing Transaction was used  
 7 to correct an error arising from the 'Payments Mismatch'  
 8 problem (as to which, see page 25 of the Letter of  
 9 Response)."  
 10 And at page 24 of that underlying document it is  
 11 signed with a statement of truth, so on the face of this  
 12 it is suggesting that a transaction was injected to at  
 13 least one account. Are you aware of whether that's  
 14 correct or not?  
 15 A. I would have to go and check the FAD code of the branch  
 16 where I know we did a balancing transaction and compare  
 17 it with the FAD codes that you're looking at here.  
 18 I haven't done that.  
 19 Q. And if they weren't the same, it might appear there was  
 20 more than one?  
 21 A. If they weren't the same, my interpretation would be  
 22 that this statement is incorrect. There has only been  
 23 one balancing transaction.  
 24 MR GREEN: My Lord, I only have local suspense, briefly, and  
 25 Dalmellington bug to go. Is that a convenient moment to

88

1 break?  
 2 MR JUSTICE FRASER: I think so. We're going to come back at  
 3 2 o'clock, Mr Godeseth, so same form as before, don't  
 4 chat to anyone about the case. If you could come back  
 5 at 2 o'clock.  
 6 (1.02 pm)  
 7 (The luncheon adjournment)  
 8 (2.02 pm)  
 9 MR JUSTICE FRASER: I have received an application,  
 10 Mr De Garr Robinson. Do you know about it?  
 11 MR DE GARR ROBINSON: My Lord, I know that there has been an  
 12 application, that is almost all I know.  
 13 MR JUSTICE FRASER: Has it been served on the claimants?  
 14 MR DE GARR ROBINSON: My understanding is it has, my Lord,  
 15 yes.  
 16 MR JUSTICE FRASER: Do you know about it?  
 17 MR GREEN: My Lord, we have just seen it, yes.  
 18 MR JUSTICE FRASER: I just saw it five minutes ago. It is  
 19 an application for me to recuse myself as being the  
 20 managing judge in these proceedings which means  
 21 effectively -- and also for this trial to stop.  
 22 Although the application says "adjourn the trial",  
 23 I think it really means start it again with another  
 24 judge.  
 25 MR DE GARR ROBINSON: I haven't seen the application,

1 my Lord.  
 2 MR JUSTICE FRASER: No, no. That's what the application is.  
 3 So the practical effects of that are that application  
 4 has to be dealt with as soon as possible.  
 5 MR DE GARR ROBINSON: Yes.  
 6 MR JUSTICE FRASER: Simply in terms of timetabling, it  
 7 presents some difficulties because we're in the middle  
 8 of cross-examining a witness, so the options are for  
 9 this trial to stop now so that application can be heard  
 10 on a day which we will then come on to discuss, or we  
 11 finish with Mr Godeseth and then the trial comes to  
 12 an end, or is, rather, subject to an interval depending  
 13 on what the outcome of the application is, so do you  
 14 have any submissions about which of those two courses of  
 15 action --  
 16 MR DE GARR ROBINSON: My Lord, I didn't appreciate that  
 17 those were the options that you would be presenting now.  
 18 I do -- entirely without instructions I would say it  
 19 would be invidious for Mr Godeseth to remain in the  
 20 witness box, as it were, for an extended period of time.  
 21 MR JUSTICE FRASER: Well, in principle I agree, but that's  
 22 dependent on a number of factors, one of which is how  
 23 much longer his cross-examination is going to be.  
 24 Mr Green, how long do you think you're going to be?  
 25 MR GREEN: I think about 10 to 15 minutes.

1 MR JUSTICE FRASER: And how long would your re-examination  
 2 be?  
 3 MR DE GARR ROBINSON: 10 to 15 minutes.  
 4 MR JUSTICE FRASER: Right, well, this is my proposal. I'm  
 5 going to rise now for ten minutes, so you can take  
 6 instructions. If you are minded to persuade me to stop  
 7 instantly then you can tell me at 2.15 and I will make  
 8 a ruling on that. If you are, in light of the  
 9 application, content for Mr Godeseth's evidence to  
 10 finish, in other words, it will be brought to an end  
 11 with the cross-examination finishing, re-examination  
 12 finishing, and any questions from me being dealt with,  
 13 we will do that, and then we will address other  
 14 logistical issues immediately after that.  
 15 MR DE GARR ROBINSON: My Lord, yes.  
 16 MR GREEN: My Lord, I'm sorry to interrupt, would  
 17 your Lordship be amenable if the applicant in the  
 18 application agreed to also hearing Mr Parker this  
 19 afternoon so that --  
 20 MR JUSTICE FRASER: Well, that depends, because at the  
 21 moment the Post Office hasn't necessarily asked for  
 22 Mr Godeseth necessarily to be finished.  
 23 MR GREEN: My Lord, of course, but I mean --  
 24 MR JUSTICE FRASER: On the basis that if the application is  
 25 successful this trial will have to be stopped and

1 restarted, I'm not going to pre-judge the outcome of  
 2 that application, but if Mr De Garr Robinson wants to  
 3 take instructions on that then he can do that at the  
 4 same time.  
 5 MR GREEN: Of course.  
 6 MR JUSTICE FRASER: All right, so is until 2.15 going to  
 7 give you long enough?  
 8 MR DE GARR ROBINSON: My Lord, I would have thought so, yes.  
 9 MR JUSTICE FRASER: All right. If you want any more time  
 10 then just send a message. I will come back in at 2.15.  
 11 I'm afraid this is going to continue a little  
 12 longer, but you've got until 2.15, Mr Godeseth, so if  
 13 you can come back to the witness box for 2.15.  
 14 (2.05 pm)  
 15 (Short Break)  
 16 (2.18 pm)  
 17 MR DE GARR ROBINSON: My Lord, we have not been able to make  
 18 contact with counsel instructed in the application.  
 19 MR JUSTICE FRASER: Are you not instructed?  
 20 MR DE GARR ROBINSON: I'm not instructed in the application  
 21 at all. My Lord, it is Lord Grabiner from my chambers  
 22 who will be acting.  
 23 MR JUSTICE FRASER: Yes.  
 24 MR DE GARR ROBINSON: I have of course taken instructions.

1 The consensus on this side of the court is that without  
 2 prejudice to that application, it would be invidious for  
 3 Mr Godeseth to be left in limbo for an unidentified and  
 4 indeterminate period of time, so I suspect that it will  
 5 be common ground on all sides that in fairness to him,  
 6 his evidence should be finished.  
 7 MR JUSTICE FRASER: Well, as long as that's -- when I said  
 8 take instructions, as long as I mean that that's  
 9 instructions you have taken from your solicitors who are  
 10 in court, then I'm completely content.  
 11 MR DE GARR ROBINSON: Yes.  
 12 MR JUSTICE FRASER: All right.  
 13 MR DE GARR ROBINSON: My Lord, as regards Mr Parker,  
 14 pragmatically we are all here ready to ask him  
 15 questions. On the other hand, your Lordship may not  
 16 feel comfortable dealing with Mr Parker's evidence given  
 17 the current state of affairs, and I'm happy to -- I have  
 18 no application that you should hear his evidence,  
 19 your Lordship won't be surprised to hear me say that.  
 20 MR JUSTICE FRASER: No, but you are effectively neutral, are  
 21 you?  
 22 MR DE GARR ROBINSON: My Lord, I don't want to press upon  
 23 your Lordship continuing with his evidence. I know  
 24 my learned friend is anxious that he doesn't -- he needs  
 25 half a day with Mr Parker and he is anxious not to

1 lose -- we have already lost 15 minutes. But if  
 2 your Lordship were minded to continue with Mr Parker,  
 3 given the pragmatic situation we are in, I wouldn't  
 4 oppose that. Entirely without prejudice, of course, to  
 5 the application.  
 6 MR JUSTICE FRASER: All of it is obviously without prejudice  
 7 to the application.  
 8 MR DE GARR ROBINSON: Yes, but I keep saying it, don't I.  
 9 MR JUSTICE FRASER: I was not asking you the question in any  
 10 way to either dilute or change whatever the  
 11 Post Office's position is on the substantive  
 12 application, it was just a matter of trial management.  
 13 If we do continue and deal with Mr Parker as well, that  
 14 would at least have the advantage that it would  
 15 effectively be a clean break at the end of the evidence  
 16 of fact.  
 17 MR GREEN: My Lord, there is still Mr Membery.  
 18 MR JUSTICE FRASER: I haven't forgotten about Mr Membery,  
 19 but he is not coming on today I don't think, is he?  
 20 MR GREEN: Not today, my Lord.  
 21 MR JUSTICE FRASER: I will revisit this at the conclusion --  
 22 I'm completely comfortable doing it, but I will revisit  
 23 it at the conclusion of Mr Godeseth because apart from  
 24 anything else, we don't know how long that is going to  
 25 take.

1 MR DE GARR ROBINSON: My Lord, yes.  
 2 MR JUSTICE FRASER: All right, Mr Green.  
 3 MR GREEN: Mr Godeseth, can we look at paragraph 46 of your  
 4 witness statement at {E2/7/12} please, and this bug  
 5 caused entries from local suspense accounts that had  
 6 been there in 2010 to be reproduced in two successive  
 7 years, yes?  
 8 A. Yes, that's right.  
 9 Q. And so this was something that persisted for years not  
 10 months as a bug, wasn't it?  
 11 A. There was data in the system that shouldn't have been  
 12 there for a couple of years.  
 13 Q. And if we look, please, at {F/1075}, this is a document  
 14 that you have referred to in your witness statement.  
 15 Now, its author is Gareth Jenkins, isn't it?  
 16 A. It is.  
 17 Q. And you have referred to understanding various matters  
 18 from Mr Jenkins at paragraphs 48 and 54 of your witness  
 19 statement. Is it fair to say that you've got most of  
 20 your information about this issue from Mr Jenkins?  
 21 A. Yes.  
 22 Q. And if we look over the page at page 2, please,  
 23 {F/1075/2} do you see "The Problem" at 2.2?  
 24 A. I do.  
 25 Q. And if you look at the screen and I read out the first

1 line of your 48.1:  
 2 "Data in the Branch Database is regularly  
 3 archived/deleted when it is no longer required."  
 4 There's a difference there because a slash has been  
 5 put in instead of "and then", yes? Otherwise the  
 6 sentence is identical. Then it says:  
 7 "There are different rules for how long different  
 8 types of data is retained and when it is deleted."  
 9 That is substantially the same, but with some  
 10 slightly different words, and we see other features  
 11 appearing, for example, at paragraph 50 of your witness  
 12 statement, at the bottom of that page {E2/7/13}.  
 13 This document has been substantially the source of  
 14 that part of your witness statement, hasn't it?  
 15 A. Correct.  
 16 Q. And if we look at paragraph 48.2 of your witness  
 17 statement {E2/7/13}, it says:  
 18 "As a result of some changes that were made on  
 19 3 July 2011 to the Horizon archiving strategy relating  
 20 to Stock Units that had been deleted in a branch, any  
 21 branch that deleted a Stock Unit at the end of 2010  
 22 which had a local suspense transaction in that Stock  
 23 Unit before it was deleted were left in the table used  
 24 for constructing the branch trading statement."  
 25 Now just pausing there, that's essentially how the

1 local suspense bug operated, isn't it?  
 2 A. The local suspense bug came about because there were  
 3 records in the branch database which should have been  
 4 removed -- whether you call that archiving or deleting,  
 5 they should not have been encountered by this particular  
 6 bit of processing.  
 7 Q. And this is a good example of how small changes to what  
 8 you might term non-transactional data can cause effects  
 9 to branch accounts, is that fair?  
 10 A. The record here was very much used in constructing the  
 11 branch trading statement.  
 12 Q. So does that suggest an interface between -- there's  
 13 a sort of -- it's not a clean break between operational  
 14 and transactional data, is it? There's a sort of  
 15 interlacing of the two where data has more than one  
 16 purpose.  
 17 A. The purpose of this particular record was really to keep  
 18 a running total of something, because you cannot go back  
 19 to the complete raw data in order to come up with the  
 20 branch trading statement, that would be a nightmare, and  
 21 so the process that it goes through is that data gets  
 22 summarised up into totals on a daily basis and you also  
 23 build up things such as suspense values and -- over  
 24 a period and then when you are producing the branch  
 25 trading statement, these things all get brought

97

1 together.  
 2 Q. Can I just ask you to look at paragraph 47 of your  
 3 witness statement please on page 12 {E2/7/12}:  
 4 "The bug was discovered in January 2013 when two  
 5 Subpostmasters, who experienced the largest  
 6 discrepancies, raised the issue with Post Office.  
 7 I understand from Gareth Jenkins that Post Office could  
 8 see the impact of the problem in their back end system  
 9 and wrote off the discrepancies ~..."  
 10 The point there is that although it had persisted  
 11 for years not months, it was SPMs who drew it to  
 12 Post Office's attention and when they did, then Fujitsu  
 13 saw it and was able to try and correct it?  
 14 A. We became aware of it in 2013, from my understanding.  
 15 Q. Yes, because it was raised by SPMs?  
 16 A. Correct.  
 17 Q. And Post Office had known about it since 2012?  
 18 A. I can't comment on that.  
 19 Q. Let's move on to the Dalmellington bug please. This was  
 20 also known as the Branch Outreach issue and again here  
 21 you are heavily reliant on Mr Jenkins who you refer to  
 22 at paragraphs 55, 57, 58 and 61 of your witness  
 23 statement, is that fair?  
 24 A. Yes.  
 25 Q. Do you have any first-hand knowledge of this at all?

98

1 A. Only the research that I have done through this.  
 2 Q. Let's look at {F/1415} please. Do you know who prepared  
 3 this document?  
 4 A. I don't know who prepared it, no.  
 5 Q. Was it Mr Jenkins?  
 6 A. I don't know.  
 7 Q. Look at page 7, please, {F/1415/7}. So the history of  
 8 the Dalmellington bug -- we can see there are 65  
 9 incidents of this bug in 2010 and 2011 and they are  
 10 broken down there by time, and at the bottom of that you  
 11 will see:  
 12 "Post Office P&BA (FSC) fully aware at the time of  
 13 both Incidents."  
 14 Do you see that?  
 15 A. I do.  
 16 Q. And there are two fixes. There's a 2010 fix, and  
 17 there's a 2011 fix, yes?  
 18 A. Yes.  
 19 Q. And if we move forward please now to page 8 {F/1415/8}  
 20 we then have a period from 2011, six incidents; 2012,  
 21 nine incidents; 2013, seven incidents. Go over the page  
 22 please {F/1415/9}. 2014, nine incidents; 2015, 16  
 23 incidents, and then you will see at the bottom there:  
 24 "Jan 2016 Fix to be applied (subject to POL  
 25 approval)."

99

1 And under all of those years, apart from 2015, the  
 2 last bullet point shows zero calls raised with Fujitsu.  
 3 Shall we go back a slide? {F/1415/8} So zero calls  
 4 raised with Fujitsu in each of those years. So the  
 5 point that someone was making at Fujitsu there was that  
 6 Post Office had not raised the matter with Fujitsu so  
 7 that it could be corrected earlier. That's the point  
 8 being made in that slide, isn't it?  
 9 A. I can't comment.  
 10 Q. What do you think it looks like?  
 11 A. It looks like that.  
 12 Q. So there was no root cause analysis by Fujitsu carried  
 13 out because they had not been contacted by Post Office  
 14 over a period of a number of years, where at least  
 15 identified incidents were numerous.  
 16 A. I think these incidents came from us going through the  
 17 audit trail to identify where there had been duplicate  
 18 pouches.  
 19 Q. So SPMs were suffering duplicate pouches over a number  
 20 of years due to a known problem with the system and  
 21 Fujitsu was not informed over that period of years until  
 22 2015?  
 23 A. As far as I'm aware, the issue was not raised with  
 24 Fujitsu until 2013. It is entirely possible that  
 25 subpostmasters were dealing with this themselves.

100

1 Q. Do you mean not raised with Fujitsu until 2015?  
 2 A. Sorry, I would have to refer back to --  
 3 Q. If you go over the slide to the next page {F/1415/9} you  
 4 will see the one call is in 2015. Do you mean 2015?  
 5 A. I couldn't be categorical on when a call was raised.  
 6 I haven't seen the PEAK or whatever it was that raised  
 7 the call with us.  
 8 Q. It does not show that any supposed countermeasures to  
 9 ensure the robustness of Horizon as a system were  
 10 working, does it?  
 11 A. Unfortunately this particular error is not subject to  
 12 receipts and payments problems because it could be -- it  
 13 could be user doing something twice, it's -- the bug had  
 14 the effect of making it look as though a user was simply  
 15 doing something multiple times.  
 16 Q. Finally, Mr Godeseth, you will be pleased to hear, the  
 17 experts are agreed that Horizon has improved a lot over  
 18 the years. Would you agree with that assessment?  
 19 A. I would say that any system improves with time.  
 20 Q. Would you agree with the assessment of that in relation  
 21 to Horizon?  
 22 A. Yes.  
 23 Q. Could you look please at {F/1848.3} to see how incident  
 24 management is now being done, and you can see in the  
 25 "[Incident] detail reported/overview":

101

1 "NBSC called the ATOS service desk and passed on  
 2 a call from Woodgate branch who reported an issue with  
 3 mismatch data between receipt and payment in the Trading  
 4 Statement."  
 5 Do you see that?  
 6 A. I do.  
 7 Q. And if we go over the page please {F/1848.3/2} under  
 8 "Background", second line:  
 9 "The background to this change was a requirement to  
 10 remove the 'Top Up' options associated to companies that  
 11 should now be branded EE, removing as example the Orange  
 12 & T-Mobile options from all the self-service machines  
 13 and Horizon counters ..."  
 14 Then we go down to the issue:  
 15 "There was a human mistake made when undertaking the  
 16 change to the reference data for these products.  
 17 "The 'front-end' reference was correctly removed.  
 18 "The 'back-end' reference was incorrectly removed at  
 19 the same time."  
 20 At the bottom, final line:  
 21 "This would have shown as a mismatch that the branch  
 22 had to accept."  
 23 That shows us, Mr Godeseth, doesn't it, how branch  
 24 data is incorporated into transaction data and accounts  
 25 for which a mismatch for which an SPM may be held liable

102

1 can arise?  
 2 A. If the reference data is wrong you can get a receipts  
 3 and payments mismatch.  
 4 Q. You mean "Yes"?  
 5 A. You can get a receipts and payments mismatch which would  
 6 be picked up by our monitoring, yes.  
 7 Q. If we go forward please to an example from 27 November  
 8 it is {F/1842} and if we go forward to page 2 please  
 9 {F/1842/2}, at the top:  
 10 "Enhanced User Management (known as Smart ID in  
 11 branch network) has been introduced to ensure all  
 12 Horizon users are both vetted and have the necessary  
 13 training to transact regulated products."  
 14 Then if we look at the issue, second paragraph:  
 15 "The change was to allow a given EUM user to lock a  
 16 counter and then log on to another counter ..."  
 17 MR JUSTICE FRASER: I'm sorry, I have lost where you are.  
 18 MR GREEN: I'm so sorry, I apologise. On to page 3  
 19 {F/1842/3}, the second paragraph on page 3:  
 20 "The change was to allow a given EUM user to lock  
 21 a counter and then log on to another counter."  
 22 Do you see that? And then the middle paragraph on  
 23 that page -- in that box:  
 24 "This has caused incidents to occur in the live  
 25 estate ... if the active user session rolls over the

103

1 current stock unit, and a locked session on another  
 2 counter attached to the same stock unit is then resumed.  
 3 This is because when the locked user session is resumed  
 4 the counter is not aware of the rollover and continues  
 5 to trade in the old trading period (TP)/balance period  
 6 (BP). These transactions are then recorded in the old  
 7 TP/BP and so will not appear on the branch accounts,  
 8 although they will be successfully sent to the back-end  
 9 systems and will be visible in the counter transaction  
 10 log for the old TP/BP:  
 11 "... as of 22 January 19 this has impacted 19  
 12 branches to date over a 6-month period."  
 13 That illustrates a different sort of problem that  
 14 can arise, doesn't it?  
 15 A. It is a new problem, correct.  
 16 Q. And it has been impacting branches over a period of  
 17 six months we see there?  
 18 A. EUM went in fairly recently, so yes, I've got no reason  
 19 to disbelieve that.  
 20 Q. And finally {F/1848.2}, one from 1 February 2019. If we  
 21 go to page 2 please {F/1848.2/2}:  
 22 "As part of the Back Office programme to migrate  
 23 from POLSAP to Core Finance System (CFS) a data cleanse  
 24 was completed on any obsolete item IDs."  
 25 Then it mentions Official Postage which would be

104

1 ended and then second paragraph in that background box:  
 2 "Following the item being reinstated overnight on  
 3 the 1st February and being live again on the  
 4 2nd February - NBSC received further calls and it became  
 5 apparent that the accounting sense being applied at the  
 6 counter was positive value not negative value. We spoke  
 7 to a couple of contacts at Fujitsu but they couldn't  
 8 explain why this was so, we also spoke to Matthew Warren  
 9 who advised that we should try reinstating the default  
 10 mode".  
 11 "What's the issue?":  
 12 "When a branch was processing a claim for Official  
 13 Postage this was increasing the cash on hand figure  
 14 rather than decreasing which could potentially result in  
 15 the branch having a discrepancy if not identified."  
 16 And if we go over the page please to "Impact"  
 17 {F/1848.2/3}, we can see that:  
 18 "As of [2 February] 720 branches are impacted  
 19 including the live kit in NBSC ..."  
 20 Do those sort of problems fairly reflect the  
 21 difficulties that people have to deal with at Fujitsu in  
 22 the normal course of their job?  
 23 A. Whilst I was certainly aware of the EUM issue, this  
 24 particular one I've got no real knowledge of, or no  
 25 knowledge of.

105

1 MR GREEN: My Lord, I have no further questions.  
 2 MR JUSTICE FRASER: Thank you very much.  
 3 Mr De Garr Robinson.  
 4 Re-examination by MR DE GARR ROBINSON  
 5 MR DE GARR ROBINSON: Mr Godeseth, I would like you to go to  
 6 a document that Mr Green took you to yesterday at  
 7 {F/614}, please. This is a document by Mark Burley.  
 8 You will see that it is dated 8 April 2010 and you will  
 9 recall that it was the document which charted the  
 10 suspension of the pilot roll-out programme for  
 11 Horizon Online. Do you remember looking at this  
 12 document?  
 13 A. I do.  
 14 Q. And if we could go to page 4 {F/614/4} you will see that  
 15 there were 614 branches live on Horizon, and then on the  
 16 third bullet point it says the high volume pilot was  
 17 suspended. And if we go on to page 5 {F/614/5}, we will  
 18 see:  
 19 "All migrations suspended as from 25/03."  
 20 There is a reference to the programme support being  
 21 on red alert, and then there's a reference you will see  
 22 in the third bullet point -- four bullet points down:  
 23 "Success Criteria for further migrations under  
 24 discussion with Fujitsu to include:  
 25 "Period of stable running ... FS Review complete and

106

1 key recommendations implemented ... Fujitsu demonstrate  
 2 monitoring and alerting."  
 3 And:  
 4 "All high priority issues resolved or agreed  
 5 workarounds in place."  
 6 From your recollection, can you remember what the  
 7 priority issues were, the high priority issues were?  
 8 A. For me, my focus was very much on the Oracle bug, so  
 9 I don't have any personal recollection of the other high  
 10 priority issues. I was establishing myself in Fujitsu,  
 11 I was concentrating on the bug.  
 12 Q. And what was the Oracle issue?  
 13 A. I can't remember the details of it, I'm afraid, but it  
 14 certainly involved nodes of the branch database going  
 15 down which had the result that users would see the  
 16 message they were unable to contact the database, or,  
 17 sorry, the data centre.  
 18 Q. That's fine. After you were asked questions about this  
 19 you were then shown a PEAK and the document reference is  
 20 {F/588}, perhaps we could look at that. This is dated  
 21 5 March 2010. You were taken to this yesterday. I'm  
 22 not going to ask you any detailed questions on it, you  
 23 will be happy to know, but this was -- as I say, this  
 24 identifies an error experienced during the pilot scheme  
 25 and you were asked a number of questions about it and

107

1 you didn't know much because this wasn't what you were  
 2 working in it at the time.  
 3 Could you explain what the purpose of the pilot  
 4 scheme is? Why don't you just roll-out Horizon into all  
 5 of the branches all at once?  
 6 A. That would be frankly a ridiculous approach because you  
 7 had to go through a process of trying out new software  
 8 on a limited set of branches so that you can learn from  
 9 the experience.  
 10 Q. And when you say learn from the experience, what kind of  
 11 things do you anticipate might happen during an early  
 12 roll-out, even a high volume roll-out of this sort?  
 13 A. Well, since I recognise this as the occasion that we  
 14 used the branch trading -- sorry, the balancing  
 15 transaction, and I have also noticed from my statement  
 16 that the balancing transaction was to do with £4,000  
 17 being doubled up to 8,000, I think the purpose of  
 18 this -- the purpose of the pilot is simply to go through  
 19 the teething problems that you are bound to have when  
 20 you're introducing a new change.  
 21 Q. And the PEAK that we see here and the £4,000 problem  
 22 that resulted in the balancing transaction that you have  
 23 just referred to, are those the sorts of problems that  
 24 you anticipate you might encounter during a pilot scheme  
 25 of that sort, or are they not?

108

1 A. I always expect to encounter problems in the early days  
 2 of any system. I expect to encounter problems  
 3 immediately after I have put in a change.  
 4 Q. Thank you, Mr Godeseth. Now I would like to ask you  
 5 about another document, {F/611}. This is a PEAK you  
 6 were taken to today, 15 April 2010. This is also during  
 7 the pilot scheme. This is in fact the PEAK that led to  
 8 the balancing transaction. I think it is anyway.  
 9 If we go to page 3 {F/611/3}, you will see --  
 10 perhaps it isn't the balancing transaction one. You  
 11 will see that -- halfway down the page, 14 April 2010 at  
 12 13:00 hours, Gareth Jenkins says three lines down:  
 13 "What we need to do is the following: ...  
 14 "1. Update BRDB\_BRANCH\_STOCK\_UNITS where fad\_hash = 14  
 15 ??? AND Branch\_accounting\_code = 314642 AND stock\_Unit  
 16 equals = ?DEF? Setting trading\_period to 11."  
 17 And 2:  
 18 "Delete BRDB\_SU\_OPENING FIGURES WHERE fad\_hash = ??? 18  
 19 AND Branch\_accounting code = 314642 AND stock\_unit =  
 20 ?DEF? trading\_period = 12."  
 21 Can I just ask you to explain what the update  
 22 involved?  
 23 A. The update would simply change a value in a record from  
 24 the 12 to 11, I think in this case, so it would be  
 25 picking a record in the branch database which currently

109

1 has a value of 12 and changing it to 11.  
 2 Q. And that doesn't -- does that have an impact on the  
 3 branch accounts themselves, on any branch's  
 4 particular -- the values in any branch's accounts?  
 5 A. It does -- it most certainly does not impact on the  
 6 underlying data. It is used to put values into the  
 7 correct bucket.  
 8 Q. And what do you mean by "values into the correct  
 9 bucket"?  
 10 A. A number of transactions -- so the transactions would  
 11 not disappear, that's the fundamental point. The raw  
 12 data will not disappear. It is whether the three  
 13 transactions will appear in TP1, or whether they will  
 14 appear in TP2. It is a case of which bucket, which --  
 15 ultimately which trading period these transactions would  
 16 be accounted for in.  
 17 Q. I see. And the "Delete" instruction, what's the effect  
 18 of the "Delete" instruction?  
 19 A. It will remove a record from the branch database.  
 20 Q. And what record was it removing for these purposes?  
 21 A. This was removing a record which was an opening balance  
 22 for period 12 which happened to have zero in it and --  
 23 Q. So with removing this record, what happens to the  
 24 balance? What would the balance have been once this  
 25 zero record was removed?

110

1 A. Well, this was the initial -- this is the initial record  
 2 needed for period 12, so the problem that was being  
 3 referred to here was that at some point, this record had  
 4 been written into the branch database but then the  
 5 rollover had not completed, so we were left with  
 6 a record in the branch database which shouldn't have  
 7 been there -- sorry, it would have been there had the  
 8 rollover continued, then it and other records would have  
 9 reflected the true position. What happened here was  
 10 that for some reason, this record was there -- my  
 11 reading of the PEAK says that it was there as a result  
 12 of problems or migration, so where branches were being  
 13 prepared to migrate from old Horizon to new Horizon,  
 14 I think this record was erroneously there.  
 15 So effectively when you then came to do a proper  
 16 rollover, there was a record there and that confused the  
 17 software -- the software had to stop because it found  
 18 a record where there shouldn't be one.  
 19 Q. And so by deleting that record, what then happens when  
 20 you rollover?  
 21 A. Once -- then because the record wasn't there, the  
 22 rollover can just happen.  
 23 Q. Oh, I -- so would I be right in thinking what you're  
 24 saying is that the rollover then happens in the normal  
 25 way based upon the data from the previous transaction

111

1 period as should have happened in the first place; is  
 2 that what you're saying?  
 3 A. Yes.  
 4 Q. I see. Then you were shown the OCP that related to this  
 5 fix. It's at {F/616.1}. You have seen this before, OCP  
 6 26361, "Branch 314642 unable to rollover", and then  
 7 about a third of the way down there's a line which reads  
 8 "Steps to implement the fix", do you see that? And the  
 9 first step is:  
 10 "Logon to BRDB Node 1 as UNIX user 'brdb'"  
 11 Could you explain what "UNIX user brdb" means?  
 12 A. I don't know any detail, but fundamentally, you're  
 13 logging onto the branch database.  
 14 Q. And "UNIX user", who would the UNIX user be?  
 15 A. Oh, sorry, UNIX user would be one of the guys in  
 16 Ireland.  
 17 Q. One of the guys in Ireland. So when you say "one of the  
 18 guys in Ireland", do you mean members of the SSC, or do  
 19 you mean someone else?  
 20 A. Someone else.  
 21 Q. Well, if we go over the page to page 2 of the same  
 22 document {F/616.1/2} about a third of the way down  
 23 there's a reference to Ed Ashford at Core Services Unix  
 24 Support. Who is Ed Ashford?  
 25 A. Ed Ashford is one of the guys in Ireland.

112

1 Q. Who are the "guys in Ireland" exactly? Could you just  
 2 clarify -- I appreciate that this may not be your daily  
 3 fare but ~...

4 A. They are the people who support the hardware, so UNIX is  
 5 an operating system so they work at a pretty low level  
 6 on the systems.

