POL00069672

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: 22 November 2006

Start time: | Units:

SJD3 having a few telephone conversations with Mandy Talbot during the day. In the first agreeing with her to fax to her the draft List of Documents because her e-mail wasn't working.

In the second conversation, discussing the Re-Amended Reply with her. She thought that paragraph 4 was confusing and she wondered whether it meant what we wanted it to mean? I said that it was not a format of wording which I would necessarily have included in a letter, but in a pleading it was okay for it to be in legalese. She said that she didn't have any other comments on the Reply. She noted what I said in relation to the mitigation point that I had raised earlier and she agreed that we wouldn't include it for presentational reasons.

I also updated her on my conversation with Castleton, explaining that I thought he was going to seek an adjournment and that we would oppose it, and that we would also apply for a Debarring Order in relation to his Amended Defence and also witness statement evidence. Mandy agreed with this approach.

Explaining to her of course that there could be adverse publicity if he tries to say that we railroaded him into a trial, but Mandy thinking that we could justify this by saying that he had made serious allegations about our system and that we wanted to go to trial to avoid incurring even more substantial costs.

Engaged: 12 minutes