



Andrew Wise

08/09/2006 09:36

To: "Stephen Dilley" <Stephen.Dilley@GRO>  
 cc: andrew.wise@GRO, carol.king@GRO, cheryl.woodward@GRO, mandy.talbot@GRO, rmorgan@GRO, "Tom Beezer" <Tom.Beezer@GRO>  
 Subject: RE: Second draft witness statement of Andrew Wise: P.O -v- Castleton

Hi Stephen,

I am happy with the amendments to para 22.

I have attached a copy of the page from our access database that shows the training details for Marine Drive and their transfer.



Office Transfer Marine Dric

Regards  
 Andrew Wise

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

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M  
M

GRO

"Stephen Dilley" &lt;Stephen.Dilley@GRO&gt;



"Stephen Dilley"

GRO

07/09/2006 19:22

To: <andrew.wise@GRO>, <rmorgan@GRO>  
 cc: <carol.king@GRO>, <cheryl.woodward@GRO>, <mandy.talbot@GRO>, "Tom Beezer" <Tom.Beezer@GRO>  
 Subject: RE: Second draft witness statement of Andrew Wise: P.O -v- Castleton

Dear Andrew,

Thanks for your email of 6 September.

I have made some further amendments in the light of your helpful comments (new version attached). Are you happy in principle with the amended statement? At para 22, page 6 you say you have a record of Castleton being offered 4 days training from 14 to 17 July and also that he had an on site trainer from 18 to 25 July. Please can you forward me a copy?

Richard:

1. The main helpful amendment is para 28 page 7 which now describes the remming in procedure in much more detail than we've had before.



2. At para 23, page 6 we refer to the Horizon user Guide and Horizon Operations Manual. These are very lengthy documents. Do you think we should exhibit them to Andrew's statement?

Kind regards.

Stephen Dilley

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

From: andrew.wise@GRO

Sent: 06 September 2006 15:12

To: Stephen Dilley

Cc: andrew.wise@GRO carol.king@GRO

cheryl.woodward@GRO mandy.talbot@GRO

rmorgan@GRO; Tom Beezer

Subject: Re: Second draft witness statement of Andrew Wise: P.O -v- Castleton

Hi Stephen,

I have been through the statement again and answered your questions in there, attached is the new version. I have answered your question below underneath your question in red type.

(See attached file: STATEMENT Andrew Wise\_1207758.DOC)

Regards  
Andrew Wise

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

Tel: GRO  
Mob:  
Mob:

"Stephen Dilley"

<andrew.wise@GRO> GRO To:

<rmorgan@GRO> GRO cc:

<Tom.Beezer@GRO> "Tom Beezer"

<mandy.talbot@GRO>, <cheryl.woodward@GRO>

05/09/2006 12:24  
<carol.king@GRO>

Subject: Second draft  
witness statement of Andrew Wise: P.O -v- Castleton

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Dear Andrew,

Thanks for your email of 23 August.

1. I attach a second draft of your statement, taking into account the comments you made on the first draft. I have included some more questions in bold italics. Please could you read the entire document carefully and amend it until you are 100% happy with it then email the amended version back to me.
2. Please could you contact personnel in Manchester and find out whether they have any record of Mr Castleton or anyone else at the Marine Drive branch (Fad code 2133377) being on holiday for the week ended 5 February 2005 (cash account week 45). The reason I ask is that the branch did not make a loss that week, whereas the weeks either side of it the branch made large losses. I have spoken to the HR teams in Salford and there are no records to say that Mr Castleton (or anyone at Marine Drive) requested leave on the 5th Feb 2004 (you put 4th feb 2005 in your question, i assumed you meant 2004 but I had them check both years just in case and nothing was showing). This does not mean he did not have leave just that he never let the HR team know. Not sure if you have done this or not but you could check the cash account for that week and see who has signed it on the front. If Mr castleton was away there should be someone else's signature on there.

I look forward to hearing from you as soon as possible and also to our meeting on Monday with Counsel.

Kind regards.

Stephen Dilley  
Solicitor  
for and on behalf of Bond Pearce LLP  
DDI: **GRO**  
Main:  
Fax:  
www.bondpearce.com

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

From: andrew.wise@ **GRO**

Sent: 23 August 2006 13:42

To: Stephen Dilley

Cc: andrew.wise@ **GRO**; cheryl.woodward@ **GRO**

mandy.talbot@ **GRO**; rmorgan@ **GRO**; Tom Beezer

Subject: Re: First draft witness statement of Andrew Wise: P.O -v- Castleton

Hi Stephen,

Please see answers to the questions you have asked below in red under each question.

