

Thursday, 28 September 2023

1
 2 (10.00 am)
 3 MR BLAKE: Good morning, sir. Can you see and hear
 4 me?
 5 SIR WYN WILLIAMS: I can. Thank you.
 6 MR BLAKE: Thank you very much. This morning we're
 7 going to hear from Mandy Talbot.
 8 SIR WYN WILLIAMS: Yes.
 9 MANDY TALBOT (sworn)
 10 Questioned by MR BLAKE
 11 MR BLAKE: Thank you very much. Can you give your
 12 full name, please?
 13 A. Mrs Mandy Talbot.
 14 Q. Mrs Talbot, you should have in front of you
 15 a witness statement?
 16 A. That's correct.
 17 Q. That has your name on the front, dated 31 May
 18 2023; is that correct?
 19 A. Correct.
 20 Q. Can I ask you to turn to the final substantive
 21 page on that witness statement, that's page 36.
 22 Is that your signature at the bottom of that
 23 page?
 24 A. It is.
 25 Q. Thank you very much. Is that statement true to

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1 preservation of relevant data and a more
 2 conducive engagement with Mr Coyne.
 3 Paragraph 24 of my statement, refers to my
 4 request to Bond Pearce not to issue cases
 5 involving Horizon. It meant cases where
 6 subpostmasters had alleged that the Horizon
 7 System was at fault in response to an action to
 8 recover debt. As now disclosed to me from
 9 September 2005 at POL00107426, email to David
 10 Smith of POL, I was seeking to set up
 11 an appropriate system for compiling data and
 12 investigating cases prior to the business
 13 sending matters out to civil litigation agents.
 14 Despite pressing, this was ultimately rejected
 15 on the basis of cost.
 16 Q. Thank you very much Mrs Talbot, that statement,
 17 which is WITN08500100 will be published by the
 18 Inquiry in due course. Those amendments have
 19 been made because, as you've said, the witness
 20 statement was taken some time ago now.
 21 I will take you thematically through various
 22 things and if any of those points jump out at
 23 you at any relevant time then please do feel
 24 free to say as well.
 25 Thank you. You are here today because you

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1 the best of your knowledge and belief?
 2 A. It is as, at the time.
 3 Q. Thank you. I believe there are some small
 4 changes that you would like to add now?
 5 A. That is correct.
 6 Q. Please do feel free to make those amendments
 7 now.
 8 A. If I may, I wish to make some additional
 9 comments, having received 1,661 pages of further
 10 disclosure that affects my original statement.
 11 I'm now aware that I was updated on the case of
 12 Wolstenholme in March 2004 by Mr Jim Cruise.
 13 This was after Mr Coyne's initial review and his
 14 comments upon the response from Fujitsu had been
 15 received. As can be seen from the documentation
 16 now disclosed to me, Mr Cruise had concerns
 17 about the case and Mr Coyne's initial opinion
 18 and response to Fujitsu. It was for that reason
 19 that counsel was instructed by agents.
 20 I've now also seen FUJ00121724, email to
 21 Colin Lenton-Smith, and report on Cleveleys,
 22 FUJ00080715, of Mr Holmes. I was very surprised
 23 by the contents of the former and agree that, if
 24 Fujitsu had been brought into the matter
 25 earlier, it could have resulted in a possible

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1 were lawyer at the Post Office. One thing that
 2 isn't entirely clear from your witness statement
 3 is whether you qualified as a solicitor and when
 4 that was. Are you able to assist on that?
 5 A. Ooh, I am qualified as a solicitor. I joined
 6 the Post Office in 1990, I believe I qualified
 7 about 18 months before that. I can't, after
 8 this period of time, recall the precise date.
 9 Q. You've said in your statement that you worked at
 10 Cameron McKenna and Wilde Sapte?
 11 A. Yes.
 12 Q. Were those training as a solicitor or some other
 13 role?
 14 A. No, that was as a junior solicitor. I did my
 15 training contract or articles, as it was then
 16 referred to, at Douglas-Jones Mercer of Swansea,
 17 a provincial firm.
 18 Q. Thank you. You joined the Post Office in 1990
 19 as a legal assistant; is that right?
 20 A. Correct.
 21 Q. You were in the Civil Litigation department?
 22 A. Correct.
 23 Q. During your time, it became Royal Mail Legal
 24 Services as well?
 25 A. Yes.

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1 Q. I think you spent over 20 years in the
2 department; is that correct?
3 A. Correct.
4 Q. Briefly, can you tell us what kinds of cases
5 that you were involved in, working for the Post
6 Office, other than the kinds of cases that we're
7 going to be talking about today?
8 A. A whole range. Usually small County Court
9 matters under the Postal Services Act,
10 injunctions, giving training courses, issuing
11 proceedings on debt actions, but I'd also done
12 personal injury work, rent arrears cases. Also
13 used to assist the chairman's office if they
14 wanted information and Freedom of Information
15 action cases.
16 Q. In 2011, you became part of the regulation team
17 at the Royal Mail Group?
18 A. Correct.
19 Q. Was that something different?
20 A. Entirely. I no longer functioned as
21 a solicitor. I became -- within Legal Services
22 Department, I was somebody with legal knowledge
23 working for Royal Mail Group itself, in a team
24 set up to arrange for the flotation of Royal
25 Mail Group as a company.

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1 I had been a team leader in the Postal
2 Services team which, as the name suggests, dealt
3 primarily with matters pertaining to the Postal
4 Services Act, items lost in the post, County
5 Court actions, some debt action against parties
6 who had contracted with Royal Mail for postal
7 services. But, after 2004, in effect, although
8 I had the title, the number of people working
9 within Legal Services meant the title was
10 a nonentity.
11 Q. So you had general counsel, did you?
12 A. She was referred to, this is Catherine
13 Churchard, as "the" solicitor but, in effect,
14 performed the role of general counsel, though
15 I don't believe she ever had a permanent
16 position on the board.
17 Q. Underneath the general counsel, would it be
18 right to say you were the principal lawyer
19 dealing with civil matters?
20 A. No, that's not correct. There was the Head of
21 Civil Litigation and I was never the Head of
22 Civil Litigation.
23 Q. Who was that, sorry?
24 A. At the beginning, Mr Joe Ashton, Clare Wardle,
25 Bidy Wyles, Rebekah Mantle, so I was there for

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1 Q. I think you took redundancy in 2014?
2 A. In the September, yes.
3 Q. Yes. Did you work elsewhere after that, or ...?
4 A. No, unfortunately for family reasons it was
5 necessary for me to help support my
6 father-in-law, my mother and, ultimately, other
7 relatives.
8 Q. Thank you. I want to begin by looking at the
9 structure of your team. During Mr Castleton's
10 case, you've been described, I think, as the
11 litigation team leader or, at one point,
12 principal lawyer.
13 A. Mm.
14 Q. Can you assist us with that role?
15 A. Prior to 2004, Legal Services had a large number
16 of in-house solicitors. In 2004, the then
17 solicitor, who was, in effect, the Head of Legal
18 Services, offered everybody and anybody who
19 wanted it redundancy on quite good terms.
20 I think, to the best of my recollection,
21 only four members of staff in the whole of Legal
22 Services were prevented from accepting the offer
23 of redundancy. There was no structure involved
24 at all and so teams were, in effect, decimated.
25 So that was 2004.

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1 a long time, and then when I was a team leader,
2 I was on a direct report to Joe Ashton but,
3 after that role disappeared, I was on a direct
4 report to Clare Wardle, Bidy Wyles, Rebekah
5 Mantle and they, in turn, would report upwards.
6 Q. So although described as the litigation team
7 leader or principal lawyer, it was, in fact, the
8 case that you weren't the leader at all?
9 A. No.
10 Q. Was there somebody in an equivalent position
11 dealing with criminal matters?
12 A. The -- equivalent to myself? There were --
13 prior to the reduction in headcount, there were
14 many caseworkers like myself in the Criminal Law
15 Department, but the Head of Criminal Law was Rob
16 Wilson.
17 Q. Who would his equivalent have been in your team?
18 A. That would have been Joe Ashton, Clare Wardle,
19 Bidy Wyles and Rebekah Mantle.
20 Q. The impression that you've given is that those
21 who remained in the team after 2004 were few in
22 number and quite stretched; is that fair?
23 A. That is correct.
24 Q. Do you know why the redundancies were offered at
25 that stage?

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1 A. To the best of my recollection, this is probably
 2 my opinion, in 2004 there was a desire on the
 3 part of the corporation to have a reduction in
 4 headcount and I believe that is the reason for
 5 the offer of mass redundancy.
 6 Q. In respect of actions against subpostmasters,
 7 whether they be criminal or civil, was there
 8 anybody in the team that had an overview of the
 9 work that was going on?
 10 A. Neither in the -- not in Civil Litigation or --
 11 this just speculation -- or Prosecution team,
 12 because prosecution was an entirely different
 13 specialism.
 14 Q. In the Civil Litigation Team, we're going to see
 15 that you were involved in a number of actions
 16 against subpostmasters. Did anyone have
 17 oversight or a general view of all of those
 18 cases?
 19 A. No.
 20 Q. In terms of Horizon, did you receive any
 21 training on the system?
 22 A. I received a one-hour training course very, very
 23 early on with people trying to explain lots of
 24 moving parts on a whiteboard, and that was it.
 25 Q. Do you think that was a similar experience of

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1 A. It is.
 2 Q. Were you given such a strong assurance and who
 3 by?
 4 A. I cannot put a name but I got the distinct
 5 impression that this was a system of which
 6 Fujitsu were incredibly proud and, as I say,
 7 anecdotally in my statement, there was
 8 a suggestion that they were so proud that there
 9 was a desire to sell it to other organisations.
 10 Q. You said you got the impression. Where did that
 11 impression come from?
 12 A. Numerous dealings with Fujitsu over the years.
 13 Q. Who, in particular, did you deal with at
 14 Fujitsu?
 15 A. Usually, when I dealt with Fujitsu, it would be
 16 in respect of a particular piece of litigation
 17 or case but, also, as you can see from the
 18 correspondence, they were copied in to numerous
 19 matters that I was dealing with, both with
 20 themselves and POL.
 21 Q. Who in particular do you think gave you the
 22 impression that the system was "infallible"?
 23 A. I would be lying if I tried to put a name to it
 24 after this period of time. I'm very sorry.
 25 Q. Can I take you to your witness statement, that's

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1 your colleagues within the team?
 2 A. Within Civil Litigation, yes. I can't speak as
 3 to any of the other teams.
 4 Q. I want to talk about your knowledge of bugs,
 5 errors and defects in the system. You've said
 6 this morning you've been receiving a number of
 7 different documents before today. But apart
 8 from the corrections that you made this morning,
 9 are you content with the words that are in your
 10 witness statement?
 11 A. Generally, yes.
 12 Q. Did you give consideration to terms that were
 13 used? For example, you have described, in
 14 respect of the Horizon System, that it was
 15 "infallible". Is that something that you were
 16 told?
 17 A. Possibly not the word "infallible" but I was
 18 given the distinct impression that it was
 19 a perfect system and that any minor bug or
 20 glitch was quickly identified, its footprint
 21 made plain and that these were things that
 22 Fujitsu would search for if we ever asked them
 23 for information as to the running of
 24 a particular branch.
 25 Q. "Infallible" is quite a strong word?

