

IN THE HIGH COURT OF JUSTICE

Claim No. HQ17X012637

QUEEN'S BENCH DIVISION

THE POST OFFICE GROUP LITIGATION

BETWEEN:

ALAN BATES & OTHERS

Claimants

- and -

POST OFFICE LIMITED

Defendant

AMENDED SCHEDULE OF INFORMATION

1.	Claimant & Branch Details	
1.1.	Name	Lisa Margaret Brennan
1.2.	Home address	<div style="border: 1px dashed black; padding: 10px; text-align: center;"> <p>GRO</p> </div>
1.3.	Branch address	Huyton Post Office 3 The Forum Centre, 18 Huyton Hey Road, Liverpool, Merseyside, L36 5RT (FAD code.: unknown)
1.4.	Subpostmaster (Yes / No, if No give details, e.g. Crown Office Employee, guarantor of Franchisee)	Crown Office Employee
1.5.	Date and form of any contract entered	Pending access to any contractual

	into with Post Office	documents and records that Post Office may hold, my recollections are as follows: I cannot recall ever signing a contract in relation to my service with Post Office.
1.6.	Start date of appointment/engagement	I was employed as a Crown Office Employee on 18 September 1989 and worked in various branches as a counter clerk. In June 1995 I was employed by Huyton Post Office.
1.7.	End date of appointment/engagement	June 2002
1.8.	Currently employed / engaged? (Yes/No)	Yes.
1.9.	Lived in linked residential premises? (Yes/No)	No.
1.10.	Employed assistants? (Yes/No, and if yes identify number as at date of termination of appointment)	Not applicable.
1.11.	Operated a retail business from same premises (Yes/No)	Not applicable.
2.	Training and Support	
2.1.	Received initial training from Defendant re: Horizon when introduced in 1999/2000 (Yes/No)	Pending access to any training records that Post Office may hold, my recollections are as follows: I do not recall receiving any training on Horizon.
2.2.	Received initial training from Defendant re: Horizon when took up position? (Yes/No, and if yes give date and brief details of any training said to have been inadequate or inappropriate)	Not applicable.
2.3.	Received any further training from Defendant re: Horizon? (Yes/No, and if yes give date and brief details of any training said to have been inadequate or	Pending access to any training records that Post Office may hold, my recollections are as follows: No. I did not receive any training in relation to

	inappropriate)	Horizon.
2.4.	Contacted Helpline to seek advice re: Horizon and/or alleged shortfalls? (Yes/No, and if yes give approximate date and brief details of any advice and responses said to have been inadequate or inappropriate)	<p>Pending access to any Helpline call logs that Post Office may hold, my recollections are as follows:</p> <p>No. The branch manager called the Helpline. I did not contact the Helpline as I was a Crown Office Employee.</p>
3.	Apparent or Alleged Shortfalls	
3.1.	<p>For each apparent or alleged shortfall attributed by the Defendant to the Claimant and in relation to which complaint is made, specify:</p> <p>(a) Amount(s): (b) Date(s): (c) Paid by the Claimant to the Defendant? (Yes/No, and dates of payment). (d) How did the Claimant treat the above amounts in the accounts and why?</p>	I did not make any payments to Post Office for apparent or alleged shortfalls.
4.	Audit and Investigation	
4.1.	Did the Defendant conduct one or more audits of the branch prior to termination? (Yes/No, and if yes give date and brief details)	<p>I can clearly remember the audits taking place, however, in relation to specific dates, I will require access to Post Office's audit records. In the meantime, I can give approximate details as follows:</p> <p>Yes. Audits did take place at the branch, however, I was a counter clerk and therefore, I was not involved in the audits and/or told the outcome of those audits.</p> <p>However, in June 2002, the auditors arrived at the branch. A shortfall was found on my counter as some of the dockets were apparently wrong. I recall that the auditors name was Steve. He took me to one side and questioned me about this. I explained that on some occasions there were mistakes with dockets but that my manager had told me that it was fine. Steve then told me that I was suspended pending further</p>

		investigation by Post Office.
4.2.	Was there an investigation carried out by the Defendant relating to alleged shortfalls? (Yes/No, and if yes give date and brief details of any investigation(s) in relation to which the Claimant raises a complaint)	No. I have seen no evidence of any adequate investigation.
5.	Suspension and Termination	
5.1.	Was the Claimant suspended for a reason related to alleged shortfalls? (Yes/No, and if yes give date and brief details of any suspensions in relation which the Claimant raises a complaint)	I was suspended in June 2002 for alleged theft. I was accused of stealing approximately £3,500 over a period of 6-12 months.
5.2.	If the Claimant was suspended: (a) Was the branch closed by the Defendant? (Yes/No, and if yes give date) (b) Was a temporary Subpostmaster appointed by the Defendant? (Yes/No, and if yes give date) (c) Was the Claimant prevented from accessing records within the branch? (Yes/No, and if yes give date and brief details)	(a) No. (b) No. (c) I was employed as a counter clerk and therefore I had no access to branch records.
5.3.	How did the Claimant's appointment end? (Terminated by Defendant / Resigned)	My contract was terminated by Post Office in August 2002.
5.4.	If the Claimant's appointment was terminated by Defendant, was this for a reason related to alleged shortfalls? (Yes/No) Was that reason stated by Post Office? (Yes/No)	I believe that my contract was terminated because of the allegations of theft.
5.5.	Did the Defendant give notice? (Yes/No, and if yes, state period of notice)	No.