7 Q. When you say "low level", I mean what do you mean by  
 8 that? Do you mean they have powerful user rights, or  
 9 they have weak user rights or ..?

10 A. They have pretty powerful user rights, but they are  
 11 very -- very much driven by process as to how they use  
 12 them.

13 Q. What do you mean by "they are driven by process"?

14 A. There's complete and utter control on the processes they  
 15 go through before they do any of these -- this type of  
 16 activity .

17 Q. Okay, well, if I could ask you to go to your witness  
 18 statement, your first witness statement, {E2/1/17}  
 19 please. I would like you to look at paragraph 59.1.  
 20 You say:

21 "A limited number of authorised Fujitsu personnel  
 22 (I am advised by Jason Muir [at] the Security Operations  
 23 team that there are currently 19 at the operating system  
 24 layer and 26 at the database layer) who have access  
 25 privileges that could be used to edit or delete

113

1 transaction data in the BRDB in Horizon Online ..."  
 2 Stopping there, were the guys from Ireland amongst  
 3 these people that you refer to there?

4 A. Yes.

5 Q. I see. So they are privileged users, are they?

6 A. In my book, yes.

7 Q. And then you say:

8 "From the outset, I should make clear that this is  
 9 only a theoretical possibility (which would require the  
 10 circumstance invention of the controls described  
 11 above) ..."

12 And then you say:

13 "(a) Fujitsu has no policy, process, procedure or  
 14 operational practice that calls for it to use its  
 15 privileged access to edit or delete transaction data."  
 16 And at (b) you say:

17 "As far as I am aware, Fujitsu has never used its  
 18 privileged access to edit or delete transaction data."

19 A. Correct.

20 Q. Might it -- given what you have now seen with this OCP  
 21 and the PEAK we looked at before, would you care to  
 22 consider paragraph (b) of your witness statement?

23 A. I think the data that was deleted was not transaction  
 24 data.

25 MR DE GARR ROBINSON: Oh, I see. My Lord, I have no further

114

1 questions.

2 Questions by MR JUSTICE FRASER

3 MR JUSTICE FRASER: What sort of data would you describe it  
 4 as?

5 A. As I was -- it is data -- sorry, it is a field where you  
 6 are building up a running total, so I would see it as  
 7 analogous to -- if you are adding up 300 different  
 8 numbers, by the time you get to the end of 100 you might  
 9 jot down a total, then you add up the next 100, you jot  
 10 down another total. So it is where you are building up  
 11 data and this one happens to be an opening balance, but  
 12 it's building up data which is going to be used in  
 13 constructing the end branch trading statement.

14 MR JUSTICE FRASER: So if I wanted to use a phrase for it  
 15 that wasn't "transaction data", what phrase should  
 16 I use?

17 A. I think we have been referring to it as "operational  
 18 data" but "operational" has such a wide connotation  
 19 that ... there possibly ought to be a different  
 20 definition for it.

21 MR JUSTICE FRASER: A different what, sorry?

22 A. There possibly ought to be a different definition for it  
 23 because equally data in the database which is telling  
 24 you which stock unit, you know, what -- which TP you're  
 25 in, whether a stock unit is in use, all of those are

115

1 operational data which do not go down and impact the  
 2 transaction data, so for me, the definition of  
 3 transaction data -- I should be able to get from one  
 4 opening -- one set of opening figures to the end opening  
 5 figures by going back to the transaction data in its  
 6 absolutely raw form.

7 As I said before, that is -- fundamentally that's  
 8 not a sensible way to process it, so you do go through  
 9 a sequence of adding things together and then you bring  
 10 them together to actually get the -- to get to your end  
 11 position in a trading statement.

12 MR JUSTICE FRASER: Right. I have just got a couple of  
 13 questions. I think you have explained at {E2/1/1} -- we  
 14 will just go to it, it's the very beginning of your  
 15 first statement, your early career. I think when you  
 16 were instructing in the Navy for those four years, what  
 17 subjects were you instructing?

18 A. Radar and electronics. Sorry, my Lord, in practical  
 19 terms, that was for the first two and a half years.  
 20 After that I went off to Bureau West in Devizes which is  
 21 where I joined the IT industry.

22 MR JUSTICE FRASER: The IT industry. Was that while you  
 23 were still in the Navy?

24 A. Correct.

25 MR JUSTICE FRASER: Then you explained about the Impact

116

1 system. What was your involvement in that, or Impact  
 2 project?  
 3 A. I was working with Post Office at the time and I was  
 4 interfacing to Fujitsu. I was also interfacing to Xansa  
 5 who were writing other components involved in the Impact  
 6 programme.  
 7 MR JUSTICE FRASER: So you were working on the Impact  
 8 programme, were you?  
 9 A. Correct.  
 10 MR JUSTICE FRASER: Then if we could call up, please,  
 11 {F/322.2/1}. I'm so sorry, I have given you a wrong  
 12 reference. {F/432.2}. You will remember we looked at  
 13 that this morning.  
 14 A. Yes, my Lord.  
 15 MR JUSTICE FRASER: It is an OCP. If you look against  
 16 "Extra detail" -- Mr Green took you through this in some  
 17 detail already -- but do you see where the new message  
 18 is described?  
 19 A. I do, my Lord.  
 20 MR JUSTICE FRASER: There's quantity -- the sale value, that  
 21 would be in pounds, wouldn't it, or effectively  
 22 equivalent to the pounds?  
 23 A. Yes.  
 24 MR JUSTICE FRASER: And then "PQty", am I right in reading  
 25 that as "product quantity"?

1 A. I don't recognise the P in there, but I think that would  
 2 be a fair assumption.  
 3 MR JUSTICE FRASER: All right. If every single entry is  
 4 a negative, it will depend, won't it, how many entries  
 5 there are as to whether that has a negative or  
 6 a positive effect because if you multiply two negatives  
 7 together you get a positive, or am I being too  
 8 elementary?  
 9 A. I think this was simply saying that there was an  
 10 original message which had the positive values and then  
 11 you put in another message which has the negative values  
 12 and they will be added together as opposed to  
 13 multiplied.  
 14 MR JUSTICE FRASER: Well, why would -- if you added quantity  
 15 to product quantity, you would get --  
 16 A. No, sorry, my Lord, you have -- I think you should see  
 17 these as two records, one above the other, and you're  
 18 going to add the two records together, so the quantity 1  
 19 would be cancelled out by the quantity minus 1, the sale  
 20 value 484 would be cancelled out by the sale value minus  
 21 484 and so on.  
 22 MR JUSTICE FRASER: So is that describing what effect the  
 23 new message should have rather than what the contents of  
 24 the new message would be?  
 25 A. I think I would see it more as: this is the record that

1 I need to put in --  
 2 MR JUSTICE FRASER: I see.  
 3 A. -- to negate the record that's there currently.  
 4 MR JUSTICE FRASER: So this is the output required  
 5 effectively?  
 6 A. The output required is all zeros.  
 7 MR JUSTICE FRASER: Yes. This is the output required from  
 8 the message to result in all zeros?  
 9 A. Yes, so my reading of this is there is a record in there  
 10 already, I need to get rid of it logically, so therefore  
 11 I will insert a record which has got all the negatives  
 12 and that will make it go away.  
 13 MR JUSTICE FRASER: Understood. Thank you very much.  
 14 Then the next point is at {F/425} we will start at  
 15 page 1 just so you can see what the document is. Do you  
 16 remember we looked at this document yesterday when we  
 17 were talking about --  
 18 A. We did, my Lord, yes.  
 19 MR JUSTICE FRASER: And I think I asked you an Oracle  
 20 question about "Insert" at the beginning of a line.  
 21 Do you remember?  
 22 A. I do.  
 23 MR JUSTICE FRASER: If we could look at page 11, please  
 24 {F/425/11}. Now, the second paragraph there is what  
 25 I asked you a question about, which was where in the

1 third line it said "It must start with the 'INSERT INTO'  
 2 clause", do you see that?  
 3 A. Yes, my Lord.  
 4 MR JUSTICE FRASER: And I think that's the point that  
 5 I asked you about yesterday, wasn't it?  
 6 A. Yes.  
 7 MR JUSTICE FRASER: If we then go down to page 13  
 8 {F/425/13}, and maybe increase the size. This I think  
 9 is a template for the transaction -- or for the SQL  
 10 statement in the transaction file. Does that --  
 11 A. Yes, my Lord.  
 12 MR JUSTICE FRASER: -- look as if it's right?  
 13 A. Yes.  
 14 MR JUSTICE FRASER: And what this page and the one I'm about  
 15 to ask you on the next page is the template for the SQL  
 16 which goes in the transaction file, is that correct? It  
 17 seems to be from the top two lines.  
 18 A. So we're inserting into a table called "RX cut off  
 19 summaries."  
 20 MR JUSTICE FRASER: Yes, but if you look at the very top of  
 21 the quotation which is just after the three lines of  
 22 text it says:  
 23 "The following SQL is a template for the SQL to be  
 24 placed in a transaction file for the ~... Transaction  
 25 Correction tool ..."

1 Do you see that?  
 2 A. Yes.  
 3 MR JUSTICE FRASER: And effectively the template starts with  
 4 the words "INSERT INTO"; is that right?  
 5 A. Yes.  
 6 MR JUSTICE FRASER: And if you -- I mean, just in passing,  
 7 the oblique stroke and the asterisk at the beginning of  
 8 the text and the end of the text just before "INSERT  
 9 INTO", those are symbols which mean that the passages  
 10 between the two symbols don't form part of the command,  
 11 is that correct?  
 12 A. I couldn't be categorical on that, my Lord.  
 13 MR JUSTICE FRASER: You don't know if that's right -- would  
 14 that be conventional at least?  
 15 A. That would seem a very sensible convention, yes.  
 16 MR JUSTICE FRASER: All right. If you then go on to the  
 17 next page underneath, please {F/425/14} and increase the  
 18 size in that. That seems to me to be a continuation of  
 19 the sequence which starts on the previous page, is that  
 20 correct?  
 21 A. Yes.  
 22 MR JUSTICE FRASER: And where the numerous lines appear  
 23 about eight times one after the other "DO NOT CHANGE  
 24 THIS VALUE FROM THE ONE SPECIFIED!!!", am I right in  
 25 reading those as notes not forming part of the template

121

1 because they don't seem to be in the correct language?  
 2 A. This to me is an instruction to a user who knows what  
 3 they're doing --  
 4 MR JUSTICE FRASER: Correct.  
 5 A. -- to say that the FAD hash has to be -- so you're not  
 6 allowed to go in there and change that.  
 7 MR JUSTICE FRASER: Exactly.  
 8 A. You're not allowed to change the branch accounting code.  
 9 MR JUSTICE FRASER: Yes. So they don't form part of the  
 10 template, they're effectively warning -- well, I suppose  
 11 they do form part of the template, but they are warnings  
 12 to the person putting the information in the template,  
 13 aren't they? They're not part of the commands to the  
 14 system?  
 15 A. Those there are very much warnings to a person who is  
 16 going to use it, who is expected to know what he is  
 17 doing --  
 18 MR JUSTICE FRASER: Yes, or what she is doing.  
 19 A. Indeed, my Lord. And then this is to make it easy, or  
 20 as easy as possible for those people to do the job that  
 21 they are intended to do without making a mistake.  
 22 MR JUSTICE FRASER: Yes. Right, and then if we could go on  
 23 to the next page {F/425/15} and increase it, do you see  
 24 there the reference to "bind variables" and the three  
 25 bullet points?

122

1 A. I do.  
 2 MR JUSTICE FRASER: Am I right that the bind variables are  
 3 also required to be inputted by whoever is it is putting  
 4 it together?  
 5 A. I'm afraid I don't know, my Lord.  
 6 MR JUSTICE FRASER: Do you know who puts the bind variables  
 7 in?  
 8 A. I don't know who would do that in practical terms, no.  
 9 MR JUSTICE FRASER: Am I right that somebody would have to  
 10 do that though? That's not something that seems to me  
 11 to be generated automatically.  
 12 A. I cannot see how that could be -- if you read the rest  
 13 of the text:  
 14 "Substituted with the values of the branch code  
 15 argument ..."  
 16 That seems -- that to me is telling me exactly as  
 17 you are surmising.  
 18 MR JUSTICE FRASER: All right, good. I just wanted to check  
 19 that. It seemed to me that was what it was doing but  
 20 I just wanted to check.  
 21 Any questions arising out of that?  
 22 MR DE GARR ROBINSON: My Lord, no.  
 23 MR JUSTICE FRASER: Any questions?  
 24 MR GREEN: My Lord, no.  
 25 MR JUSTICE FRASER: Mr Godeseth, you are now free to leave.

123

1 That's the end of your evidence, thank you very much  
 2 indeed.  
 3 A. Thank you, my Lord.  
 4 Procedural matter  
 5 MR JUSTICE FRASER: Upon reflection, and the fact it is  
 6 after 3 o'clock anyway, I intend not to ask you to call  
 7 Mr Parker. What I'm going to do is I'm going to give  
 8 some directions in respect of your application --  
 9 MR DE GARR ROBINSON: My Lord, yes.  
 10 MR JUSTICE FRASER: -- which has obviously got to be dealt  
 11 with.  
 12 One thing that the email letter that accompanied it  
 13 said which I literally received at 1.55 was that a hard  
 14 copy of it would be brought to court. Is there a hard  
 15 copy for me?  
 16 MR DE GARR ROBINSON: My Lord, there is.  
 17 MR JUSTICE FRASER: Thank you.  
 18 (Pause).  
 19 I think there might be some exhibits. Is there an  
 20 exhibit as well?  
 21 MR DE GARR ROBINSON: My Lord, I'm sorry. (Handed).  
 22 MR JUSTICE FRASER: Thank you very much.  
 23 Right, so it seems to me that there are three things  
 24 that need to be dealt with in order. One is any  
 25 response or responsive evidence by the claimants, if

124

1 they oppose the application, which I imagine they will  
 2 need some time to decide, the second is service of  
 3 skeletons, and the third is a date to hear it.  
 4 If it is at all feasible, I would like to hear this  
 5 application on the next day of this trial which is going  
 6 to be Monday 1 April which -- that's only likely to be  
 7 possible if those other two steps, but in particular,  
 8 the first of those two steps, can be accomplished in the  
 9 time between now and then, so that's really a question  
 10 for Mr Green.

11 MR DE GARR ROBINSON: My Lord, it is.

12 MR JUSTICE FRASER: So Mr Green?

13 Submissions by MR GREEN

14 MR GREEN: My Lord, your Lordship won't have seen this  
 15 necessarily but there is a difficulty requiring an  
 16 earlier step, in our respectful submission.

17 MR JUSTICE FRASER: I haven't. What is it?

18 MR GREEN: If your Lordship has the witness statement of  
 19 Mr Parsons. My clerks have printed this off over lunch  
 20 so I'm not sure what order your Lordship's one will be  
 21 in, but we have got a witness statement, I think, in  
 22 support.

23 MR JUSTICE FRASER: I have a 14th witness statement of  
 24 Mr Parsons.

25 MR GREEN: Exactly. If your Lordship would just kindly turn

125

1 to page 6 of that --

2 MR JUSTICE FRASER: I should say, other than reading the  
 3 first couple of paragraphs and then the letter and the  
 4 draft order, I haven't read this witness statement.

5 MR GREEN: That's why I'm drawing your Lordship's attention  
 6 to it.

7 MR JUSTICE FRASER: Right. Where do we go?

8 MR GREEN: If we go to page 6.

9 MR JUSTICE FRASER: Yes.

10 MR GREEN: The particularisation of the basis of the  
 11 application is I think supposed to be set out in  
 12 paragraphs 24 and 25 essentially. The first part is to  
 13 say that the findings in relation to matters which arose  
 14 in the common issues trial:

15 "... give the clear impression the judge has already  
 16 formed a firm view on these matters. It is expected  
 17 that this will prevent him from taking an impartial view  
 18 on the same matters when they are revisited at the  
 19 subsequent trials with the benefit of full evidence and  
 20 disclosure."

21 And then 25:

22 "The judgment also contains a great deal of critical  
 23 invective directed at Post Office, none of which is  
 24 relevant to the determination of the common issues.  
 25 That too creates a clear impression that the judge has

126

1 not behaved impartially. The same can be said for those  
 2 parts of the judgment which harshly criticised  
 3 Post Office's witnesses on matters irrelevant to the  
 4 common issues."

5 MR JUSTICE FRASER: Yes.

6 MR GREEN: And, my Lord, those complaints are wholly  
 7 unparticularised, they are serious matters and if we are  
 8 going to analyse them and respond to them -- I've never  
 9 seen any -- I have not seen very many recusal  
 10 applications, but I have not seen a recusal application  
 11 as lacking in particularity as this. If there are  
 12 specific criticisms of matters in the judgment that are  
 13 said to show -- create an impression of your Lordship  
 14 not having behaved impartially, any applicant in that  
 15 situation must set those out with particularity, for two  
 16 reasons: so that your Lordship can fairly consider what  
 17 is being said, not in some vague penumbra of complaint  
 18 by the losing party, but also so that the claimants have  
 19 an opportunity to consider precisely what the basis of  
 20 this remarkable application actually is, and at the  
 21 moment, we don't actually know which parts of the  
 22 judgment they are pointing to.

23 What is said to be -- what is a fair appraisal of  
 24 the credibility of a particular witness and what is  
 25 invective? And it's not to be left for us to scabble

127

1 around, as we have had to do on some other things, to  
 2 try and work out what's being said, and so, my Lord, at  
 3 the moment we're not in a position to form a view on the  
 4 application, less still file responsive evidence.

5 The allegations -- the basis of this application,  
 6 which is a serious application to make, and is likely if  
 7 not calculated to derail these proceedings, has to be  
 8 spelt out with proper particularity before we are in  
 9 a position to respond to it, so I would invite  
 10 your Lordship to consider directing that that be done  
 11 and I would invite your Lordship to do so within  
 12 a fairly short time period, because no solicitor signing  
 13 a witness statement of this sort could put his name to  
 14 an allegation of that sort without having satisfied  
 15 himself of precisely the basis upon which it was being  
 16 said. So this is not "Oh, I will go away and work it  
 17 out now"; this must have been worked out with great care  
 18 already, otherwise an allegation of that sort could not  
 19 properly be made.

20 MR JUSTICE FRASER: All right, well, just before I ask you  
 21 for a response on that, Mr De Garr Robinson, what I'm  
 22 actually going to do is I'm going to go and read the  
 23 whole witness statement, because I think I quite clearly  
 24 have explained I haven't had a chance to read it yet.

25 MR DE GARR ROBINSON: Nor have I.

128

1 MR JUSTICE FRASER: Well, you might then also benefit from  
 2 having had a chance to look at it.  
 3 MR DE GARR ROBINSON: Indeed.  
 4 MR JUSTICE FRASER: I will come back in at I think 3.40.  
 5 I will take all the papers with me. The only ones that  
 6 I will probably have had a real chance to look at in  
 7 great detail is the witness statement. I know the  
 8 judgment fairly well, for obvious reasons. Then I will  
 9 come back, I will hear Mr De Garr Robinson what you have  
 10 to say about Mr Green's point, and we will revisit the  
 11 whole question of timetabling if I have missed out a  
 12 important step which, upon reflection, I decide ought to  
 13 be taken. So 3.40.  
 14 (3.14 pm)  
 15 (Short Break)  
 16 (3.44 pm)  
 17 MR JUSTICE FRASER: Mr De Garr Robinson.  
 18 Submissions by MR DE GARR ROBINSON  
 19 MR DE GARR ROBINSON: My Lord, responding to my learned  
 20 friend's submission, he puts his point as a requirement  
 21 for particulars. The truth is this is a matter of  
 22 argument, and your Lordship and indeed my learned  
 23 friend, have already had no shortage of arguments.  
 24 There was an overwhelming number of those arguments at  
 25 the common issues trial.

129

1 It is not necessary for there to be a list of  
 2 critical findings in your Lordship's judgment, everybody  
 3 knows what those findings are and my learned friend's  
 4 suggestion that he needs particulars in order to decide  
 5 his position on the application is frankly surreal.  
 6 However, my Lord, I do have a proposal which in my  
 7 submission will be better than particulars, which is to  
 8 order sequential skeleton arguments and I would invite  
 9 your Lordship to order that the defendant's skeleton  
 10 argument be served by close of business on Tuesday, that  
 11 the claimants' skeleton argument be served by close of  
 12 business on Thursday, so that everyone is ready for the  
 13 hearing that you suggested, that obviously should be  
 14 dealt with as quickly as possible, on Monday the 1st.  
 15 MR JUSTICE FRASER: I'm sorry, when did you say for the  
 16 claimants? End of Thursday?  
 17 MR DE GARR ROBINSON: Thursday.  
 18 MR JUSTICE FRASER: Well, that proposal doesn't include  
 19 within it provision for any evidence that they might  
 20 want to put in?  
 21 MR DE GARR ROBINSON: My Lord, that's true.  
 22 MR JUSTICE FRASER: And I think it is also -- it effectively  
 23 takes as read that they are going to oppose the  
 24 application.  
 25 MR DE GARR ROBINSON: Well, my learned friend suggested

130

1 otherwise, which is why I --  
 2 MR JUSTICE FRASER: I think he said he -- but in a way ...  
 3 yes, all right. So you say no need for any evidence in  
 4 response.  
 5 MR DE GARR ROBINSON: Well, my Lord, if my learned friend  
 6 wishes to put in evidence, he can put in evidence, but  
 7 I do respectfully suggest that when he talks about  
 8 particulars, he is really talking about argument, and  
 9 I have no objection to giving him prior sight of --  
 10 I should say the defendant has no objection to giving  
 11 the claimants prior sight of their arguments, but,  
 12 my Lord, to slow matters down by having the formality,  
 13 in my respectful submission, the useless and expensive  
 14 formality of a list of points -- I don't quite know what  
 15 the particulars would look like -- that wouldn't add to  
 16 the efficiency of this process and it certainly wouldn't  
 17 add to its speed.  
 18 MR JUSTICE FRASER: No, but it is important that other  
 19 matters aren't sacrificed in the interests of speed,  
 20 given the nature of the application.  
 21 MR DE GARR ROBINSON: Of course.  
 22 MR JUSTICE FRASER: If the skeleton -- the defendant's  
 23 skeleton argument were to identify in a schedule the  
 24 following three points -- because apart from anything  
 25 else, I will need to know this at some point: the

131

1 specific findings that are referred to in paragraph 24,  
 2 the critical invective referred to in paragraph 25 and  
 3 the harsh criticisms referred to in paragraph 25, then  
 4 that would effectively -- whether it comes in a schedule  
 5 to a skeleton, or whether it comes in the 15th witness  
 6 statement of Mr Parsons, that would effectively identify  
 7 what parts of the judgment were being attacked -- or  
 8 were being relied on to found the application.  
 9 But let me hear from Mr Green about the sequential  
 10 skeleton approach.  
 11 MR DE GARR ROBINSON: My Lord, it would, but may I just  
 12 mention one thing.  
 13 MR JUSTICE FRASER: Yes.  
 14 MR DE GARR ROBINSON: Were an order -- a direction to be  
 15 made requiring a skeleton which contains a schedule of  
 16 that sort, those things would not be things in relation  
 17 to which my learned friend would wish to put in evidence  
 18 in response.  
 19 MR JUSTICE FRASER: I entirely accept that, but what they  
 20 would do, for example, Mr De Garr Robinson, just taking  
 21 paragraph 24 as an example, they would say "These are  
 22 the specific findings which we, the Post Office, says  
 23 justifies the suggestion that the judge has already made  
 24 a clear -- that justify the clear impression that the  
 25 judge has formed a firm view on these other matters."

132

1 Now, those passage are going to have to be brought to my  
 2 attention at some point.  
 3 MR DE GARR ROBINSON: Absolutely. My Lord, I'm not  
 4 resisting any direction of that sort, just to be clear,  
 5 but what I am resisting is the suggestion that there  
 6 needs to be some further time to allow evidence to be  
 7 formulated once these matters are flushed out.  
 8 MR JUSTICE FRASER: Evidence arguing to the contrary.  
 9 MR DE GARR ROBINSON: Yes.  
 10 MR JUSTICE FRASER: I agree with you about that. As  
 11 I understand the witness statement of Mr Parsons, which  
 12 I have now read very carefully, twice, it is based on  
 13 the judgment, number 3 on the common issues, or  
 14 certainly that's how it is explained in the actual  
 15 witness statement, and insofar as it is necessary to  
 16 look at other things, they are things in respect of  
 17 which there is a transcript available because they  
 18 relate to matters that have happened at an interlocutory  
 19 hearing, so there's not going to be any evidential  
 20 argument about what actually happened. Is that  
 21 a correct analysis?  
 22 MR DE GARR ROBINSON: My Lord, all I have done is read the  
 23 witness statement in the same way that your Lordship  
 24 has.  
 25 MR JUSTICE FRASER: All right. Well, I don't want unfairly

133

1 to put you on the spot about that.  
 2 Mr Green.  
 3 Submissions by MR GREEN  
 4 MR GREEN: My Lord, I couldn't respectfully disagree more --  
 5 MR JUSTICE FRASER: With?  
 6 MR GREEN: -- with what Mr De Garr Robinson has just said.  
 7 The starting position for any application of this  
 8 type is that it must immediately be made on a basis  
 9 which clearly sets out, with particularity, the aspects  
 10 of the judgment in this case and findings which are said  
 11 to demonstrate apparent bias of the court. That is  
 12 a totally uncontroversial statement and one that is  
 13 not -- a principle that's not lightly to be departed  
 14 from. And the reason for that is it affords the party  
 15 on the other side an opportunity to consider, with  
 16 clarity, whether they wish to resist the application or  
 17 not.  
 18 MR JUSTICE FRASER: Yes.  
 19 MR GREEN: Before they are committed to a 24-hour or 36-hour  
 20 or 48-hour window in which to respond to a skeleton  
 21 argument, a skeleton argument which has doubtless  
 22 already been considered insofar as the matters which  
 23 would go into the schedule, and will continue to be  
 24 considered without us knowing what those points are all  
 25 the way up until Wednesday when it is served and when we

134

1 then learn for the first time what the actual basis of  
 2 this application is.  
 3 My Lord, the reason I say that is this: a finding  
 4 which is adverse to a party is not a proper foundation  
 5 for an application of this sort.  
 6 MR JUSTICE FRASER: Yes.  
 7 MR GREEN: A criticism of a witness is not a proper  
 8 foundation for an application of this sort. And  
 9 therefore, it is essential that the applicant in this  
 10 application spells out, in every case, what is said to  
 11 be critical invective going beyond the bounds of what  
 12 a court may properly do without creating the apparent  
 13 bias now alleged and what it is -- which findings it is  
 14 said or parts of the judgment which harshly criticise  
 15 Post Office witnesses on matters irrelevant to the  
 16 common issues.  
 17 Those matters have been to be spelled out and  
 18 my learned friend, Mr De Garr Robinson, has just told  
 19 the court that everybody knows which parts of the  
 20 judgment he is referring to. If that's true --  
 21 I don't -- but if there's any basis for saying that to  
 22 the court, then he can write them out in a list and,  
 23 my Lord, this application --  
 24 MR JUSTICE FRASER: Well, I'm not necessarily sure  
 25 Mr De Garr Robinson could write them out in a list

135

1 but --  
 2 MR GREEN: Sorry, your Lordship is quite right.  
 3 MR JUSTICE FRASER: -- somebody at the Post Office can write  
 4 them out. Mr De Garr Robinson has been dealing with the  
 5 computer issues trial.  
 6 MR GREEN: My Lord, that's a very fair point and I should  
 7 observe that distinction, but it doesn't take away from  
 8 the fact that whoever has prepared and advised on and  
 9 considered whether this is a proper application to make  
 10 must have identified what the basis is, so asking them  
 11 to spell it out is not a subsequent step, they must have  
 12 done that before this could be signed off. This is not  
 13 an application for directions or something like that,  
 14 this is a very important application and it cannot have  
 15 been made without carefully thinking what the elements  
 16 in each case are and particularly where it is said that  
 17 the criticism, for example, of Post Office's witnesses  
 18 on matters irrelevant to the common issues -- that has  
 19 to be spelled out too and its basis. It is not  
 20 satisfactory, in our respectful submission, for this to  
 21 be done the other way round, so that we only find out  
 22 after a skeleton argument has been filed in an  
 23 application what the basis is and we then have to decide  
 24 both whether to resist it and on what basis within  
 25 a very truncated time period.

136

1 So I would be inviting your Lordship to order  
 2 provision of particulars of those two paragraphs, by  
 3 list, and an explanation, a proper explanation of the  
 4 basis of this application.  
 5 MR JUSTICE FRASER: Well, the second of those -- what I'm  
 6 minded to do -- and I will explain what it is and  
 7 Mr De Garr Robinson can make any submissions about it he  
 8 wants to. What I am minded to do is order the  
 9 Post Office to provide a witness statement by noon on  
 10 Tuesday 26th -- but we can come and discuss the timing  
 11 in a moment -- that sets out: 1, the specific findings  
 12 in the judgment referred to in paragraph 24 of  
 13 Mr Parson's 14th witness statement; 2, the critical  
 14 invective referred to in paragraph 25 of Parsons 14; and  
 15 3, the criticisms of the Post Office witnesses referred  
 16 to in paragraph 25.  
 17 Now, in a way, Mr De Garr Robinson, it doesn't much  
 18 matter whether that's a schedule -- it would be the same  
 19 exercise whether it was a schedule to a skeleton or  
 20 whether it was in another witness statement from  
 21 Mr Parsons, but I think in the circumstances it should  
 22 be in a witness statement.  
 23 Submissions by MR DE GARR ROBINSON  
 24 MR DE GARR ROBINSON: Well, my Lord, I would resist that.  
 25 It shouldn't be in a witness statement in my respectful

137

1 submission. It's a list of particulars and the  
 2 appropriate document would be an order for particulars.  
 3 Actually it would be preferable, and more efficient in  
 4 my submission, if a skeleton argument were directed  
 5 which should have a schedule setting out those  
 6 particulars. That would actually be beneficial to --  
 7 and more useful for the claimants than a witness  
 8 statement or some independent document that goes on --  
 9 MR JUSTICE FRASER: Well, I think everyone is agreed there  
 10 has to be an identification of them.  
 11 MR DE GARR ROBINSON: Yes.  
 12 MR JUSTICE FRASER: In these circumstances I think it is  
 13 best if it is in a witness statement, but if that is to  
 14 refer to an exhibited schedule, well that's one way of  
 15 doing it. I'm not going to debate it endlessly.  
 16 MR DE GARR ROBINSON: Well, my Lord, could I just address  
 17 your Lordship on that.  
 18 MR JUSTICE FRASER: Yes.  
 19 MR DE GARR ROBINSON: There is -- it would put the person  
 20 making the witness statement in an invidious position.  
 21 I mean, if your Lordship is happy to direct a witness  
 22 statement in which a human being has to make a witness  
 23 statement saying these things then of course that order  
 24 will be complied with.  
 25 MR JUSTICE FRASER: Why would it put them in an invidious

138

1 position?  
 2 MR DE GARR ROBINSON: Well, my Lord, because it will be  
 3 a human being criticising a High Court judge for making  
 4 findings of that sort. Bearing in mind that the  
 5 important thing is simply that the information is  
 6 provided so that it can be understood, in my respectful  
 7 submission it would be better for it to be in a schedule  
 8 to a skeleton argument. If your Lordship wishes to  
 9 order that a human being makes a witness statement, then  
 10 that will of course be complied with.  
 11 MR JUSTICE FRASER: Well, the purpose of this is not to  
 12 personalise it or in any way identify somebody as being  
 13 the personification of the application. I was assuming  
 14 it would be Mr Parsons because he has said these things  
 15 already in Parsons 14.  
 16 MR DE GARR ROBINSON: He has.  
 17 MR JUSTICE FRASER: So it would simply be identification of  
 18 which those passages are -- I don't think it is  
 19 necessary to add this, but I will in any case -- by  
 20 explaining which passages to which he is referring in  
 21 his 15th witness statement, or it might even be the  
 22 first witness statement of someone else. I don't think  
 23 there's any concern about exposure of a human being  
 24 because it would be coming from one of the parties'  
 25 advisors.