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1 WITN08500100, please. It's page 27 of that
 2 statement. It's paragraph 62. Thank you.
 3 You say there, at the bottom of the page:
 4 "Looking back, I obviously have concerns
 5 about the cases I was involved in knowing now
 6 that there were problems with the Horizon System
 7 but that is with hindsight and the knowledge
 8 that has come into the public domain. At the
 9 time when Civil Litigation was instructed to
 10 obtain repayment of money by POL via legal
 11 agents, we genuinely believed the position
 12 adopted by Fujitsu."
 13 Can you tell us when it is that you have
 14 obtained -- you say "with hindsight", with the
 15 information from the public domain, since --
 16 since when did you know that it was not
 17 infallible.
 18 A. The case of *Bates*, and the increasing amount of
 19 publicity about the Horizon System in the press.
 20 Q. Do you really think that it was not until *Bates*
 21 that you didn't have sufficient information to
 22 cast serious doubts on the reliability of the
 23 Horizon System?
 24 A. I left Civil Litigation in January 2011 to go
 25 into a very different world, a very labour

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1 intensive job. I didn't really think anything
 2 about Horizon, from the time I entered Royal
 3 Mail Group as a non-lawyer to the time of the
 4 eventual class action.

5 **Q.** During the years that you were working in Civil
 6 Litigation though -- 2004, 2005, 2006, 2007,
 7 2008, 2009, 2010 -- did you not feel you had
 8 enough information to cast doubt on the
 9 reliability of the Horizon System?

10 **A.** I really, really didn't. In 2010, looking at
 11 the additional documentation that's been
 12 supplied, I believe -- and this is just my
 13 opinion -- that concerns were maybe arising
 14 within POL itself but, you know, even through to
 15 the summer of 2010 with the Rod Ismay report --
 16 and I know there has been serious criticism of
 17 that -- we were still being assured that the
 18 system was robust and fit for purpose.

19 **Q.** Who by?

20 **A.** Well, there were -- there was Mr Rod Ismay
 21 himself and the other senior partners to which
 22 his report were copied to.

23 **Q.** Okay, we'll get to that report in due course but
 24 is it your evidence then that, internally within
 25 the Post Office, you were being convinced that

13

1 on 17 January 2001. He says there in the first
 2 paragraph:

3 "At that time the losses were £14,000 and
 4 the [subpostmistress] was refusing to make them
 5 good blaming the losses on the Horizon System
 6 which had been introduced in February 2000 at
 7 her office."

8 If we look at the third paragraph, the final
 9 sentence there, it says:

10 "[Mrs Wolstenholme] asked for proof that the
 11 losses were her fault and caused by computer
 12 failure. She also asked for copies of all error
 13 notices but Chesterfield said that these were
 14 not available."

15 Can we go over the page, please. The second
 16 line there says:

17 "The CC [that's the counterclaim] is that
 18 the contract was wrongly terminated; the
 19 computer system was unfit for its purpose and
 20 throws in the Human Rights Act", and other
 21 regulations as part of the counterclaim.

22 If we go down to the fourth paragraph he
 23 summarises there at the end of that paragraph,
 24 he says:

25 "She declined to settle saying the losses

15

1 the Horizon System was robust?

2 **A.** I can only speak as to the situation within
 3 Civil Litigation. I cannot speak as to the
 4 actual position in Post Office Limited at the
 5 time.

6 **Q.** But you spoke earlier of being reassured by
 7 Fujitsu and now you've mentioned Mr Ismay. So
 8 was it from outside and also within that you
 9 were being reassured about the robustness of
 10 Horizon?

11 **A.** From within Post Office Limited and Fujitsu.
 12 Yes.

13 **Q.** I want to begin with the Cleveleys case that we
 14 looked at before the summer break. Can we look
 15 at POL00118236, please. We're here in March
 16 2004. Could we scroll down, please. There's
 17 an email from Jim Cruise to you. Can you tell
 18 us who Jim Cruise was, please?

19 **A.** He was a member of my team. Formerly, he had
 20 been a member of the Prosecution team and, very
 21 unusually, a number of years earlier, he had
 22 transferred from that specialism over into Civil
 23 Litigation.

24 **Q.** He is there summarising the case of
 25 Mrs Wolstenholme. He says that it started back

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1 were not accepted as her fault but let [the Post
 2 Office] remove all the equipment other than the
 3 computer equipment."

4 The next paragraph, if we could scroll down
 5 slightly, thank you very much, says:

6 "Since then ..."

7 So this about an offer to settle:

8 "... the report of the computer expert, Best
 9 Practice [Limited], based on the available call
 10 logs has been received and as you are all aware
 11 is unfavourable and unflattering to Fujitsu if
 12 not actually hostile. In light of the report,
 13 which cannot really be challenged, I do not
 14 think that POL will be able to prove, even on
 15 the balance of probabilities that the losses
 16 were the fault of the [subpostmistress] and our
 17 agents are still concerned about the lack of
 18 evidence for the losses."

19 Next paragraph, he says the advice that he
 20 is going to give the Post Office, he says, about
 21 halfway down that final paragraph:

22 "I intend therefore to advise that [the Post
 23 Office] should pay [Mrs Wolstenholme] or pay
 24 into court the figure of 3 months' remuneration
 25 plus interest on the basis that although it is

16

1 unlikely that POL can now prove the losses were
2 her fault alone, as per the contract for
3 services, [the Post Office] can give 3 months'
4 notice without giving reasons and this is all
5 she will be able to obtain by way of damages in
6 any event if she takes the matter to trial."

7 So you were aware, in March 2004, that there
8 was this case against Mrs Wolstenholme and that
9 it was her case that the Horizon System was at
10 fault; is that right?

11 **A.** Yes, correct.

12 **Q.** And also that there was an expert report that
13 was unfavourable to the Post Office?

14 **A.** Correct.

15 **Q.** Why is Mr Cruise updating you in this email? Is
16 this your first involvement in that case?

17 **A.** I believe it was my first involvement and it
18 would have been part of Jim's preparation for
19 leaving Legal Services via the mass redundancy.

20 **Q.** So is he passing the case on to you?

21 **A.** The case was actually out with Weightmans who
22 were one of the firms of external agents. In
23 effect, he was passing on to me the in-house
24 role in respect of the case.

25 **Q.** That somewhat minimises the role of the Post

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1 a matter of keeping an eye on the costs and, if
2 anything unusual or untoward occurred, we would
3 then try and assist the external agents to the
4 best of our ability to achieve a successful
5 resolution for POL.

6 **Q.** Is it, therefore, your evidence that you weren't
7 in some way directing the actions of the law
8 firm, with regards to, for example, settlement.

9 **A.** Until such time as this email, I would have had
10 no involvement in this case whatsoever.
11 Thereafter, given the concerns expressed,
12 I probably would have endorsed their decision to
13 go to external counsel.

14 **Q.** Can we look at the actual report from Best
15 Practice Group, that's Mr Coyne's report. It is
16 WITN09020115. It's a report that's well known
17 to the Inquiry. We've heard from Mr Coyne. If
18 we look at page 2, please. He says:

19 "I have been contacted by Weightman Vizards
20 a law firm representing 'Post Office Counters
21 Limited' and Mrs Julie Wolstenholme,
22 an individual ..."

23 Were you aware that Mr Coyne had been
24 instructed jointly both by the Post Office and
25 Mrs Wolstenholme?

19

1 Office, though, because you are instructing
2 Weightmans, aren't you?

3 **A.** At that time, because of the mass redundancy,
4 Post Office Limited were entitled to take
5 matters directly out to our external legal
6 agents, without referring the matter to in-house
7 solicitors. This case, I believe, might be
8 slightly different in that, I believe, from
9 the -- from this document that Jim himself had
10 issued proceedings for the return of Post Office
11 Limited property at her branch and it was only
12 thereafter that it was referred out to
13 Weightmans, our agents.

14 **Q.** Trying to understand how things would operate in
15 the generality of cases, are you saying, then,
16 that the external law firms had significant
17 discretion as to how they carried out their
18 practice and were not instructed?

19 **A.** There was this massive redundancy, followed by
20 quite a lot of work that wasn't conducted by
21 myself, setting up agreements with a network of
22 external agents, under which Post Office Limited
23 could give instructions directly to external
24 agents and, insofar as we within civil
25 litigation were usually involved, it was

18

1 **A.** Not at the time of the email that we previously
2 looked at. Not at the time I made my original
3 statement but, with the additional disclosure,
4 I am now aware.

5 **Q.** Were you aware at the time? I mean, this report
6 is January 2004. Presumably, you would have
7 received this report?

8 **A.** Personally, no, not until such time as
9 I received the email communication from Jim
10 Cruise. Then I would have been made aware of
11 this report.

12 **Q.** So on receiving his email of the 17 March 2004,
13 did you then read the expert report?

14 **A.** I did.

15 **Q.** You did. Were you, therefore, aware that it was
16 a jointly-appointed expert report?

17 **A.** At that time, I would have been, yes.

18 **Q.** Were you aware of what that meant in respect of
19 the importance of it, in respect of the fairness
20 of it?

21 **A.** Yes.

22 **Q.** What did you understand by the importance of it
23 and the fairness of it?

24 **A.** That the report or initial observations, as he
25 actually terms it, would have been created for

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1 the assistance and benefit of the court.

