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**From:** Stephen Dilley  
**Sent:** 13 April 2006 16:44  
**To:** 'grahamc.ward' [GRO]  
**Cc:** 'ian.herbert' [GRO] 'mandy.talbot' [GRO] Tom Beezer;  
tony.rutting [GRO]  
**Subject:** Post Office Limited -v- Mr L Castleton  
**Attachments:** eCopy scanned document.pdf

Dear Mr Ward,

As you know, we act on behalf of the Post Office in relation to the above matter. In summary, the dispute is as follows:

**(1) The dispute**

Lee Castleton was a Sub-Postmaster at the Marine Drive branch 18 July 2003 to 23 March 2004. His Contract for services states that he is strictly responsible for the safe custody of cash and stock, obliged to make good all losses caused through his own negligence, carelessness or error and losses of any kind caused by his assistants and that his responsibility does not cease when he relinquished his appointment and that he remains obliged to make good any losses incurred during his term of office which subsequently came to light.

Between 18 July 2003 and 25 March 2004, net losses of £27,115.83 occurred at the Marine Drive branch. Castleton's case is that any shortfall is entirely the fault of problems with the Horizon computer and accounting system at Marine Drive branch and that the P.O wrongfully terminated his Contract in respect of which he has suffered loss not exceeding £250,000.

**(2) Witness Statements and Fujitsu**

We have to serve Witness Statements by no later than 14 July 2006. I understand that you have been having a frustrating time trying to get anything meaningful from Fujitsu. We have an email from Andrew Price at NBSC to Cath Oglesby (P.O.) stating that **Andrew Wise** at NBSC had been unable to find any errors with the system. We also have an email from **Julie Welsh** Service Delivery Manager, HSH which stated that there was no evidence of any system problems. (Copies of these documents are attached). To make life easy for Fujitsu, I would like to arrange a date to visit Julie Welsh and Andrew Wise to take Proofs of Evidence from them. I will then draft their Witness Statements based upon the evidence they give to me.

I understand that Andrew Wise is a Human Resources Training Manager based at Capston House, 35 Broadway, Manchester, M5 6YY. Tel: [GRO] Andrew.wise [GRO]

Julie Welsh is based at Fujitsu Services, Lovelace Road, Bracknell, Berkshire, RG12 8SM. Telephone number: [GRO]  
Mobile Number: [GRO] or email julie.welsh [GRO]

I propose to contact Andrew Wise and Julie Welsh directly to arrange dates to visit them and take proofs of evidence. Ideally the meetings would take place between around 22 May and 9 June. It may also be helpful for you to attend. Are you available around that time? I am also copying in Ian Herbert of Hugh James to this email. Ian is dealing with two similar claims that may be brought against the Post Office by other Sub-Postmasters (by Bajaj and Bilku) in relation to Horizon issues. Ian will probably also attend. (Ian, please also let me have your availability).

13/04/2006

Secondly, is there a "techy" person that you can identify at Fujitsu, that will have an intimate knowledge of the Horizon System and be able to explain how it works and capability etc, who I could also interview at the same time as Julie Welsh?

I look forward to hearing from you as soon as possible.

Kind regards.

Stephen Dilley

Solicitor

for and on behalf of Bond Pearce LLP

DDI:

Main office phone:

Fax:

[www.bondpearce.com](http://www.bondpearce.com)