I have been through the statement and amended a couple of small things, the main thing I altered was paragraph 20. This did not accurately reflect at what point the email came from Cath Oglesby and when the investigation was carried out by Sarah and myself.

Attached is a new copy of the statement with my alterations. Also I have answered all of your questions that were in Bold Italics, I have answered these in red after each question.



(See attached file: STATEMENT V1\_1198369.DOC)

If you require anything please let me know

Regards  
Andrew Wise

Training Manager  
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Tel  
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Mob

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"Stephen Dilley"

<Stephen.Dilley@GRO> To:  
<andrew.wise@GRO>  
GRO  
GRO  
CC: "Tom Beezer"  
<Tom.Beezer@GRO> <rmorgan@GRO>  
<mandy.talbot@GRO> <cheryl.woodward@GRO>

22/08/2006 12:35 Subject: First draft  
witness statement of Andrew Wise: P.O -v- Castleton

Dear Andrew,

Following our meeting on 14 June, I attach a (very) first draft of your witness statement and exhibit. There are various questions for you in bold italics within the statement and I'd be grateful if you could answer them so that I can amend the statement accordingly. There are a few additional points:

1. Please do feel free to put it into your own words more. We need to explain simply how the processes and systems work to a judge who will be unfamiliar with it.

2. Are you content to give an overview of the calls made to NBSC (paragraphs 25 to 112)? If not, please can you identify someone else at NBSC who is and then we can ask them to give that part of the evidence. I would be content to give an overview of these calls. Please note that I probably dealt with very few of these calls (if any at all) and the questions I have answered in the statement regarding the calls are a lot of the time based on my interpretation (from experience) of what is written in the call logs. Having not taken these calls myself, a lot of the time I can only assume what the call is about and use my best judgement.

3. Some of the NBSC call logs we have don't have a call reference. Would you be able to locate the call references and insert these? I would not be able to obtain these numbers. I think you may have to





approach Dave Hulbert for this information.

4. When going through this draft, please can you amend as appropriate to describe the systems that were in place at the material time (December 2003 to March 2004) if they were different to what is in place today. I have made a note in the statement for you explaining that the weekly balancing hand out I gave you is the procedure that is used now. Branch Trading and Trading statements were not introduced until Sept 05. The process on this handout was the same in Feb 03 apart from a few changes where it mentions balancing monthly and trading statements. I have amended these in the statement.

5. When the subpmr has to balance, does he check that the daily and weekly figures match each other? They do not have to check this but it is a practice that some SPMR will do. If everything is checked correct on a daily basis then there is no one to repeat this.

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:

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**GRO**

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1 - [REPORT FOR OFFICE TRANSFERS]

FILE EDIT INSERT RECORDS WINDOW HELP

**OFFICE TRANSFERS** CANCELLED MONTH QUERY CANCELLED GO TO OFFICE CTO A B PSA  
TO DATABASE TO MONTH MONTH FOR SIA TRAINER OFFICE ADDRESS C D

CLASSROOM MONTH: JUL 03 OFFICE: MARINE DRIVE GED GED CTO SITE ADHOC

OUTLET SUPPORT TEAM: TC4 BRANCH CODE: 213337 NOTES: 4 DAYS CLASSROOM REQUESTED

RESIGNATION DATE: 16-Apr-03 TRANSFER TIME: 13 8 WEEKS: 1 10 WEEKS: 0

APPOINTMENT DATE: 09-Jun-03 TRAINING TIME: 6 15 WEEKS: 0 OVER 15 WEEKS: 0

TRANSFER DATE: 18-Jul-03 START DATE: FINISH DATE: 26-Jul-03 FUB DATE:

Scheduled By: John Ince JUL 03 Unit 1: P.S.A. Total  
Recruitment: Claire Goodier 5336 6164 Unit 2: Score  
Office: MARINE DRIVE Unit 3:  
FAD: 213337  
Type: SPSO  
Area Office: Lesley Joyce  
Name Of Incoming Subpostmaster:  
Mr Lee Castleton  
Office Confirmed: ☒  
Time Of Audit: 17:30  
J. L. Letter Sent: ☒  
First Day: 14 July 2003  
Last Day: 17 July 2003  
Finished: 26 July 2003  
VENUE: LEEDS  
Mobile No: None

TRAINER 1: David Thomson  
TRAINER 2: None

**OFFICE ADDRESS**  
FAD CODE: 213337 A  
MARINE DRIVE SPSO  
14 SOUTH MARINE DRIVE  
BRIDLINGTON  
YO15 30B  
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OPEN SPSOCA

Record: 14 of 2710 of 5719

Form View

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