139

1 MR DE GARR ROBINSON: I have made my submission. I'm not  
 2 sure I can helpfully add to it.  
 3 MR JUSTICE FRASER: And if it is -- and even if it is  
 4 a simple form of words like "The findings to which  
 5 I refer in paragraph 24 are ... 1, 2, 3, 4, 5, 6, 7 ..."  
 6 I mean, I think that would be satisfactory but I'm not  
 7 going to give any specific direction about what the  
 8 contents of it should be. I think it's just explaining  
 9 what the paragraphs or the findings or the parts of the  
 10 judgments are which have already been referred to in  
 11 paragraphs 24 and 25 of Parsons 14.  
 12 MR DE GARR ROBINSON: I understand. My Lord, does that mean  
 13 that the hearing of the application will be delayed  
 14 beyond Monday?  
 15 MR JUSTICE FRASER: Well, that's what we're going to have to  
 16 address now I think because what we have to do, or what  
 17 I have to do, is I have to balance enough time for the  
 18 steps that are necessary to be taken properly without  
 19 simply imposing inordinate delay on the process  
 20 generally, so if noon on Tuesday for the witness  
 21 statement -- by then that would be Tuesday 26th -- then  
 22 the claimants are going to have to provide their  
 23 response -- or identify, firstly, if they oppose the  
 24 application or not by a particular time or date which we  
 25 will come on to. Then if so advised, I suppose

140

1 technically they have to be given the opportunity to put  
 2 evidence in response, but I can't imagine if the  
 3 substance of the application is the judgment that would  
 4 necessarily be a step that would be taken, but I can't,  
 5 I don't think, press Mr Green to tell me now whether or  
 6 not it definitely will be, and then we will have to put  
 7 some provisions in for skeletons which, given these  
 8 circumstances, can be simultaneous I think.  
 9 So, Mr Green, if you get either Parsons 15 or Mr or  
 10 Mrs X number 1 by noon on Tuesday, when would you like  
 11 firstly to notify the other side of your position in  
 12 respect of the application?  
 13 MR GREEN: My Lord, I think we would have to have 24 hours.  
 14 MR JUSTICE FRASER: Yes, all right. So if you're asking  
 15 until noon on the 27th?  
 16 MR GREEN: My Lord, yes.  
 17 MR JUSTICE FRASER: And I imagine that will just be in  
 18 a letter?  
 19 MR GREEN: Indeed.  
 20 MR JUSTICE FRASER: Then if so advised, evidence in response  
 21 by ..?  
 22 MR GREEN: Hopefully we would be able to do that within a --  
 23 MR JUSTICE FRASER: Friday?  
 24 MR GREEN: Yes.  
 25 MR JUSTICE FRASER: By noon on Friday?

141

1 MR GREEN: By noon on Friday. My Lord, I think --  
 2 MR JUSTICE FRASER: Just before I get onto skeletons,  
 3 Mr De Garr Robinson, do those two intervals require any  
 4 observation from you?  
 5 MR DE GARR ROBINSON: My Lord, none.  
 6 MR JUSTICE FRASER: All right. That then means the  
 7 hearing -- I think I said rather peremptorily before  
 8 I left court it would be 1 April, but I think it's going  
 9 to have to be a day or two later in that week because  
 10 you're going to have to have provisions for skeletons,  
 11 I'm then going to have to have a little time to read  
 12 them, and the application says set down for four hours  
 13 but I think in the circumstances, I will just set it  
 14 down for a day.  
 15 Skeletons by 10 o'clock on Tuesday 2nd with the  
 16 hearing on Wednesday 3rd?  
 17 MR DE GARR ROBINSON: My Lord, I'm unaware whether  
 18 Lord Grabiner will be available on Wednesday and  
 19 enquiries need to be made.  
 20 MR JUSTICE FRASER: Well, Mr De Garr Robinson, in all the  
 21 circumstances and given that is actually one of the days  
 22 this trial should have been sitting, if you want to move  
 23 it from the 3rd you're going to have to issue an  
 24 application I'm afraid because I'm not going to say  
 25 anything more that at this point. So skeletons at the

142

1 end of Monday 1st, let's say 5 o'clock Monday 1st, the  
 2 skeletons, together with a single bundle of authorities,  
 3 although I can't imagine any of them will be  
 4 controversial, the test is fairly well-established.  
 5 Any further directions are going to have to wait  
 6 until the application has been resolved, I think. Will  
 7 the parties draw up an order?  
 8 MR DE GARR ROBINSON: My Lord, yes. When you say "any  
 9 further directions", do you mean directions in relation  
 10 to the Horizon trial?  
 11 MR JUSTICE FRASER: Well, not necessarily in relation to the  
 12 Horizon trial, because that would suggest I have  
 13 prejudged the outcome of the application which obviously  
 14 I haven't. Well, the question of whether I would  
 15 reserve judgment, how long it would take, all of those  
 16 sorts of things, I don't think I'm in a position to say  
 17 anything about that now until having heard -- seen the  
 18 evidence and heard the arguments on the 3rd.  
 19 MR DE GARR ROBINSON: Yes.  
 20 (Pause).  
 21 My Lord, we are not presently aware of what  
 22 Lord Grabiner's availability will be, but we should know  
 23 by Monday, and if an application needs to be made,  
 24 your Lordship will hear it then.  
 25 MR JUSTICE FRASER: Although I'm not making any directions

143

1 about this, it would be foolish to ignore the fact that  
 2 we still have got in the Horizon issues trial definitely  
 3 Mr Parker, who I think is going to be less than half  
 4 a day, because you haven't got longer than that anyway.  
 5 MR GREEN: No.  
 6 MR JUSTICE FRASER: The position vis-à-vis Mr Membery, which  
 7 I know is in a state of flux because of his personal  
 8 circumstances.  
 9 MR DE GARR ROBINSON: Yes.  
 10 MR JUSTICE FRASER: And then the experts. I think it is  
 11 pretty clear we won't be able to hear any more -- if the  
 12 application is not acceded to, we won't be able to hear  
 13 any expert evidence at all this side of Easter --  
 14 MR DE GARR ROBINSON: I see.  
 15 MR JUSTICE FRASER: -- it seems to me, because apart from  
 16 anything else, depending on the outcome of the  
 17 application, either party might want to make a new  
 18 application about further delay, I say, expressing  
 19 myself neutrally, because they might want to appeal  
 20 whatever my answer is, but we will cross those bridges  
 21 if and when we come to them.  
 22 So I think that deals with everything in respect of  
 23 the application to recuse. Is there anything I have  
 24 missed out?  
 25 MR DE GARR ROBINSON: My Lord, not that I can think of.

144

1 MR JUSTICE FRASER: Anything I have missed out? 1  
2 MR GREEN: My Lord, no. 2  
3 Housekeeping 3  
4 MR JUSTICE FRASER: Turning to the rather more mundane 4  
5 subject of outstanding housekeeping in what we have 5  
6 already been doing, I was still waiting for hard copies 6  
7 of the PEAKs and the KELs. 7  
8 MR GREEN: My Lord, yes, we're going to put those together 8  
9 for you and deliver them tomorrow, if that's all right. 9  
10 MR JUSTICE FRASER: I think you should probably still do 10  
11 that -- 11  
12 MR GREEN: It has to be done. 12  
13 MR JUSTICE FRASER: -- so it doesn't get lost -- well, it 13  
14 will have to be done for whoever it is who is the trial 14  
15 judge who takes the matter all the way through, whether 15  
16 it is me or somebody else. 16  
17 There was still a hard copy of Dr Worden's report 17  
18 with appendices. 18  
19 MR DE GARR ROBINSON: Oh, has that not got to you? I do 19  
20 apologise. 20  
21 MR JUSTICE FRASER: It might have appeared somewhere, but 21  
22 I don't believe it has. 22  
23 I did, however, get three hard copies of the 23  
24 application to recuse myself as the managing judge, but 24  
25 I didn't get any hard copy of Dr Worden. 25

INDEX

25 MR TORSTEIN OLAV GODESETH .....1  
(continued)

1 MR DE GARR ROBINSON: I'm so sorry.  
2 MR JUSTICE FRASER: And then there was still an outstanding  
3 summary from you, Mr De Garr Robinson, about your  
4 privilege redaction review but in the circumstances  
5 I don't need to pursue that with you now.  
6 MR DE GARR ROBINSON: That's very kind. I am prepared to  
7 address your Lordship on it now should you wish, but I'm  
8 happy to -- perhaps it would be better ...  
9 MR JUSTICE FRASER: I think we will put that on the -- as  
10 the only matter still outstanding so far as current  
11 housekeeping is concerned in this trial, until the  
12 application has been dealt with.  
13 MR DE GARR ROBINSON: Very good, my Lord.  
14 MR JUSTICE FRASER: Anything else?  
15 MR GREEN: My Lord, no.  
16 MR JUSTICE FRASER: So someone is going to draw up an order.  
17 MR DE GARR ROBINSON: We will decide, my Lord.  
18 MR JUSTICE FRASER: I think you can probably agree between  
19 yourselves who that is, and until Wednesday 3rd at 10.30  
20 and we will have Opus here for that obviously.  
21 MR GREEN: My Lord, yes.  
22 (4.07 pm)  
23 (The court adjourned until 10.30 am on  
24 Wednesday, 3 April 2019)  
25

1  
Cross-examination by MR GREEN (continued) .....1

2  
Re-examination by MR DE GARR ROBINSON .....106

3  
Questions by MR JUSTICE FRASER .....115

4  
Procedural matter .....124

5  
Submissions by MR GREEN .....125

6  
Submissions by MR DE GARR ROBINSON .....129

7  
Submissions by MR GREEN .....134

8  
Submissions by MR DE GARR ROBINSON .....138

9  
Housekeeping .....145

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

148

149

**A**

aa (1) 54:7

abbreviation (1) 16:18

ability (1) 44:9

able (12) 3:17 4:8 29:14  
38:21 68:18,20 92:18  
98:13 116:3 141:22  
144:11,12

above (8) 28:13,14  
34:15 35:11 60:21  
69:17 114:11 118:17

abovementioned (1)  
14:17

absence (1) 14:17

absolutely (6) 1:9 35:19  
42:12 46:15 116:6  
133:3

absorb (1) 83:5

acceded (1) 144:12

accept (10) 8:24 13:25  
27:1,12 64:18 68:23  
74:2 83:13 102:22  
132:19

accepted (8) 6:5 27:11  
52:19 56:2,2,3 59:4,10

accepting (1) 73:7

access (8) 40:13,17,20  
42:6 85:19 113:24  
114:15,18

accompanied (1)  
124:12

accomplished (1) 125:8

accord (1) 87:12

accordingly (1) 38:25

account (14) 18:18  
21:24 22:1 57:23 58:1  
69:13 77:15  
81:16,21,25  
82:14,14,17 88:13

accounted (1) 110:16

accounting (2) 105:5  
122:8

accounts (11) 66:15  
72:17 86:15,19 87:6  
95:5 97:9 102:24  
104:7 110:3,4

accuracy (1) 72:23

accurate (3) 3:10  
26:11,19

acknowledged (1) 32:23

across (5) 37:6 39:19  
48:3 68:21 70:9

acting (1) 92:23

action (3) 3:19 13:10  
90:15

active (1) 103:25

activity (1) 113:16

actual (5) 37:3 66:24  
72:4 133:14 135:1

actually (25) 18:13  
25:13 52:7,10 53:11  
56:5 57:5 67:16 68:2  
70:1,12 75:12,19 76:8  
77:5 86:3,17 116:10  
127:20,21 128:22  
133:20 138:3,6 142:21

adamant (1) 63:15

add (6) 115:9 118:18  
131:15,17 139:19  
140:2

added (2) 118:12,14

adding (2) 115:7 116:9

additional (3) 6:1 14:1  
42:19

address (4) 91:13  
138:16 140:16 146:7

adequate (1) 61:3

adjourn (1) 89:22

adjourned (1) 146:23

adjournment (1) 89:7

adjusted (1) 3:7

adjustments (1) 19:6

administrators (1) 44:7

admit (2) 36:8,16

advantage (1) 94:14

adverse (1) 135:4

advice (2) 61:21,23

advise (1) 65:20

advised (10) 8:23 9:1,3  
19:10 54:20 105:9  
113:22 136:8 140:25  
141:20

advising (1) 60:22

advisors (1) 139:25

affairs (1) 93:17

affect (1) 50:1

affected (18) 49:25  
65:7,20 66:14 67:14  
68:25 69:14 70:10  
77:24 79:17 83:20  
84:1,3,4 85:7 86:4  
87:10 88:2

affecting (1) 64:21

affects (1) 64:13

affords (1) 134:14

afraid (6) 17:22 28:15  
92:11 107:13 123:5  
142:24

after (19) 1:7 2:2 13:17  
23:6 27:19 29:17  
32:23 53:20 56:3  
57:11 85:16 91:14  
107:18 109:3 116:20  
120:21 121:23 124:6  
136:22

afternoon (1) 91:19

again (12) 7:7 8:13  
34:11 39:19 54:8 60:3  
62:21 76:18 83:13  
89:23 98:20 105:3

against (3) 35:5,6  
117:15

agent (1) 52:14

agents (3) 50:7,21 83:7

agnostic (1) 78:19

ago (1) 89:18

agree (18) 1:23 4:16,24  
6:10 26:10 34:12  
44:12 67:1,5 71:1  
78:18,23 80:7 90:21  
101:18,20 133:10  
146:18

agreed (13) 2:22 9:22  
11:4 12:8 13:7 39:13  
59:17 76:15 82:25  
91:18 101:17 107:4  
138:9

agreement (1) 19:18

aiming (1) 80:19

alan (5) 54:1 58:18  
59:19,22,25

albeit (1) 82:17

alert (2) 27:24 106:21

alerting (1) 107:2

aligned (2) 16:11,16

allan (2) 62:20 63:15

allegation (2) 128:14,18

allegations (1) 128:5

alleged (1) 135:13

allow (5) 27:10 79:16  
103:15,20 133:6

allowed (4) 2:16 51:22  
122:6,8

allows (1) 44:13

almost (2) 23:5 89:12

already (19) 12:8  
13:8,22 33:18,25  
34:20 51:23 64:11  
94:1 117:17 119:10  
126:15 128:18 129:23  
132:23 134:22 139:15  
140:10 145:6

also (27) 6:1 8:13 10:23  
16:24 19:19 43:2,9  
51:20 57:16 63:8  
67:15,23 75:16 83:13  
89:21 91:18 97:22  
98:20 105:8 108:15  
109:6 117:4 123:3  
126:22 127:18 129:1  
130:22

alter (2) 38:25 81:14

alternative (1) 3:19

although (10) 8:25 17:2  
52:11 64:22 79:17  
89:22 98:10 104:8  
143:3,25

always (3) 20:24 72:4  
109:1

amenable (1) 91:17

amendments (1) 40:23

american (2) 7:23 15:25

amongst (1) 114:2

amount (4) 3:6 8:16  
13:18 57:23

amounts (1) 53:22

analogous (1) 115:7

analyse (1) 127:8

analysed (1) 15:9

analysing (1) 70:8

analysis (2) 100:12  
133:21

andor (2) 47:3 48:21

andrew (2) 41:12,13

andy (7) 7:2,4,5 8:19  
9:10 12:13 43:6

anne (19) 13:1 18:25  
33:13 34:15 41:6,7  
64:1,2,22 70:12,19  
71:6,18,21,25  
72:3,6,10 73:11

another (27) 14:18  
15:8,12 21:21 22:2  
45:3 51:5,23 52:17  
54:19 55:15 56:13  
57:17 58:15 61:11  
62:19 68:19,21 72:2  
89:23 103:16,21 104:1  
109:5 115:10 118:11  
137:20

answer (7) 26:17 31:7  
50:23 68:11 69:20  
86:3 144:20

anticipate (2) 108:11,24

anticipated (2) 25:17  
39:11

anxious (2) 93:24,25

anxiousmaking (1)

59:15

anyone (2) 45:7 89:4

anything (11) 36:13  
48:11 58:19 94:24  
131:24 142:25 143:17  
144:16,23 145:1  
146:14

anyway (4) 52:3 109:8  
124:6 144:4

apart (4) 94:23 100:1  
131:24 144:15

apologise (2) 103:18  
145:20

apparent (4) 52:3 105:5  
134:11 135:12

apparently (1) 57:6

appeal (1) 144:19

appear (7) 27:21 81:3  
88:19 104:7 110:13,14  
121:22

appeared (6) 15:24 32:5  
55:17,23 56:4 145:21

appearing (1) 96:11

appears (10) 13:23 14:5  
20:14 29:24 37:1  
52:13 59:14 71:3 77:8  
83:9

appendices (1) 145:18

applicant (3) 91:17  
127:14 135:9

application (61)  
89:9,12,19,22,25  
90:2,3,9,13 91:9,18,24  
92:2,19,21 93:2,18  
94:5,7,12 124:8  
125:1,5 126:11  
127:10,20 128:4,5,6  
130:5,24 131:20 132:8  
134:7,16  
135:2,5,8,10,23  
136:9,13,14,23 137:4  
139:13 140:13,24  
141:3,12 142:12,24  
143:6,13,23  
144:12,17,18,23  
145:24 146:12

applications (1) 127:10

applied (2) 99:24 105:5

apply (1) 81:7

appraisal (1) 127:23

appreciate (2) 90:16  
113:2

approach (2) 108:6  
132:10

appropriate (1) 138:2

approval (1) 99:25

approve (1) 19:16

approved (3) 25:1,4  
82:16

approx (1) 55:15

approximately (4) 3:8  
84:17 85:12,15

appsup (4) 40:9,22  
41:2,21

april (9) 25:25 32:23  
34:10 106:8 109:6,11  
125:6 142:8 146:24

archiveddeleted (1)  
96:3

archiving (3) 50:16  
96:19 97:4

area (2) 41:15 58:15

areas (1) 39:2

arent (3) 24:23 122:13  
131:19

argue (1) 9:6

arguing (1) 133:8

argument (12) 123:15  
129:22 130:10,11  
131:8,23 133:20  
134:21,21 136:22  
138:4 139:8

arguments (5)  
129:23,24 130:8  
131:11 143:18

arise (4) 25:21 50:20  
103:1 104:14

arising (2) 88:7 123:21

arose (3) 74:10 75:6  
126:13

around (4) 59:22 64:9  
82:4 128:1

article (2) 15:10 60:1

ashford (4) 43:9  
112:23,24,25

ask (12) 5:16 16:4  
66:16 93:14 98:2  
107:22 109:4,21  
113:17 120:15 124:6  
128:20

asked (12) 23:19 46:24  
47:11 62:4 72:2 79:18  
91:21 107:18,25  
119:19,25 120:5

asking (5) 68:3 72:1  
94:9 136:10 141:14

aspect (1) 85:5

aspects (3) 16:12 62:10  
134:9

asserting (1) 32:16

assessment (2)  
101:18,20

assistant (1) 56:5

assists (1) 17:25

associated (1) 102:10

assuming (1) 139:13

assumption (2) 66:3  
118:2

asterisk (2) 8:12 121:7

atos (3) 50:10 68:15  
102:1

attached (1) 104:2

attacked (1) 132:7

attempt (1) 29:21

attempts (2) 16:5 60:17

attention (9) 28:6 67:25  
68:1 77:1 84:20 85:6  
98:12 126:5 133:2

attribute (1) 21:4

attributes (1) 11:17

audit (3) 44:18 70:23  
100:17

auditing (1) 42:10

august (1) 37:2

author (3) 71:7 76:17  
95:15

authorisation (2) 4:14  
5:3

authorise (1) 58:1

authorised (1) 113:21

authorities (2) 5:17  
143:2

authority (2) 5:19,20

automated (1) 31:5

automatically (1)  
123:11

availability (1) 143:22

available (7) 42:1 47:23  
48:6 72:9 79:11  
133:17 142:18

avoid (1) 39:7

avoided (1) 34:7

awaiting (1) 34:2

aware (26) 5:2 6:7,9  
8:22 9:6,14 11:1 19:20  
22:19 37:18,20  
42:4,22 61:22 62:12  
72:8 83:17 87:4 88:13  
98:14 99:12 100:23  
104:4 105:23 114:17  
143:21

away (3) 119:12 128:16  
136:7

awful (2) 44:17 47:11

**B**

b (2) 114:16,22

back (36) 1:17 4:9 7:7  
12:21 17:10 20:7  
24:15 31:8 45:5  
52:13,14 55:2 56:3  
59:24 60:4,6 62:22  
66:8 68:15 74:16  
77:8,15 84:5 86:2  
89:2,4 92:10,13 97:18  
98:8 100:3 101:2  
104:22 116:5 129:4,9

backend (7) 12:2 13:20  
18:3 20:17,25 102:18  
104:8

background (4) 9:12  
102:8,9 105:1

backstage (1) 36:22

bal (6) 29:10,11  
31:2,6 33:16

balance (15) 3:11  
35:1,5,6,6,8 63:14  
65:21 77:21 82:17  
110:21,24,24 115:11  
140:17

balanced (2) 10:19  
79:13

balancing (25) 22:18  
24:5 25:15 32:24  
33:20 34:23,24 49:25  
50:1 51:14,15 57:10  
61:24 65:18  
87:5,17,23 88:6,16,23  
108:14,16,22 109:8,10

bansal (1) 45:22

barring (1) 32:16

based (3) 61:1 111:25  
133:12

basically (2) 24:16  
47:18

basis (16) 26:23 80:6  
91:24 97:22 126:10  
127:19 128:5,15 134:8  
135:1,21  
136:10,19,23,24 137:4

basket (1) 29:19

bb (3) 3:2,5,11

bbc (1) 76:21

bdc (1) 13:16

bearing (1) 139:4

became (4) 72:8 83:15  
98:14 105:4

become (1) 74:8

before (32) 3:20 4:1,7  
8:22 10:19 11:17 20:6  
22:10,12 31:6 45:6  
50:22 62:17 65:20  
73:15 78:25 79:24  
86:10,13 89:3 96:23  
112:5 113:15 114:21  
116:7 121:8 128:8,20  
134:19 136:12 142:2,7

began (1) 79:20

beginning (4) 79:23  
116:14 119:20 121:7

begins (1) 74:13

behalf (2) 6:5 18:24

behaved (2) 127:1,14

behind (2) 6:6 48:11

being (54) 5:17 6:7,7,8  
8:8 9:15 12:17,18  
23:19 25:10 27:4 30:8  
35:24 36:18,18 37:21  
39:6 42:16 51:1,25  
59:23 60:7 61:10,23  
65:7 68:18,20 79:16  
81:6,19 83:11 87:6  
89:19 91:12 100:8  
101:24 105:2,3,5  
106:20 108:17  
111:2,12 118:7 127:17  
128:2,15 132:7,8  
138:22 139:3,9,12,23

believe (5) 12:23 70:22  
77:24 79:13 145:22

below (10) 2:13 6:1  
22:20 33:5 42:20 43:3  
45:21 55:14,20 59:1

beneficial (1) 138:6

benefit (4) 38:13,20  
126:19 129:1

best (2) 8:23 138:13

better (3) 130:7 139:7  
146:8

between (16) 10:24  
11:2 12:15 13:19  
15:17 18:21 19:8  
66:22 77:9 81:19  
97:12,13 102:3 121:10  
125:9 146:18

beyond (3) 48:10  
135:11 140:14

bias (2) 134:11 135:13

big (4) 9:18 28:16,23,24

bigger (1) 71:10

bims (1) 60:21

bind (3) 122:24 123:2,6

bit (8) 7:16,23 26:8  
34:22 36:22 51:19  
71:10 97:6

blackburn (1) 13:22

blue (2) 15:6 68:6

bold (2) 10:8,9

book (1) 114:6

both (12) 1:5 10:13  
13:12 41:22 49:8  
55:17,23 61:2 84:9  
99:13 103:12 136:24

bottom (17) 2:11 8:18  
14:12 28:23 37:23  
40:7 43:12 57:19 65:1  
68:6,8 84:6 87:3 96:12  
99:10,23 102:20