2 **Q.** Can we scroll down the page, please. I'll just
3 highlight some parts of this report. We've
4 already looked at them. This is where Mr Coyne
5 refers to the statement from Ms Elaine Tagg, the
6 Retail Network Manager, and it's a section from
7 her witness statement in those proceedings,
8 where she said:

9 "Mrs Wolstenholme persisted in telephoning
10 the Horizon System Helpdesk in relation to any
11 problems which she had with the system
12 generally, these problems related to the use and
13 general operation of the system and were not
14 technical problems relating to the system."

15 Mr Coyne then says:

16 "This, in my opinion is not a true
17 representation on the evidence that I have had
18 access to. Of the 90 or so fault logs that
19 I have reviewed, 63 of these are without doubt
20 system related failures. Only 13 could be
21 considered as Mrs Wolstenholme calling the wrong
22 support helpdesk requesting answers to 'How do
23 I ...?' type training questions."

24 He says:

25 "The majority of the systems issues were
21

1 support operator stating: 'They all freeze, but
2 if it gets bad give us a call and we will
3 investigate'.

4 "From 31 October ... there seems to be
5 a number of logs which talk of 'large
6 discrepancies' in stock figures, trial balances
7 with 'all sorts of figures showing minus
8 figures' ..."

9 He references a call log and he says:

10 "... there is a comment noted by the support
11 operative that '[the postmistress] advised that
12 this is an intermittent problem occurring since
13 the counters were upgraded ...' Although the
14 documents do not list an upgrade taking place,
15 it does seem that these 'large' reported
16 discrepancies occur very frequently and shortly
17 after the noted upgrade."

18 If we go over the page, please, he then
19 summarises his opinion and he says:

20 "From a computer system installation
21 perspective it is my opinion that the technology
22 installed at the Cleveleys sub post office was
23 clearly defective in the elements of its
24 hardware, software or interfaces."

25 "Clearly defective" is quite a strong term,
23

1 screen locks, freezes, and blue screen errors
2 which are clearly not a fault of
3 Mrs Wolstenholme's making, but most probably due
4 to faulty computer hardware software, interfaces
5 or power. In fact, on a detailed view of call
6 11021413, dated 2 November 2000, Ms Tagg may
7 have witnessed firsthand the style of system
8 problems that Mrs Wolstenholme experienced in
9 her operation of the system. The fault log
10 notes that: 'Elaine reports that one of the
11 counters has a blue screen with the message [and
12 it gives the message]' and was advised by the
13 operator to 'reboot'."

14 Could we go over the page, please. He then
15 gives his opinion. He refers, for example, to
16 system freezing:

17 "'System freeing' which is most probably due
18 to either the hardware or interfaces crashing;
19 or alternatively fully saturated communication
20 lines."

21 If we scroll down to the final three
22 paragraphs on that page, he says:

23 "It is interesting and certainly warrants
24 further examination that in November 2000 the
25 'system freeing' is reported again with the
22

1 isn't it?

2 **A.** Yes.

3 **Q.** Did that not surprise you at the time?

4 **A.** Mr Coyne had created this report, or so
5 I believe, on the basis of a review of the
6 pleadings and the HSH logs. Subsequent to this
7 document being received, Fujitsu then took the
8 opportunity to comment upon the same.
9 I believe, though I haven't been shown a copy,
10 but Mr Coyne then commented upon their opinion
11 and, ultimately, Fujitsu wrote to Legal
12 Services, again disputing the conclusions
13 reached by Mr Coyne, but being open to inviting
14 him to come and visit engineers and their
15 facilities, to take him through the Horizon
16 System.

17 **Q.** You, at this stage, a qualified solicitor, who
18 had been practising for some time, you receive
19 an independent expert's report, jointly
20 appointed, that says that the technology
21 installed was clearly defective. Did that not
22 cause you to pause a little on your view of the
23 robustness of the Horizon System?

24 **A.** It was expressed to be an initial report, and
25 I took the view that Fujitsu being so open to
24

1 inviting him in to discuss the matters further
 2 was further evidence of their conviction of the
 3 robustness of their system.
 4 **Q.** It didn't cause you to be worried in any way
 5 about the impact that this might have?
 6 **A.** I was advised by Fujitsu that the system in 2004
 7 was very different to the system in 2000, under
 8 which -- the 2000 system -- data was disposed
 9 of, I believe, after a period of 18 months. The
 10 system in 2004, I was assured was much more
 11 robust.
 12 **Q.** Who told you that?
 13 **A.** That would have been the people I was speaking
 14 to in Fujitsu.
 15 **Q.** Can you please give their names?
 16 **A.** Oh. After this period of time, I'm sorry,
 17 I can't.
 18 **Q.** Okay, well, perhaps over the lunch break you can
 19 look at the papers you've been given and you
 20 might --
 21 **A.** Yes.
 22 **Q.** -- recall more. But, in respect of say, the
 23 period, then, 2000 to 2004, were you not worried
 24 about the impact that this opinion may have had?
 25 **A.** No, because I was assured it was on a unique set
 25

1 "She was talking about taking the option to
 2 admit the report and concede the contents are
 3 an accurate reflection of what happened (the
 4 [Horizon System Helpdesk] transcripts are
 5 an accurate reflection of what happened it's
 6 just the 'Expert' opinion is the problem). The
 7 liability question is removed and it's then just
 8 about 'how much to go away and keep your mouth
 9 shut.'
 10 Now, Stephen Dilley's evidence to this
 11 Inquiry is that you speak in a way that is
 12 "eminently quotable", was his words. Now, are
 13 your words that are quoted there, "how much to
 14 go away and keep your mouth shut"?
 15 **A.** It's a minute created -- sorry, it's
 16 a communication created by Jan Holmes. It
 17 really doesn't sound like me. Possibly, I am
 18 "eminently quotable" but I really don't think
 19 I'd have expressed myself in those terms.
 20 **Q.** Why would that be the best approach if you
 21 weren't at all worried about the report from
 22 Mr Coyne?
 23 **A.** We had a situation with the original
 24 documentation in *Castleton* -- I'm sorry, the
 25 original documentation with Mrs Wolstenholme was
 27

1 of facts that had occurred in 2000 and, in 2004,
 2 it simply couldn't happen.
 3 **Q.** So you weren't at all worried, no?
 4 **A.** No.
 5 **Q.** Well, can we look at FUJ00121637, please. This
 6 is an email from Jan Holmes of Fujitsu to Colin
 7 Lenton-Smith, and he says:
 8 "Jim Cruise has taken early retirement so
 9 I ended up speaking to Mandy Talbot, who was his
 10 boss."
 11 Now, you're described there as Jim Cruise's
 12 boss; is that right?
 13 **A.** Correct.
 14 **Q.** That's correct.
 15 "The [postmistress] rejected the offer that
 16 was made to her some time ago and a trial date
 17 has been set ... [The Post Office] are still
 18 taking advice as to how best to deal with this
 19 and Mandy's view/belief was that the safest way
 20 to manage this is to throw money at it and get
 21 a confidentiality agreement signed. She is not
 22 happy with the 'Experts' report as she considers
 23 it to be not well balanced and wants, if
 24 possible, to keep it out of the public domain.
 25 This is unlikely to happen if it goes to court.
 26

1 relating back to 2000. The original
 2 documentation, plus the original records on the
 3 Horizon System, were no longer available. All
 4 that was left was the HSH logs.
 5 We had members of Fujitsu who were happy to
 6 create witness statements to go to court to
 7 adduce to the effective working of the system,
 8 but we did also have a jointly-appointed expert,
 9 albeit creating only a preliminary view.
 10 I took the view that, if the matter went to
 11 court, it was unlikely that the evidence of
 12 Fujitsu would be persuasive. As such, the
 13 effective way of dealing with such a litigation
 14 is try to resolve it by making an economic
 15 settlement.
 16 **Q.** That all sounds very reasonable, Mrs Talbot, if
 17 I may say. But why confidentiality agreement?
 18 Why "keep your mouth shut"? Why would you want
 19 to hide what had happened in this case?
 20 **A.** I had absolutely no desire to hide what had
 21 happened in this case. If the matter was
 22 settled, there would be no need for the expert's
 23 report to be disclosed in court. If the matter
 24 were not capable of being settled, then it would
 25 have been disclosed in court.
 28

- 1 **Q.** It was an unhelpful statement. You are
2 describing here to Mr Holmes that you would like
3 Mrs Wolstenholme to sign a confidentiality
4 agreement and the words there, whether they're
5 exactly the phrase you used or not, are
6 effectively to silence her. If this was simply
7 a matter of not having the right documentation
8 to prove the case, why would that have been
9 necessary?
- 10 **A.** The settlement negotiations, I believe, were
11 dealt with by Weightmans. I'm not certain how
12 much more involvement I had in this matter after
13 this time.
- 14 **Q.** So you did not mind if publicity were shined
15 upon this case?
- 16 **A.** No. I mean --
- 17 **Q.** Nothing to hide?
- 18 **A.** In effect, if it had gone into court, at that
19 time, then it might well have had an impact upon
20 POL and its relationship with Fujitsu but so be
21 it.
- 22 **Q.** Absolutely nothing to hide?
- 23 **A.** No.
- 24 **Q.** Didn't want to hide it from the public view?
- 25 **A.** No.

29

1 "Prior to this point, a number of errors
2 and/or deficiencies had arisen in relation to
3 Mrs Wolstenholme's Post Office accounts."
4 If we continue over the page to
5 paragraph 10, please. Counsel continued:
6 "Mrs Wolstenholme has defended the
7 proceedings, claiming the computer system
8 installed by the Post Office was defective and
9 this was, in fact, the cause of the losses
10 recorded within her accounts."
11 Paragraph 11:
12 "The trial of this matter is now about one
13 month away. A joint computer expert's report
14 has been obtained. This report concludes, from
15 the limited records available, that the computer
16 system installed by the Post Office did appear
17 defective."
18 Over the page, please, to paragraph 13:
19 "I am asked to advise in relation to quantum
20 and evidence. I am asked to take into
21 particular account that the Post Office is
22 anxious for the negative computer experts'
23 report to be given as little publicity as
24 possible."

