

Stephen Dilley

From: andrew.wise [GRO]
Sent: 06 June 2006 14:52
To: Stephen Dilley
Cc: graham.c.ward [GRO]
Subject: RE: FW: Post Office Limited -v- Mr L Castleton

Hi,

Just to let you know I have booked room 204 for our meeting next Wednesday.
When you arrive at capstan House please book in at reception and ask for myself and you will be directed to my workspace.

Also please note that there is no visitor car parking at Capstan House, the nearest NPC is at the lowry shopping centre - this is about a 10 Min walk from Capstan House.

Here are the directions to capstan House.

Directions by Rail

If arriving at any mainline station in Manchester city centre, a direct Metrolink tram operates from Manchester Piccadilly & Piccadilly Gardens.
Simply board an Eccles bound tram and get off at "The Anchorage" cross to the opposite platform towards the Barclay's Bank. Capstan House is the large building across the road with the clock tower on it. The entrance is reached by following the tree line road to the right of the building, and entering via the first gate on the left-hand side. Capstan House is the centre building.

Directions by road

From the South (M6) Leave the M6 at junction 21a (signposted for Manchester). Follow M62 to junction 12. Continue on M602 (signposted Salford/Manchester City Centre).
From the North (M6) Leave the M6 at junction 30 (signposted Bolton/Manchester). Follow M61 to junction 1. Continue on M60 at junction 12. Continue on M602 (signposted Salford).

From the West (M62) Follow M62 to junction 12. Continue on M602 (signposted Salford/Manchester City Centre).

From the East (M62) Follow M62 to junction 18. Continue on M60 (signposted Liverpool/Bolton/Preston/Stockport). Leave M60 at junction 12. Continue on M602 (signposted Salford).

From the East (M602) Leave M602 at junction 3 (signposted A5063 Salford/Trafford Park). Take the third exit off the roundabout (signposted

A5063 Trafford Park/Salford Quays-Trafford Road).

Once on Trafford Road at the first set of traffic lights, turn right into Broadway. Down the hill to the roundabout with flags, you will see a building in front of you with a clock. This is Capstan House. Go left at this roundabout and follow this road until you come to the NCP Car Park at the Lowry Centre. Walk back to Capstan House the same way you have driven to park

Regards
Andrew Wise

Training Manager
Post Office Ltd
Human Resources
Capstan house, Chanders point, 35 Broadway, Salford Quays, Salford, M50 2PB

Tel [GRO]
Mobile [GRO]
Mobex [GRO]

"Stephen Dilley"
[GRO]
<Mared.Hughes [GRO]>, "Adrian Bratt" < [GRO]>
05/05/2006 15:54
To: <andrew.wise [GRO]>
cc: <graham.c.ward [GRO]>, "Mared Hughes"
Subject: RE: FW: Post Office Limited -v- Mr L Castleton

Dear Andrew,

Thanks for your email.

Shall we meet at your office at say 1pm on Wednesday 14 June 2006?

I look forward to hearing from you.

Kind regards.

Stephen Dilley
Solicitor
for and on behalf of Bond Pearce LLP

DDI: [GRO]
Main office phone: [GRO]
Fax: [GRO]
www.bondpearce.com

Please note that on Monday 8 May our telephone and fax numbers are changing to:

Firmwide number: [GRO]
My direct line: [GRO]
Plymouth office fax: [GRO]

-----Original Message-----

From: andrew.wise [GRO]
Sent: 26 April 2006 15:02
To: Stephen Dilley
Cc: graham.c.ward@postoffice.co.uk
Subject: Re: FW: Post Office Limited -v- Mr L Castleton

Hi Stephen,

I am free for the most part of June, the only dates I can not make are the 13th and 20th June.

Also I am free between the 20th October and 8th December.

Regards
Andrew Wise

Training Manager
Post Office Ltd
Human Resources
Capstan house, Chandlers point, 35 Broadway, Salford Quays, Salford, M50 2PB

Te: [GRO]
Mobile: [GRO]
Mobex: [GRO]

"Stephen Dilley"

<Stephen.Dilley [GRO]> To:
<Andrew.wise [GRO]>
pearce.com> cc:
<graham.c.ward [GRO]>, <andrew.price [GRO]>
<mandy.talbot [GRO]>

26/04/2006 13:49
Limited -v- Mr L Castleton

Subject: FW: Post Office

Dear Mr Wise,

I refer to my email of 21 April (see below) and would be grateful if you could confirm your availability for a meeting in early June and also give me your dates between 20 October and 8 December 2006 when you would be unavailable to give evidence.

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: [GRO]
Main office phone: [GRO]
Fax: [GRO]
www.bondpearce.com

Please note that on Monday 8 May our telephone and fax numbers are changing to:

Firmwide number: [GRO]
My direct line: [GRO]
Plymouth office fax: [GRO]

From: Stephen Dilley
Sent: 21 April 2006 11:58
To: 'Andrew.wise' [GRO]
Cc: 'graham.c.ward' [GRO]
Subject: Post Office Limited -v- Mr L Castleton

Dear Mr Wise,

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 Drivebranch 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 Drivebranch and that the P.O wrongfully terminated his Contract in respect of which he has suffered loss not exceeding £250,000.

(2) Mr Castleton's specific assertions about the computer system

Mr Castleton states that he encountered the following problems with the Horizon system: (a) the 2 computer terminals did not communicate with each other properly;

- (b) 1 or other of both terminals tended to freeze, i.e failed to lock up in respond to commands, requiring a re-boot;
- (c) display of 1 or other of both terminals would go blank before returning to the sale screen;
- (d) electronic swipe card of one or other of both terminals, used to read a customer's payment card, failed to read the card properly;
- (e) the Horizon system "rolled over" cash figures, giving an OHCH figure that was 4 to 5 times as big as the actual cash declaration for the day;
- (f) the Horizon system would "lose" ie failed to record transactions.

Mr Castleton maintains that if the Horizon system missed a transactional piece of information, that would alter the balance recorded on it. For example, if Horizon failed to record a payment out, there will be less actual cash at the branch than the amount of cash recorded on the system. Furthermore, if a cheque paid in is inputted into the Horizon system and the system sends that data off site, but loses the information locally, when Castleton prints a cheque report to be sent with a bundle of cheques to be sent away, the report will not correspond to the number of cheques present.

(3) Meeting with you in early June 2006

We have to serve Witness Statements by no later than 14 July 2006. We have an email from Andrew Price at NBSC to Cath Oglesby (P.O.) stating that you have 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). I would like to arrange to meet and interview you at Capston House in June to understand what involvement you had at the time and what you make of Mr Castleton's assertions. Based on our discussions, I will then prepare a short Witness Statement for you to approve and sign.

Graham Ward of the P.O and Mared Hughes of Hugh James solicitors (who are dealing with similar Horizon disputes for the P.O) would also like to attend. Our collective dates to avoid in June are currently 1, 8, 9. Please could you confirm your availability?

(4) Trial

If this claim does not settle, it will go to trial between 20 October and 8 December 2006. We are shortly going to fix an actual date for that trial. Please can you email me any dates within that period when you would be unavailable to give evidence, for example because you are out of the country on holiday.

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: [REDACTED] GRO

Main office phone: [REDACTED] GRO

Fax: [REDACTED] GRO

www.bondpearce.com

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