bought (1) 8:1

bound (1) 108:19

bounds (1) 135:11

<p><b>box (27)</b> 2:10 3:1 6:13,21,23 7:9 8:4 9:18 13:2 15:6 22:20 23:5 26:3 28:17,23,23,24 32:3 33:6 37:23 39:23 54:2 72:12 90:20 92:13 103:23 105:1</p> <p><b>bp (3)</b> 2:17 33:20 104:6</p> <p><b>bra01 (2)</b> 12:3,8</p> <p><b>bracknell (1)</b> 12:3</p> <p><b>branch (103)</b> 3:20 6:16 8:6,20,22,23 10:13,20,23,24,25 11:2,21 12:14 13:12,15,23 15:19 16:11,14,15 17:8 18:2,11 19:7,24 25:13,14,21 27:17 31:16,17 33:7,23 34:6,13 35:14 38:3 39:4 40:11 44:10,14 52:1,8,11,23 53:15,17 56:6,6 66:15 67:14 72:18 75:17 77:14,15,19 79:8,13 81:14,16,21,23 82:3,6,7,9,9,16,21 86:14,17 87:6 88:15 96:2,20,21,24 97:3,9,11,20,24 98:20 102:2,21,23 103:11 104:7 105:12,15 107:14 108:14 109:25 110:3,19 111:4,6 112:6,13 115:13 122:8 123:14</p> <p><b>branchaccounting (1)</b> 109:19</p> <p><b>branchaccountingcode (1)</b> 109:15</p> <p><b>branches (37)</b> 21:3 34:7 49:25 50:1 66:2,14 68:25 69:14 70:9 72:13 73:17 74:20 75:2 77:16,23 79:17,18 80:4 81:3,7 82:22 83:3,19 84:1,3,4,5 85:7 86:4 87:9 104:12,16 105:18 106:15 108:5,8 111:12</p> <p><b>branches (4)</b> 86:19 87:6 110:3,4</p> <p><b>branded (1)</b> 102:11</p> <p><b>brdb (13)</b> 29:21 32:5 34:13,17 37:8,11 38:18,21 40:23 112:10,10,11 114:1</p> <p><b>brdbbranchinfo (1)</b> 33:24</p> <p><b>brdbbranchstockunits (1)</b> 109:14</p> <p><b>brdbbxeposs (1)</b> 23:9</p> <p><b>brdbxrepession (1)</b> 23:8</p> <p><b>brdbsu (1)</b> 33:19</p> <p><b>brdbsuopeningfigures (1)</b> 109:18</p> <p><b>break (8)</b> 44:23 45:3,9 89:1 92:15 94:15 97:13 129:15</p> <p><b>bridges (1)</b> 144:20</p> <p><b>briefly (3)</b> 2:2 49:16</p>	<p>88:24</p> <p><b>bring (3)</b> 28:6 81:25 116:9</p> <p><b>broadcast (1)</b> 76:22</p> <p><b>broadcasting (1)</b> 78:20</p> <p><b>broken (2)</b> 57:14 99:10</p> <p><b>brought (5)</b> 84:19 91:10 97:25 124:14 133:1</p> <p><b>brown (1)</b> 54:1</p> <p><b>brss (1)</b> 40:20</p> <p><b>bt (2)</b> 23:12,23</p> <p><b>bts (1)</b> 34:1</p> <p><b>bubble (1)</b> 62:10</p> <p><b>bucket (3)</b> 110:7,9,14</p> <p><b>bug (40)</b> 27:22,23,24 28:3,4 31:12,22 32:8,16 52:12 54:23,23 63:22 65:8 67:1,5 69:1,7,13 73:13 74:3,9,18 77:25 78:16 80:3 83:21 85:4 88:25 95:4,10 97:1,2 98:4,19 99:8,9 101:13 107:8,11</p> <p><b>bugs (5)</b> 45:1,12,23,25 74:4</p> <p><b>build (1)</b> 97:23</p> <p><b>building (3)</b> 115:6,10,12</p> <p><b>bullet (5)</b> 100:2 106:16,22,22 122:25</p> <p><b>bundle (1)</b> 143:2</p> <p><b>bureau (3)</b> 10:4 15:14 116:20</p> <p><b>burley (1)</b> 106:7</p> <p><b>business (6)</b> 54:21 58:12 63:4 83:7 130:10,12</p> <p><b>businesses (1)</b> 61:2</p> <p><b>busy (1)</b> 50:12</p> <p><b>buttonpress (1)</b> 31:4</p> <hr/> <p style="text-align: center;"><b>C</b></p> <hr/> <p><b>c4215 (1)</b> 87:20</p> <p><b>c4216 (1)</b> 87:25</p> <p><b>calculated (1)</b> 128:7</p> <p><b>calculation (3)</b> 84:11,12,21</p> <p><b>call (14)</b> 19:10 50:15 54:1 56:21 58:9 64:16,17 97:4 101:4,5,7 102:2 117:10 124:6</p> <p><b>called (4)</b> 17:3 55:2 102:1 120:18</p> <p><b>callendar (16)</b> 46:3 48:25 49:15 52:11,12 53:15,17 54:23 62:9,12,15 64:3 66:19 67:2,4 69:7</p> <p><b>calls (5)</b> 75:2 100:2,3 105:4 114:14</p> <p><b>calvert (1)</b> 43:14</p> <p><b>came (6)</b> 24:11,13 72:15 97:2 100:16 111:15</p> <p><b>canadian (3)</b> 7:24 8:1 15:25</p> <p><b>cancel (1)</b> 4:21</p> <p><b>cancelled (2)</b> 118:19,20</p> <p><b>cancels (2)</b> 4:11 77:19</p> <p><b>cannot (7)</b> 27:7,9 32:17 62:14 97:18 123:12 136:14</p>	<p><b>cant (21)</b> 5:14 7:15 17:22,23 18:6 20:4 24:8 32:14 41:13 53:13 62:7 69:25 72:19 73:7 84:7 98:18 100:9 107:13 141:2,4 143:3</p> <p><b>cap (2)</b> 4:9 54:11</p> <p><b>card (3)</b> 37:14 56:12 68:7</p> <p><b>care (3)</b> 31:8 114:21 128:17</p> <p><b>career (1)</b> 116:15</p> <p><b>careful (1)</b> 35:14</p> <p><b>carefully (4)</b> 57:14 83:14 133:12 136:15</p> <p><b>carried (1)</b> 100:12</p> <p><b>carry (2)</b> 29:1 36:22</p> <p><b>cartwright (1)</b> 46:18</p> <p><b>cash (11)</b> 3:6 33:21 35:23,25 36:5 53:22 61:19 72:17 77:17 83:8 105:13</p> <p><b>cashurrencies (1)</b> 34:2</p> <p><b>catalogue (1)</b> 40:14</p> <p><b>categorical (2)</b> 101:5 121:12</p> <p><b>category (1)</b> 57:1</p> <p><b>catered (1)</b> 41:25</p> <p><b>cath (1)</b> 43:2</p> <p><b>catherine (1)</b> 14:13</p> <p><b>cause (5)</b> 4:20 60:11,13 97:8 100:12</p> <p><b>caused (12)</b> 2:21 8:13 9:19 13:4 56:18 65:19 72:16 74:19 80:3 82:5 95:5 103:24</p> <p><b>causing (2)</b> 52:19 78:22</p> <p><b>centre (4)</b> 33:9 57:19 75:2 107:17</p> <p><b>certain (1)</b> 77:14</p> <p><b>cfs (1)</b> 104:23</p> <p><b>chain (1)</b> 63:25</p> <p><b>chambers (18)</b> 13:1 18:25 33:13 41:6,7 64:1,2,22 70:12 71:6,18,21,25 72:3,6,10 73:11 92:22</p> <p><b>chance (4)</b> 14:11 128:24 129:2,6</p> <p><b>change (29)</b> 4:8,17 8:2,8 10:18 11:24 12:1,8 16:9,10,13,22 17:8 19:16 21:12,13 25:13 84:23 94:10 102:9,16 103:15,20 108:20 109:3,23 121:23 122:6,8</p> <p><b>changes (11)</b> 4:13,15,24 5:4 6:7 19:24 20:1 21:24 37:20 96:18 97:7</p> <p><b>changing (4)</b> 33:24 82:6,8 110:1</p> <p><b>channel (1)</b> 31:10</p> <p><b>chaos (1)</b> 78:22</p> <p><b>characterisation (1)</b> 47:13</p> <p><b>charted (1)</b> 106:9</p> <p><b>chat (1)</b> 89:4</p> <p><b>check (7)</b> 28:9 29:4 64:17 84:5 88:15 123:18,20</p>	<p><b>checked (1)</b> 75:10</p> <p><b>checking (1)</b> 57:12</p> <p><b>cheque (1)</b> 54:19</p> <p><b>cheryl (3)</b> 37:14 56:12 68:7</p> <p><b>chose (1)</b> 21:13</p> <p><b>chosen (1)</b> 25:16</p> <p><b>chronology (1)</b> 58:23</p> <p><b>chunks (1)</b> 29:2</p> <p><b>circa (1)</b> 77:16</p> <p><b>circumstance (1)</b> 114:10</p> <p><b>circumstances (9)</b> 40:10 66:14 137:21 138:12 141:8 142:13,21 144:8 146:4</p> <p><b>claimant (1)</b> 88:2</p> <p><b>claimants (12)</b> 6:5 45:16 87:7 88:3 89:13 124:25 127:18 130:11,16 131:11 138:7 140:22</p> <p><b>clarify (5)</b> 1:11 9:9 32:2 70:5 113:2</p> <p><b>clarity (1)</b> 134:16</p> <p><b>classification (2)</b> 42:23 44:1</p> <p><b>clause (1)</b> 120:2</p> <p><b>clean (2)</b> 94:15 97:13</p> <p><b>cleanse (1)</b> 104:23</p> <p><b>clear (12)</b> 1:24 6:8 54:22 72:22 77:5 114:8 126:15,25 132:24,24 133:4 144:11</p> <p><b>cleared (1)</b> 82:18</p> <p><b>clearly (9)</b> 1:14 7:2 14:5 79:12,24 81:22 84:17 128:23 134:9</p> <p><b>clerk (2)</b> 51:22 56:2</p> <p><b>clerks (1)</b> 125:19</p> <p><b>close (2)</b> 130:10,11</p> <p><b>closed (1)</b> 60:12</p> <p><b>closely (1)</b> 53:16</p> <p><b>closing (1)</b> 35:6</p> <p><b>clue (2)</b> 29:13 30:13</p> <p><b>coblen01 (1)</b> 43:2</p> <p><b>code (14)</b> 12:8 29:16 33:3 34:20 35:10 53:17,21 55:1 79:16 80:15 88:15 109:19 122:8 123:14</p> <p><b>codes (1)</b> 88:17</p> <p><b>colleagues (1)</b> 45:20</p> <p><b>collection (1)</b> 34:3</p> <p><b>colour (1)</b> 28:19</p> <p><b>column (1)</b> 42:23</p> <p><b>come (27)</b> 1:17 2:10 3:2 14:8 19:18 24:4 31:1,5 45:5 62:22 68:24 70:4 71:9 84:12,21 85:1 89:2,4 90:10 92:10,13 97:19 129:4,9 137:10 140:25 144:21</p> <p><b>comes (4)</b> 81:23 90:11 132:4,5</p> <p><b>comfortable (4)</b> 70:19 75:10 93:16 94:22</p> <p><b>coming (4)</b> 31:15,23 94:19 139:24</p> <p><b>command (1)</b> 121:10</p> <p><b>commands (1)</b> 122:13</p> <p><b>commencing (2)</b> 80:20,21</p>	<p><b>comment (8)</b> 32:14 56:22 69:10 73:1 85:18,23 98:18 100:9</p> <p><b>commented (1)</b> 86:1</p> <p><b>commenting (1)</b> 85:24</p> <p><b>comments (2)</b> 12:12 40:8</p> <p><b>committed (3)</b> 26:7 27:5 134:19</p> <p><b>common (8)</b> 93:5 126:14,24 127:4 129:25 133:13 135:16 136:18</p> <p><b>comms (1)</b> 31:10</p> <p><b>communicate (2)</b> 69:21 83:16</p> <p><b>communicated (2)</b> 77:23 78:6</p> <p><b>communication (1)</b> 82:16</p> <p><b>companies (1)</b> 102:10</p> <p><b>compare (1)</b> 88:16</p> <p><b>complaint (1)</b> 127:17</p> <p><b>complaints (1)</b> 127:6</p> <p><b>complete (5)</b> 69:8 81:23 97:19 106:25 113:14 106:25</p> <p><b>completed (5)</b> 59:14 80:11,23 104:24 111:5</p> <p><b>completely (3)</b> 70:16 93:10 94:22</p> <p><b>completeness (1)</b> 17:6</p> <p><b>completion (1)</b> 77:20</p> <p><b>complicated (4)</b> 15:4,14 30:19,22</p> <p><b>complications (1)</b> 83:6</p> <p><b>complied (2)</b> 138:24 139:10</p> <p><b>component (3)</b> 20:21,21 21:21</p> <p><b>components (9)</b> 15:16 16:8 17:14,20,21 20:20 21:8 48:11 117:5</p> <p><b>computer (1)</b> 136:5</p> <p><b>concealing (1)</b> 78:12</p> <p><b>concentrating (1)</b> 107:11</p> <p><b>concern (3)</b> 42:5 58:6 139:23</p> <p><b>concerned (6)</b> 31:17 42:11 54:18 58:18 61:16 146:11</p> <p><b>concerns (1)</b> 82:2</p> <p><b>conclusion (2)</b> 94:21,23 112:23</p> <p><b>condensed (1)</b> 1:22</p> <p><b>confidence (1)</b> 38:22</p> <p><b>confident (2)</b> 42:3 70:16</p> <p><b>confirm (1)</b> 23:11</p> <p><b>confirmed (1)</b> 62:2</p> <p><b>confused (1)</b> 111:16</p> <p><b>confusion (3)</b> 2:1 7:23 15:24</p> <p><b>connect (2)</b> 33:8 40:1</p> <p><b>connotation (1)</b> 115:18</p> <p><b>consecutive (1)</b> 52:6</p> <p><b>consensus (1)</b> 93:1</p> <p><b>consequence (1)</b> 13:24</p> <p><b>consequences (1)</b> 39:7</p> <p><b>consider (5)</b> 114:22 127:16,19 128:10 134:15</p>	<p><b>considerable (1)</b> 67:6</p> <p><b>considerations (1)</b> 81:12</p> <p><b>considered (5)</b> 8:8 81:6 134:22,24 136:9</p> <p><b>consistent (2)</b> 20:18 64:10</p> <p><b>constructing (3)</b> 96:24 97:10 115:13</p> <p><b>consulted (1)</b> 45:19</p> <p><b>contact (5)</b> 54:20 62:24 65:18 92:19 107:16</p> <p><b>contacted (5)</b> 2:15,15 62:2,21 100:13</p> <p><b>contacts (1)</b> 105:7</p> <p><b>contain (1)</b> 84:18</p> <p><b>contains (3)</b> 44:4 126:22 132:15</p> <p><b>content (3)</b> 72:11 91:9 93:10</p> <p><b>contents (2)</b> 118:23 140:8</p> <p><b>context (8)</b> 6:4 7:4 14:11 30:7 34:8 39:21 41:24 46:5</p> <p><b>contingency (1)</b> 25:21</p> <p><b>continuation (1)</b> 121:18</p> <p><b>continue (5)</b> 26:22 92:11 94:2,13 134:23</p> <p><b>continued (6)</b> 1:3,4 39:10 111:8 147:25 148:1</p> <p><b>continues (2)</b> 77:21 104:4</p> <p><b>continuing (3)</b> 65:13,21 93:23</p> <p><b>continuously (1)</b> 50:16</p> <p><b>contract (1)</b> 62:6</p> <p><b>contrary (2)</b> 62:5 133:8</p> <p><b>control (1)</b> 113:14</p> <p><b>controls (1)</b> 114:10</p> <p><b>controversial (1)</b> 143:4</p> <p><b>convenient (3)</b> 19:22 44:22 88:25</p> <p><b>convention (1)</b> 121:15</p> <p><b>conventional (1)</b> 121:14</p> <p><b>conversation (2)</b> 85:2,25</p> <p><b>conversations (1)</b> 47:8</p> <p><b>copies (4)</b> 12:22 34:1 145:6,23</p> <p><b>copy (8)</b> 23:15 72:1,2,7 124:14,15 145:17,25</p> <p><b>core (3)</b> 14:16 104:23 112:23</p> <p><b>correct (57)</b> 1:12 3:6,7,9,18 9:16 14:23 16:3,10 18:9 21:10,22 22:6 26:20 27:13 34:18 37:8,17 40:5,25 44:19,20 46:20 48:7 49:4,9,14,19,21 54:12 60:5 66:23 71:13 73:21 75:5 76:10 83:2 85:7 87:1,6 88:7,14 96:15 98:13,16 104:15 110:7,8 114:19 116:24 117:9 120:16 121:11,20 122:1,4 133:21</p> <p><b>corrected (8)</b> 9:20 13:5,14 25:9 70:2 81:2 83:23 100:7</p>	<p><b>correcting (2)</b> 10:25 73:18</p> <p><b>correction (17)</b> 3:12,13,25 4:1 13:17,24 20:20,25 23:7 25:4,9 37:9,15 38:15 44:15 60:23 120:25</p> <p><b>corrections (3)</b> 14:2 20:24 37:18</p> <p><b>corrective (4)</b> 3:19 10:4 13:10,13</p> <p><b>correctly (3)</b> 35:10 70:20 102:17</p> <p><b>corrects (1)</b> 38:15</p> <p><b>correspondence (2)</b> 20:3 50:8</p> <p><b>corresponding (1)</b> 10:12</p> <p><b>couldnt (8)</b> 25:9 28:10 29:5 32:7 101:5 105:7 121:12 134:4</p> <p><b>counsel (1)</b> 92:19</p> <p><b>counter (31)</b> 6:17 8:7,9,16 9:19 10:18 11:20,24 12:17 13:4 19:25 20:3 31:2,3 48:10 51:15 54:6,8 65:20 68:18,20 77:13 81:14 103:16,16,21,21 104:2,4,9 105:6</p> <p><b>countermeasures (1)</b> 101:8</p> <p><b>counters (5)</b> 21:3 51:17 53:22 54:8 102:13</p> <p><b>couple (6)</b> 8:3 49:13 95:12 105:7 116:12 126:3</p> <p><b>course (11)</b> 27:19 75:4 79:21 91:23 92:5,25 94:4 105:22 131:21 138:23 139:10</p> <p><b>courses (1)</b> 90:14</p> <p><b>cover (1)</b> 69:8</p> <p><b>covered (1)</b> 69:9</p> <p><b>coyne (1)</b> 45:16</p> <p><b>crashed (1)</b> 22:23</p> <p><b>create (1)</b> 127:13</p> <p><b>created (8)</b> 37:1 39:19 71:17 72:10 73:3,5,6,10</p> <p><b>creates (1)</b> 126:25</p> <p><b>creating (1)</b> 135:12</p> <p><b>creation (1)</b> 73:8</p> <p><b>credence (4)</b> 79:5,6,7,10</p> <p><b>credibility (1)</b> 127:24</p> <p><b>criteria (1)</b> 106:23</p> <p><b>critical (5)</b> 126:22 130:2 132:2 135:11 137:13</p> <p><b>criticise (1)</b> 135:14</p> <p><b>criticised (1)</b> 127:2</p> <p><b>criticising (1)</b> 139:3</p> <p><b>criticism (2)</b> 135:7 136:17</p> <p><b>criticisms (3)</b> 127:12 132:3 137:15</p> <p><b>cross (1)</b> 144:20</p> <p><b>crossexamination (5)</b> 1:4 44:22 90:23 91:11 148:1</p> <p><b>crossexamining (1)</b> 90:8</p> <p><b>cs (1)</b> 60:20</p> <p><b>currency (5)</b> 7:21,22</p>
--	--	---	--	---	--	--

19:4 21:17,24  
current (3) 93:17 104:1  
146:10  
currently (7) 6:15 8:5  
53:5 87:4 109:25  
113:23 119:3  
customer (2) 7:18 82:14  
cut (1) 120:18  
cynical (2) 64:18,24

D

d2 (1) 72:12  
daily (2) 97:22 113:2  
dalmellington (3) 88:25  
98:19 99:8  
damage (2) 44:17 65:23  
dark (1) 81:3  
data (50) 14:16,24  
24:23 26:6 27:1,4  
32:5,10 33:8 35:17  
40:23 82:2,6,9,23 83:2  
95:11 96:2,8  
97:8,14,15,19,21  
102:3,16,24,24 103:2  
104:23 107:17  
110:6,12 111:25  
114:1,15,18,23,24  
115:3,5,11,12,15,18,23  
116:1,2,3,5  
database (30) 25:13,22  
26:7 27:1,5,8,10,15,17  
31:16,17 32:8 35:15  
38:3 40:11  
44:7,10,14,16 96:2  
97:3 107:14,16 109:25  
110:19 111:4,6 112:13  
113:24 115:23  
date (12) 2:6 5:10 14:7  
29:1 39:16,18 42:8  
73:8 81:4 104:12  
125:3 140:24  
dated (3) 58:16 106:8  
107:20  
dates (2) 1:16 37:4  
david (1) 4:6  
day (6) 90:10 93:25  
125:5 142:9,14 144:4  
days (6) 7:25 8:3 31:13  
58:24 109:1 142:21  
db (2) 28:10 29:5  
dba (1) 44:6  
de (82) 1:5,20 22:16  
28:16 89:10,11,14,25  
90:5,16 91:3,15  
92:2,8,18,21,25  
93:11,13,22 94:8 95:1  
106:3,4,5 114:25  
123:22 124:9,16,21  
125:11 128:21,25  
129:3,9,17,18,19  
130:17,21,25 131:5,21  
132:11,14,20  
133:3,9,22 134:6  
135:18,25 136:4  
137:7,17,23,24  
138:11,16,19 139:2,16  
140:1,12  
142:3,5,17,20  
143:8,19 144:9,14,25  
145:19  
146:1,3,6,13,17  
148:2,6,8

deal (9) 2:2 44:25  
45:11,12 46:3 63:8  
94:13 105:21 126:22  
dealing (11) 3:14 15:14  
25:17 46:5 48:25 63:3  
66:18 74:14 93:16  
100:25 136:4  
deals (4) 20:12,17  
66:11 144:22  
dealt (9) 22:3 42:16  
60:7 90:4 91:12  
124:10,24 130:14  
146:12  
debate (1) 138:15  
debt (1) 82:20  
december (8) 2:8 3:1  
7:4 8:19 11:6 13:1  
42:9 71:7  
decide (7) 27:19 61:2  
125:2 129:12 130:4  
136:23 146:17  
decided (1) 83:2  
decision (3) 3:17 9:7  
78:15  
declared (1) 3:6  
decreasing (1) 105:14  
deemed (1) 60:13  
def (3) 33:20 109:16,20  
default (1) 105:9  
defect (2) 66:20,24  
defendant (1) 131:10  
defendants (3) 88:1  
130:9 131:22  
defensive (1) 82:24  
definitely (2) 141:6  
144:2  
definition (3) 115:20,22  
116:2  
defrauding (1) 78:10  
delay (2) 140:19 144:18  
delayed (1) 140:13  
delete (8) 40:4 44:13  
109:18 110:17,18  
113:25 114:15,18  
deleted (7) 35:14,15  
96:8,20,21,23 114:23  
deleting (2) 97:4 111:19  
deletion (2) 18:4 35:24  
deliver (3) 41:19 80:20  
145:9  
delivered (2) 39:25 61:1  
demonstrate (2) 107:1  
134:11  
departed (1) 134:13  
depend (1) 118:4  
dependent (1) 90:22  
depending (3) 10:21  
90:12 144:16  
depends (1) 91:20  
deposits (1) 54:19  
derail (1) 128:7  
derived (2) 75:20,22  
describe (1) 115:3  
described (6) 4:18  
14:16 69:17 87:10  
114:10 117:18  
describing (1) 118:22  
descriptions (1) 42:20  
design (1) 40:11  
designed (2) 34:23 35:7  
desk (6) 58:10 62:25  
63:2,5,8 102:1  
detail (17) 11:9 14:4

17:12 20:4 21:16  
47:10 48:18 75:10,23  
77:7 85:6 87:13  
101:25 112:12  
117:16,17 129:7  
detailed (1) 107:22  
details (3) 12:10 37:17  
107:13  
determination (1)  
126:24  
developer (1) 26:12  
development (3) 41:17  
51:17 56:21  
developmentisd (1)  
33:25  
devizes (1) 116:20  
dialogue (1) 9:12  
dictionary (1) 40:2  
didn't (14) 29:13 46:22  
47:6 52:23 63:8 67:24  
69:19 70:2 73:20  
84:12,17 90:16 108:1  
145:25  
difference (6) 12:15  
13:19 14:2 15:17 25:8  
96:4  
different (20) 21:14  
28:1 34:14 36:15 43:3  
63:15 66:22 68:4,10  
74:3,4 86:3 96:7,7,10  
104:13 115:7,19,21,22  
difficulties (2) 90:7  
105:21  
difficulty (1) 125:15  
dilute (1) 94:10  
direct (1) 138:21  
directed (2) 126:23  
138:4  
directing (1) 128:10  
direction (3) 132:14  
133:4 140:7  
directions (6) 124:8  
136:13 143:5,9,9,25  
directly (4) 38:2 66:9  
69:21,24  
disagree (1) 134:4  
disappear (3) 77:14  
110:11,12  
disappearing (1) 80:16  
disbelieve (1) 104:15  
disclosed (1) 71:15  
disclosure (2) 84:1  
126:20  
disconnected (1) 55:10  
discovered (4) 66:20,24  
67:2 98:4  
discrepancies (6) 65:8  
67:18 77:13 82:18  
98:6,9  
discrepancy (17) 2:18  
52:1,8,20,25 53:3 79:8  
80:16 81:15,24  
82:5,13,21  
86:15,17,19 105:15  
discuss (4) 1:6 45:6  
90:10 137:10  
discussed (5) 19:5 49:6  
61:15 71:23 81:19  
discussing (1) 20:2  
discussion (4) 23:6  
24:18 33:12 106:24  
dishonesty (1) 78:13  
disputes (1) 63:15

distinction (1) 136:7  
distribute (1) 66:11  
distributed (1) 66:5  
document (32) 42:9  
69:13 72:23 73:2,18  
75:24  
76:1,4,13,17,17,20  
77:10 78:25 79:23  
81:4 85:18 88:10  
95:13 96:13 99:3  
106:6,7,9,12 107:19  
109:5 112:22  
119:15,16 138:2,8  
documentary (1) 76:22  
documents (7) 6:6 8:25  
49:5,8 77:2 85:24,25  
does (19) 15:21 17:20  
23:12 29:12 52:8 65:6  
68:11 69:5 83:10,10  
87:12 97:12 101:8,10  
110:2,5,5 120:10  
140:12  
doesn't (19) 9:3 27:20  
34:19 52:7 65:4,15,25  
69:4 79:9 82:24 84:18  
93:24 102:23 104:14  
110:2 130:18 136:7  
137:17 145:13  
doing (15) 4:20 11:5  
19:22 32:15 33:7 62:5  
94:22 101:13,15  
122:3,17,18 123:19  
138:15 145:6  
dollars (5) 7:24 8:1  
10:11 15:25,25  
done (24) 4:1 5:2 9:15  
21:14 25:3 33:25  
51:17 54:7 56:19  
61:20 62:4 64:14  
65:23 70:11,19 88:18  
99:1 101:24 128:10  
133:22 136:12,21  
145:12,14  
dont (50) 4:12 7:6 9:4  
17:5 20:1 22:3 28:4  
45:6 48:2,18 49:2 52:2  
53:8,11,11 54:23  
65:13 76:13 84:10  
85:10 87:13,17,19  
89:3 93:22 94:8,19,24  
99:4,6 107:9 108:4  
112:12 118:1  
121:10,13 122:1,9  
123:5,8 127:21 131:14  
133:25 135:21  
139:18,22 141:5  
143:16 145:22 146:5  
double (5) 8:11,11  
25:11 34:24,25  
doubled (2) 57:18  
108:17  
doubling (1) 24:16  
doubt (1) 61:8  
doubtful (1) 64:23  
doubtless (1) 134:21  
down (46) 2:10 3:2,3  
6:13,24 8:4,11,18  
14:8,10 28:2,16,22  
29:1 31:8 36:22,25  
37:14 39:21 41:6  
43:6,10,14 47:1,9 53:1  
55:16 56:9,10 57:14  
64:2 99:10 102:14

106:22 107:15  
109:11,12 112:7,22  
115:9,10 116:1 120:7  
131:12 142:12,14  
download (1) 71:2  
dr (2) 145:17,25  
draft (1) 126:4  
draw (5) 67:25,25 77:1  
143:7 146:16  
drawing (1) 126:5  
drew (1) 98:11  
driven (2) 113:11,13  
due (9) 3:20 7:11 27:19  
54:5 56:16 61:15  
79:21 83:8 100:20  
dump (5) 28:8,10  
29:3,5 32:6  
duplicate (16) 23:7 26:6  
27:1 28:9 29:4  
32:6,10,12,13 52:22  
56:17 59:21 60:16  
84:5 100:17,19  
duplicates (2) 28:10  
29:5  
duration (1) 11:6  
during (7) 33:21 35:22  
51:14 107:24  
108:11,24 109:6  
dutymanagerroyalmailcom  
(1) 18:24

E

e211 (1) 116:13  
e2116 (1) 23:19  
e2117 (2) 23:21 113:18  
e217 (1) 73:14  
e271 (1) 45:13  
e2710 (2) 74:13,17  
e2711 (2) 83:19 86:24  
e2712 (3) 83:25 95:4  
98:3  
e2713 (2) 96:12,17  
e273 (3) 46:4,25 69:7  
e275 (2) 66:6 69:11  
e279 (1) 74:14  
earlier (4) 66:10 73:8  
100:7 125:16  
earliest (1) 80:24  
early (6) 5:6,10 31:13  
108:11 109:1 116:15  
easter (1) 144:13  
easy (3) 58:3 122:19,20  
ed (4) 43:9  
112:23,24,25  
edit (3) 113:25  
114:15,18  
ee (1) 102:11  
effect (6) 13:11 79:7  
101:14 110:17  
118:6,22  
effected (2) 12:1 19:24  
effectiveexrate (1)  
14:25  
effectively (18) 3:5  
19:18 29:11 36:10  
40:13 46:24 68:18  
89:21 93:20 94:15  
111:15 117:21 119:5  
121:3 122:10 130:22  
132:4,6  
effects (6) 6:17 8:7  
10:12,14 90:3 97:8  
efficiency (1) 131:16

efficient (1) 138:3  
eg (1) 60:16  
eight (1) 121:23  
either (11) 1:16,17 8:1  
22:16 72:15 76:21  
77:1 79:22 94:10  
141:9 144:17  
electronics (1) 116:18  
element (1) 16:3  
elementary (1) 118:8  
elements (1) 136:15  
else (12) 21:4 69:24  
73:23 84:11 94:24  
112:19,20 131:25  
139:22 144:16 145:16  
146:14  
elsewhere (2) 5:6 8:25  
email (4) 63:25,25  
71:22 124:12  
emergency (2) 40:23  
62:3  
employee (1) 9:10  
empty (1) 3:5  
enable (1) 3:11  
encounter (3) 108:24  
109:1,2  
encountered (1) 97:5  
end (25) 1:9 38:20 42:8  
44:21 45:19 53:7  
77:15 79:6,22 83:9,16  
86:11 90:12 91:10  
94:15 96:21 98:8  
115:8,13 116:4,10  
121:8 124:1 130:16  
143:1  
ended (1) 105:1  
ending (1) 50:3  
endlessly (1) 138:15  
enhanced (1) 103:10  
enough (2) 92:7 140:17  
enquiries (1) 142:19  
ensure (3) 17:18 101:9  
103:11  
entered (2) 13:19 32:11  
entirely (5) 73:10 90:18  
94:4 100:24 130:19  
entries (8) 25:14 26:24  
28:9 29:4 32:17 68:4  
95:5 118:4  
entry (26) 25:11 26:6  
32:6,12,14 33:19,21  
34:25,25  
35:4,14,20,22,24 43:3  
52:10 58:2 61:17  
67:25 68:6 69:3  
72:16 81:16,21 118:3  
equal (4) 9:21 13:6  
14:17 59:2  
equally (2) 78:20  
115:23  
equals (3) 22:21 33:6  
109:16  
equivalent (1) 117:22  
ernst (1) 42:5  
erroneously (1) 111:14  
error (17) 4:13,25 8:14  
10:10 50:14 54:13  
57:12,25 59:20 60:12  
63:16,20 79:16 87:10  
88:7 101:11 107:24  
errors (5) 47:20 54:5  
56:17,19 68:9  
escalate (1) 79:19

escher (5) 53:5,8,12  
64:14,21  
especially (1) 65:12  
essential (1) 135:9  
essentially (2) 96:25  
126:12  
established (3) 63:21  
69:15 70:16  
establishing (1) 107:10  
estate (2) 64:17 103:25  
eum (4) 103:15,20  
104:18 105:23  
even (8) 29:6 76:13  
82:20 84:16 85:14  
108:12 139:21 140:3  
event (6) 51:20 65:19  
69:16 70:9,18 86:13  
eventing (1) 51:21  
events (6) 50:12  
51:2,16 72:13 75:1,4  
ever (1) 62:14  
every (4) 52:5 68:9  
118:3 135:10  
everybody (2) 130:2  
135:19  
everyone (2) 130:12  
138:9  
everything (2) 29:23  
144:22  
evidence (26) 45:15  
64:6 71:4 75:6 87:18  
91:9 93:6,16,18,23  
94:15 124:1,25 126:19  
128:4 130:19  
131:3,6,6 132:17  
133:6,8 141:2,20  
143:18 144:13  
evidenceinchief (1)  
73:19  
evidential (1) 133:19  
exact (2) 41:14 73:7  
exactly (5) 36:14 113:1  
122:7 123:16 125:25  
example (9) 43:21  
75:24 96:11 97:7  
102:11 103:7  
132:20,21 136:17  
exception (3) 15:20,21  
33:16  
exchange (6) 8:2 10:21  
11:17 15:13,15 21:23  
exchanging (2)  
85:18,24  
execute (1) 39:24  
executing (2) 29:20  
33:16  
exercise (1) 137:19  
exhibit (1) 124:20  
exhibited (1) 138:14  
exhibits (1) 124:19  
exist (4) 26:15  
42:21,24,24  
existed (1) 42:22  
existing (2) 38:25 51:24  
exists (2) 28:9 29:4  
expand (1) 57:9  
expect (2) 109:1,2  
expectation (1) 78:13  
expected (2) 122:16  
126:16  
expensive (1) 131:13  
experience (2) 108:9,10  
experienced (4) 52:12