25 Now, that is directly contrary to the

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- 1 **Q.** Can we please look at POL00118229, please. This
2 is an advice on evidence and quantum. If we
3 turn to the final page, page 18, if we look at
4 the bottom of the page, we can see it's written
5 by counsel at 9 St John Street in Manchester.
6 Can we turn back, please, to the beginning and
7 perhaps we can start at page 2, paragraph 4.
8 26 July 2004. The author, counsel, writes:
9 "The Horizon computer system did not operate
10 smoothly at all times, and a support help line
11 was set up manned by personnel from the company
12 which supplied the system.
13 "Mrs Wolstenholme claims that she had
14 enormous difficulties with her computer system,
15 and that it frequently malfunctioned, causing
16 inaccuracies in stock and other figures to
17 arise. She claims that she repeatedly contacted
18 both the helpline and the Post Office about
19 problems she was encountering, but little
20 effective was done to assist.
21 "In November 2000, Mrs Wolstenholme became
22 so disillusioned with the computer system that
23 she decided to stop using it. This was in
24 breach of her obligations to the Post Office and
25 she was duly suspended."

30

- 1 evidence that you have just given. Why do you
2 say that was not your instruction?
- 3 **A.** I did not instruct counsel in this matter. It
4 would have been our external agents. It's true
5 that adducing the report in court would have not
6 been great for Post Office Limited but,
7 ultimately, if it had to happen, it had to
8 happen.
- 9 **Q.** If your view at the time was nothing to hide --
- 10 **A.** Mm-hm.
- 11 **Q.** -- why on earth would your solicitors have got
12 the impression that the Post Office is anxious
13 for the negative computer expert's report to be
14 given as little publicity as possible? Where do
15 you say that was coming from?
- 16 **A.** I can't comment.
- 17 **Q.** You did nothing to give them that impression
18 that that was your instruction?
- 19 **A.** I genuinely cannot remember, after this period
20 of time, I'm sorry.
- 21 **Q.** We'll continue going through the report and
22 perhaps some of that might refresh your memory.
23 Can we look at paragraph 17, please:
24 "In view of the negative expert's report in
25 this case regarding the computer system in

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1 place, Mrs Wolstenholme's suggestion that the
2 errors that arose were the result of defects in
3 the computer system must be taken seriously. It
4 is sufficient to place genuine and significant
5 doubt on the evidence relied upon by the Post
6 Office."

7 Was that communicated back to you, counsel's
8 position that there was genuine and significant
9 doubt on the evidence being relied upon by the
10 Post Office?

11 **A.** I cannot recall.

12 **Q.** Can we look at paragraph 49, please. That's the
13 bottom of page 15, top of page 16. It says
14 there:

15 "On the basis of the above it can be
16 concluded that the Post Office claim against
17 Mrs Wolstenholme will fail, save for the return
18 of the equipment which she has possibly
19 retained. Her claim against the Post Office in
20 respect of failure to give proper notice is
21 likely to succeed. What is the appropriate
22 course of conduct in the circumstances,
23 particularly given the desire of those
24 instructing me and the Post Office to avoid, if
25 possible, publication of the negative experts'

33

1 relationship, why Cheryl Woodward and I think --
2 is it to Cheryl Woodward and copied to you?
3 **A.** Cheryl Woodward worked in one of the departments
4 in Post Office Limited that were entitled to
5 instruct regional agents, like Bond Pearce,
6 directly. Ergo the instructions to issue
7 proceedings against Mr Castleton were authorised
8 by Ms Woodward.

9 **Q.** So that's a direct instruction from somebody
10 within the Post Office who is not a lawyer --

11 **A.** Correct.

12 **Q.** -- but copied to you, who is a lawyer?

13 **A.** No. This is a communication from Stephen Dilley
14 after he had taken over conduct of the Castleton
15 matter going back directly to his original
16 instructing -- to his firm's original
17 instructing party, Cheryl Woodward, copied in to
18 me because of the concerns over his firm
19 permitting judgment in default on a massive
20 potential counterclaim being issued.

21 **Q.** You were a lawyer involved in civil litigation
22 in the Post Office --

23 **A.** Correct.

24 **Q.** -- being copied in to an email from Mr Dilley,
25 who was acting for Bond Pearce, the law firm

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1 report in the public arena?"

2 Now, if the Post Office had as much
3 confidence in the Horizon System as your
4 evidence has been earlier today, why on earth
5 would they want to avoid publication of that
6 expert's report?

7 **A.** Because I think it might have affected the
8 relationship between Post Office Limited and
9 Fujitsu, but that is purely my opinion. I can't
10 speak to Post Office's intentions.

11 **Q.** Having read Jim Cruise's email, having read the
12 expert report, at this point in time was it not
13 dawning on you that the Horizon System might not
14 be as infallible as you indeed thought?

15 **A.** I can categorically say no. At that time, it
16 certainly didn't.

17 **Q.** I'm going to move on to the case of Lee
18 Castleton. I'm going to start in 2005. Can we
19 look at POL00107423, please. Thank you. Can we
20 start at page 7 of this. It's a chain of
21 emails. Thank you. At the bottom of that page
22 we have an email from Stephen Dilley to Cheryl
23 Woodward and copied to you. Can we just scroll
24 slightly above that, please, just to see who
25 it's to and from. Can you tell us the

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1 instructed in this case --

2 **A.** Right.

3 **Q.** -- presumably copied in because you were
4 a lawyer; is that right?

5 **A.** I was copied in because of the fact that they
6 had permitted judgment to be entered in default.
7 This meant that it wasn't being dealt with as
8 business as usual. They had to come back to us
9 at Legal Services and explain what had occurred.
10 For that reason, I was now being copied in.

11 **Q.** So was there a threshold of seriousness before
12 which it wouldn't get to the legal team but
13 beyond which it would have to be copied in or
14 the legal team involved in some way?

15 **A.** I had nothing to do with setting up the
16 contracts for outsourcing. But, by any ream,
17 permitting a potential counterclaim of £250,000
18 to be entered against your client would justify
19 contacting Legal Services, yes.

20 **Q.** We're here in October 2005, was this the first
21 involvement that you had with the Castleton
22 case?

23 **A.** There's a possibility that I might have been
24 asked for contact of people within Post Office
25 Limited via the solicitor who was dealing with

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1 the case prior to Mr Dilley.
 2 **Q.** If we look at the first paragraph in his case
 3 summary, he says:
 4 "The Post Office's claim is for
 5 approximately [£27,000] plus interest and costs
 6 in respect of net losses. Clearly, Mr Castleton
 7 is contractually responsible for any losses that
 8 the Post Office makes caused by negligence or
 9 error. However, the real issue is whether there
 10 has been any real shortfall, or whether this
 11 shortfall has really been generated by computer
 12 error. To win, the Post Office must show that
 13 there has been a real shortfall."
 14 If we go over the page, he summarises some
 15 reports that -- sorry, over one more page, thank
 16 you, to page 9. There's a blank page that
 17 follows but it's over the page, thank you.
 18 He refers to some reports that have been
 19 obtained by Mr Castleton, one from Bentley
 20 Jennison and one from White and Hoggard, and he
 21 says about halfway down that bottom paragraph
 22 that:
 23 "Mr Castleton's Defence, 'appears to hold
 24 potential merit based on the limited
 25 documentation' ..."

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1 of it case against Castleton is being challenged
 2 and his counterclaim dwarfs the size of the
 3 claim. The adequacy of the records obtained
 4 from the Horizon System is being challenged. As
 5 the business chose to give summary termination
 6 instead of three months' notice it is required
 7 to physically prove the loss. If the Horizon
 8 evidence is not up to the job this will have
 9 serious ramifications for the business."
 10 You were recognising there that, if there
 11 was a successful challenge to the Horizon
 12 System, it would have serious ramifications; is
 13 that right?
 14 **A.** Correct, yes.
 15 **Q.** Yes. Is that following your experience from the
 16 Cleveleys case, where the Horizon case was --
 17 the reliability of Horizon was called into
 18 question?
 19 **A.** No, it really wasn't. I mean, my major concern
 20 about the matter of Castleton was the sheer size
 21 of the counterclaim, £250,000, and the cost of
 22 putting a full defence together, because I was
 23 concerned the proceedings had been issued in the
 24 first place because the paper documentation that
 25 should have been in place prior to proceedings

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1 This is a quote from Bentley Jennison in
 2 their report. He is passing on that information
 3 to you. He says:
 4 "White and Hoggard reach a similar
 5 conclusion in their report."
 6 Can we go back, please, to higher up the
 7 email chain, page 5. At the bottom of page 5,
 8 please, this seems to be you forwarding that
 9 email to various people. Can you assist us with
 10 who the recipients are? Carol King, Nicky
 11 Sherrott, Jennifer Robson.
 12 **A.** Clare Wardle was my immediate line manager at
 13 the time. Nicky Sherrott was, I believe, Head
 14 of Commercial, might even have been performing
 15 the role of Acting Head of Legal. John Legg and
 16 Carol King were Post Office Limited employees.
 17 **Q.** I'm going to read from your covering email, if
 18 we could scroll down the page over to page 7,
 19 please.
 20 It'll be over the page again. I think these
 21 were original hard copies, which were
 22 photocopied, which explains the blank pages.
 23 You say:
 24 "This is a case where the adequacy of the
 25 evidence which [the Post Office] has in support

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1 being issued wasn't.
 2 **Q.** But the final sentence there:
 3 "If the Horizon evidence is not up to the
 4 job this will have serious ramifications for the
 5 business."
 6 It seems as though your concern, actually,
 7 is about the adequacy of the Horizon System and
 8 the ramifications that that may have; is that
 9 wrong?
 10 **A.** That's what I said at the time but, in reality,
 11 it was the sheer size of the counterclaim and
 12 the cost and expense that we knew we would be
 13 put to in defending a full challenge.
 14 **Q.** We've seen before counsel's advice about the
 15 Post Office wishing to avoid publicity. We saw
 16 that time and again in relation to the Cleveleys
 17 case. Isn't this much of the same thing?
 18 **A.** No.
 19 **Q.** Can we look at the first page of this chain,
 20 please, and the bottom of the first page. We
 21 have there an email from Dave Hulbert to Carl
 22 Marx -- not the Karl Marx, a different Carl
 23 Marx. Can you tell us who they were?
 24 **A.** I have no idea who Carl Marx was, which is
 25 surprising, given his name. Dave Hulbert,