5.6.	If the Claimant resigned, was this under pressure from Defendant for a reason related to alleged shortfalls (Yes/No, and if yes give date and brief details)?	Not applicable.
5.7.	Did the Defendant prevent or impede sale or transfer of the Claimant's business? (Yes/No, and if yes give date and brief details)	Not applicable.
6.	Civil and Criminal Proceedings	
6.1.	Did the Defendant pursue recovery of any alleged shortfalls by civil proceedings? (Yes/No, and if yes give date and brief details)	No.
6.2.	If yes, what was the outcome of the proceedings? (Settled, Judgment for Claimant, Judgment for Defendant, currently stayed) Please give date and brief details.	Not applicable.
6.3.	Did the Defendant pursue any criminal proceedings against the Claimant? (Yes/No)	Yes.
6.4.	If yes, specify (with dates): (a) charges (Theft, False Accounting, and any other charges); (b) outcome (guilty after contested trial, acquitted after contested trial, guilty plea, not pursued).	Pending access to any records that Post Office may hold, my recollections are as follows: (a) I was charged with 32 counts of theft. (b) I was acquitted of 5 of the counts but convicted in respect of 27 at the Crown Court in Liverpool in September 2003.
6.5.	Has any conviction been referred to the Criminal Case Review Commission or is the subject of any appeal? (Yes/No)	No.
7.	Nature of claims pursued	

<i>In this section, indicate whether the Claimant relies on generic Particulars of Claim in respect of the types of claim identified (in each case, Yes/No).</i>		
7.1.	Contract, tort & fiduciary duty	
(i)	Training	Yes.
(ii)	Support	Yes.
(iii)	Availability of transactional information	Yes.
(iv)	Execution / reconciling transactions	Yes.
(v)	Inappropriate attribution of alleged shortfalls	Yes.
(vi)	Demands for payment	Yes
(vii)	Investigation	Yes.
(viii)	Suspension	Yes.
(ix)	Termination	Yes.
(x)	Pressure to resign	No.
(xi)	Impeding sale / transfer	No.
(xii)	Concealment	Yes
(xiii)	Breaches of overarching duties	Yes.
7.2.	Harassment	Yes.
7.3.	Deceit	Yes
7.4.	Malicious Prosecution	Yes.

7.5.	Unjust Enrichment	Yes
8.	Nature of claims for loss	
8.1.	Repayment of alleged shortfalls (Yes/No and amount)	No.
8.2.	Loss of investment (Yes/No, and approximate value, subject to expert evidence)	Not applicable.
8.3.	Loss of earnings during suspension (approximate value and brief details)	I was suspended with pay.
8.4.	Loss of earnings for failure to give notice (approximate value)	When my contract was terminated, Post Office did give me any notice. £3,000
8.5.	Loss of earnings post termination (period claimed and approximate value) [If not already dealt with at 8.2 above]	<p>If it were not for the events that occurred, my future plans in my role were:</p> <p>To continue to work in my role as a Crown Office Employee until retirement <u>in approximately 32 years</u>. I had been in my role since 1989. I knew the job well, I enjoyed it and I had a good pension. <u>During this time, I would have earned approximately £384,000.</u></p> <p>I struggled to find employment for around 4-5 years because of my criminal conviction. <u>In 2006, my cousin established a florist and I worked with her for 16 hours per week. I was paid minimum wage. I returned to college to undertake a teacher training course. However, at the end of my course, I could not find employment in a school because of my conviction.</u></p> <p><u>From 2007 to 2015 I worked in retail. I earned minimum wage for around 8 years until 2015 when I was promoted to a managerial position. I earned approximately £20,000. I have recently taken a pay cut to £15,000 to work in an office environment which I never</u></p>

		<u>thought I would be able to do again as a consequence of my criminal conviction.</u>
8.6.	Stigma and/or reputational damage (Yes/No and brief details)	Yes. The local media reported the story. I was branded a thief and talked about in my local area where I lived with my family. Eventually my marriage broke down and I lost my home.
8.7.	Personal Injury (Yes/No and brief details, subject to expert evidence)	Yes. I suffered from severe depression and was prescribed medication. I also attempted to commit suicide.
8.8.	Losses related to bankruptcy/other insolvency procedures (Yes/No and brief details)	Yes. The costs of the bankruptcy. I also lost my house.
8.9.	Losses related to prosecution (Yes/No and brief details)	I received legal aid.
8.10.	Any other loss not covered above (identify category and provide, brief details and amount).	Any further losses found to have been suffered following disclosure and expert quantum evidence.

The information provided in this Schedule is true to the best of the Claimant's knowledge and belief on the basis of the information presently available to the Claimant. However, the information is provided prior to disclosure by the Defendant, prior to any expert evidence, and figures provided in relation to loss are approximations only.

I believe that the facts stated in this Schedule are true.

Signed: ... 

Lisa Margaret Brennan

Date: 07.12.2017

Freeths Reference: CBS/2131239/1