55:7 98:5 107:24  
**expert (1)** 144:13  
**experts (3)** 27:20  
 101:17 144:10  
**explain (11)** 45:14  
 54:17 82:19 84:23  
 85:4 87:23 105:8  
 108:3 109:21 112:11  
 137:6  
**explained (6)** 72:2  
 75:15 116:13,25  
 128:24 133:14  
**explaining (2)** 139:20  
 140:8  
**explains (1)** 77:12  
**explanation (4)** 17:13  
 43:16 137:3,3  
**explicitly (1)** 41:18  
**exploit (1)** 78:9  
**exploiting (1)** 77:24  
**explored (1)** 80:23  
**exposure (1)** 139:23  
**expressed (1)** 42:5  
**expressing (1)** 144:18  
**expressly (1)** 4:21  
**extended (1)** 90:20  
**extra (4)** 11:9 17:12  
 21:16 117:16  
**extract (1)** 29:25  
**extracts (1)** 18:5  
**extreme (1)** 40:10  
**extremely (1)** 40:9

**F**

**f1000 (1)** 76:1  
**f1001 (2)** 76:5 77:8  
**f10012 (1)** 78:24  
**f10013 (1)** 79:14  
**f1075 (1)** 95:13  
**f10752 (1)** 95:23  
**f1415 (1)** 99:2  
**f14157 (1)** 99:7  
**f14158 (2)** 99:19 100:3  
**f14159 (2)** 99:22 101:3  
**f1842 (1)** 103:8  
**f18422 (1)** 103:9  
**f18423 (1)** 103:19  
**f18482 (1)** 104:20  
**f184822 (1)** 104:21  
**f184823 (1)** 105:17  
**f18483 (1)** 101:23  
**f184832 (1)** 102:7  
**f243 (1)** 50:2  
**f297 (1)** 53:16  
**f2972 (1)** 54:2  
**f298 (1)** 54:25  
**f2981 (1)** 68:2  
**f2982 (1)** 55:2  
**f2983 (3)** 56:8 68:2,5  
**f2985 (1)** 60:7  
**f3001 (1)** 57:3  
**f30012 (1)** 57:8  
**f30013 (1)** 57:20  
**f3012 (1)** 58:14  
**f30122 (1)** 58:17  
**f302 (1)** 58:24  
**f31012 (1)** 59:18  
**f3121 (1)** 61:11  
**f31212 (1)** 61:13  
**f3221 (1)** 71:2  
**f32221 (1)** 117:11  
**f323 (1)** 2:3  
**f3232 (1)** 2:25

**f3233 (1)** 4:5  
**f3241 (1)** 62:18  
**f3331 (1)** 63:23  
**f33313 (1)** 63:24  
**f354 (1)** 52:17  
**f425 (1)** 119:14  
**f42511 (1)** 119:24  
**f42513 (1)** 120:8  
**f42514 (1)** 121:17  
**f42515 (1)** 122:23  
**f432 (2)** 5:23 12:21  
**f4321 (1)** 7:4  
**f4322 (4)** 6:12 7:7 10:4  
 117:12  
**f43222 (1)** 11:23  
**f4323 (2)** 9:18 12:25  
**f4341 (2)** 12:7,18  
**f485 (3)** 1:13 14:6 16:25  
**f4851 (1)** 18:3  
**f4852 (3)** 15:4 17:7  
 18:10  
**f48521 (1)** 20:7  
**f48522 (1)** 19:14  
**f565 (1)** 51:8  
**f5652 (1)** 51:9  
**f5653 (1)** 52:4  
**f588 (1)** 107:20  
**f590 (1)** 22:12  
**f5901 (1)** 24:15  
**f59010 (1)** 30:7  
**f5903 (2)** 23:4 24:17  
**f5909 (1)** 25:24  
**f594 (1)** 36:19  
**f5942 (1)** 38:14  
**f611 (2)** 32:21 109:5  
**f6112 (1)** 33:13  
**f6113 (2)** 33:14 109:9  
**f614 (1)** 106:7  
**f6144 (1)** 106:14  
**f6145 (1)** 106:17  
**f6161 (1)** 112:5  
**f61612 (1)** 112:22  
**f754 (1)** 84:2  
**f768 (1)** 39:14  
**f7682 (1)** 41:5  
**f7683 (1)** 40:6  
**f7684 (1)** 39:22  
**f777 (1)** 76:16  
**f869 (1)** 42:13  
**face (7)** 2:23,24 26:16  
 50:21 51:1 67:22  
 88:11  
**factors (1)** 90:22  
**fad (8)** 10:5 33:2  
 53:17,20 55:1  
 88:15,17 122:5  
**fadhash (2)** 109:14,18  
**fail (1)** 21:5  
**failed (4)** 30:15,18  
 31:10,16  
**failing (1)** 66:21  
**fair (23)** 6:4 9:4 13:25  
 15:13 16:6 26:9 30:4  
 32:3 52:15,16 66:2,3  
 69:10 70:1 72:25 73:1  
 74:5 95:19 97:9 98:23  
 118:2 127:23 136:6  
**fairly (13)** 8:24 30:19,21  
 49:2 68:13,23 74:2  
 104:18 105:20 127:16  
 128:12 129:8 143:4  
**fairness (2)** 68:1 93:5  
**falkirk (2)** 62:15,17

**falkirkcalendar (2)**  
 67:13 69:1  
**familiar (2)** 23:2 26:1  
**far (10)** 17:21 20:15  
 21:22 31:17 42:22  
 63:11 87:4 100:23  
 114:17 146:10  
**fare (1)** 113:3  
**fear (2)** 78:8,10  
**feasible (1)** 125:4  
**features (1)** 96:10  
**february (19)** 14:8,9,12  
 15:7 18:25 39:19  
 42:15 51:9,12 52:13  
 64:1,23 66:9 71:15  
 76:22 104:20  
 105:3,4,18  
**feed (2)** 12:13 16:9  
**feedback (1)** 79:20  
**feeds (1)** 79:4  
**feel (1)** 93:16  
**few (5)** 15:5,16 51:13  
 64:8 68:9  
**field (1)** 115:5  
**fifth (1)** 54:2  
**figure (6)** 2:13 35:25  
 53:1 73:19 81:14  
 105:13  
**figures (9)** 2:16 3:9,10  
 13:11 15:18 34:3  
 54:10 116:4,5  
**file (9)** 29:14,18 38:7,7  
 71:16 120:10,16,24  
 128:4  
**filed (2)** 85:17 136:22  
**files (1)** 26:15  
**fill (1)** 34:18  
**filter (4)** 30:16,18  
 31:16,21  
**final (3)** 3:11 52:10  
 102:20  
**finally (4)** 42:4 64:14  
 101:16 104:20  
**finance (2)** 78:4 104:23  
**find (5)** 16:24 28:10  
 29:5 32:12 136:21  
**finding (1)** 135:3  
**findings (12)** 36:13  
 126:13 130:2,3  
 132:1,22 134:10  
 135:13 137:11 139:4  
 140:4,9  
**fine (4)** 17:23 21:3  
 30:25 107:18  
**finish (4)** 19:11 47:25  
 90:11 91:10  
**finished (3)** 1:8 91:22  
 93:6  
**finishing (2)** 91:11,12  
**firm (2)** 126:16 132:25  
**first (30)** 2:3 9:19 13:4  
 14:15,21 16:12,25  
 19:7 36:6 37:25  
 53:9,25 58:25 63:24  
 72:9,22 84:4,19 85:20  
 95:25 112:1,9 113:18  
 116:15,19 125:8  
 126:3,12 135:1 139:22  
**firsthand (2)** 49:2 98:25  
**firstly (3)** 49:17 140:23  
 141:11  
**five (5)** 14:15 53:1  
 56:10 58:24 89:18

**fix (17)** 11:18 37:8,23  
 38:13,20,21 39:1  
 41:25 61:3,5 66:11  
 80:15 99:16,17,24  
 112:5,8  
**fixed (4)** 8:22 64:15,19  
 66:20  
**fixes (2)** 60:25 99:16  
**fixing (2)** 16:8 64:22  
**fixingresolving (1)**  
 38:17  
**flag (1)** 36:10  
**flagged (1)** 36:18  
**fleeing (1)** 47:8  
**flushed (1)** 133:7  
**flux (1)** 144:7  
**focus (1)** 107:8  
**follow (5)** 15:4 30:6,24  
 58:6 65:10  
**followed (2)** 8:12 60:21  
**following (13)** 15:8  
 29:14 30:3 34:16  
 43:19 44:1,5 50:16  
 67:8 105:2 109:13  
 120:23 131:24  
**follows (2)** 29:17 77:14  
**followup (1)** 58:8  
**follish (1)** 144:1  
**foot (1)** 33:13  
**footnote (1)** 87:8  
**foreign (3)** 7:21,22  
 21:17  
**forgotten (2)** 17:4 94:18  
**form (8)** 45:6 89:3  
 116:6 121:10 122:9,11  
 128:3 140:4  
**formality (2)** 131:12,14  
**formed (2)** 126:16  
 132:25  
**forming (1)** 121:25  
**formulated (1)** 133:7  
**forth (1)** 57:16  
**fortunately (1)** 56:19  
**forward (19)** 5:22 14:6  
 20:5 22:8 28:5  
 32:19,22 51:8 52:17  
 54:25 57:3 58:14  
 61:10 63:23 76:4  
 80:24 99:19 103:7,8  
**forwarded (1)** 19:13  
**found (9)** 15:20,21 16:3  
 32:6 67:17 70:6,22  
 111:17 132:8  
**foundation (2)** 135:4,8  
**four (5)** 43:10 56:9  
 106:22 116:16 142:12  
**fourth (1)** 35:20  
**fourthly (1)** 49:25  
**frankly (2)** 108:6 130:5  
**fraser (220)** 1:9,15  
 6:20,23 7:17,20,25  
 10:6,8 11:14 12:9,11  
 16:17  
 17:1,5,10,12,19,23  
 20:6,11,15,17,19,23  
 21:8,11,15 22:2,5,7,14  
 23:15,18 26:16,21  
 27:11,14,18,25  
 28:12,15,18,21,23,25  
 29:6,9,12,16,23  
 30:2,5,21,24 31:19  
 32:1 36:2,6,13,21  
 38:7,9 39:16 44:24

45:2,5 47:17,22,25  
 48:2,5,8,14 50:22  
 55:4,6 67:23 68:22  
 70:1 71:8 73:6,15,24  
 78:25 84:14 86:7,9  
 89:2,9,13,16,18  
 90:2,6,21 91:1,4,20,24  
 92:6,9,20,24  
 93:7,12,20  
 94:6,9,18,21 95:2  
 103:17 106:2  
 115:2,3,14,21  
 116:12,22,25  
 117:7,10,15,20,24  
 118:3,14,22  
 119:2,4,7,13,19,23  
 120:4,7,12,14,20  
 121:3,6,13,16,22  
 122:4,7,9,18,22  
 123:2,6,9,18,23,25  
 124:5,10,17,22  
 125:12,17,23  
 126:2,7,9 127:5  
 128:20 129:1,4,17  
 130:15,18,22  
 131:2,18,22 132:13,19  
 133:8,10,25 134:5,18  
 135:6,24 136:3 137:5  
 138:9,12,18,25  
 139:11,17 140:3,15  
 141:14,17,20,23,25  
 142:2,6,20 143:11,25  
 144:6,10,15  
 145:1,4,10,13,21  
 146:2,9,14,16,18  
 148:3  
**fraudulent (1)** 61:17  
**free (1)** 123:25  
**freeths (1)** 42:16  
**friday (3)** 141:23,25  
 142:1  
**friends (2)** 129:20 130:3  
**frontend (6)** 11:18  
 13:19 18:1 20:12,25  
 102:17  
**fs (1)** 106:25  
**fsc (1)** 99:12  
**fujitsu (46)** 5:11 9:10,15  
 18:16,19,22,23 37:20  
 42:18,22 47:7 58:11  
 62:13 63:1,2,5,8 64:1  
 69:15 70:16 75:9  
 76:17 78:4 79:16,18  
 80:15 81:15,19 98:12  
 100:2,4,5,6,12,21,24  
 101:1 105:7,21 106:24  
 107:1,10 113:21  
 114:13,17 117:4  
**fujitsus (3)** 69:12 74:25  
 75:2  
**full (4)** 51:16 80:11,22  
 126:19  
**fuller (1)** 77:3  
**fully (1)** 99:12  
**function (1)** 58:12  
**fundamental (1)** 110:11  
**fundamentally (2)**  
 112:12 116:7  
**further (16)** 16:2 21:4  
 42:18 43:16 51:18  
 55:16 72:21 75:23  
 105:4 106:1,23 114:25  
 133:6 143:5,9 144:18

**future (1)** 80:19  


---

**G**  


---

**gaby (5)**  
 18:14,16,19,22,23  
**gain (10)** 2:18,21 3:8  
 4:11,21 8:16 10:20,22  
 21:19 83:8  
**gaps (1)** 34:18  
**gareth (26)** 23:6 24:18  
 34:11 36:25 37:17  
 47:1 48:19,22 49:6,12  
 74:24 75:13,15,21,22  
 76:2 77:7 84:15,23  
 85:8,11,14 86:1 95:15  
 98:7 109:12  
**gareths (1)** 86:13  
**garr (82)** 1:5,20 22:16  
 28:16 89:10,11,14,25  
 90:5,16 91:3,15  
 92:2,8,18,21,25  
 93:11,13,22 94:8 95:1  
 106:3,4,5 114:25  
 123:22 124:9,16,21  
 125:11 128:21,25  
 129:3,9,17,18,19  
 130:17,21,25 131:5,21  
 132:11,14,20  
 133:3,9,22 134:6  
 135:18,25 136:4  
 137:7,17,23,24  
 138:11,16,19 139:2,16  
 140:1,12  
 142:3,5,17,20  
 143:8,19 144:9,14,25  
 145:19  
 146:1,3,6,13,17  
 148:2,6,8  
**garrett (1)** 15:7  
**gary (1)** 13:22  
**gave (3)** 65:4 78:9  
 84:14  
**general (1)** 88:5  
**generally (1)** 140:20  
**generate (1)** 82:4  
**generated (3)** 13:17  
 79:16 123:11  
**generating (1)** 51:15  
**generic (4)** 68:13,14  
 88:4,5  
**genesis (1)** 52:13  
**genuine (1)** 13:23  
**get (32)** 4:7,10 5:9  
 16:9,11 29:13 31:1  
 39:21 50:11 51:2  
 59:24 68:17,20 74:6  
 76:25 77:3 84:9 97:25  
 103:2,5 115:8  
 116:3,10,10 118:7,15  
 119:10 141:9 142:2  
 145:13,23,25  
**gets (2)** 33:8 97:21  
**getting (4)** 30:19 57:5  
 66:1 85:6  
**gibson (3)** 41:12,13  
 43:6  
**giro (1)** 54:19  
**girobank (1)** 59:21  
**give (9)** 7:3 14:10 30:7  
 51:20 71:22 92:7  
 124:7 126:15 140:7  
**given (19)** 5:18 22:16  
 40:12,22 41:2 43:16

61:23 63:19 79:22  
 93:16 94:3 103:15,20  
 114:20 117:11 131:20  
 141:1,7 142:21  
**giving (4)** 5:20 57:16  
 131:9,10  
**glitch (1)** 31:25  
**godeseth (26)**  
 1:3,7,11,18,23 6:5  
 17:12,24 22:17 44:25  
 45:3,11 89:3 90:11,19  
 91:22 92:12 93:3  
 94:23 95:3 101:16  
 102:23 106:5 109:4  
 123:25 147:25  
**godeseths (1)** 91:9  
**goes (5)** 64:25 68:14  
 97:21 120:16 138:8  
**going (53)** 1:22 5:14  
 11:19,20 17:18 20:7  
 28:18 34:19,21 35:13  
 41:24 47:9 65:15  
 67:25 75:17 89:2  
 90:23,24 91:5  
 92:1,6,11 94:24  
 100:16 107:14,22  
 115:12 116:5 118:18  
 122:16 124:7,7 125:5  
 127:8 128:22,22  
 130:23 133:1,19  
 135:11 138:15  
 140:7,15,22  
 142:8,10,11,23,24  
 143:5 144:3 145:8  
 146:16  
**gone (4)** 21:2 30:10  
 31:2 61:19  
**good (6)** 18:21 60:3  
 61:20 97:7 123:18  
 146:13  
**grabiner (2)** 92:22  
 142:18  
**grabiners (1)** 143:22  
**granted (3)** 44:4,6,8  
**grateful (1)** 1:10  
**great (3)** 126:22 128:17  
 129:7  
**green (111)**  
 1:4,10,17,22 6:21,25  
 8:4 10:7,9 11:15  
 12:10,12 16:21,24  
 17:6,11,24 20:7,10  
 22:7,8,14,15,17  
 23:20,21 26:22,23  
 28:1,20 30:5,6 31:20  
 32:1,2 36:19,22,23  
 38:12 39:17 44:21,25  
 45:11 48:15 50:25  
 55:5,7 67:24  
 68:3,22,23 70:4 71:10  
 73:25 74:1 79:3 84:23  
 86:8,10 88:24 89:17  
 90:24,25 91:16,23  
 92:5 94:17,20 95:2,3  
 103:18 106:1,6 117:16  
 123:24  
 125:10,12,13,14,18,25  
 126:5,8,10 127:6  
 132:9 134:2,3,4,6,19  
 135:7 136:2,6  
 141:5,9,13,16,19,22,24  
 142:1 144:5  
 145:2,8,12 146:15,21

148:1,5,7  
greens (2) 68:11 129:10  
ground (1) 93:5  
grouped (1) 74:5  
groups (1) 81:8  
guy (2) 32:14 41:13  
guys (8) 24:4,7  
112:15,17,18,25 113:1  
114:2

H

h19611 (1) 43:10  
h19612 (1) 43:13  
h19614 (1) 43:16  
h19615 (1) 43:23  
h1969 (1) 42:14  
h225 (1) 87:2  
h296 (1) 66:16  
h297 (1) 87:14  
h63 (1) 67:9  
hadnt (2) 36:8 85:19  
half (6) 18:13 29:24  
68:6 93:25 116:19  
144:3  
halfway (13) 3:2  
6:13,24 8:4,11 28:16  
36:24 41:6 43:6,14  
47:1 64:2 109:11  
hand (2) 93:15 105:13  
handed (1) 124:21  
handle (1) 63:4  
happen (8) 9:17 27:10  
31:1 35:13 41:1 65:11  
108:11 111:22  
happened (13) 26:11  
27:21 28:2 30:14  
31:18 70:13,17 86:13  
110:22 111:9 112:1  
133:18,20  
happening (4) 35:18  
55:9 57:4 75:17  
happens (4) 110:23  
111:19,24 115:11  
happy (7) 7:25 19:5  
49:24 93:17 107:23  
138:21 146:8  
hard (8) 12:22 23:15  
124:13,14  
145:6,17,23,25  
hardware (4) 60:14  
63:3,7 113:4  
harsh (1) 132:3  
harshly (2) 127:2  
135:14  
hash (1) 122:5  
hasnt (5) 41:10 61:20  
83:23 91:21 96:14  
havent (14) 45:24 46:1  
64:6 66:25 72:6 88:18  
89:25 94:18 101:6  
125:17 126:4 128:24  
143:14 144:4  
having (15) 4:12 14:4  
31:9 39:1 41:25  
62:14,21 65:1 72:15  
105:15 127:14 128:14  
129:2 131:12 143:17  
head (1) 74:6  
heading (3) 10:7,8,9  
hear (10) 93:18,19  
101:16 125:3,4 129:9  
132:9 143:24  
144:11,12

heard (6) 50:25 58:19  
62:14 90:9 143:17,18  
hearing (7) 27:20 91:18  
130:13 133:19 140:13  
142:7,16  
heavily (1) 98:21  
held (4) 57:23 60:2  
65:19 102:25  
help (8) 17:24 20:8  
62:25 63:2,5,8 68:11  
77:2  
helpdesk (2) 61:21  
62:22  
helpfully (2) 74:4 140:2  
helps (1) 74:8  
hence (2) 39:5 40:1  
here (19) 4:18,22 20:3  
27:4 28:2 30:20  
34:14,22 57:6 58:4  
84:18 88:17 93:14  
97:10 98:20 108:21  
111:3,9 146:20  
high (6) 106:16  
107:4,7,9 108:12  
139:3  
highlight (1) 82:22  
highly (2) 28:11 51:6  
himself (2) 22:17  
128:15  
historically (1) 70:9  
history (4) 57:16 63:19  
69:8 99:7  
hit (1) 64:7  
hitting (1) 21:6  
hmgx (1) 74:18  
honest (2) 78:12,21  
hoped (1) 84:19  
hopefully (4) 12:22  
14:11 64:22 141:22  
horizon (47) 1:14 2:2,23  
5:7,12 31:12,14  
47:15,18,19 49:17,18  
57:15,18 58:10 59:20  
61:15 62:22,25 66:21  
67:7 74:9,11,15,18  
75:1 77:13 79:8 80:19  
81:14 82:23 83:12  
96:19 101:9,17,21  
102:13 103:12  
106:11,15 108:4  
111:13,13 114:1  
143:10,12 144:2  
horrible (1) 58:5  
host (1) 34:17  
hostdev (1) 39:25  
hours (4) 65:22 109:12  
141:13 142:12  
housekeeping (5) 1:6  
145:3,5 146:11 148:9  
however (7) 3:10,18  
13:15 57:24 88:6  
130:6 145:23  
huge (2) 32:17 83:6  
human (5) 102:15  
138:22 139:3,9,23  
hung (1) 50:16  
hypothesis (1) 26:21

I

id (2) 11:10 103:10  
identical (1) 96:6  
identification (2)  
138:10 139:17

identified (12) 3:24  
42:23 43:25 45:20  
57:22 71:21 74:25  
75:9 83:22 100:15  
105:15 136:10  
identifies (2) 16:2  
107:24  
identify (6) 71:6 100:17  
131:23 132:6 139:12  
140:23  
identifying (1) 30:12  
ids (2) 42:16 104:24  
ie (4) 14:18,24 25:23  
83:3  
ignore (1) 144:1  
ignored (2) 50:14 51:3  
illustrates (1) 104:13  
illustration (1) 32:21  
im (67) 1:10,22,24 5:13  
6:21 7:15 17:15,22  
20:8 22:11,15 26:10  
28:15,15,20 31:11  
33:23 36:13 42:3  
49:24 61:7,7 67:25  
73:7 74:6 75:10 78:19  
86:7,8 91:4,16  
92:1,11,21 93:10,17  
94:22 100:23  
103:17,18 107:13,21  
117:11 120:14 123:5  
124:7,7,21 125:20  
126:5 128:21,22  
130:15 133:3 135:24  
137:5 138:15 140:1,6  
142:11,17,24,24  
143:16,25 146:1,7  
imagine (7) 22:3  
24:11,13 125:1  
141:2,17 143:3  
immediately (4) 55:14  
91:14 109:3 134:8  
impact (21) 5:13 13:15  
37:1,23,24,24  
38:12,19 67:20 81:23  
82:19 83:5 98:8  
105:16 110:2,5  
116:1,25 117:1,5,7  
impacted (3) 81:7  
104:11 105:18  
impacting (2) 77:16  
104:16  
impartial (1) 126:17  
impartially (2) 127:1,14  
implement (1) 112:8  
implemented (1) 107:1  
implications (2) 82:6,8  
important (4) 129:12  
131:18 136:14 139:5  
imposing (1) 140:19  
impression (4)  
126:15,25 127:13  
132:24  
improved (1) 101:17  
improves (1) 101:19  
inchief (1) 70:2  
incident (4) 23:22 57:1  
101:23,25  
incidents (10)  
99:9,13,20,21,22,22,23  
100:15,16 103:24  
include (2) 106:24  
130:18  
includes (2) 17:19 69:3

including (3) 11:17  
66:15 105:19  
inconsistency (2) 10:24  
11:2  
incorporated (1) 102:24  
incorrect (5) 23:20  
39:3,5 67:15 88:22  
incorrectly (1) 102:18  
increase (3) 120:8  
121:17 122:23  
increasing (1) 105:13  
independent (1) 138:8  
indeterminate (1) 93:4  
index (1) 147:23  
indication (1) 36:10  
individual (1) 38:3  
industry (2) 116:21,22  
inference (1) 9:5  
information (22)  
24:2,3,3,8,12 40:21  
47:2,12 48:16,20  
55:7,14,22 66:1 70:6  
71:24 72:5 79:10 88:3  
95:20 122:12 139:5  
informed (2) 46:19  
100:21  
informing (2) 82:7,9  
initial (2) 111:1,1  
initially (2) 54:8 74:25  
initiated (1) 2:7  
injected (3) 20:2 86:25  
88:12  
inordinate (1) 140:19  
input (1) 54:18  
inputted (1) 123:3  
insert (9) 14:24 25:14  
40:4 44:13 119:11,20  
120:1 121:4,8  
inserted (4) 12:17,19  
33:21 35:22  
inserting (5) 6:16 8:6  
9:20 13:5 120:18  
insertopeningbalanceforrolove:5,7,15,20 41:9  
(1) 33:17  
inserts (1) 38:2  
inset (1) 10:14  
insofar (2) 133:15  
134:22  
inspected (1) 48:6  
instances (1) 83:21  
instantly (1) 91:7  
instead (1) 96:5  
instructed (3)  
92:19,20,21  
instructing (2)  
116:16,17  
instruction (3)  
110:17,18 122:2  
instructions (7) 42:18  
90:18 91:6 92:3,25  
93:8,9  
integrity (2) 82:2 83:6  
intend (1) 124:6  
intended (2) 34:24  
122:21  
intention (1) 60:2  
intentionally (1) 77:25  
interactions (1) 39:2  
interested (1) 64:15  
interests (1) 131:19  
interface (1) 97:12  
interfacing (4) 5:7,11  
117:4,4

interlacing (1) 97:15  
interlocutory (1) 133:18  
interpret (1) 78:16  
interpretation (2) 26:12  
88:21  
interrupt (1) 91:16  
interval (1) 90:12  
intervals (1) 142:3  
intervention (1) 58:15  
into (40) 2:10,17 3:21  
9:20 11:19,20 13:5  
16:9 22:1 27:9 30:19  
32:4,5 38:3 44:9,13  
47:9 56:3 61:18  
62:3,13 71:17 74:6  
77:21 79:4 80:20,25  
82:14 84:22 97:22  
102:24 108:4 110:6,8  
111:4 120:1,18  
121:4,9 134:23  
introduce (1) 34:24  
introduced (1) 103:11  
introducing (1) 108:20  
investive (5) 126:23  
127:25 132:2 135:11  
137:14  
invention (1) 114:10  
investigate (4) 32:15  
55:8 65:15 70:13  
investigated (2) 59:23  
70:20  
investigating (3) 26:13  
50:11 65:12  
investigation (3) 15:8  
53:5 57:1  
investigations (1) 40:20  
invidious (4) 90:19 93:2  
138:20,25  
invite (3) 128:9,11  
130:8  
inviting (1) 137:1  
involved (12)  
45:22,23 66:21 76:11  
107:14 109:22 117:5  
involvement (1) 117:1  
ireland (7) 41:13  
112:16,17,18,25 113:1  
114:2  
irrelevant (3) 127:3  
135:15 136:18  
isnt (22) 3:15 8:9 11:18  
34:8,22 39:8 42:11  
44:19 58:10 63:20  
64:11 65:24 67:15,21  
72:25 79:11 80:5  
86:12 95:15 97:1  
100:8 109:10  
isolate (1) 79:17  
issued (5) 22:23 25:10  
57:25 60:22 81:11  
issues (22) 5:15 8:21  
42:11 55:11 61:15  
63:3 70:21 72:21  
91:14 107:4,7,7,10  
126:14,24 127:4  
129:25 133:13 135:16  
136:5,18 144:2  
item (6) 34:25 35:1,13  
36:4 104:24 105:2  
items (1) 2:16  
its (51) 1:14 2:7 6:5,8  
8:23 9:4,6 10:4 13:25

18:13 26:10 31:3,22  
36:4,14 52:3 54:22  
55:1 56:6 62:19  
63:19,21 65:6 66:23  
68:17 70:6 71:1 72:22  
73:2,9 74:8 76:1  
77:5,5 86:15 95:15  
97:13 101:13 112:5  
114:14,17 115:12  
116:5,14 120:12  
127:25 131:17 136:19  
138:1 140:8 142:8  
itself (1) 53:16  
ive (4) 34:12 104:18  
105:24 127:8

J

j (1) 51:10  
jan (1) 99:24  
january (7) 3:20 4:2,5  
62:19 67:10 98:4  
104:11  
jason (1) 113:22  
jenkins (25) 23:6 24:18  
34:11 47:1,4 48:19,22  
49:6,9 74:24 75:13,21  
76:2,8,14,18 77:1  
86:10 95:15,18,20  
98:7,21 99:5 109:12  
jennifer (1) 62:2  
jez (1) 60:9  
job (4) 5:12 70:19  
105:22 122:20  
john (1) 71:25  
joined (1) 116:21  
jot (2) 115:9,9  
journal (7) 28:8 29:3  
30:15,18 31:15,21  
82:13  
jsn (13) 26:4,24 27:1,8  
28:9 29:4 31:23,23  
32:6,6,12,14,18

jons (1) 32:8  
judge (9) 89:20,24  
126:15,25 132:23,25  
139:3 145:15,24  
judgment (14) 126:22  
127:2,12,22 129:8  
130:2 132:7 133:13  
134:10 135:14,20  
137:12 141:3 143:15  
judgments (1) 140:10  
julieedgeleypostoffice  
(1) 18:23  
july (4) 66:18 86:6,10  
96:19  
june (5) 2:6 51:18  
52:18,21,23  
justification (1) 10:18  
justified (1) 78:12  
justifies (1) 132:23  
justify (1) 132:24

K

keep (7) 36:21 47:15,17  
48:2,2 94:8 97:17  
keeping (1) 16:15  
keil (6) 7:2,4,5 8:19  
9:10 12:13  
kel (14) 14:17 50:3,3  
51:10 52:3,17,22,24

53:7,10,13 66:10  
68:15,15  
kels (3) 64:10 65:17  
145:7  
kept (1) 81:3  
key (5) 27:8,15 41:14  
45:12 107:1  
kind (2) 108:10 146:6  
kindly (4) 17:6 67:11  
71:11 125:25  
king (1) 46:18  
kit (1) 105:19  
knew (6) 18:19 24:4,5  
65:14,24 72:19  
know (60) 9:4 17:2  
20:2,15 21:22,22 25:8  
32:20 34:17 41:9,23  
42:2 45:6,23 46:22  
47:14 48:17,18,19  
51:25 52:2 53:8,11,11  
54:23 56:20 64:6,20  
72:9 75:12,19 81:10  
87:13,17,19 88:16  
89:10,11,12,16 93:23  
94:24 99:2,4,6 107:23  
108:1 112:12 115:24  
121:13 122:16  
123:5,6,8 127:21  
129:7 131:14,25  
143:22 144:7  
knowing (1) 134:24  
knowledge (9) 41:23  
47:6 48:15 49:3  
75:20,22 98:25  
105:24,25  
known (11) 19:23 64:21  
65:8 67:13 72:4 76:14  
78:3 98:17,20 100:20  
103:10  
knows (4) 77:5 122:2  
130:3 135:19