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1 I believe, worked in -- I believe worked in
 2 Fujitsu or was a liaison between POL and
 3 Fujitsu.
 4 **Q.** We also have there Keith Baines. That's higher
 5 up the chain, in effect.
 6 **A.** I can't remember their title.
 7 **Q.** He was the Horizon Contract Manager at the Post
 8 Office; do you recall that?
 9 **A.** *(The witness nodded)*
 10 **Q.** Looking at that bottom email, though, can we
 11 scroll down, please. Carl to Dave, it says in
 12 the second paragraph:
 13 "I've also copied below a response you
 14 provided some weeks ago relating to a different
 15 case, (Smallbridge) about the system creating
 16 discrepancies and it would be worth having your
 17 view on whether this provides useful supporting
 18 evidence, particularly in countering the
 19 Experts' Reports (referred to in Stephen
 20 Dilley's email)."
 21 Now, do you recall a case of Smallbridge,
 22 where there were discrepancies?
 23 **A.** Absolutely not but what you have to appreciate
 24 is that there was never, ever an overriding
 25 system that gave Civil Litigation visibility of

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1 **A.** No. It's not.
 2 **Q.** At this time, were you telling people about, for
 3 example, the Cleveleys case that you had, where
 4 a joint expert had said that that simply isn't
 5 right?
 6 **A.** I wasn't telling people about the Cleveleys
 7 case. As far as we were concerned, that had
 8 been concluded.
 9 **Q.** You had an independent jointly-appointed expert
 10 who was saying that describing it as robust
 11 simply wasn't right. Do you think it might have
 12 been worth, during that period of time, to have
 13 told more people within the Post Office?
 14 **A.** It was expressed to be a preliminary report.
 15 I viewed it as a case in isolation.
 16 **Q.** Can we look at POL00070574, please. This is
 17 7 November 2005, so we're still in 2005,
 18 an email from Stephen Dilley to Stephen Lister,
 19 and he summarises much the same. He says:
 20 "As you are the relationship partner for the
 21 Royal Mail, I thought it would be helpful to
 22 update you in relation to a case I am dealing
 23 with for them in case Mandy Talbot mentions it.
 24 I recently inherited this case from Denise
 25 Gammack when she left the firm, who in turn

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1 all Post Office Limited matters.
 2 **Q.** If we look at the top, if we go back a page to
 3 page 1, we see Carol King at the Post Office,
 4 Jennifer Robson, Debt Recovery Section Manager.
 5 They're all in receipt of this chain of emails.
 6 **A.** Mm-hm.
 7 **Q.** Was that not something that was ever brought to
 8 your attention?
 9 **A.** I cannot recall after this period of time.
 10 **Q.** If we stick with page 3, please, we can see at
 11 the bottom of page 3, this is Carol to Dave, and
 12 he says that he's copied certain wording from
 13 the Smallbridge case, and it says there at the
 14 bottom:
 15 "In summary, the system is very robust. In
 16 our experience it very seldom loses transactions
 17 unless equipment is physically removed from
 18 site; if it does lose transactions Post Office
 19 procedures should quickly identify discrepancies
 20 and they should be followed through with
 21 Helpdesk assistance within a week."
 22 Now, do you know where that draft wording
 23 came from? Are you able to assist? Is that
 24 a phrase that you heard, a form of words that
 25 you heard repeated?

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1 inherited it from [somebody else]."
 2 If we scroll down to the third paragraph,
 3 please, he says there that:
 4 "[Mr Castleton] has obtained 2 experts'
 5 reports which conclude that the [Post Office's]
 6 Horizon computer System, despite the suspense
 7 account entry, has failed to recognise the entry
 8 on the daily snapshot and that Mr Castleton's
 9 Defence, 'appears to hold potential merit based
 10 on the limited documentation' they have so far
 11 reviewed."
 12 They say further down the page:
 13 "We take instructions from Cheryl Woodward,
 14 Agents Debt Team, Chesterfield but Mandy Talbot
 15 is copied in on emails. I spoke to Mandy last
 16 week to take instructions and her first question
 17 was why Bond Pearce had issued the claim when
 18 reliability was unclear."
 19 So it seems clear that you did provide
 20 instructions to Stephen Dilley, from that
 21 phrase?
 22 **A.** At that stage, yes.
 23 **Q.** "I informed Mandy that my colleagues had
 24 expressed concern to Cheryl about issuing."
 25 Then, if we could scroll down, there's

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1 a paragraph there about snapshots missing,
2 certain information missing, and then it says
3 this, it says:

4 "Mandy's next comment was that Cheryl may
5 not have had authority to tell Laura to issue
6 a claim but I was able to tell Mandy that Cheryl
7 had referred this question to her Managers
8 before instructing Laura to proceed.

9 "In any event, Mandy has instructed me to
10 put forward an offer of mediation to try to
11 settle the claim."

12 Now, did your previous experience in the
13 Cleveleys case influence you in some way on
14 receiving that email, on receiving that
15 information, to want to settle this case as
16 quickly as possible?

17 **A.** No, we wanted to settle the claim because it was
18 one where a counterclaim had been issued for
19 £250,000 and, even in 2005, that was a serious
20 amount of money. I was also concerned by the
21 fact that, when proceedings had been issued, the
22 paper in support of the claim wasn't in
23 apple-pie order. That was why I was concerned
24 that instructions had been issued given to issue
25 proceedings in the first place.

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1 with this case."

2 Why were you tired with this case at that
3 time?

4 **A.** It was taking up an awful lot of resource.
5 Ordinarily, subpostmasters' cases, for me
6 personally, would take up one/two hours a week
7 maximum. This case was beginning to take up
8 substantial periods of time.

9 Whether I expressed being tired with it,
10 it's quite possible I did use that word.

11 **Q.** Was it that Mr Castleton wasn't accepting
12 a payout at that stage, like in the Cleveleys
13 case?

14 **A.** Absolutely not.

15 **MR BLAKE:** We're going to move now to 2006.

16 Sir, that might be an appropriate moment to
17 take our mid-morning break. It's slightly early
18 but I think it is a natural break. Perhaps we
19 could --

20 **SIR WYN WILLIAMS:** That's fine, Mr Blake what time
21 shall we resume?

22 **MR BLAKE:** If we resume at 11.30, please.

23 **SIR WYN WILLIAMS:** Okay, yes.

24 (11.08 am)

(A short break)

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1 **Q.** So it continues to be your evidence that the
2 Cleveleys case was in no way relevant to your
3 thinking --

4 **A.** That was my evidence.

5 **Q.** -- in the *Castleton* case? Can we look at
6 POL00072402, please. We're still in November
7 2005. This is an attendance note made by Bond
8 Pearce. JMS1 is Julian Summerhayes. I believe
9 he is from Bond Pearce. It says there:

10 "JMS1 want to know whether there was any
11 evidence at all of the monies that were alleged
12 by Royal Mail to be outstanding? MT [that's
13 you, I believe, Mandy Talbot] indicating that
14 she had gone through the file but was certainly
15 not able to find any manual documents to confirm
16 this. JMS1 talking through a few of the issues
17 in the Reply and Defence to Counterclaim and
18 saying he had slightly amended that from the
19 version that had been sent through earlier."

20 It ends on this, it ends:

21 "She was still not sure why the firm had
22 been given instructions to issue. She will
23 revert soonest."

24 In fact, it also says:

25 "MT [that's you] talking about getting tired

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1 (11.30am)

2 **MR BLAKE:** Thank you, sir.

3 Mrs Talbot, before we broke -- I'm going to
4 summarise the position as far as I understand
5 it -- on Cleveleys, your evidence is you didn't
6 have anything to hide; is that right?

7 **A.** Correct.

8 **Q.** In respect of *Castleton*, you wanted to settle
9 *Castleton* because of the size of the
10 counterclaim; is that correct?

11 **A.** And because of missing paper documentation.

12 **Q.** But in respect of *Castleton*, like Cleveleys, is
13 it your evidence you had nothing to hide?

14 **A.** Absolutely nothing to hide.

15 **Q.** Can we look at POL00072669, please. This is
16 an attendance note we looked at with Mr Dille, 24
17 February 2006. He summarises a telephone
18 conversation that he had with you. Can we
19 scroll down a little bit, I'll just read those
20 two paragraphs.

21 He's recalling a discussion with you. He
22 says:

23 "Internally the Post Office feels conflicted
24 about which direction to go in with the
25 *Castleton* case. The Post Office believes the

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1 Horizon System is robust, but the downside is
 2 the cost (in Post Office's time and money) in
 3 proving a negative (ie that there are no faults)
 4 and that is expensive. For example, Mandy would
 5 need to get a report from Fujitsu (who
 6 apparently have difficulty writing in plain
 7 English) and get someone in the Post Office to
 8 review Fujitsu data to see if there are any
 9 anomalies."

10 It goes on to say:

11 "It is Mandy's view that the Post Office
 12 must not show any weaknesses and even if this
 13 case will cost a lot, there are broader issues
 14 at stake than just the *Castleton* claim: if the
 15 Post Office are seen to compromise on *Castleton*,
 16 then the 'the whole system will come crashing
 17 down' ie it will egg on other subpostmasters to
 18 issue speculative claims."

19 Pausing there, is that what you told Stephen
 20 Dilley in February 2006?

21 **A.** It may have been, as expressed in paragraph 1,
 22 Post Office genuinely believed that Horizon was
 23 a robust system and it felt -- I believe Post
 24 Office felt the need to demonstrate that it
 25 would take a firm line with any and all

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1 itself. We believed that it was a pure
 2 accountancy issue, in effect, but because of
 3 publicity sought, as I say, it was becoming
 4 a test case on Horizon, even though our -- that
 5 is not what we believed the case was about.

6 **Q.** If you had such confidence in Horizon and
 7 nothing to hide, why would you need to take such
 8 a hard line against Mr Castleton?

9 **A.** It wasn't necessarily against Mr Castleton.
 10 I really do think it was driven by the size of
 11 the potential counterclaim and that, if he had
 12 accepted any of the offers to mediate, I think
 13 things could have been resolved on a round table
 14 basis.

15 **Q.** Where there does it refer to the counterclaim
 16 being your motivation, driving force, in your
 17 case strategy?

18 **A.** This is a document created by Mr Stephen Dilley
 19 and the disclosure to this Inquiry has been very
 20 partial. I don't know whether, in February
 21 2006, I was in the position of expressing
 22 strategy. There was no litigation strategy
 23 within the Civil Litigation Department on how to
 24 deal with these cases. There was no strategy
 25 coming down from on high, from Post Office

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1 challenges to Horizon.

