

Bond Pearce

Telephone attendance

Client: Royal Mail Group PLC Sub Postmaster Litigation

Matter: Mr Lee Castleton

Matter no: 348035.134

Attending:

Name: Stephen Dilley

Location: N/A

Date: 16 October 2006

Start time:

Units:

I had a telephone conversation with Mandy Talbot, just for a catch-up.

Discussing the following points:-

1. Mandy said that she noted that I had had problems getting from the Post Office copies of the opening Audit. Telling her that that was correct and that the reason we wanted it was to compare the handover position with the closing position to try to get Horizon out of the picture. Apparently what happens is that stock and cash is logged out from one sub-postmaster and logged in to the new sub-postmaster so it should show on the first week's cash account i.e. what stock and cash was handed over. I had therefore asked Mr Castleton's solicitors to disclose weeks 1-39 of the cash accounts since we do not have them. As a back-up though, that information should be available from the Horizon logs going back to the time he became a sub-postmaster and Graham Ward was getting those for me. I need to chase Graham.
2. Up-dating Mandy that I had about eight Witness Statements signed so far and anticipated receiving another four by the end of the week, with three to follow with hopefully minor amendments.
3. Counsel was much happier with the case now that we had all these Witness Statements and in fact thought that they were thorough and we didn't really need expert evidence at the moment, because the Statements prove the case by themselves, unless that is that Mr Castleton's solicitors serve late experts' reports from either IT or Accountancy that we need to deal with. Counsel therefore wants to play some brinkmanship with the other side i.e. push for a December Trial, but preserving our ability to get that adjourned if they serve a late report that we need to deal with. I said that we could prepare for a December Trial if necessary and I was happy to do so, but I was concerned to make sure that we could reply to any expert reports served by Castleton. I also thought that our Counsel was effectively trying to ambush the other side because he thinks that when we serve these fifteen Witness Statements on them, they will be knocked reeling a bit. Mandy appreciates the tactics of this. She said that the only thing was with a December Trial is that the Post Office get very busy before Christmas generally. She will speak to her colleagues and come back to me on Counsel's tactical ideas.
4. Finally, mentioning to her that Counsel had just billed £17,925.00 for several months' work that works out about £8,000 per month. She acknowledged that she thought the costs were going to be high and so the Post Office were prepared for this and she said that presumably that included going over the evidence and two conferences and I said that it did. She therefore wasn't surprised by this.

Mandy will come back to me tomorrow on the tactical ideas of the brinkmanship.
re engaged including attendance note – 24 mins.