L

lacking (1) 127:11  
language (2) 29:17  
122:1  
large (5) 4:11,11,20,21  
13:1  
larger (1) 84:2  
largest (1) 98:5  
last (9) 8:2 21:16 22:16  
31:7 53:10 55:8  
56:13,17 100:2  
later (5) 36:24 51:19  
58:24 76:24 142:9  
layer (2) 113:24,24  
lead (2) 51:14 82:3  
learn (3) 108:8,10 135:1  
learned (8) 93:24  
129:19,22 130:3,25  
131:5 132:17 135:18  
least (8) 39:11 47:22  
66:9 81:4 88:13 94:14  
100:14 121:14  
leave (2) 1:7 123:25  
leaves (1) 59:22  
led (2) 73:18 109:7  
left (9) 25:22 44:25  
61:11 64:16 93:3  
96:23 111:5 127:25  
142:8  
legacy (3) 1:14,25 49:17  
lenton (3) 69:12,18 70:7

less (4) 37:9 38:16  
128:4 144:3  
let (2) 47:25 132:9  
lets (31) 6:12 20:5  
24:15 26:16,21  
28:5,18 32:19 37:24  
43:1 46:3 49:15 50:2  
51:8 58:14 62:18 69:6  
71:2 72:11 73:13,14  
74:1,12,16 75:25  
78:24 79:14 81:12  
98:19 99:2 143:1  
letter (11) 42:13,15  
43:15 57:9 66:17  
67:9,11 88:8 124:12  
126:3 141:18  
level (5) 5:8 61:5,9  
113:5,7  
levels (1) 3:7  
liable (2) 60:2 102:25  
light (3) 15:6 68:6 91:8  
lightly (1) 134:13  
like (4) 3:15 20:6  
35:23 45:11 100:10,11  
106:5 109:4 113:19  
125:4 131:15 136:13  
140:4 141:10  
likely (7) 37:10 38:16  
48:12 63:19 65:11  
125:6 128:6  
limbo (1) 93:3  
limited (5) 4:15 5:3  
18:15 108:8 113:21  
line (22) 7:8,11,17  
10:12 13:11 21:5  
22:20 28:6,22 29:1  
38:8 40:11 73:22 75:3  
86:5,7 96:1 102:8,20  
112:7 119:20 120:1  
lines (11) 14:18 23:8  
24:19 28:14 29:24  
53:1 87:3 109:12  
120:17,21 121:22  
list (8) 42:23 84:4 130:1  
131:14 135:22,25  
137:3 138:1  
listed (3) 5:24,25 6:1  
literally (1) 124:13  
little (5) 36:22 40:18  
71:10 92:11 142:11  
live (12) 5:14 17:16,17  
37:16 40:24 64:17  
80:21,25 103:24  
105:3,19 106:15  
local (9) 61:18 74:11  
81:16,21 88:24 95:5  
96:22 97:1,2  
locally (1) 10:25  
located (1) 71:14  
location (4) 11:24  
12:1,2,8  
lock (10) 49:22 50:7,21  
52:14 64:7 65:19  
67:17 68:12 103:15,20  
locked (2) 104:1,3  
locks (1) 70:14  
log (15) 26:15  
29:17,19,25 33:16  
44:16,19,19 58:15,15  
61:11 62:19 103:16,21  
104:10  
logging (1) 112:13  
logic (1) 75:16

logically (1) 119:10  
logistical (1) 91:14  
logon (1) 112:10  
logs (5) 29:7 34:1 69:16  
70:9,18  
long (10) 79:19 86:10  
90:24 91:1 92:7 93:7,8  
94:24 96:7 143:15  
longer (6) 34:6 72:19  
90:23 92:12 96:3  
144:4  
look (99) 2:3,10 6:10,12  
7:1,8 10:3  
12:6,12,24,25 14:11  
15:3,6 16:3 17:6  
18:1,3 21:15 22:20  
23:13,21 32:13 33:5  
34:10,12 36:24  
37:23,23,24  
39:14,18,22 40:6 46:3  
50:10 51:8,9,12,18  
53:3,15,25 55:3 56:8  
57:8 58:6,25 60:8  
61:12 62:18 63:25  
64:5 66:16,18  
67:8,8,10,11,23 69:6  
71:2,16 72:11 73:14  
74:12 76:1 78:24  
79:6,14 81:12 84:3  
86:4,5 87:2,8,14,20  
95:3,13,22,25 96:16  
98:2 99:2,7 101:14,23  
103:14 107:20 113:19  
117:15 119:23  
120:12,20 129:2,6  
131:15 133:16  
looked (9) 13:8 30:8  
32:11 64:6,11 70:17  
114:21 117:12 119:16  
looking (14) 6:24 12:9  
27:23,24 32:4,9 34:5  
37:6 39:20 75:23 78:9  
80:13 88:17 106:11  
looks (5) 7:20 35:23  
40:17 100:10,11  
lordship (25) 1:6 16:24  
39:17 91:17  
93:15,19,23 94:2  
125:14,18,25  
127:13,16 128:10,11  
129:22 130:9 133:23  
136:2 137:1 138:17,21  
139:8 143:24 146:7  
lordships (3) 125:20  
126:5 130:2  
lose (2) 82:23 94:1  
losing (1) 127:18  
loss (14) 8:16 13:16,23  
14:1 21:20 54:11  
58:19 59:22 60:5  
61:15,18 62:3 77:17  
83:5  
lost (6) 72:1,7 83:4 94:1  
103:17 145:13  
lot (9) 18:25 21:2 24:8  
32:4 41:9 44:17 47:11  
59:1 101:17  
lots (2) 32:10 44:8  
low (2) 113:5,7  
lunch (1) 125:19  
luncheon (1) 89:7

M

machines (1) 102:12  
majority (1) 72:14  
makes (4) 38:16 60:1  
65:11 139:9  
making (13) 4:12,24 8:8  
36:13 37:9 38:13 60:3  
100:5 101:14 122:21  
138:20 139:3 143:25  
malformed (1) 19:4  
manage (2) 78:16 83:14  
management (4) 45:22  
94:12 101:24 103:10  
manager (4) 19:7 57:6  
58:15 69:13  
managing (2) 89:20  
145:24  
manifestation (1) 67:2  
manual (3) 4:13,24 31:3  
manually (2) 81:15,20  
many (8) 66:14  
67:17,18 70:10 72:13  
85:6 118:4 127:9  
march (8) 1:1 22:9 23:4  
37:4,14 66:5,21  
107:21  
margin (2) 14:24,25  
margins (2) 15:15 21:23  
mark (1) 106:7  
materially (1) 80:5  
matter (9) 75:4 94:12  
100:6 124:4 129:21  
137:18 145:15 146:10  
148:4  
matters (19) 1:7 42:4  
62:9 95:17  
126:13,16,18  
127:3,7,12 131:12,19  
132:25 133:7,18  
134:22 135:15,17  
136:18  
matthew (7)  
69:12,18,19,20,21  
70:7 105:8  
maybe (3) 19:25 71:8  
120:8  
mclachlan (4) 47:2,5  
48:16,20  
mclachlans (1) 46:8  
mean (25) 15:22 16:23  
20:20 47:17,22 48:2,5  
91:23 93:8 101:1,4  
103:4 110:8 112:18,19  
113:7,7,8,13 121:6,9  
138:21 140:6,12 143:9  
means (6) 27:12 51:7  
89:20,23 112:11 142:6  
meant (2) 41:1,23  
meanwhile (1) 81:3  
mechanism (1) 21:24  
members (2) 40:16  
112:18  
membery (3) 94:17,18  
144:6  
mention (1) 132:12  
mentioned (2) 17:2  
39:25  
mentions (1) 104:25  
merely (1) 86:1  
message (29) 6:16 8:6  
9:20 10:4,10,13,14,15  
11:10,13 13:5,13,13  
27:9 29:21 31:1,5,6,24  
33:8 68:20 92:10

107:16 117:17  
118:10,11,23,24 119:8  
messages (4) 50:17  
54:6 55:11 56:16  
messagstore (20)  
4:8,13,17,25 6:15  
8:5,9 9:21 10:19  
11:19,20 13:6  
16:11,14 17:8 18:2,11  
19:24 20:1 25:12  
middle (5) 3:1 7:12  
12:10 90:7 103:22  
might (18) 23:18 30:14  
67:23 68:16 72:24  
88:19 97:8 108:11,24  
114:20 115:8 124:19  
129:1 130:19 139:21  
144:17,19 145:21  
migrate (2) 104:22  
111:13  
migrating (1) 34:7  
migration (4) 33:21  
35:22 77:16 111:12  
migrations (2)  
106:19,23  
mike (2) 64:2,3  
mind (2) 34:25 139:4  
minded (4) 91:6 94:2  
137:6,8  
minus (4) 11:14 86:6  
118:19,20  
minute (1) 71:6  
minutes (8) 11:7 45:2  
87:21 89:18 90:25  
91:3,5 94:1  
mirrors (1) 72:23  
misbalance (1) 61:16  
misinterpreted (1) 73:9  
mismatch (18) 10:22  
73:13 74:1,19 75:18  
76:5,16 79:15 80:4  
86:22 87:10,14 88:7  
102:3,21,25 103:3,5  
mismatched (1) 8:21  
mismatches (2) 69:14  
72:20  
misra (2) 46:6 47:7  
misreading (1) 73:11  
missed (5) 23:11 36:16  
129:11 144:24 145:1  
missing (3) 14:16,24  
21:3  
mistake (3) 6:25 102:15  
122:21  
mistakes (2) 37:10  
38:16  
mode (1) 105:10  
model (1) 80:21  
moment (9) 10:3 44:22  
61:4 86:5 88:25 91:21  
127:21 128:3 137:11  
monday (7) 76:22 125:6  
130:14 140:14  
143:1,1,23  
monitor (1) 40:1  
monitoring (3) 74:25  
103:6 107:2  
monitors (1) 75:3  
month (1) 32:23  
months (3) 95:10 98:11  
104:17  
moral (3) 82:5,8 83:6  
more (21) 14:4 32:20

38:22 53:16 65:2,6,11  
69:3,8 70:24 78:22  
88:20 92:9 97:15  
118:25 134:4 138:3,7  
142:25 144:11 145:4  
morning (2) 19:8 117:13  
most (3) 64:13 95:19  
110:5  
move (18) 5:22 14:6  
20:5 22:8 28:5 32:19  
36:19 54:25 57:3  
58:14 61:10 63:23  
73:13,15 74:1 98:19  
99:19 142:22  
moved (2) 24:17 37:20  
moving (3) 32:22 50:22  
80:24  
msc (1) 40:10  
msu (1) 60:20  
much (13) 30:5 36:23  
90:23 97:10 106:2  
107:8 108:1 113:11  
119:13 122:15  
124:1,22 137:17  
muir (1) 113:22  
multiple (2) 72:13  
101:15  
multiplied (1) 118:13  
multiply (1) 118:6  
mundane (1) 145:4  
murmuring (1) 36:21  
murray (1) 60:9  
must (13) 19:20 30:10  
36:8,16 65:17 83:5  
85:15 120:1 127:15  
128:17 134:8  
136:10,11  
myself (4) 89:19 107:10  
144:19 145:24

N

name (3) 36:25 76:8  
128:13  
narrative (3) 2:7 37:3  
39:18  
nature (1) 131:20  
navy (2) 116:16,23  
nb (1) 72:13  
nbsc (8) 54:21 57:21  
62:24 63:3,13 102:1  
105:4,19  
neat (1) 85:13  
necessarily (8) 20:8  
21:1 91:21,22 125:15  
135:24 141:4 143:11  
necessary (10) 19:6  
38:2 47:3 48:21 61:3  
103:12 130:1 133:15  
139:19 140:18  
need (16) 3:17 34:12,16  
37:16 48:10 54:12  
82:15 109:13 119:1,10  
124:24 125:2 131:3,25  
142:19 146:5  
needed (7) 21:5,12  
25:1,5 37:18 60:4  
111:2  
needs (7) 4:1 34:5  
50:11 93:24 130:4  
133:6 143:23  
negate (3) 10:14 23:7  
119:3  
negative (4) 105:6  
118:4,5,11

negatives (2) 118:6  
119:11  
net (1) 13:10  
network (6) 48:3  
78:14,22 80:11,22  
103:11  
neutral (1) 93:20  
neutrally (1) 144:19  
never (7) 6:9 18:20  
25:20 42:21 65:1  
114:17 127:8  
news (1) 59:24  
next (14) 2:17 4:2 29:1  
33:14 43:10 61:18  
81:23 101:3 115:9  
119:14 120:15 121:17  
122:23 125:5  
nicola (1) 19:15  
night (1) 22:16  
nightmare (1) 97:20  
nine (2) 99:21,22  
node (15) 51:21,24  
55:10,19,20 56:4  
59:3,3,4,9,10,11,12,13  
112:10  
nodes (4) 55:17,24  
60:18 107:14  
none (2) 126:23 142:5  
nonetheless (1) 27:5  
nontransaccional (1)  
97:8  
nonzero (1) 15:19  
noon (6) 137:9 140:20  
141:10,15,25 142:1  
nor (1) 128:25  
normal (5) 30:25 40:20  
82:15 105:22 111:24  
normally (3) 18:1,2  
30:14  
note (4) 34:13 38:24  
65:17 79:4  
noted (2) 13:16 57:7  
notes (3) 76:6 86:11  
121:25  
nothing (2) 35:4 79:4  
notice (5) 54:13 57:25  
59:20 65:19,22  
noticed (2) 73:23  
108:15  
notified (1) 13:22  
notify (1) 141:11  
noting (1) 8:20  
november (8) 10:11  
50:4 52:14 59:18 60:9  
61:12 62:1 103:7  
nuance (2) 36:9,14  
number (27) 5:23  
26:4,24 35:8,24 36:20  
39:14 43:5 64:13  
68:25 70:2 73:17  
74:3,4 84:7,7,10 85:3  
90:22 100:14,19  
107:25 110:10 113:21  
129:24 133:13 141:10  
numbers (2) 27:2 115:8  
numerous (2) 100:15  
121:22  
nutshell (1) 78:14

O

obeng (2) 14:13 43:2  
objection (2) 131:9,10  
objective (2) 78:21 85:3

objects (2) 4:8,17  
oblique (1) 121:7  
observation (2) 55:23  
142:4  
observe (1) 136:7  
obsolete (1) 104:24  
obtainable (2) 47:3  
48:21  
obvious (1) 129:8  
obviously (8) 25:20  
27:19 78:8 94:6  
124:10 130:13 143:13  
146:20  
occasion (3) 9:2 51:25  
108:13  
occasional (4) 50:11  
51:2,4,7  
occasionally (1) 68:16  
occur (5) 37:10 38:17  
68:9 77:19 103:24  
occurred (4) 56:20  
68:12 69:7 75:15  
occurrence (3) 24:5  
50:13 56:13  
occurring (1) 52:5  
oclock (7) 11:6 34:10  
89:3,5 124:6 142:15  
143:1  
ocp (23) 5:24,25 9:25  
11:18 13:9 14:2 17:7,8  
18:1,10 20:12,21 21:9  
22:2,5 25:1,4 33:25  
34:13 112:4,5 114:20  
117:15  
ocr (12) 5:25 6:1 12:2,6  
14:3,9,10 18:2,8  
20:17,21 21:9  
ocr17532 (2) 12:6 16:22  
october (12) 36:20  
53:10 58:16,25 77:10  
79:23  
80:9,12,20,22,23 81:2  
office (52) 4:7,15  
5:3,12,18 9:5,7,13,14  
12:19 18:14,18,20  
19:15,19 34:3 46:17  
57:10 58:12 61:22  
62:16,17,20 63:1,10  
69:13 78:11,15 80:21  
81:20 82:6,19  
83:3,5,16 87:4 88:5  
91:21 98:6,7,17 99:12  
100:6,13 104:22 117:3  
126:23 132:22 135:15  
136:3 137:9,15  
offices (10) 46:11,14,19  
66:17 67:9 88:4 94:11  
98:12 127:3 136:17  
office (2) 104:25  
105:12  
oh (8) 6:23 36:16 85:23  
111:23 112:15 114:25  
128:16 145:19  
okay (16) 4:4 7:7 17:23  
18:17,21 20:5 28:21  
45:2 51:5,8 58:13  
62:18 63:12 68:16  
85:8 113:17  
olav (2) 1:3 147:25  
old (6) 47:15,19  
104:5,6,10 111:13  
once (7) 13:14 64:17  
87:5 108:5 110:24

111:21 133:7  
**ones (2)** 66:10 129:5  
**ongoing (2)** 59:19 61:15  
**online (13)** 1:14 2:2  
 29:10 31:14 49:18  
 55:11 74:9,11,15,18  
 75:1 106:11 114:1  
**onto (3)** 59:9 112:13  
 142:2  
**onwards (4)** 42:17 46:4  
 48:24 54:6  
**open (7)** 4:13,25 61:2  
 64:16,20 78:21 83:11  
**opened (1)** 37:3  
**opening (9)** 34:3  
 35:1,8,25 110:21  
 115:11 116:4,4,4  
**openingbalance (1)**  
 33:19  
**openly (1)** 81:19  
**operated (2)** 87:7 97:1  
**operating (3)** 48:5  
 113:5,23  
**operational (7)** 5:8,15  
 97:13 114:14  
 115:17,18 116:1  
**operations (3)** 38:19  
 41:15 113:22  
**opportunity (4)** 7:1  
 127:19 134:15 141:1  
**oppose (4)** 94:4 125:1  
 130:23 140:23  
**opposed (1)** 118:12  
**opposite (3)** 9:21 13:6  
 14:18  
**option (3)** 41:20 47:16  
 81:12  
**optional (2)** 40:22 41:2  
**options (4)** 90:8,17  
 102:10,12  
**opus (2)** 42:8 146:20  
**oracle (12)** 27:7,9,15,22  
 28:3 32:7,8,16 44:6  
 107:8,12 119:19  
**oral (1)** 71:4  
**orange (1)** 102:11  
**order (18)** 48:11 60:5  
 88:4 97:19 124:24  
 125:20 126:4  
 130:4,8,9 132:14  
 137:1,8 138:2,23  
 139:9 143:7 146:16  
**orientate (1)** 74:16  
**original (10)** 10:15  
 11:10 13:12 21:20  
 50:14 60:17 84:10,22  
 85:2 118:10  
**originally (4)** 71:24 72:3  
 85:12 86:2  
**osr (6)** 29:7,9,17,19,25  
 33:16  
**osrlog (1)** 29:14  
**otherwise (4)** 39:11  
 96:5 128:18 131:1  
**ought (3)** 115:19,22  
 129:12  
**outcome (4)** 90:13 92:1  
 143:13 144:16  
**outlet (4)** 54:12  
 65:2,5,7  
**output (4)** 50:16  
 119:4,6,7  
**outreach (1)** 98:20

**outset (1)** 114:8  
**outstanding (3)** 145:5  
 146:2,10  
**over (43)** 2:15,25 3:5  
 4:5 6:12 7:7 8:3 9:17  
 11:23 12:18 15:3 17:9  
 19:13 22:7 30:6 32:1  
 33:7 38:14 43:13 52:4  
 54:2 55:2 57:19 58:16  
 61:17 64:17 83:9  
 87:25 95:22 97:23  
 99:21 100:14,19,21  
 101:3,17 102:7 103:25  
 104:12,16 105:16  
 112:21 125:19  
**overall (1)** 77:17  
**overcome (1)** 35:11  
**overnight (4)** 6:19 7:2  
 14:4 105:2  
**overwhelming (1)**  
 129:24  
**overwrite (1)** 27:17

---

**P**

---

**p (1)** 118:1  
**packages (1)** 39:25  
**pages (1)** 43:16  
**panorama (1)** 76:24  
**papers (1)** 129:5  
**paperwork (1)** 60:4  
**paragraph (51)** 13:3  
 22:18 23:21 33:15  
 35:21 39:23 42:17  
 45:13,19  
 46:4,5,7,10,25 48:24  
 58:7 61:4 64:5 66:5,19  
 67:12 69:11 72:24  
 74:12,17 75:25 77:11  
 80:3 83:19,25 86:23  
 87:2 95:3 96:11,16  
 98:2 103:14,19,22  
 105:1 113:19 114:22  
 119:24 132:1,2,3,21  
 137:12,14,16 140:5  
**paragraphs (7)** 95:18  
 98:22 126:3,12 137:2  
 140:9,11  
**parentheses (1)** 68:7  
**parked (1)** 21:7  
**parker (11)** 24:9,10,12  
 71:22 91:18 93:13,25  
 94:2,13 124:7 144:3  
**parkers (2)** 70:22 93:16  
**parsons (11)** 125:19,24  
 132:6 133:11  
 137:13,14,21  
 139:14,15 140:11  
 141:9  
**part (18)** 27:8 29:10  
 34:24 42:14 47:22  
 57:24 60:8 63:24  
 66:17 67:9 96:14  
 104:22 121:10,25  
 122:9,11,13 126:12  
**particular (19)** 5:11  
 19:19 21:12 35:9  
 36:11 57:5 65:10  
 78:16 85:6,11,25  
 97:5,17 101:11 105:24  
 110:4 125:7 127:24  
 140:24  
**particularisation (1)**  
 126:10

**particularity (4)**  
 127:11,15 128:8 134:9  
**particularly (3)** 65:3,5  
 136:16  
**particulars (9)** 129:21  
 130:4,7 131:8,15  
 137:2 138:1,2,6  
**parties (3)** 5:19 139:24  
 143:7  
**parts (6)** 127:2,21 132:7  
 135:14,19 140:9  
**party (4)** 127:18 134:14  
 135:4 144:17  
**partys (1)** 64:18  
**pass (1)** 56:21  
**passage (1)** 133:1  
**passages (3)** 121:9  
 139:18,20  
**passed (1)** 102:1  
**passing (1)** 121:6  
**past (4)** 31:21 42:22,25  
 64:7  
**paul (2)** 43:12,13  
**pause (5)** 71:8,17 73:16  
 124:18 143:20  
**pausing (9)** 4:16 5:9  
 34:19 40:3 41:1 42:9  
 81:1,9 96:25  
**pay (1)** 85:5  
**payment (2)** 79:15  
 102:3  
**payments (18)** 8:14  
 10:22 72:20 73:13  
 74:1,6,19 75:18  
 76:5,16 80:4 86:22  
 87:10,14 88:7 101:12  
 103:3,5  
**pba (2)** 82:13 99:12  
**pc0086212 (1)** 51:17  
**pc0152014 (1)** 14:19  
**pc0195561 (1)** 22:9  
**pds (1)** 22:22  
**peak (41)** 1:13 2:4  
 5:11,23 6:11 9:13  
 12:21 13:1 14:4,6,7,18  
 15:9 16:2 23:22  
 24:4,15 25:25 26:1  
 33:5 34:12 36:20 37:3  
 39:14,25 40:8 53:16  
 54:25 56:15 60:6,8,12  
 67:24 72:15 101:6  
 107:19 108:21 109:5,7  
 111:11 114:21  
**peaks (4)** 32:20 41:9  
 68:3 145:7  
**pending (2)** 56:25 59:12  
**penultimate (1)** 58:7  
**penumbra (1)** 127:17  
**people (16)** 15:24 19:18  
 42:1 44:12,16  
 47:14,19 61:23  
 78:7,10 84:13,15  
 105:21 113:4 114:3  
 122:20  
**per (1)** 40:8  
**peremptorily (1)** 142:7  
**perhaps (4)** 3:12 107:20  
 109:10 146:8  
**period (34)** 4:2  
 33:20,20 35:1,2,9  
 36:3,5,7,7,18 37:6  
 39:20 61:18 77:20,21  
 81:24 90:20 93:4

97:24 99:20 100:14,21  
 104:5,5,12,16 106:25  
 110:15,22 111:2 112:1  
 128:12 136:25  
**periods (1)** 36:15  
**permission (2)** 40:3,4  
**permissions (3)** 39:24  
 42:6,6  
**persisted (2)** 95:9 98:10  
**person (9)** 5:16 32:3  
 41:14 43:5,18,25  
 122:12,15 138:19  
**personal (2)** 107:9  
 144:7  
**personalise (1)** 139:12  
**personally (1)** 73:20  
**personification (1)**  
 139:13  
**personnel (1)** 113:21  
**personpoa (1)** 43:6  
**personssc (1)** 43:3  
**persuade (1)** 91:6  
**phoned (1)** 54:17  
**phrase (2)** 115:14,15  
**picked (4)** 36:8 72:21  
 85:3 103:6  
**picking (1)** 109:25  
**picture (1)** 77:3  
**pilot (7)** 106:10,16  
 107:24 108:3,18,24  
 109:7  
**piste (3)** 34:21 41:21,24  
**place (5)** 21:24  
 60:15,20 107:5 112:1  
**placed (1)** 120:24  
**places (2)** 21:13,13  
**planned (4)** 11:5  
 25:19,20 80:8  
**play (1)** 47:20  
**plead (1)** 88:5  
**please (76)** 2:3,25 4:5  
 5:22 6:12 10:3 12:24  
 15:3 25:24 31:4  
 32:19,21 36:19,22  
 39:14,21,22 40:6 41:5  
 42:14 43:15 50:2 51:8  
 52:17 54:25 56:8  
 57:3,8,20 58:14,24  
 59:18 60:7 61:10,13  
 62:18 63:23,24 64:5  
 65:17 66:16 69:6  
 71:2,16 72:11 73:14  
 76:4 78:24 79:14 84:3  
 86:4,5 87:2,20,23,25  
 95:4,13,22 98:3,19  
 99:2,7,19,22 101:23  
 102:7 103:7,8 104:21  
 105:16 106:7 113:19  
 117:10 119:23 121:17  
**pleased (2)** 32:19  
 101:16  
**plus (1)** 75:22  
**pm (24)** 2:15,15 3:6  
 4:10,10 22:22,23  
 33:25 45:8 51:15  
 54:17 55:7,10  
 56:17,20 59:3,9 89:6,8  
 92:14,17 129:14,16  
 146:22  
**poa (6)**  
 43:9,14,24,24,25  
 60:20  
**pointing (1)** 127:22

**points (6)** 15:5 106:22  
 122:25 131:14,24  
 134:24  
**pol (17)** 3:11,17,25 9:22  
 13:7,22 18:17,17  
 19:5,16 25:1,4 54:12  
 60:22 78:4 82:16  
 99:24  
**polfs (10)** 10:13,24 11:2  
 12:13 13:11,11  
 16:10,16 18:8 21:4  
**policy (1)** 114:13  
**polmis (1)** 13:12  
**polspag (5)** 79:4,7,10  
 82:16 104:23  
**popular (1)** 41:20  
**populated (1)** 72:19  
**position (16)** 1:25 36:5  
 58:5 65:14 94:11  
 111:9 116:11 128:3,9  
 130:5 134:7 138:20  
 139:1 141:11 143:16  
 144:6  
**positive (4)** 105:6  
 118:6,7,10  
**possibility (2)** 13:25  
 114:9  
**possible (9)** 4:17,19  
 39:3 81:20 90:4  
 100:24 122:20 125:7  
 130:14  
**possibly (4)** 21:14 65:10  
 115:19,22  
**post (56)** 4:14 5:3,12,18  
 9:5,7,13,14 12:19  
 18:14,18,20 19:15,19  
 46:11,14,17,19 58:12  
 61:22 62:16,17  
 63:1,10 66:17 67:9  
 69:13 78:11,15 81:20  
 82:6,19 83:3,5,16 87:4  
 88:4,5 91:21 94:11  
 98:6,7,12,17 99:12  
 100:6,13 117:3 126:23  
 127:3 132:22 135:15  
 136:3,17 137:9,15  
**postage (2)** 104:25  
 105:13  
**postmaster (1)** 60:15  
**potentially (3)** 82:22  
 83:7 105:14  
**pouches (2)** 100:18,19  
**pounds (2)** 117:21,22  
**powerful (3)** 40:9  
 113:8,10  
**pqty (2)** 12:14 117:24  
**pqty1000 (1)** 11:16  
**practical (3)** 90:3  
 116:18 123:8  
**practice (2)** 65:21  
 114:14  
**pragmatic (1)** 94:3  
**pragmatically (1)** 93:14  
**preceding (1)** 30:3  
**precise (2)** 5:9 35:19  
**precisely (3)** 21:19  
 127:19 128:15  
**prefer (1)** 83:3  
**preferable (1)** 138:3  
**prejudge (1)** 92:1  
**prejudged (1)** 143:13  
**prejudice (3)** 93:2  
 94:4,6

**prepared (8)** 34:21  
 45:14 58:1 99:2,4  
 111:13 136:8 146:6  
**presented (1)** 26:24  
**presenting (1)** 90:17  
**presently (1)** 143:21  
**presents (1)** 90:7  
**press (3)** 31:5 93:22  
 141:5  
**pressing (2)** 65:2,6  
**presumably (2)** 60:13  
 86:14  
**pretty (5)** 5:13 31:13  
 113:5,10 144:11  
**prevent (1)** 126:17  
**preventing (1)** 72:14  
**previous (10)** 7:3 16:7  
 35:7 40:8 52:22,24  
 60:12 74:13 111:25  
 121:19  
**primary (2)** 27:8,15  
**principle (2)** 90:21  
 134:13  
**printed (2)** 34:1 125:19  
**prior (3)** 44:18 131:9,11  
**priority (6)** 61:1 65:5  
 107:4,7,7,10  
**privilege (2)** 43:22  
 146:4  
**privileged (4)** 42:6  
 114:5,15,18  
**privileges (6)**  
 43:17,20,24 44:8,13  
 113:25  
**privilegesroles (1)** 44:2  
**probably (8)** 3:25 16:20  
 62:12 67:6 68:14  
 129:6 145:10 146:18  
**problem (64)** 2:21 3:18  
 4:7 7:9 9:19 10:25  
 11:1 13:4,14,24  
 14:14,19,19,21 21:12  
 25:18,21 31:14 33:2  
 35:11 36:17 41:25  
 45:22 49:17,18,20,23  
 50:20 52:5,21,25  
 53:8,20 54:17,20  
 56:14 57:16,17,22  
 60:11 62:23 63:7  
 64:7,8,21 65:3,4 67:17  
 68:14 72:16 75:15  
 78:3 79:17 83:11,15  
 86:25 88:8 95:23 98:8  
 100:20 104:13,15  
 108:21 111:2