2 **Q.** We have there in speech marks, so similar to the
 3 speech marks we saw earlier in respect of
 4 "keeping your mouth shut" it says, "the whole
 5 system will come crashing down". It says:

6 "Mandy knows that Mr Castleton is talking to
 7 Barjarge (the other subpostmaster bringing
 8 a Horizon based claim). The Post Office's clear
 9 line to the industry must be that we are taking
 10 a firm line with Castleton. She even said she
 11 thought it might be damaging to settle the claim
 12 on confidential terms rather than fight it and
 13 lose."

14 So there seems to be a strengthening of the
 15 line towards Mr Castleton. We've gone from 2005
 16 potential settlement to now making an example of
 17 Mr Castleton.

18 **A.** Yes, that is correct. It went from being
 19 a case, to the best of my recollection, that
 20 started off small subpostmaster deficiency,
 21 massive potential counterclaim, based on, so we
 22 believed, unsupported allegations about the
 23 Horizon System.

24 By February 2006, however, it had sort of
 25 morphed into a test case on Horizon, despite

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1 Limited, on how to deal with these cases.

2 **Q.** Doesn't paragraph 2 there precisely set out the
 3 strategy that you wanted to adopt in
 4 Mr Castleton's case?

5 **A.** In this instance, this particular piece of
 6 litigation.

7 **Q.** Where were you getting those instructions from?

8 **A.** It says here I was getting them from Post Office
 9 Limited.

10 **Q.** Who was telling you that you needed to send
 11 a message to the industry? Was this your own
 12 view? Did it come from somewhere else?

13 **A.** I think it was coming from Post Office Limited.

14 But it was a very long time ago.

15 **Q.** Post Office Limited is a company name, it must
 16 have come from an individual. Who was it coming
 17 from -- or individuals?

18 **A.** I can't recall after this period of time, as
 19 I hadn't had the advantage of having access to
 20 full sequential documentation.

21 **Q.** There is a conversation between yourself and
 22 Stephen Dilley in February 2006, where he is
 23 quoting what he considers to be your view that
 24 the Post Office must not show any weakness. Is
 25 the strategy coming from you? I mean, it's

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1 quite a significant strategy that has
 2 implications for somebody's life. Can you try
 3 and assist with where the strategy is coming
 4 from?
 5 **A.** I believe it was coming from Post Office
 6 Limited, as expressed through me, and it was not
 7 personal, it was just dealing with an individual
 8 litigation case.
 9 **Q.** You have no recollection whatsoever where that
 10 direction was coming from?
 11 **A.** No.
 12 **Q.** Can we look at POL00070811, please. We are now
 13 in May 2006, an email from Stephen Dilley to
 14 you:
 15 "Dear Mandy,
 16 "I refer to our telephone conversation this
 17 afternoon and attach our draft cost schedule,
 18 for your information. As discussed, this is
 19 partly a tactical document: Mr Castleton wants
 20 to postpone mediation. The estimate should
 21 bring home the costs implications of doing
 22 that."
 23 If we continue to scroll down -- sorry, if
 24 we can scroll up to the top, you're the only
 25 name from the Post Office that's in the

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1 you], even if [the Post Office] wins, you may
 2 well find it difficult to enforce any judgment
 3 because of Castleton's asset position which is
 4 at best unclear. However, from the [Post
 5 Office's] view there are importance broader
 6 implications at stake such as the message it
 7 will send out to other subpostmasters if the
 8 [Post Office] settle or are seen to pursue it
 9 vigorously."
 10 So, once again -- the earlier message was
 11 from February, we're now in May -- a message to
 12 other subpostmasters being sent out in this
 13 litigation. Is that your recollection of the
 14 tactical approach that was being taken to that
 15 litigation at that time?
 16 **A.** At this stage, it had morphed, I think, from
 17 becoming a technical test case to an actual test
 18 case and, therefore, that is the position and
 19 the message that POL wished to put out.
 20 **Q.** Had you and the Post Office lost sight, by that
 21 point, of the fact that Mr Castleton,
 22 an individual, was involved in this case?
 23 **A.** I don't believe so because I seem to recall
 24 that, at the beginning of the litigation, he did
 25 have insurance cover. I do not know whether

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1 addressees there.
 2 **A.** Yes.
 3 **Q.** Yes. So he seems to be discussing tactical
 4 approaches to the litigation with you; is that
 5 a fair summary of what this email is aimed at?
 6 **A.** In this document, though I may well have sought
 7 instruction on it from my line manager and/or
 8 POL.
 9 **Q.** If we scroll down to number 4 and 5, please,
 10 thank you, he says there:
 11 "I've estimated the total global costs at
 12 nearly £223,000 including VAT and disbursements.
 13 As discussed, the costs will be disproportionate
 14 to the amount of the claim [which is circa
 15 £27,000] but not as it currently stands the
 16 counterclaim which is unspecified but put at not
 17 more than £250,000. However, I would value the
 18 counterclaim as much lower. There is a risk
 19 therefore that if the [Post Office] win,
 20 a significant proportion of costs may be
 21 disallowed on assessment because of
 22 proportionality."
 23 So disproportionate costs may be being spent
 24 on this litigation. He says:
 25 "As previously discussed [presumably with

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1 that had expired by this time.
 2 **Q.** But you are clearly spending what might be
 3 disproportionate costs on a case in order to
 4 pursue it for a wider goal. Is that a fair
 5 summary of the tactical approach that was being
 6 taken?
 7 **A.** This is still potentially a counterclaim for
 8 £250,000 where Horizon had now been put in to
 9 question, therefore POL thought it was the
 10 appropriate tactic to take.
 11 **Q.** Paragraph 5 suggests that, actually, the
 12 counterclaim isn't the real important matter
 13 that was at stake but it was sending a message
 14 out to subpostmasters?
 15 **A.** The counterclaim had not been amended at that
 16 stage.
 17 **Q.** Can we look at POL00090437, please. This is
 18 a pile of different documents. So it's not
 19 in -- I know the first page says, "Advice" but
 20 if we look at page 65, there's an email chain
 21 that appears there.
 22 At the bottom of page 65, please. We're now
 23 on 21 August 2006 and this is an email from Tom
 24 Beezer of Bond Pearce to yourself, copied to
 25 Stephen Dilley. Again, you're the only Post

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1 Office name at this stage that's being copied in
 2 to these emails. Are we to read into that that
 3 you had a significant handle on this case by
 4 that time?

5 **A.** I was the person within Civil Litigation that
 6 was dealing with the matter *vis à vis* Bond
 7 Pearce but I was seeking instructions upwards
 8 from senior officers within Post Office Limited
 9 and keeping my line manager copied into relevant
 10 communications.

11 **Q.** Are you still unable to name any of those senior
 12 managers?

13 **A.** Well, I've already given you the raft of
 14 managers within Civil Litigation.

15 **Q.** But in terms of who was providing you with the
 16 significant instructions to pass to Tom Beezer
 17 and Stephen Dilley, who was that?

18 **A.** I would have to go through what little
 19 disclosure there is to see who I was getting
 20 instructions from, if that correspondence hasn't
 21 already been disclosed.

22 **Q.** If we scroll down over to the next page, please,
 23 this is the contents of Tom Beezer's email. It
 24 says:
 25 "As we discussed last week I am writing to
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1 Mail/Post Office know of no issues with the
 2 Fujitsu system and are confident that it
 3 operates correctly. Please discuss this with me
 4 if you have a different view."

5 Did you at this point say, "Well, I had this
 6 case, the Cleveleys case, a joint expert was
 7 instructed independently and he questioned its
 8 integrity"?

9 **A.** No, I did not.

10 **Q.** Why at this stage did the Cleveleys case seem to
 11 simply be forgotten about?

12 **A.** Because I was of the opinion that the
 13 preliminary view by Mr Coyne was created in
 14 a unique set of circumstances, given that the
 15 original data was no longer available. I didn't
 16 consider it to be a full report because the
 17 offer from Fujitsu for him to come and visit
 18 their sites and look all over the data was never
 19 communicated to him. So I didn't consider that
 20 it was a full and comprehensive report.

21 **Q.** Did you consider that only a full and
 22 comprehensive report would have been sufficient
 23 to require passing on to your lawyers, who were
 24 dealing with a complaint about the Horizon
 25 System?
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1 update you on certain points that came out of my
 2 discussions on the *Castleton* case with Richard
 3 Morgan of Maitland Chambers."

4 He gives an "Overview" and he says:
 5 "A further point made by Richard Morgan was
 6 that we should endeavour to move the main area
 7 of focus in the case away from the Horizon
 8 System if possible."
 9 He then addresses, further down the page,
 10 Fujitsu. He says:
 11 "In this matter, Fujitsu are clearly going
 12 to play a role. I understand that Fujitsu are
 13 currently looking at the matters raised in
 14 a letter of 25 July 2006 from Castleton's
 15 lawyers ... One of the pivotal issues in this
 16 matter will be the arithmetic used throughout
 17 and I would like to go the answer from Fujitsu
 18 as soon as possible to the points raised by
 19 Castleton's lawyers. Is there any pressure you
 20 can bring to bear upon Fujitsu to cause them to
 21 answer this letter in the near future? I would
 22 be most grateful if you would consider this.
 23 "One other point raised by Richard was the
 24 integrity of the Fujitsu product generally.
 25 Just to confirm, I understand that Royal
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1 **A.** In all events, that full and comprehensive
 2 report never came into creation.

3 **Q.** And anything less than a full and comprehensive
 4 report you didn't think was sufficient to pass
 5 on to your legal advisers?

6 **A.** That's correct.

7 **Q.** They had asked you directly here whether --
 8 well, he says there:
 9 "... I understand that Royal Mail/Post
 10 Office know of no issues with the [Horizon
 11 System]."
 12 Did you not think at that point "Well, maybe
 13 I should be raising some issues with the Horizon
 14 System that I've learnt about in my experience
 15 of other cases"?

16 **A.** There isn't any communication in the document
 17 that has been -- documents that have been
 18 disclosed in which any conversation between
 19 myself and Stephen on that point is itemised.
 20 I do not believe, to the best of my
 21 recollection, that I did mention the case of
 22 Wolstenholme to him.

23 **Q.** Can we now POL00069592, please. This is
 24 a document I took Mr Dilley to. I know you saw
 25 Mr Dilley's evidence and you've had sight of
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1 this document today.

