

Stephen Dilley

From: Pinder Brian [GRO]
Sent: 08 November 2006 13:56
To: Stephen Dilley
Cc: graham.c.ward [GRO]; Tom Beezer; mandy.talbot [GRO];
martyn.mitchell [GRO]
Subject: RE: Post Office Limited v Lee Castleton
Importance: High

Stephen

Please find answers to your queries interleaved in red, I hope they help to resolve the issues outstanding.

Kind Regards Brian

1. One of the things that each subpostmaster has to do is to make a cash declaration each day, stating what quantity of each denomination of cash they have in their till. We have many, but not all of Mr Castleton's cash declarations. As an example, I attach copies of what some of them look like. We are missing the cash declarations made from and including **Friday 12 March 2004** onwards and ideally could do with them at a minimum up to and including Wednesday 24 March 2004 (but preferably **Wednesday 31 March 2004** for completeness).

Yes. We can provide the data for these from the message store audit trail (but not the actual reports - Expected date for this is about 14th Nov)

The P.O. are going to e-mail me a spreadsheet showing the total cash declared each day in January, February and March 2004 (as an example, I attach January's spreadsheet). However, that spreadsheet does not show the quantity of each denomination which Mr Castleton declared on each day. Is this something that you would be able to obtain from the Horizon archives?

Yes and I will inform you when we have this information.

2. The Court has ordered the parties to disclose any further documents which may help or hinder their case. In this context, a "document" means anything in which information of any description is recorded, so it includes a computer database. So far, we have disclosed many documents including spreadsheets received from you and the P.O. that were extracted from the database. We have not named the database itself as a document, which we will now do. Is there a formal name for it? What data does it contain that we have not so far received?

We refer to this as the "message store" and it contains details of everything that is recorded at the counter by Horizon, e.g. (approx) 1.7 million banking transactions a day, apart from other events. The "message store" itself would be of considerable size (holding at least 7 yrs of data) and although possible, it would certainly not be considered practical or financially viable to move or copy the information.

3. It is possible (although not very likely) that Mr Castleton's solicitors may wish to inspect the database by 27 November. (The Court rules state we must give them access if they require it). If they do, is there one computer either at the P.O or Fujitsu where they could get access to all of the data relating to Marine Drive?

08/11/2006

Yes, there are PC's at Fujitsu (Bracknell) within the security teams 'secure area', which can access the "message store" however we would need to know in advance what exact information is required as it can take some time (hrs to days) to retrieve from the servers, although this would greatly depend on the number of days involved for inspection.

My impression from the P.O. is that there is not one particular person there who has access to everything and that the P.O must make a formal request to Fujitsu for data (above a certain number per month) and that accordingly, it is more likely that there will be one person at Fujitsu who will have access to all of the data on the database.

Yes correct, although its not strictly a database as such but the "message store".

From: Stephen Dilley [mailto: [REDACTED] GRO]
Sent: 07 November 2006 11:35
To: Pinder Brian
Cc: graham.c.ward [REDACTED] GRO; Tom Beezer; mandy.talbot [REDACTED] GRO
martyn.mitchell [REDACTED] GRO
Subject: Post Office Limited v Lee Castleton

Dear Brian,

Thanks for your email of yesterday, which was helpful.

1. One of the things that each subpostmaster has to do is to make a cash declaration each day, stating what quantity of each denomination of cash they have in their till.

We have many, but not all of Mr Castleton's cash declarations. As an example, I attach copies of what some of them look like. We are missing the cash declarations made from and including **Friday 12 March 2004** onwards and ideally could do with them at a minimum up to and including Wednesday 24 March 2004 (but preferably **Wednesday 31 March 2004** for completeness).

The P.O. are going to e-mail me a spreadsheet showing the total cash declared each day in January, February and March 2004 (as an example, I attach January's spreadsheet). However, that spreadsheet does not show the quantity of each denomination which Mr Castleton declared on each day. Is this something that you would be able to obtain from the Horizon archives? It stands to reason that if the subpostmaster has to tell the computer what quantities of what denomination he has, the computer must record that information somewhere and that consequently, we should be able to retrieve it. If so, please could you obtain it and forward it to me?

2. The Court has ordered the parties to disclose any further documents which may help or hinder their case. In this context, a "document" means anything in which information of any description is recorded, so it includes a computer database. So far, we have disclosed many documents including spreadsheets received from you and the P.O. that were extracted from the database. We have not named the database itself as a document, which we will now do. Is there a formal name for it? What data does it contain that we have not so far received?

3. It is possible (although not very likely) that Mr Castleton's solicitors may wish to inspect the database by 27 November. (The Court rules state we must give them access if they require it). If they do, is there one computer either at the P.O or Fujitsu where they could get access to all of the data relating to Marine Drive? My impression from the P.O. is that there is not one particular person there who has access to everything and that the P.O must make a formal

request to Fujitsu for data (above a certain number per month) and that accordingly, it is more likely that there will be one person at Fujitsu who will have access to all of the data on the database.

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

Kind regards,

Stephen Dilley
Solicitor
for and on behalf of Bond Pearce LLP

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