



# Telephone attendance

Client: Royal Mail Group PLC Sub Postmaster Litigation

Matter: Mr Lee Castleton

Matter no: 348035.134

Attending: Mandy Talbot; Tony Utting - Post Office, Ian Herbert of Hugh James Solicitors (Solicitor on Bajaj and Bilkhu cases), Tom Beezer - Partner - Bond Pearce LLP, Stephen Dilley - Solicitor - Bond Pearce LLP

Name: Stephen Dilley

Location: N/A

Date: 7 April 2006

Start time:

Units:

This was a telephone conference to explore how we could obtain more meaningful IT information from Fujitsu.

Before the Post Office joined the call, Stephen Dilley and Tom Beezer had a telephone conversation with Ian Herbert. Agreeing that the PO had had difficulty obtaining information from Fujitsu and that the strategy should be to identify key individuals at Fujitsu who could provide the relevant information we require in terms of evidence and then for Stephen Dilley of Bond Pearce LLP and Ian Herbert at Hugh James to make an appointment to visit those individuals at Fujitsu to take Proofs of Evidence. Each solicitor could prepare Witness Statements for their respective cases for Fujitsu to sign, thereby making it easy for them.

The PO joined the telephone conversation and Tom Beezer outlined our proposal to Mandy Talbot. Mandy broadly agreed with it. Mandy explained that Graham Ward of the PO was authorised to take a Statement on the Castleton case. The first draft prepared by Fujitsu was appalling. Mandy agreed that the respective solicitors should visit Fujitsu.

Tom Beezer explained that if Fujitsu were not going to put forward an expert, we would need to take Fujitsu through questions we have for them. The information we get from Fujitsu will not be an independent expert report and we could not pay them for it, because we cannot pay for evidence. We will need to obtain a separate independent expert report as well, but this will be easier if we have Fujitsu's evidence first because then we will be able to focus the independent expert's report (which the PO will need to pay for) on relevant issues.

Many explained that Slaughter and May were advising the PO in relation to ongoing negotiations with Fujitsu to renew the service they provide for the PO. The fact that Fujitsu had not been able to assist the PO on this particular point will feature in those negotiations.

Many said that Graham Ward should also attend the meeting between Fujitsu and the solicitors.

**Action Point: Graham to identify a person in Fujitsu to interview.**

Mandy explained that Fujitsu were based in Feltham and Cheadle. The solicitors were to check with Graham where the Fujitsu witnesses are based.

**Action Point: Mandy Talbot will give to us Graham Ward's contact details.**

Mandy also explained that Tony Utting had prepared his statement about how Fujitsu operated that was used for criminal prosecutions and that it contained a general narrative about Fujitsu, but had specific points that were adapted to each relevant case. Mandy said

that she had sent us the transaction logs and that the PO needs to draw down on these in more detail and get a Statement from the two helplines. She said that we needed Witness Statements from both helplines. The NBSC is the General Post Office helpline and the HSH is the Fujitsu Horizon helpline. Stephen Dilley confirming that Andrew Wise at NBSC and Julie Welsh at HSH are the people that we need to interview.

Mandy pointed out that PO hadn't pleaded that even if there was something wrong with the system, it was open to the Sub-Postmaster to allege training errors. This was pertinent to the Bilku case because some of the transactional logs seemed to contain elemental