2 A. Yes.

3 Q. It's dated 5 September 2006. It's from BDO Stoy
4 Hayward, who were instructed in the *Castleton*
5 case on behalf of the Post Office. Could we go
6 to the final page there, please. Sorry, if we
7 could scroll up to the previous page, thank you,
8 it's that paragraph there, "Early indications of
9 problems with the Horizon System".

10 So it's on 5 September that they contact
11 Mr Dilley and say:

12 "We have found that there is some indication
13 of possible problems with Horizon from our
14 initial review of the electronic information you
15 sent us."

16 Was that communicated to you at the time?

17 A. I have no recollection of this document at all,
18 until a hard copy of it was handed to me this
19 morning.

20 Q. In terms of the BDO report, I'll take you to
21 that shortly -- you ultimately saw the BDO
22 report, didn't you?

23 A. In the additional disclosure, yes.

24 Q. So you hadn't seen it before this Inquiry?

25 A. I cannot recall seeing it.

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1 dealing with subpostmaster cases, was there
2 a particular group that was interested in
3 Horizon cases or something else?

4 A. I cannot recall after this period of time why
5 this selection. I can only conclude that they
6 are people who had shown an interest and it was
7 for that reason -- shown an interest or possibly
8 participated because I recall that Keith Baines
9 had given witness evidence, and so I felt that
10 they were an appropriate selection of parties to
11 contact to communicate this information.

12 Q. You haven't so far named any individuals who
13 were providing you with instructions to pass on
14 to the Post Office's solicitors. Does this
15 assist in any way with identifying who it may
16 have been who was providing you with the
17 instructions or information or direction in the
18 *Castleton* case?

19 A. There would have been a whole selection of
20 people who, in turn, would have raised it
21 further on up their reporting structures. So it
22 was, to a certain extent, a movable feast.

23 Q. No individuals stand out in particular there?

24 A. Not particularly.

25 Q. Could we go over the page, please. You're

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1 Q. I'll get to the report shortly. But you are
2 seen here on a number of different emails
3 between the solicitors acting for the Post
4 Office and you. Is it likely that, on receiving
5 a letter of this significance from BDO, that
6 they would have passed on or summarised that
7 information for you?

8 A. I can't answer that.

9 Q. Can we look at POL00113909, please. If we
10 scroll to the bottom, we're now in November,
11 9 November 2006. There's an email from you.
12 Can you assist us with that distribution list
13 and why you would have been sending information
14 about the *Castleton* case to that distribution
15 list?

16 A. Okay. Biddy Wyles by this time was my immediate
17 line manager; Clare Wardle, head of Civil
18 Litigation; Rod Ismay has already given evidence
19 to this Inquiry. I used to communicate with
20 these people regularly but, after so many years,
21 I'm afraid I can't assist.

22 Q. Are you able to assist, not with what their
23 specific roles or duties were but simply why it
24 is that you would have chosen that group of
25 individuals? Was there a particular group

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1 passing on some good news -- and, over the page
2 again, thank you -- about the *Castleton* case.
3 It's about the potential of settlement in that
4 case. We're in November 2006. This settlement
5 doesn't ultimately happen but can we go over to
6 page 5, please. Thank you. It's the second
7 paragraph there. You say there, about halfway
8 down:

9 "The benefit of having a judgment against
10 him [against Mr Castleton] in the full amount is
11 that we will be able to use this to demonstrate
12 to the network that despite his allegations
13 about HORIZON we were able to recover the full
14 amount from him. It will be of tremendous use
15 in convincing other postmasters to think twice
16 about their allegations."

17 So again, that seems to be a significant
18 driving factor in respect of the Post Office's
19 approach to this report.

20 A. By this time, it had become, in fact, a test
21 case. Therefore, if a judgment were obtained,
22 it would have been of benefit to Post Office
23 Limited.

24 Q. We saw a moment ago that in September 2006, BDO,
25 the accountants, had written their initial

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1 concerns and sent a letter to Mr Dilley. You're
2 not sure whether you received that or not but,
3 at this time, when you were talking about using
4 his case as a message to other subpostmasters,
5 do you think it likely that, in fact, you knew
6 that there may, in fact, be problems with the
7 Horizon System, as highlighted by BDO Stoy
8 Hayward?

9 **A.** Excuse me, can you just scroll back as to the
10 date of this? Oh, this is November, isn't it?
11 **Q.** Yes, this is 9 November 2006. The BDO letter
12 was 5 September 2006. If it assists -- and I'm
13 going to take you to it shortly -- the actual
14 report from BDO, the draft report, was received
15 on 29 November. So the final report was shortly
16 after this email correspondence but there had
17 been correspondence from BDO to Mr Dilley.

18 **A.** Excuse me, can you repeat the question again you
19 want me to answer?

20 **Q.** At this time, the strategy seems to be
21 convincing other postmasters to think twice
22 about their allegations. Might you, by this
23 stage, have known that, in fact, your own
24 experts had raised an issue with the Horizon
25 System, very similar to the Cleveleys case?

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1 System did not contribute to the errors in any
2 way and formally withdraw all statements I made
3 to the contrary."

4 So there is a form of words there that
5 clearly suggests that the Horizon System didn't
6 contribute to the errors. It says that the debt
7 arose out of human error. What evidence was
8 there that the debt arose out of human error?

9 **A.** The evidence of the witnesses from Fujitsu and
10 Post Office Limited who had recreated the
11 accountancy side of this debt action.

12 **Q.** Why do you say "human error", though? Why is it
13 not something else? How can you be sure, have
14 sufficient certainty, that the debt arose out of
15 human error? First of all, how can you be sure
16 that there was a debt at all? If there was
17 a wrong button pressed, for example, how could
18 you be sure that there was an actual loss to the
19 Post Office?

20 **A.** Because Post Office Limited staff had gone
21 through the accounts and the materials at the
22 branch and recreated various cash accounts and
23 other documentation to demonstrate that there
24 was a valid debt.

25 **Q.** There may have been figures showing that there

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1 **A.** An issue but we had a whole selection of witness
2 statements from Fujitsu employees who were
3 confident that their evidence was going to be
4 persuasive.

5 **Q.** Can we, please, look at POL00069775, please,
6 10 November. So this is the day after that
7 email.

8 **A.** Mm-hm.

9 **Q.** Can we please look at page 3. So if we scroll
10 slightly up the bottom of page 2 we have
11 an email from you, 10 November, to that
12 distribution list, so we have names such as Rod
13 Ismay on there. If we scroll down, you are
14 proposing that Mr Castleton signs a form of
15 words and the proposal there is as follows, for
16 him to say:

17 "I Mr L Castleton the former postmaster at
18 Marine Drive Post Office admit that a sum of
19 money was owed by me to Post Office Limited as
20 a result of errors which arose whilst I was the
21 postmaster at the above office. I had [must be
22 'thought'] that this debt arose due to
23 a malfunction of the HORIZON System but I now
24 accept that I was mistaken and the debt arose
25 out of human error. I declare that the HORIZON

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1 was a debt but, in terms of an actual loss to
2 the Post Office, how could be sure of that?

3 **A.** If they were of the opinion that there was
4 a valid debt and there was sufficient
5 documentary evidence in support, I was prepared
6 to accept that position.

7 **Q.** You mentioned earlier that the case was about
8 the size of the counterclaim and that's why you
9 wanted to settle the case. If it was about the
10 counterclaim, why would you be seeking to get
11 Mr Castleton to sign up to this statement?

12 **A.** Because, as I've said earlier, by this time, it
13 had become, due to publicity, a test case in its
14 own right.

15 **Q.** Was it very much like the Cleveleys case: that
16 you wanted to silence him?

17 **A.** No.

18 **Q.** Why get him to sign up to a statement such as
19 that if you didn't want to silence?

20 **A.** Because it would have -- I didn't seek silence.
21 It would have been of use to Post Office Limited
22 in dealing with other suggestions that there
23 might be issues with the Horizon System.

24 **Q.** Isn't that entirely consistent with, for
25 example, counsel's advice in the Cleveleys case

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1 that I took you to earlier about the Post Office
 2 seeking to avoid publicity?
 3 **A.** I don't accept that.
 4 **SIR WYN WILLIAMS:** Whose idea was it to ask
 5 Mr Castleton to use those form of words? Was it
 6 yours or was it someone else and, if so, who was
 7 it?
 8 **A.** I genuinely can't remember after this period of
 9 time. Supporting the Horizon System was very
 10 important to Post Office Limited at the time.
 11 **SIR WYN WILLIAMS:** But --
 12 **A.** On the balance of probabilities, I think it was
 13 something that emanated from Post Office Limited
 14 but that's purely my opinion.
 15 **SIR WYN WILLIAMS:** Like Mr Blake, the expression
 16 "Post Office Limited" doesn't give me very much
 17 information because, ultimately, there must have
 18 been a person or persons within Post Office
 19 Limited. So is your evidence to me that
 20 probably this form of words was suggested to you
 21 and you acted, in effect, as the go-between in
 22 passing it on but you can't remember who it was
 23 that suggested the form of words to you?
 24 **A.** I'm very sorry but I can't assist you any
 25 further on this.

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1 **Q.** If we go to the first page, we then have
 2 Mr Dilley commenting on it and he seems to want
 3 to strengthen it further. I think the additions
 4 he has, for example, are "unreservedly withdraw
 5 the untrue allegations" and also, the words at
 6 the bottom:
 7 "... allegations about the Horizon System
 8 and/or its functioning."
 9 Do you remember having any views as to that
 10 form of words?
 11 **A.** No, it was just an alternative draft.
 12 **Q.** Knowing what you already knew from, for example,
 13 the Cleveleys case, did you think that then
 14 might have been an appropriate time to raise any
 15 concerns you had about the functioning of the
 16 Horizon System?
 17 **A.** As I've said previously, I draw distinction
 18 under the Cleveleys case and I did not think
 19 that that was the time to draw distinction.
 20 **Q.** Ultimately, the approach there and the approach
 21 in the Cleveleys case was similar, in that you
 22 were getting somebody to effectively "shut up",
 23 to use the words from -- or "keep their mouth
 24 shut", I think was the expression in the
 25 Cleveleys case. Was this again an attempt to

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1 **SIR WYN WILLIAMS:** All right.
 2 **MR BLAKE:** Mrs Talbot, it may assist, if we look at
 3 the email again, if we go to the top of the
 4 email with the distribution list -- sorry, it's
 5 the bottom of page 2. We have there the
 6 distribution list. So it's an email from you to
 7 various people within the Post Office.
 8 **A.** Mm-hm.
 9 **Q.** Were those people, on the whole, more senior to
 10 you, less senior?
 11 **A.** Biddy Wyles and Clare Wardle, certainly within
 12 Legal Services. I think that Mr Ismay, Richard
 13 Barker were more senior to me. I don't know the
 14 status about the others.
 15 **Q.** If we scroll down, we can see, you say above the
 16 highlighted passage:
 17 "I have prepared a short statement but would
 18 be very grateful for any improvements which you
 19 can suggest."
 20 So it certainly seems as though that form of
 21 words was your drafting.
 22 **A.** It may well -- it -- it's a possibility.
 23 **Q.** Would you have said, "I have prepared a short
 24 statement", if somebody else had drafted it?
 25 **A.** Probably not.