**problems (24)** 26:13  
 37:11 38:17 51:14,20  
 52:14 55:7 56:20  
 57:10 59:20 61:24  
 62:21 63:9 65:6,13,18  
 66:8 101:12 105:20  
 108:19,23 109:1,2  
 111:12  
**procedural (2)** 124:4  
 148:4  
**procedure (1)** 114:13  
**proceduresequence (1)**  
 65:11  
**proceedings (2)** 89:20  
 128:7  
**process (10)** 63:4 70:7  
 97:21 108:7 113:11,13  
 114:13 116:8 131:16  
 140:19  
**processes (2)** 82:15  
 113:14  
**processing (2)** 97:6  
 105:12  
**producing (1)** 97:24  
**product (4)** 11:10 14:25  
 117:25 118:15  
**products (2)** 102:16  
 103:13  
**professor (4)** 47:2,5  
 48:16,20  
**programme (6)** 76:25  
 104:22 106:10,20  
 117:6,8  
**progress (3)** 2:7 37:3  
 39:18  
**progressed (2)** 81:9,10  
**project (1)** 117:2  
**prone (1)** 65:3  
**proper (9)** 15:20,21  
 42:10 111:15 128:8  
 135:4,7 136:9 137:3  
**properly (3)** 128:19  
 135:12 140:18  
**properties (2)** 71:6 73:4  
**proposal (3)** 91:4  
 130:6,18  
**proposed (1)** 37:8  
**proposing (2)** 1:24  
 34:14  
**prose (1)** 17:13  
**provide (4)** 3:10 79:20  
 137:9 140:22  
**provided (2)** 11:9 139:6  
**provides (1)** 75:3  
**proving (1)** 80:21  
**provision (2)** 130:19  
 137:2  
**provisions (2)** 141:7  
 142:10  
**purpose (6)** 97:16,17  
 108:3,17,18 139:11  
**purposes (3)** 69:16 70:8  
 110:20  
**pursue (1)** 146:5  
**pushed (1)** 86:2  
**puts (2)** 123:6 129:20  
**putting (3)** 31:20  
 122:12 123:3  
**puzzling (2)** 26:8,10

---

**Q**

---

**q (294)**  
 2:6,10,13,21,23,25  
 3:5,17,24 4:5,20,24  
 5:2,9,16,22 6:4 7:7  
 8:11,18 9:9,14,17,25  
 10:3,18 11:5,9,20,23  
 12:1,6,21,24 13:22  
 14:6,24 15:3,17  
 16:1,4,12  
 18:8,10,13,17,21  
 19:3,18,22 20:5 22:12  
 23:2,4,13,25  
 24:2,7,10,12,15,22,25  
 25:8,19,24 26:3,14  
 27:4 28:5 32:9,19  
 33:2,5,12 34:10  
 35:3,10,16,18  
 37:6,14,20,23  
 39:10,14 40:6,16,20  
 41:1,5,9,12,16

42:2,4,8,13 43:5,9,12	98:6,15 100:2,4,6,23	<b>records (7)</b> 18:8 32:7	47:10,11 62:14 69:25	<b>respond (3)</b> 127:8 128:9	<b>robustness (1)</b> 101:9	<b>second (29)</b> 13:3 14:17
44:12,18 45:19	101:1,5,6	38:3 97:3 111:8	72:19 73:7 106:11	134:20	<b>role (10)</b> 39:24 40:8,12	15:6 16:13 17:10
46:1,3,10,16,22,24	<b>rate (3)</b> 10:21 11:17	118:17,18	107:6,13 117:12	<b>responding (2)</b> 46:7	41:2 44:4,5,6,7,8,12	18:13 22:20 26:5,6,25
47:13 48:19,24	15:13	<b>recoverrefund (1)</b> 82:14	119:16,21	129:19	<b>roll (2)</b> 8:22 77:21	32:4 33:6 35:4 36:2,4
49:2,5,8,11,15,20,22,25	<b>rates (4)</b> 8:2 15:15	<b>recoveryrefund (1)</b>	<b>remind (2)</b> 16:17 64:16	<b>response (12)</b> 31:8	<b>rolled (3)</b> 3:5 4:8 61:17	39:23,23 45:12 51:24
50:2,7,10,20 51:8,12	21:23,25	82:20	<b>remit (1)</b> 7:15	45:15 88:1,6,9 124:25	<b>rolling (3)</b> 2:15 33:7	59:1 64:5 77:11 102:8
52:3,10,17	<b>rather (6)</b> 84:19 90:12	<b>rectified (1)</b> 57:22	<b>remote (1)</b> 85:19	128:21 131:4 132:18	58:20	103:14,19 105:1
53:3,7,13,15,20,25	105:14 118:23 142:7	<b>recurs (1)</b> 60:21	<b>remove (6)</b> 6:17 8:7	140:23 141:2,20	<b>rollout (7)</b> 80:8,11,22	119:24 125:2 137:5
54:16,25 55:14,19,22	145:4	<b>recusal (2)</b> 127:9,10	10:12 36:4 102:10	<b>responsive (2)</b> 124:25	106:10 108:4,12,12	<b>secondly (2)</b> 49:20 73:2
56:1,8,12,25 57:3	<b>rational (1)</b> 78:20	<b>recuse (3)</b> 89:19 144:23	110:19	128:4	<b>rollover (16)</b> 2:16,17	<b>seconds (1)</b> 34:10
58:6,13,23 59:8,18	<b>raw (3)</b> 97:19 110:11	145:24	<b>removed (4)</b> 97:4	<b>rest (1)</b> 123:12	3:21 4:3,9,10 33:3	<b>section (2)</b> 44:21 74:13
61:9 62:1,9,16,18	116:6	<b>red (2)</b> 27:24 106:21	102:17,18 110:25	<b>restarted (1)</b> 92:1	35:12 104:4	<b>security (1)</b> 113:22
63:8,12,19,23	<b>react (1)</b> 79:19	<b>redaction (1)</b> 146:4	<b>removing (4)</b> 102:11	<b>result (11)</b> 13:10 14:1	111:5,8,16,20,22,24	<b>seddon (1)</b> 4:6
64:5,13,25 65:10	<b>read (15)</b> 6:19 14:4 32:3	<b>reexamination (4)</b>	110:20,21,23	54:7 74:25 75:1 79:15	112:6	<b>see (160)</b> 1:23
66:4,8,14 67:4,8,21	40:13 59:25 68:13	91:1,11 106:4 148:2	<b>repair (9)</b> 14:22	96:18 105:14 107:15	<b>rolls (1)</b> 103:25	2:4,6,8,11,13,19,20
69:3,6,11,21,24	95:25 123:12 126:4	<b>refer (9)</b> 75:24 76:13,20	16:9,13,16,18,23 17:3	111:11 119:8	<b>room (1)</b> 2:1	3:1,3,18,22 5:24
70:15,24 71:2,14,21	128:22,24 130:23	83:25 98:21 101:2	21:1,2	<b>resulted (3)</b> 3:8 54:11	<b>root (3)</b> 60:11,13	6:1,6,10,14,18 7:3
72:4,11 73:2,13	133:12,22 142:11	114:3 138:14 140:5	<b>repaired (1)</b> 21:7	108:22	100:12	8:4,11 9:25 11:23,24
74:8,12,16,23	<b>reading (10)</b> 9:13 10:6	<b>reference (16)</b> 13:9	<b>repeat (1)</b> 31:24	<b>resulting (3)</b> 57:11	<b>roughly (1)</b> 13:18	12:2,7,12,18 14:8,9,18
75:6,9,12,19,24	17:15 31:11 36:17	14:9 16:24 17:1 23:20	<b>repeatedly (1)</b> 75:24	69:14 70:21	<b>round (1)</b> 136:21	15:17 16:15 17:7
76:4,8,11,13,16,20,24	111:11 117:24 119:9	56:15 102:16,17,18	<b>repeats (1)</b> 88:5	<b>resumed (2)</b> 104:2,3	<b>routing (1)</b> 29:10	18:4,13,14,25 19:13
77:5,8 78:3,6,12,18,24	121:25 126:2	103:2 106:20,21	<b>replaced (1)</b> 72:17	<b>retain (1)</b> 47:22	<b>row (4)</b> 84:7,7 86:8,9	21:8 26:3 27:9 28:11
79:13 80:2,8,11,14,19	<b>reads (1)</b> 112:7	107:19 112:23 117:12	<b>replicate (1)</b> 47:20	<b>retained (1)</b> 96:8	<b>rules (1)</b> 96:7	29:14 30:7,8 32:11
81:6,12,19,23 82:2,12	<b>ready (2)</b> 93:14 130:12	122:24	<b>replicated (4)</b> 21:25	<b>retired (2)</b> 30:15,17	<b>ruling (1)</b> 91:8	33:2,6,10,12,15
83:1,15,19,25 84:9	<b>real (2)</b> 105:24 129:6	<b>references (1)</b> 6:6	40:21 54:6 56:16	<b>retrieving (2)</b> 6:15 8:5	<b>run (1)</b> 62:25	34:2,6,11 35:20 36:25
85:1,8,14,19,22	<b>realised (1)</b> 73:21	<b>referred (20)</b> 32:24 46:6	<b>replicating (1)</b> 51:21	<b>retry (2)</b> 31:4,9	<b>running (5)</b> 47:18,19	37:2,4 39:15,23 41:6,6
86:4,14,19,23	<b>really (13)</b> 3:25 5:16	49:22 51:25 52:24	<b>replication (2)</b> 54:20	<b>retrying (1)</b> 31:3	97:18 106:25 115:6	43:2,5,6,7,9,12,13,21
87:2,14,17,20 88:19	32:14 46:22 62:9	61:14 71:4,5 87:14	72:14	<b>reversal (1)</b> 51:24	<b>rx (1)</b> 120:18	50:3,4,7 52:11,25
95:9,13,17,22,25	64:15 68:17 69:18	95:14,17 108:23 111:3	<b>reply (1)</b> 88:5	<b>review (3)</b> 49:8 106:25		53:17,25 54:3,10,14
96:16 97:7,12	75:20 89:23 97:17	132:1,2,3	<b>report (5)</b> 45:16 57:21	146:4	<b>S</b>	55:1,12,16,19 56:25
98:2,15,17,19,25	125:9 131:8	137:12,14,15 140:10	72:16,18 145:17	<b>reviewed (1)</b> 49:5	<b>s90 (3)</b> 64:17 65:14	57:8,9,15 58:4,6
99:2,5,7,16,19	<b>reason (10)</b> 11:5 25:8	<b>referring (4)</b> 71:12	<b>reported (2)</b> 72:15	<b>revisit (3)</b> 94:21,22	66:4	59:1,6 60:6,10,19
100:10,12,19	39:6 61:8 82:20 83:14	115:17 135:20 139:20	102:2	129:10	<b>sacrificed (1)</b> 131:19	61:13 63:17 64:2
101:1,3,8,16,20,23	104:18 111:10 134:14	<b>refers (2)</b> 9:25 22:17	<b>reportedoverview (1)</b>	<b>revisited (1)</b> 126:18	<b>safely (1)</b> 3:9	68:3,5,16 70:10
102:7 103:4,7	135:3	<b>reflect (1)</b> 105:20	101:25	<b>reynolds (5)</b>	<b>sale (6)</b> 7:19 11:11	71:5,17,19 73:3 74:21
104:16,20 106:14	<b>reasonably (3)</b> 15:4	<b>reflected (1)</b> 111:9	<b>reports (1)</b> 57:12	18:14,16,19,22,23	12:14 117:20	76:2,8,17 77:22
107:12,18 108:10,21	25:25 49:16	<b>reflection (3)</b> 26:11	<b>represented (1)</b> 46:17	<b>ri (1)</b> 7:15	118:19,20	78:3,10,19,19 80:8,17
109:4	<b>reasons (3)</b> 87:23	124:5 129:12	<b>represents (1)</b> 35:8	<b>rid (1)</b> 119:10	<b>salevalue484 (1)</b> 11:16	84:6 86:6 87:3 88:8
110:2,8,17,20,23	127:16 129:8	<b>reflects (1)</b> 72:23	<b>reproduced (1)</b> 95:6	<b>ridiculous (1)</b> 108:6	<b>same (29)</b> 13:18 21:19	95:23 96:10 98:8
111:19,23	<b>reboot (1)</b> 65:20	<b>regard (1)</b> 5:12	<b>request (3)</b> 29:13	<b>righthand (1)</b> 71:18	22:5 25:24 26:4,24	99:8,11,14,23
112:4,14,17,21	<b>recall (2)</b> 63:11 106:9	<b>regarding (2)</b> 58:9,19	30:11,12	<b>rights (3)</b> 113:8,9,10	31:1,5,7,23 32:18 40:4	101:4,23,24 102:5
113:1,7,13,17	<b>receipts (18)</b> 8:13 10:22	<b>regards (1)</b> 93:13	29:3,6 47:2,5 48:20	<b>ring (1)</b> 63:6	45:5 52:6 55:1 56:6	103:22 104:17 105:17
114:5,7,20	22:24 24:17 72:20	<b>region (1)</b> 14:24	57:9 58:18	<b>riposte (9)</b> 49:20,22	77:20 88:19,21 89:3	106:8,14,18,21 107:15
<b>quantity (10)</b>	73:13 74:1,6,19 75:18	<b>regression (4)</b> 38:1,9	<b>requests (1)</b> 48:15	50:12,12,15,20 54:5	92:4 96:9 102:19	108:21 109:9,11
11:11,11,13,14	76:5,16 79:15 80:4	39:5,6	<b>require (3)</b> 88:3 114:9	56:17 64:7	104:2 112:21 126:18	110:17 112:4,8
117:20,25	86:22 101:12 103:2,5	<b>regularly (1)</b> 96:2	142:3	<b>rise (2)</b> 51:20 91:5	127:1 133:23 137:18	114:5,25 115:6 117:17
118:14,15,18,19	<b>received (7)</b> 13:12	<b>regulated (1)</b> 103:13	<b>required (10)</b> 34:4 38:2	<b>risk (4)</b> 78:22 82:2,22	<b>satisfactory (2)</b> 136:20	118:16,25 119:2,15
<b>quantity1 (1)</b> 11:16	18:22 58:8 59:20 89:9	<b>reinstated (1)</b> 105:2	39:5 40:23 82:19 96:3	83:6	140:6	120:2 121:1 122:23
<b>queries (2)</b> 63:4,8	105:4 124:13	<b>reinstating (1)</b> 105:9	119:4,6,7 123:3	<b>risks (2)</b> 38:23 39:1	<b>satisfied (2)</b> 57:12	123:12 144:14
<b>question (11)</b> 6:4 68:11	<b>recent (1)</b> 64:6	<b>rejected (3)</b> 26:5,25	127:17	7:12,14	128:14	<b>seeing (5)</b> 22:11 28:20
70:24 73:17 87:22	<b>recently (1)</b> 104:18	27:17	<b>requirement (2)</b> 102:9	<b>robison (82)</b> 1:5,20	<b>saw (7)</b> 9:11 12:16 17:1	51:13 73:12 86:17
94:9 119:20,25 125:9	<b>recept (1)</b> 102:3	<b>relate (2)</b> 23:12 133:18	129:20	22:16 28:16	52:21 66:10 89:18	<b>seek (2)</b> 4:14 84:1
129:11 143:14	<b>reclarified (1)</b> 49:13	<b>related (7)</b> 7:22 15:8	<b>requiring (2)</b> 125:15	89:10,11,14,25	98:13	<b>seem (6)</b> 34:19 65:15,25
<b>questions (14)</b> 82:3,4	<b>recognise (3)</b> 66:21	64:10 66:8,9,10 112:4	132:15	90:5,16 91:3,15	<b>saying (17)</b> 7:7 9:9	68:9 121:15 122:1
91:12 93:15 106:1	108:13 118:1	<b>relates (3)</b> 18:8 21:17	<b>research (1)</b> 99:1	92:2,8,18,21,25	17:15 19:15 20:19	<b>seema (1)</b> 46:6
107:18,22,25 115:1,2	<b>recognised (1)</b> 82:9	57:24	<b>reserve (1)</b> 143:15	93:11,13,22 94:8 95:1	29:19 36:1,4,9 57:15	<b>seemed (1)</b> 123:19
116:13 123:21,23	<b>recollection (3)</b> 63:2	<b>relating (3)</b> 14:14 49:5	<b>reset (1)</b> 4:9	106:3,4,5 114:25	65:25 94:8 111:24	<b>seems (15)</b> 9:17 15:12
148:3	107:6,9	96:19	<b>resist (3)</b> 134:16 136:24	123:22 124:9,16,21	112:2 118:9 135:21	16:5 18:21 20:18
<b>quick (1)</b> 41:20	<b>recommendation (1)</b>	<b>relation (9)</b> 23:22 42:4	137:24	125:11 128:21,25	138:23	52:23 65:22 74:8
<b>quicker (1)</b> 38:21	81:8	87:9,18 101:20 126:13	<b>resisting (2)</b> 133:4,5	129:3,9,17,18,19	<b>sc (5)</b> 7:11,17,18 10:10	75:13 120:17 121:18
<b>quickly (2)</b> 49:16 130:14	<b>recommendations (1)</b>	132:16 143:9,11	<b>resolve (2)</b> 37:11 86:25	130:17,21,25 131:5,21	14:15	123:10,16 124:23
<b>quietest (1)</b> 19:8	107:1	<b>release (1)</b> 66:4	<b>resolved (5)</b> 10:23,25	132:11,14,20	<b>schedule (11)</b> 42:19	144:15
<b>quite (9)</b> 15:16 21:1	<b>reconciliation (3)</b> 56:18	<b>released (1)</b> 80:25	14:20 107:4 143:6	133:3,9,22 134:6	87:11 131:23 132:4,15	<b>seemungal (1)</b> 37:17
30:25 39:17 63:19	60:12 72:16	<b>relevant (2)</b> 12:6 126:24	<b>resource (1)</b> 40:1	135:18,25 136:4	134:23 137:18,19	<b>seemungals (1)</b> 36:25
85:13 128:23 131:14	<b>record (25)</b> 24:22 25:14	27:16 97:10,17	<b>respect (11)</b> 9:15 36:2,6	137:7,17,23,24	138:5,14 139:7	<b>seen (20)</b> 19:19
136:2	27:16 97:10,17	<b>relied (1)</b> 132:8	42:19 43:17,24 48:5	138:11,16,19 139:2,16	108:4,24 109:7	22:10,12 24:16 35:11
<b>quotation (1)</b> 120:21	109:23,25	<b>remain (2)</b> 61:2 90:19	124:8 133:16 141:12	140:1,12	<b>scheme (4)</b> 107:24	66:23 77:2 78:25
<b>quoting (2)</b> 84:13,15	110:19,20,21,23,25	<b>remains (1)</b> 82:17	144:22	142:3,5,17,20	<b>scrabble (1)</b> 127:25	79:18,24 89:17,25
	111:1,3,6,10,14,16,18,19	<b>remarkable (1)</b> 127:20	<b>respectful (5)</b> 125:16	143:8,19 144:9,14,25	<b>screen (3)</b> 22:14 26:18	101:6 112:5 114:20
<b>R</b>	118:25 119:3,9,11	<b>remedy (1)</b> 16:5	131:13 136:20 137:25	145:19	95:25	125:14 127:9,10
<b>radar (1)</b> 116:18	<b>recorded (2)</b> 15:18	<b>remedying (1)</b> 17:14	139:6	146:1,3,6,13,17	<b>script (2)</b> 38:11 42:1	143:17
<b>raised (15)</b> 23:22	104:6	<b>remember (18)</b> 7:6,15	<b>respectfully (2)</b> 131:7	148:2,6,8	<b>scripts (3)</b> 18:5	<b>select (5)</b> 40:1,2,3,14
50:4,5,15 52:18 53:9	<b>recording (1)</b> 9:11	20:4 24:8 28:4 41:13	134:4	<b>robson (1)</b> 62:2	41:17,19	43:22

selfservice (1) 102:12  
 selling (3) 7:20,22 10:11  
 send (2) 31:7 92:10  
 sense (2) 34:22 105:5  
 sensible (2) 116:8  
 121:15  
 sent (5) 51:17 53:8,11  
 66:17 104:8  
 sentence (3) 6:18 21:16  
 96:6  
 separate (2) 19:14  
 76:24  
 separately (1) 1:25  
 sept (1) 72:17  
 september (18) 40:7  
 52:10 54:1,3 55:3,4  
 56:9 57:7 68:7 74:18  
 75:6,9,25 77:9  
 79:23,25 80:3 86:12  
 sequence (3) 75:17  
 116:9 121:19  
 sequential (2) 130:8  
 132:9  
 serious (2) 127:7 128:6  
 serve (1) 7:18  
 served (4) 89:13  
 130:10,11 134:25  
 server (1) 20:3  
 service (9) 29:10 50:15  
 58:8,10,11 61:5,9  
 102:1 125:2  
 services (1) 112:23  
 session (4) 77:21  
 103:25 104:1,3  
 set (9) 35:10 37:2 42:20  
 108:8 116:4 126:11  
 127:15 142:12,13  
 sets (2) 134:9 137:11  
 setting (3) 36:7 109:16  
 138:5  
 settlement (4) 7:12  
 10:12 14:18 29:19  
 seven (1) 99:21  
 several (2) 34:1 65:22  
 severe (1) 57:10  
 severity (1) 61:1  
 sh (2) 38:7,11  
 shall (2) 1:7 100:3  
 sheet (1) 59:14  
 shell (1) 38:11  
 short (5) 45:3,9 92:15  
 128:12 129:15  
 shortage (5) 4:11,20  
 57:11,24 129:23  
 shortcomings (1) 38:24  
 shorthand (2) 74:3,9  
 shortly (1) 16:4  
 should (46) 3:10,19  
 4:10 13:14 25:3,21  
 26:5,25 27:1,6  
 30:15,17 31:8,22  
 40:9,12,16,22 41:2  
 61:9 62:24 81:9 82:18  
 93:6,18 97:3,5 102:11  
 105:9 112:1 114:8  
 115:15 116:3  
 118:16,23 126:2  
 130:13 131:10 136:6  
 137:21 138:5 140:8  
 142:22 143:22 145:10  
 146:7  
 shouldn't (6) 26:8 31:20  
 95:11 111:6,18 137:25

show (5) 9:1 77:15  
 81:15 101:8 127:13  
 showing (6) 2:16  
 59:11,12,13 60:18  
 77:13  
 shown (6) 15:8 73:8,18  
 102:21 107:19 112:4  
 shows (11) 6:11 9:1,4  
 26:23 32:3 33:16  
 39:10 79:7,24 100:2  
 102:23  
 side (7) 25:23,23 71:18  
 93:1 134:15 141:11  
 144:13  
 sides (2) 14:14 93:5  
 sight (2) 131:9,11  
 sign (1) 33:6  
 signed (2) 88:11 136:12  
 significant (4) 28:11  
 65:7 68:24 82:2  
 signing (1) 128:12  
 signs (2) 22:21 59:2  
 similar (3) 14:19 52:14  
 55:7  
 simpkins (2) 51:10  
 71:25  
 simple (3) 15:5 31:24  
 140:4  
 simpson (2) 15:7 43:12  
 simultaneous (1) 141:8  
 since (11) 27:8 30:14  
 66:8,9 67:6 77:16 81:1  
 85:8,19 98:17 108:13  
 single (7) 7:11 10:10  
 33:19 35:22 87:6  
 118:3 143:2  
 site (3) 33:8 52:6 64:7  
 sites (4) 64:13,21 65:18  
 68:10  
 sitting (1) 142:22  
 situation (5) 3:15 30:25  
 31:11 94:3 127:15  
 situations (1) 31:9  
 six (2) 99:20 104:17  
 size (2) 120:8 121:18  
 skeleton (14)  
 130:8,9,11 131:22,23  
 132:5,10,15 134:20,21  
 136:22 137:19 138:4  
 139:8  
 skeletons (7) 125:3  
 141:7 142:2,10,15,25  
 143:2  
 slash (1) 96:4  
 slide (3) 100:3,8 101:3  
 slightly (2) 34:14 96:10  
 slow (1) 131:12  
 slt (1) 60:25  
 small (2) 32:2 97:7  
 smart (1) 103:10  
 smc (3) 65:17,22 66:1  
 software (10) 57:16  
 60:14,25 61:5,24 63:9  
 75:2 108:7 111:17,17  
 solicitor (1) 128:12  
 solicitors (6)  
 46:11,14,19 66:17  
 67:10 93:9  
 solution (9) 50:10  
 53:4,7 81:8,13 82:5,12  
 83:1,10  
 solutions (2) 81:7,10  
 somebody (6) 32:13

73:23 123:9 136:3  
 139:12 145:16  
 someone (9) 42:10  
 69:24 84:11,14 100:5  
 112:19,20 139:22  
 146:16  
 something (23) 5:4  
 20:8 21:4 27:19 30:10  
 31:2,10,15 48:17 51:5  
 62:5 64:14,19 65:24  
 70:11 75:12,19 95:9  
 97:18 101:13,15  
 123:10 136:13  
 sometimes (2) 9:1  
 49:22  
 somewhere (2) 77:9  
 145:21  
 soon (2) 59:23 90:4  
 sort (23) 5:21 6:8 31:25  
 36:8,16 48:12 61:23  
 65:5 97:13,14 104:13  
 105:20 108:12,25  
 115:3 128:13,14,18  
 132:16 133:4 135:5,8  
 139:4  
 sorted (2) 33:23 60:4  
 sorts (3) 42:11 108:23  
 143:16  
 sought (3) 5:3,17 88:3  
 sounds (1) 82:24  
 source (2) 72:4 96:13  
 sp (1) 7:15  
 spanning (1) 39:19  
 spans (1) 37:6  
 speak (1) 69:19  
 speaking (2) 19:6 57:18  
 special (1) 65:5  
 specific (8) 70:7 74:9  
 84:21 127:12 132:1,22  
 137:11 140:7  
 specifically (2) 47:14  
 48:24  
 specified (1) 121:24  
 speculating (1) 42:2  
 speed (2) 131:17,19  
 spell (1) 136:11  
 spelled (2) 135:17  
 136:19  
 spells (1) 135:10  
 spelt (1) 128:8  
 spm (7) 2:21 9:2  
 19:20,23 59:15 79:11  
 102:25  
 spmr (4) 57:15,21 61:16  
 62:4  
 spms (8) 9:1 57:4 78:12  
 83:11,16 98:11,15  
 100:19  
 spoke (3) 59:19 105:6,8  
 spoken (7) 45:24 46:1  
 49:9,12 85:8,10,19  
 spot (1) 134:1  
 spreadsheet (13) 67:16  
 68:24 69:3,23  
 70:11,21 71:12,25  
 72:6,8 73:22 83:25  
 86:4  
 sql (7) 34:17,20 35:10  
 120:9,15,23,23  
 square (18) 46:3 48:25  
 49:15 52:11,12  
 53:15,17 54:23  
 62:9,12,15 64:3 66:19

67:2,4,13 69:1,7  
 ssc (13) 37:10 38:21,24  
 39:24 40:12,16,21  
 41:1,18 43:17,17,18  
 112:18  
 ssscs (1) 43:5  
 stable (1) 106:25  
 stage (8) 3:24 5:6 8:24  
 9:2 30:16,18 34:21  
 65:16  
 stages (1) 43:1  
 standing (1) 1:5  
 stands (2) 7:16 29:9  
 star (1) 8:11  
 start (7) 19:11 28:18  
 49:15 50:2 89:23  
 119:14 120:1  
 starting (2) 50:13 134:7  
 starts (5) 28:24 29:24  
 68:2 121:3,19  
 stated (2) 4:21 55:10  
 statement (81)  
 23:14,16 32:25 33:17  
 37:1 45:13,14 46:8,25  
 66:4 69:6,16  
 70:8,15,25 71:3,5 72:6  
 73:21 76:21 80:2,2  
 84:10,16,18,22  
 85:2,9,15,16,20 86:23  
 88:11,22 95:4,14,19  
 96:12,14,17,24  
 97:11,20,25 98:3,23  
 102:4 108:15  
 113:18,18 114:22  
 115:13 116:11,15  
 120:10 125:18,21,23  
 126:4 128:13,23 129:7  
 132:6 133:11,15,23  
 134:12  
 137:9,13,20,22,25  
 138:8,13,20,22,23  
 139:9,21,22 140:21  
 statements (2) 33:8  
 72:18  
 states (3) 2:15 7:2  
 59:10  
 stayed (1) 85:22  
 step (5) 112:9 125:16  
 129:12 136:11 141:4  
 stepping (1) 66:8  
 steps (5) 77:14 112:8  
 125:7,8 140:18  
 sterling (1) 7:25  
 steve (7) 24:9,10,12  
 45:24 70:22 71:23,23  
 steward (2) 64:2,3  
 still (18) 26:15 48:6  
 52:5 58:19 59:21,23  
 65:12 70:23 77:15  
 94:17 116:23 128:4  
 144:2 145:6,10,17  
 146:2,10  
 stock (21) 3:2,5,7 10:19  
 13:16 33:19 35:20,23  
 36:11,18 54:7 57:17  
 59:3 66:22  
 96:20,21,22 104:1,2  
 115:24,25  
 stockunit (3) 4:9  
 109:15,19  
 stop (5) 80:15 89:21  
 90:9 91:6 111:17  
 stopped (1) 91:25

stopping (1) 114:2  
 storm (1) 68:17  
 storms (2) 65:19,23  
 strategy (1) 96:19  
 stroke (1) 121:7  
 struggling (1) 28:15  
 stuart (1) 43:13  
 stuck (1) 41:18  
 stuff (1) 21:2  
 su (1) 53:22  
 subject (4) 90:12 99:24  
 101:11 145:5  
 subjective (1) 51:6  
 subjects (1) 116:17  
 submitted (2) 45:15,16  
 subpostmaster (7) 9:8  
 19:23 58:3 60:1  
 63:6,11 88:2  
 subpostmasters (5) 6:7  
 78:8,14 98:5 100:25  
 subsequent (2) 126:19  
 136:11  
 subsequently (1) 62:22  
 substance (1) 141:3  
 substantially (2)  
 96:9,13  
 substantive (1) 94:11  
 substituted (1) 123:14  
 subtract (1) 84:9  
 success (1) 106:23  
 successful (2) 60:17  
 91:25  
 successfully (1) 104:8  
 successive (1) 95:6  
 suffering (2) 61:24  
 100:19  
 suggest (6) 65:4 70:15  
 83:10 97:12 131:7  
 143:12  
 suggested (5) 1:12 23:6  
 34:15 130:13,25  
 suggesting (2) 24:19  
 88:12  
 suggestion (3) 130:4  
 132:23 133:5  
 summaries (1) 120:19  
 summarise (1) 26:3  
 summarised (1) 97:22  
 summary (5) 26:9 30:4  
 33:2 53:20 146:3  
 supervision (1) 40:10  
 supplied (1) 44:7  
 support (12) 40:12,20  
 57:5,18 58:8,11 75:2,3  
 106:20 112:24 113:4  
 125:22  
 supported (1) 82:15  
 supporting (1) 48:10  
 suppose (2) 122:10  
 140:25  
 supposed (3) 27:14  
 101:8 126:11  
 sure (10) 5:13 20:8  
 26:10,18 30:13 49:13  
 83:21 125:20 135:24  
 140:2  
 surmising (1) 123:17  
 surprised (3) 32:4 78:6  
 93:19  
 surreal (1) 130:5  
 suspect (4) 30:9,10  
 33:18 93:4  
 suspended (2)

106:17,19  
 suspense (12) 34:2  
 57:23 58:1 61:19 62:3  
 74:11 88:24 95:5  
 96:22 97:1,2,23  
 suspension (1) 106:10  
 symbols (2) 121:9,10  
 symptoms (2) 31:11  
 85:4  
 synonym (1) 29:11  
 system (38) 1:25 2:23  
 3:9 12:19 17:16,17,17  
 18:8 19:6 22:23 25:12  
 31:13,22 35:7  
 47:15,18,19 48:13  
 59:11 62:23 63:16,20  
 75:1,4 79:8 82:4 83:8  
 95:11 98:8 100:20  
 101:9,19 104:23 109:2  
 113:5,23 117:1 122:14  
 systems (2) 104:9 113:6  
 136:11  
 T  
 tab (2) 71:16 84:3  
 table (10) 27:9 28:8,9  
 29:3,4 35:8 40:2,14  
 96:23 120:18  
 tables (7) 23:9  
 24:19,22,22 38:4  
 44:10,14  
 taken (12) 3:20 22:1  
 42:18 79:19 81:1  
 92:25 93:9 107:21  
 109:6 129:13 140:18  
 141:4  
 takes (3) 66:11 130:23  
 145:15  
 taking (2) 126:17  
 132:20  
 talk (2) 51:5 68:18  
 talking (8) 7:8,9 15:25  
 63:10,10 72:5 119:17  
 131:8  
 talks (2) 67:16 131:7  
 tampering (1) 82:3  
 target (5) 2:6 14:7  
 39:16,17 61:9  
 tcs (1) 81:11  
 team (6) 24:11,13 34:17  
 40:16 58:1 113:23  
 technical (2) 68:19 85:5  
 technically (2) 35:13  
 141:1  
 teething (1) 108:19  
 telephoned (2) 58:18  
 62:20  
 telling (2) 115:23  
 123:16  
 tells (1) 55:22  
 template (9) 34:20  
 120:9,15,23 121:3,25  
 122:10,11,12  
 templates (8)  
 37:9,16,21 38:1,16,25  
 39:3,12  
 temporarily (2) 40:22  
 41:3  
 ten (3) 11:7 45:2 91:5  
 tend (1) 12:2  
 term (2) 34:6 97:8  
 terminals (2) 12:3 63:15  
 terms (3) 90:6 116:19  
 123:8

territory (2) 30:19,22  
 test (6) 17:16 37:25  
 38:1,9 80:20 143:4  
 tested (2) 17:15,16  
 testing (2) 39:5,6  
 text (4) 120:22 121:8,8  
 123:13  
 thank (13) 5:22 19:12  
 30:5 36:23 45:4 58:13  
 106:2 109:4 119:13  
 124:1,3,17,22  
 thats (89) 2:21 3:14 4:2  
 7:18 10:7 13:18 14:22  
 17:3,23 18:10 19:13  
 20:11 23:19 25:19  
 27:7,13,14 30:4 32:9  
 34:8 36:1,1 39:6,8  
 40:5,14 41:4 43:18  
 44:19,21 46:20 47:4  
 48:21 49:9,11 51:6  
 52:16 53:3 55:22  
 58:10 64:10 66:3,5  
 67:15,21 69:10,20  
 70:6,18,25 72:25  
 76:20,24 79:10,12  
 83:23 84:2 85:13  
 86:10 87:21 88:13  
 90:2,21 93:7,8 95:8  
 96:25 100:7 107:18  
 110:11 116:7 119:3  
 120:4 121:13 123:10  
 124:1 125:6,9 126:5  
 130:21 133:14 134:13  
 135:20 136:6 137:18  
 138:14 140:15 145:9  
 146:6  
 themselves (2) 100:25  
 110:3  
 theoretical (1) 114:9  
 thereabouts (1) 10:21  
 thereafter (1) 53:9  
 therefore (5) 21:5 31:17  
 80:2 119:10 135:9  
 theres (32) 2:1 5:24 6:1  
 7:23 8:15 12:15 13:8  
 14:9 30:17 35:21,23  
 39:11 54:1 61:4 76:21  
 79:10 84:4,6 86:21  
 96:4 97:12,14  
 99:16,17 106:21  
 112:7,23 113:14  
 117:20 133:19 135:21  
 139:23  
 theyre (5) 19:22 36:14  
 122:3,10,13  
 thing (9) 5:21 19:7  
 35:5,7 51:4,6 124:12  
 132:12 139:5  
 thinking (3) 85:12  
 111:23 136:15  
 third (8) 12:25 33:14  
 106:16,22 112:7,22  
 120:1 125:3  
 thirdly (1) 49:22  
 thirty (1) 69:14  
 though (4) 76:13 82:20  
 101:14 123:10  
 thought (5) 50:25 63:6  
 67:19 84:15 92:8  
 three (9) 81:6 87:3  
 109:12 110:12 120:21  
 122:24 124:23 131:24  
 145:23

threeletter (1) 16:18  
 through (20) 5:19  
 21:2,25 30:7 31:15,15  
 36:17 58:23 75:16,17  
 80:6 97:21 99:1  
 100:16 108:7,18  
 113:15 116:8 117:16  
 145:15  
 thursday (4) 1:1  
 130:12,16,17  
 thus (1) 52:19  
 ti (1) 51:23  
 ticket (1) 23:22  
 tidy (1) 34:13  
 tied (1) 21:23  
 time (52) 4:14 5:2  
 12:24 19:8,22 31:7  
 32:15,22 39:11 40:21  
 47:10 50:7 51:4,24  
 53:9 61:5 62:11  
 65:23,25 66:2 67:6  
 70:12,21,24 73:3,11  
 76:11,21 77:23 81:8  
 86:14,20 90:20 92:4,9  
 93:4 99:10,12 101:19  
 102:19 108:2 115:8  
 117:3 125:2,9 128:12  
 133:6 135:1 136:25  
 140:17,24 142:11  
 timed (2) 29:20,22  
 timeout (1) 68:12  
 times (3) 64:8 101:15  
 121:23  
 timetabling (2) 90:6  
 129:11  
 timing (1) 137:10  
 tip (7) 16:9,13,18,23  
 17:3 21:1,6  
 title (1) 41:14  
 tmobile (1) 102:12  
 today (6) 42:21,24 79:1  
 94:19,20 109:6  
 together (12) 17:21  
 26:12 74:5 98:1  
 116:9,10 118:7,12,18  
 123:4 143:2 145:8  
 told (11) 46:13 47:4  
 57:21 59:22 63:14  
 69:18,20 71:14  
 75:21,22 135:18  
 tomorrow (1) 145:9  
 too (3) 118:7 126:25  
 136:19  
 took (4) 67:24 68:4  
 106:6 117:16  
 tool (21) 14:22  
 16:9,13,19,23 17:3  
 21:1 25:4,15,15 34:23  
 37:9,15,16,21 38:2,16  
 39:8,10 44:15 120:25  
 topic (1) 85:22  
 torstein (2) 1:3 147:25  
 total (6) 15:18 84:6  
 97:18 115:6,9,10  
 totally (5) 26:11,18  
 62:5 78:21 134:12  
 totals (2) 39:4 97:22  
 touched (1) 14:13  
 towards (2) 2:11 13:2  
 tp (6) 2:15 4:9 33:20,24  
 34:4 115:24  
 tp1 (2) 34:1 110:13  
 tp10 (1) 3:21

tp2 (1) 110:14  
 tpbalance (1) 104:5  
 tpbp (2) 104:7,10  
 tpsc256 (1) 72:18  
 tpsolfsummariesincomp  
 (1) 15:10  
 tracing (1) 58:23  
 trade (1) 104:5  
 trading (23) 4:2 33:7,20  
 35:1 36:3,5,6,7,15  
 61:18 72:18 77:20  
 81:23 96:24  
 97:11,20,25 102:3  
 104:5 108:14 110:15  
 115:13 116:11  
 tradingperiod (2)  
 109:16,20  
 trail (2) 70:23 100:17  
 trailer (1) 4:10  
 training (1) 103:13  
 transact (1) 103:13  
 transaction (56) 3:12  
 4:1 12:17 14:22 15:16  
 22:18 24:5,19,22  
 25:3,9,15,15,22 26:5  
 29:20 30:17 32:24  
 34:23 35:17 37:9,15  
 38:3,15 51:22 56:4  
 60:22 87:5,17,24  
 88:6,12,16,23 96:22  
 102:24 104:9  
 108:15,16,22 109:8,10  
 111:25 114:1,15,18,23  
 115:15 116:2,3,5  
 120:9,10,16,24,24  
 transactional (1) 97:14  
 transactions (25)  
 7:13,14 8:21 14:15,16  
 18:4,5 19:4 23:9 26:4  
 37:11 38:17,21 39:4  
 51:16 54:18 56:18  
 59:21 60:16 86:24  
 104:6 110:10,10,13,15  
 transcript (1) 133:17  
 transfer (18) 22:22 23:7  
 51:20,22 52:19,22  
 55:15,17,19,20,23  
 56:2,18 59:9,10,12,14  
 60:16  
 transferred (2) 51:23  
 59:5  
 transferring (1) 59:3  
 transfers (8) 54:7,9  
 56:3 57:17,24 60:3  
 62:21 66:22  
 transparent (1) 83:11  
 trial (19) 46:6 47:5,7  
 89:21,22 90:9,11  
 91:25 94:12 125:5  
 126:14 129:25 136:5  
 142:22 143:10,12  
 144:2 145:14 146:11  
 trials (1) 126:19  
 trt (6) 14:21  
 16:20,21,22,22 17:2  
 true (3) 111:9 130:21  
 135:20  
 truncated (1) 136:25  
 truth (2) 88:11 129:21  
 try (7) 1:22 32:12 39:7  
 47:20 98:13 105:9  
 128:2  
 trying (13) 8:15 15:5

22:22 27:16 32:13,15  
 37:10 48:12 51:4 59:9  
 63:14 74:6 108:7  
 tuesday (7) 19:7 130:10  
 137:10 140:20,21  
 141:10 142:15  
 turn (3) 42:14 46:19  
 125:25  
 turning (1) 145:4  
 twenty (1) 69:15  
 twice (6) 52:19 54:8,19  
 56:20 101:13 133:12  
 type (10) 5:15 16:22  
 25:18 38:7 50:14,20  
 61:5 67:20 113:15  
 134:8  
 types (1) 96:8  
 typically (2) 43:19 44:1

**U**

ultimately (1) 110:15  
 unable (5) 3:9 33:3,8  
 107:16 112:6  
 unaware (1) 142:17  
 unbalanced (1) 25:22  
 uncontroversial (1)  
 134:12  
 underlying (8) 12:21  
 54:22 66:24 67:1,5  
 68:19 88:10 110:6  
 underneath (5) 36:25  
 37:2 54:16 77:11  
 121:17  
 understand (18) 20:12  
 21:16 26:17 27:7  
 31:19 46:11 47:1 62:7  
 63:13 69:12 70:12  
 74:24 83:13 86:24  
 88:4 98:7 133:11  
 140:12  
 understanding (8)  
 49:14 70:5 73:10  
 81:11 87:12 89:14  
 95:17 98:14  
 understands (1) 77:7  
 understood (7) 4:4 12:5  
 21:15 72:24 73:24  
 119:13 139:6  
 undertaken (2) 39:7  
 49:8  
 undertaking (1) 102:15  
 unexpected (2) 10:20  
 39:1  
 unexplained (1) 86:15  
 unfairly (1) 133:25  
 unfortunately (4) 30:13  
 41:17 65:21 101:11  
 unidentified (1) 93:3  
 unintended (1) 39:7  
 unit (17) 3:2,5 10:19  
 13:16 33:19 35:20,23  
 36:12,18 54:7 59:3  
 96:21,23 104:1,2  
 115:24,25  
 units (2) 66:22 96:20  
 unix (13)  
 43:7,9,14,24,24,25  
 112:10,11,14,14,15,23  
 113:4  
 unknown (1) 42:24  
 unless (3) 32:8 40:21  
 41:19  
 unlike (1) 82:16

unlock (1) 49:23  
 unpacking (1) 61:4  
 unparticularised (1)  
 127:7  
 unstick (1) 34:13  
 until (17) 1:7 21:7 61:2  
 65:14 66:11 92:6,12  
 100:21,24 101:1  
 134:25 141:15  
 143:6,17 146:11,19,23  
 unxadm (1) 44:4  
 update (7) 35:19 37:8  
 40:4 44:13  
 109:14,21,23  
 updated (4) 12:15  
 35:24 37:17 53:10  
 updatedeleteinsert (1)  
 44:9  
 updates (1) 38:15  
 updating (3) 12:13 18:4  
 39:12  
 upon (6) 61:1 93:22  
 111:25 124:5 128:15  
 129:12  
 urgently (1) 34:5  
 usd (1) 15:11  
 used (15) 14:21 18:5  
 21:1 37:15 40:9  
 87:5,18 88:6 96:23  
 97:10 108:14 110:6  
 113:25 114:17 115:12  
 useful (1) 138:7  
 useless (1) 131:13  
 user (24) 37:24  
 38:12,20 42:16,20  
 43:17,24 60:9  
 101:13,14  
 103:10,15,20,25 104:3  
 112:10,11,14,14,15  
 113:8,9,10 122:2  
 userids (1) 42:19  
 usernames (1) 42:21  
 users (7) 40:12  
 43:17,25 44:8 103:12  
 107:15 114:5  
 using (11) 3:12,25  
 16:9,12,18 17:2  
 25:3,14 35:10 44:14  
 69:16  
 usually (1) 65:1  
 utter (1) 113:14

**V**

vague (1) 127:17  
 validation (1) 21:6  
 value (16) 11:11  
 12:14,16 15:19 33:22  
 35:23 77:17 81:16  
 105:6,6 109:23 110:1  
 117:20 118:20,20  
 121:24  
 values (8) 82:13 97:23  
 110:4,6,8 118:10,11  
 123:14  
 valuesquantities (2)  
 9:21 13:6  
 variables (3) 122:24  
 123:2,6  
 various (3) 45:20 57:12  
 95:17  
 vary (1) 53:22  
 version (1) 48:6  
 versions (1) 74:3

vetted (1) 103:12  
 via (3) 24:11 54:12  
 82:14  
 viable (2) 47:16 48:9  
 visible (2) 38:20 104:9  
 visit (1) 58:15  
 visits (1) 57:6  
 visvis (1) 144:6  
 volume (2) 106:16  
 108:12  
 volumes (1) 3:7

**W**

wait (2) 71:8 143:5  
 waiting (3) 50:7 68:12  
 145:6  
 wanting (1) 47:15  
 wants (4) 55:8 56:20  
 92:2 137:8  
 warn (1) 65:18  
 warned (1) 78:7  
 warning (1) 122:10  
 warnings (2) 122:11,15  
 warren (1) 105:8  
 wasnt (16) 5:15 13:20  
 22:14,16 47:15 48:8  
 58:3 78:3 79:25 81:21  
 86:17 95:10 108:1  
 111:21 115:15 120:5  
 watch (1) 66:1  
 watson (1) 19:15  
 way (30) 1:23 3:18 4:18  
 16:15 21:14  
 25:12,16,17,19 31:22  
 32:21 35:7 69:21 70:6  
 78:10,17,18 94:10  
 111:25 112:7,22 116:8  
 131:2 133:23 134:25  
 136:21 137:17 138:14  
 139:12 145:15  
 wayne (1) 43:14  
 ways (2) 3:14 16:16  
 weak (1) 113:9  
 wednesday (6) 10:20  
 134:25 142:16,18  
 146:19,24  
 wednesdays (1) 51:14  
 week (10) 51:13 52:5  
 55:8 56:17,19 57:10  
 68:9 80:20,21 142:9  
 weeks (5) 52:6 56:13,21  
 64:8,13  
 wellestablished (1)  
 143:4  
 wellknown (1) 83:15  
 wendy (2) 19:6,10  
 went (6) 56:3 62:13  
 67:7 75:16 104:18  
 116:20  
 werent (4) 76:11 82:10  
 88:19,21  
 west (1) 116:20  
 weve (2) 22:8 24:18  
 whatever (4) 47:21  
 94:10 101:6 144:20  
 whats (14) 3:24 8:8  
 26:16,18 27:4 30:8  
 37:7 43:21 51:1 57:4  
 70:17 105:11 110:17  
 128:2  
 whereas (1) 79:8  
 whilst (1) 105:23

whoever (3) 123:3  
 136:8 145:14  
 whole (7) 27:13 30:21  
 32:3 48:13 64:17  
 visible (2) 38:20 104:9  
 wholly (1) 127:6  
 wide (1) 115:18  
 window (1) 134:20  
 winn (1) 78:4  
 wish (3) 132:17 134:16  
 146:7  
 wishes (3) 1:6 131:6  
 139:8  
 witness (55) 23:13,15  
 45:12,14,15 46:8 66:4  
 69:6 71:5 72:5 76:20  
 80:2 84:10 86:23  
 90:8,20 92:13  
 95:4,14,18  
 96:11,14,16 98:3,22  
 113:17,18 114:22  
 125:18,21,23 126:4  
 127:24 128:13,23  
 129:7 132:5  
 133:11,15,23 135:7  
 137:9,13,20,22,25  
 138:7,13,20,21,22  
 139:9,21,22 140:20  
 witnesses (4) 127:3  
 135:15 136:17 137:15  
 wombles (1) 42:15  
 wonder (2) 1:6 36:21  
 wondering (1) 33:23  
 wont (7) 20:24 42:13  
 93:19 118:4 125:14  
 144:11,12  
 wordgate (1) 102:2  
 worden (1) 145:25  
 wordens (1) 145:17  
 work (8) 8:15 17:18  
 26:21 27:14 51:7  
 113:5 128:2,16  
 workaround (5) 34:5  
 60:15,20 61:3,11  
 workarounds (1) 107:5  
 worked (4) 18:19,20  
 31:23 128:17  
 working (5) 5:6 101:10  
 108:2 117:3,7  
 works (1) 48:13  
 worried (3) 1:18 59:25  
 62:5  
 worries (1) 62:7  
 worry (1) 17:5  
 worth (2) 8:20 65:12  
 worthwhile (1) 65:14  
 wouldnt (9) 5:20 8:24  
 27:12 59:16 69:9 94:3  
 117:21 131:15,16  
 write (9) 10:4 29:21  
 41:17 81:16,20 83:3  
 135:22,25 136:3  
 writes (1) 13:3  
 writing (5) 23:8 24:19  
 41:12 80:15 117:5  
 written (9) 7:8,11 9:10  
 10:10 25:23 28:2 76:2  
 86:11 111:4  
 wrong (7) 30:10 31:2  
 34:17 67:21 80:5  
 103:2 117:11  
 wrote (3) 12:13 18:15  
 98:9

**X**

x (2) 22:23 141:10  
 xansa (1) 117:4

**Y**

year (1) 51:19  
 years (15) 64:9,20,21  
 95:7,9,12 98:11  
 100:1,4,14,20,21  
 101:18 116:16,19  
 yellow (11) 2:10  
 6:13,21,23 7:9 8:4  
 9:18 13:2 22:20 23:5  
 28:17  
 yesterday (7) 1:11,12  
 17:2 106:6 107:21  
 119:16 120:5  
 yet (2) 22:11 128:24  
 young (1) 42:5  
 youre (18) 5:16 6:8  
 26:18 36:11 72:5  
 88:17 90:24 108:20  
 111:23 112:2,12  
 115:24 118:17 122:5,8  
 141:14 142:10,23  
 yours (1) 76:9  
 yourself (4) 46:22 47:6  
 75:12,19  
 yourselves (1) 146:19  
 youve (6) 12:22 19:14  
 48:19,22 92:12 95:19

**Z**

zero (8) 13:11 33:22  
 34:3 35:23 100:2,3  
 110:22,25  
 zeros (2) 119:6,8

**0**

0 (1) 2:16  
 0126042 (1) 53:16  
 0126376 (2) 55:1 60:8  
 0130275 (1) 2:4  
 0152014 (1) 5:24  
 0175821 (2) 1:13 14:7  
 0195962 (1) 36:20  
 0197592 (1) 33:5  
 0208119 (1) 39:15  
 04042003 (1) 50:13

**1**

1 (24) 11:11,14  
 33:20,21 34:10 35:24  
 42:21 60:11 77:10  
 81:12,13 104:20  
 109:14 112:10  
 118:18,19 119:15  
 125:6 137:11 140:5  
 141:10 142:8 147:25  
 148:1  
 10 (8) 7:4 11:6 23:4  
 46:25 60:9 90:25 91:3  
 142:15  
 100 (2) 115:8,9  
 1000 (6) 7:11 8:1 10:11  
 11:12 12:16 13:16  
 10122007 (1) 5:23  
 101473 (1) 12:14  
 102 (1) 89:6

1030 (3) 1:2 146:19,23  
 106 (1) 148:2  
 10am (1) 19:8  
 11 (10) 3:20 4:2 34:1  
 36:7 42:15 67:10  
 109:16,24 110:1  
 119:23  
 1141 (1) 45:8  
 1142 (1) 33:12  
 115 (1) 148:3  
 1150 (1) 45:5  
 1151 (1) 45:10  
 115830 (1) 60:9  
 11th (1) 80:22  
 12 (17) 8:19 33:20,20  
 34:4 36:3,5,18 37:14  
 46:4 48:24 58:25 98:3  
 109:20,24 110:1,22  
 111:2  
 1212 (1) 12:13  
 1236 (1) 7:4  
 124 (1) 148:4  
 125 (1) 148:5  
 129 (1) 148:6  
 13 (1) 120:7  
 1300 (1) 109:12  
 134 (1) 148:7  
 1359r (1) 50:3  
 138 (1) 148:8  
 14 (7) 13:1 34:10 43:15  
 109:11 137:14 139:15  
 140:11  
 140905 (1) 54:5  
 142 (1) 66:5  
 145 (1) 148:9  
 14th (2) 125:23 137:13  
 15 (9) 54:1,3 69:11  
 72:24 90:25 91:3 94:1  
 109:6 141:9  
 1505 (1) 28:13  
 150518 (1) 28:14  
 1530 (1) 54:5  
 153554 (2) 25:25 28:24  
 155 (1) 124:13  
 15th (2) 132:5 139:21  
 16 (2) 86:10 99:22  
 160515 (1) 3:2  
 160868 (2) 53:18 55:1  
 161227 (1) 54:3  
 161308 (1) 56:9  
 167 (1) 61:12  
 1709 (3) 55:3,4,5  
 1722 (1) 2:11  
 1726 (1) 59:1  
 1739 (1) 59:8  
 173940 (1) 14:13  
 17510 (2) 5:25 9:25  
 17532 (1) 5:25  
 18 (1) 62:1  
 18000 (3) 2:13,17 3:8  
 183227 (1) 10:5  
 19 (6) 14:9,12 73:19  
 104:11,11 113:23  
 1955 (1) 23:24  
 1st (4) 105:3 130:14  
 143:1,1

---

2

---

2 (36) 2:25 15:3 22:23  
 23:8 41:5 42:24 51:9  
 52:6 55:2,19 56:21  
 57:8  
 59:4,4,10,11,13,18

60:13 61:12 64:8  
 78:24 81:8 82:12  
 84:7,7 89:3,5 95:22  
 103:8 104:21 105:18  
 109:17 112:21 137:13  
 140:5  
 20 (2) 15:7 73:19  
 2000 (4) 12:18 50:4  
 52:14 66:10  
 2003 (4) 51:9,12 52:13  
 66:9  
 2004 (5) 51:18  
 52:18,21,23 53:8  
 2005 (25) 2:8 3:1 5:14  
 52:10,12 54:1,3 55:3  
 56:9 57:7 58:16,25  
 59:18 60:9 61:12 62:1  
 66:20,24 67:2 68:7  
 69:8 72:17 73:5,6,12  
 2006 (10) 2:6 5:6,7,10  
 53:10 64:1,23  
 66:5,11,21  
 2007 (4) 7:4 8:19 11:6  
 13:1  
 2009 (6) 1:20 14:6,8,12  
 15:7 18:25  
 2010 (33) 1:21 22:8,9  
 23:4 25:25 32:23  
 34:10 36:20,24 37:2,4  
 62:13 74:10,11,18  
 75:6,9,25 77:9,10  
 79:25 80:3 86:6,10,12  
 95:6 96:21 99:9,16  
 106:8 107:21 109:6,11  
 20100302 (2) 29:2,24  
 20100305 (1) 28:13  
 2011 (9) 39:19 40:7  
 42:5,9 76:22 96:19  
 99:9,17,20  
 2012 (5) 39:15,16,18  
 98:17 99:20  
 2013 (5) 76:25 98:4,14  
 99:21 100:24  
 2014 (1) 99:22  
 2015 (11) 44:18 71:7  
 73:3,5,9 99:22  
 100:1,22 101:1,4,4  
 2016 (2) 66:18 99:24  
 2017 (1) 67:10  
 2019 (5) 1:1 42:15  
 71:15 104:20 146:24  
 202 (1) 89:8  
 20446 (1) 37:14  
 205 (1) 92:14  
 2080 (1) 12:15  
 20k (2) 77:17 83:5  
 20th (1) 57:7  
 21 (5) 1:1 55:3,4 66:19  
 80:9  
 211205 (1) 2:11  
 215 (5) 91:7  
 92:6,10,12,13  
 218 (1) 92:17  
 21847 (2) 14:10 18:3  
 21918 (1) 17:7  
 21st (3) 57:7 80:11,23  
 22 (8) 3:1 14:8 25:25  
 56:9 68:7 71:7 95:23  
 104:11  
 22122015 (1) 71:18  
 22290 (1) 52:25  
 23 (1) 64:1  
 24 (9) 50:4 88:10

126:12 132:1,21  
 137:12 140:5,11  
 141:13  
 2490 (1) 59:9  
 24hour (1) 134:19  
 25 (10) 54:11 57:11  
 88:8 126:12,21  
 132:2,3 137:14,16  
 140:11  
 2503 (1) 106:19  
 26 (1) 113:24  
 26361 (1) 112:6  
 26th (3) 10:11 137:10  
 140:21  
 27 (3) 18:25 71:15  
 103:7  
 27th (1) 141:15  
 28 (1) 66:18  
 28th (1) 57:7  
 29 (2) 75:25 77:9  
 2d (1) 72:12  
 2nd (3) 75:3 105:4  
 142:15

---

3

---

3 (32) 4:5,5 23:4 24:17  
 45:13,19 54:6,7,9,19  
 55:17,20,24 56:8  
 60:15,21 63:24 64:8  
 67:11 68:5 79:14  
 80:14 83:1 96:19  
 103:18,19 109:9 124:6  
 133:13 137:15 140:5  
 146:24  
 30 (1) 40:7  
 300 (1) 115:7  
 314 (1) 129:14  
 314642 (4) 33:3  
 109:15,19 112:6  
 338q (1) 51:10  
 34 (1) 84:7  
 340 (2) 129:4,13  
 344 (1) 129:16  
 348969 (1) 54:11  
 3500 (1) 59:22  
 36 (3) 74:12,17 80:3  
 36hour (1) 134:19  
 37842 (1) 15:18  
 39 (3) 75:25 87:22 88:1  
 3rd (7) 40:11 64:18  
 75:3 142:16,23 143:18  
 146:19

---

4

---

4 (10) 39:22  
 55:17,20,24 56:4  
 59:18 60:19 77:10  
 106:14 140:5  
 40 (3) 57:1 75:25 77:16  
 4000 (5) 22:22 24:16  
 25:8 108:16,21  
 4000pds (1) 22:23  
 407 (1) 146:22  
 41 (2) 75:25 84:7  
 42 (1) 83:19  
 43 (1) 86:23  
 4322 (1) 12:16  
 45 (1) 83:25  
 4540 (1) 55:15  
 46 (1) 95:3  
 47 (1) 98:2  
 48 (1) 95:18

481 (1) 96:1  
 482 (1) 96:16  
 484 (6) 7:12,25 10:21  
 11:11 118:20,21  
 4851 (1) 18:10  
 48hour (1) 134:20  
 4th (1) 80:20

---

5

---

5 (8) 11:6 60:24 61:4  
 62:18 106:17 107:21  
 140:5 143:1  
 50 (1) 96:11  
 5129 (1) 11:10  
 514 (1) 55:14  
 5163 (2) 87:2,3  
 54 (1) 95:18  
 55 (1) 98:22  
 57 (2) 87:8 98:22  
 58 (1) 98:22  
 588 (2) 22:18 23:21  
 591 (1) 113:19

---

6

---

6 (5) 62:19 87:11  
 126:1,8 140:5  
 60 (10) 83:19  
 84:9,13,14,17,21,23  
 85:12,15 86:2  
 60813 (1) 56:4  
 61 (1) 98:22  
 614 (1) 106:15  
 62 (2) 83:23 84:24  
 64 (2) 84:6,9  
 641446 (1) 57:11  
 65 (1) 99:8  
 6month (1) 104:12

---

7

---

7 (12) 22:9 46:7 58:16  
 59:3,9,12 76:22  
 86:5,8,9 99:7 140:5  
 720 (1) 105:18  
 777 (1) 86:6  
 781 (1) 67:12

---

8

---

8 (3) 46:10 99:19 106:8  
 8000 (1) 108:17  
 82 (1) 42:17  
 83 (2) 46:16,20  
 85133 (1) 23:5  
 863 (1) 43:22  
 87 (1) 43:22  
 877 (1) 44:3

---

9

---

9 (3) 25:24 34:10 42:9  
 98996 (1) 15:19  
 9am (1) 19:8