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1 get Mr Castleton to keep his mouth shut?
 2 **A.** No. It was a way of drawing litigation to
 3 a conclusion on the best possible terms for Post
 4 Office Limited.
 5 **Q.** Would Mr Castleton have been free to continue
 6 saying that the Horizon System was not
 7 functioning properly?
 8 **A.** If he had been prepared to sign the Tomlin
 9 Order, that is maybe something we would have
 10 taken into consideration later. As it was, he
 11 instructed his solicitors that he wasn't
 12 prepared to sign the Tomlin Order.
 13 **Q.** Had he signed up to that, would he have been
 14 free to say that the problem was the Horizon
 15 system?
 16 **A.** I can't tell. That's not a situation that
 17 occurred.
 18 **Q.** You've said that it wasn't intended to shut him
 19 up but, in reality, if he had signed what you
 20 were asking him to sign, would he have been
 21 free, in reality, to continue to make
 22 allegations --
 23 **A.** It's a hypothetical. It didn't occur.
 24 **Q.** I agree but can you answer the question?
 25 **A.** It didn't occur.

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1 Q. I'm trying to get to your thinking behind this
 2 form of words. You've said that it wasn't to
 3 shut Mr Castleton up. Surely, if he had signed
 4 it, he could not have criticised the Horizon
 5 System, so the effect was intended to shut him
 6 up, was it not? I'm asking about your thinking
 7 behind the effect of asking him to sign up to
 8 such a stringent form of words.

9 A. If he had signed it, which he didn't, the
 10 litigation would have concluded. He would not
 11 have been able to comment further upon the
 12 Horizon System and Post Office Limited would
 13 have been free to comment upon the *Castleton*
 14 situation as it chose.

15 Q. Do you not see parallels between the strategy
 16 that was adopted in the *Cleveleys* case and the
 17 strategy that is being adopted here, that you
 18 are effectively ensuring that somebody does not
 19 publicly criticise the Horizon System?

20 A. There was no diktat from on high dictating
 21 strategy within these two separate litigation
 22 cases.

23 Q. So you were an individual who was involved in
 24 both cases; the strategy seems to be the same.
 25 Was that therefore coming from you?

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1 problems that apparent from the accounting
 2 records are three very small differences in the
 3 cash account ..."

4 So having identified there that there are
 5 possible computer problems, were you aware of
 6 that?

7 A. I would have seen a copy of this report at the
 8 time it was created.

9 Q. Is that in some way consistent with the expert
 10 report in the *Cleveleys* case of possible
 11 computer problems?

12 A. Based on two wholly different sets of facts, BDO
 13 Stoy Hayward were ostensibly a firm of
 14 accountants, not IT experts.

15 Q. Two cases in two years, two expert reports, both
 16 identifying possible computer problems. Did
 17 that not cause you to pause for thought?

18 A. At the time, no.

19 Q. Why wasn't this report ultimately disclosed to
 20 Mr Castleton?

21 A. I've seen an email exchange between Stephen
 22 Dilley and myself and I've wracked my brains and
 23 I cannot recall why it wasn't disclosed.

24 Q. Did you discuss that report with anybody at the
 25 Post Office?

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1 A. I dealt with both cases separately and
 2 individually and came to the same advice in
 3 both.

4 Q. Was it entirely a coincidence that the strategy
 5 adopted in both was to try to prevent public
 6 criticism of the Horizon System?

7 A. Post Office Limited was concerned to preserve
 8 the integrity of the Horizon System. There is
 9 no doubt about that.

10 Q. As the Chair has said, "Post Office Limited" is
 11 not a very helpful description of who it was
 12 that was concerned. You were involved in both
 13 of these cases. Was this your strategy?

14 A. It is, I believe, the strategy of Post Office
 15 Limited -- though I cannot speak to Post Office
 16 Limited -- communicated through myself as the
 17 solicitor dealing with these two litigation
 18 cases.

19 Q. Can we please look at POL00069955, please. This
 20 is the draft report from BDO Stoy Hayward and
 21 it's page 4. You'll have seen this is
 22 a document that I took Mr Dilley to. We have
 23 the summary there and the very first of BDO's
 24 conclusions is:
 25 "The only indications of possible computer

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1 A. I genuinely cannot recall, after this period of
 2 time.

3 Q. Did that report not make you question whether
 4 the infallibility of the Horizon System was now
 5 in question, in doubt?

6 A. The sums in the report are tiny in the extreme
 7 and we had become aware of potential glitches
 8 but were assured by Fujitsu that they were rare,
 9 unusual, extreme, capable of being identified
 10 and, therefore, excluded when Fujitsu were asked
 11 to look at Horizon data.

12 Q. Given that there were potential glitches, do you
 13 think it was right to be trying to get Lee
 14 Castleton to sign an undertaking not making
 15 allegations about the Horizon System when your
 16 own expert had identified at least one issue
 17 and, as you say, Fujitsu themselves had accepted
 18 that there were potential glitches?

19 A. At that time, I was tasked with obtaining
 20 a satisfactory resolution of this litigation
 21 from the perspective of Post Office Limited.

22 Q. Were you personally satisfied that that was the
 23 correct approach, the ethical approach, for
 24 example?

25 A. It was the approach I adopted at the time.

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1 Q. We know you adopted that approach but did you
2 think it was right at the time?

3 A. I don't think I considered it.

4 Q. Do you now, looking back at it, think it was the
5 right approach?

6 A. Given the information that has become aware in
7 the public arena since the *Bates* trial, I do not
8 any longer consider that that was the right
9 approach to have adopted but then, given the
10 information that's become public since *Bates*,
11 I think it was wrong the proceedings were ever
12 issued against Mr Castleton.

13 Q. *Bates*, of course, was much later.

14 A. Yes.

15 Q. You're here in 2006. You've got the BDO report.
16 You've got, as you said, acceptance from Fujitsu
17 that there were potential glitches. Looking
18 back at it then, with the information you had
19 then, do you consider that it was right to try
20 to get Lee Castleton to try to sign
21 an undertaking not making allegations about the
22 Horizon System, in light of the information you
23 had at that time?

24 A. I believe that it was because my job was to
25 conclude litigation in a satisfactory fashion as

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1 back to a document we've already looked at,
2 which is POL00070811. This was the email,
3 I think you'll recall, from Stephen Dilley to
4 you and, at the bottom, where he says that, as
5 previously discussed, essentially, costs would
6 be disproportionate but there will be broader
7 implications.

8 This is just to refresh your memory of that
9 particular document. I'd now like to go to
10 POL00119897. This is a documents from 18 August
11 2006, from Cheryl Woodward to Stephen Dilley.
12 She says:

13 "I've passed the case on to a Senior Manager
14 who is going to speak to Mandy Talbot regarding
15 not being happy about the costing of this matter
16 going to trial."

17 Do you remember about the costing -- you not
18 being happy about the costs?

19 A. No, I -- I'd never seen this email before
20 disclosure.

21 Q. Okay. I'm going to look at a policy. It comes
22 later, it's POL00084977. This is a policy
23 that -- the copy that we have, the version that
24 we have -- post-dates this particular case.
25 It's December 2009. I'd like to take you to

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1 far as Post Office Limited were concerned.

2 Q. Can we look at POL00070160, please. We're now
3 on 5 September 2006, so quite close to the trial
4 in the *Castleton* case we have there an email
5 from yourself to Stephen Dilley talking about
6 a case called *Brown* and you say:

7 "Apparently *Brown* is going to be a problem
8 because it is a case where [the Post Office]
9 admitted there was a problem with the system and
10 replaced it. I am hoping this is a one-off
11 event like a power outage or something of the
12 like. I will investigate further tomorrow."

13 Very close to trial, did this cause you to
14 pause for thought at all?

15 A. The consequence of the list of parties,
16 including Mr Brown, who I believe Mr Castleton
17 had indicated he was going to call to trial, and
18 some information about what they were likely to
19 say, made me go to Post Office Limited and
20 Fujitsu to try to investigate, to acquire as
21 much information about these cases as I could
22 and to relay what information I acquired to
23 Mr Dilley.

24 Q. I'm going to move on to a different topic and
25 that's the topic of costs. Can we please go

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1 page 17 of this. Is this a document that you're
2 familiar with at all?

3 A. I have no recollection of this document
4 whatsoever and, although the coversheet is
5 December '09, if you look at the date at the
6 bottom of most of the appendices, it is August
7 2010.

8 Q. Yes.

9 A. Therefore, I have no knowledge whether this was
10 actually ever implemented at all.

11 Q. There's something I'd just like your view on,
12 it's page 17.

13 A. Mm-hm.

14 Q. If we scroll down, it says there:

15 "The write-off authority levels are fairly
16 transparent ... The decision-making process to
17 write-off debt is usually where the cost of
18 recovery outweighs the debt (ie very high legal
19 costs) and/or the debt is unrecoverable
20 (eg insufficient evidence, legalities,
21 [et cetera]). It is important to note that
22 every case is unique, and therefore all cases
23 are assessed on a case by case basis."

24 It seems to suggest that certainly
25 a consideration in writing off debt is whether

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1 the case would be very high legal costs and
 2 whether the debt was unrecoverable. Were those
 3 considerations that you were asked to take into
 4 account in relation to Mr Castleton's case,
 5 irrespective of the fact that this policy comes
 6 later, but those considerations, do they feature
 7 in your thinking at all?

8 **A.** No. On the basis that the case and having
 9 a judgment that would be beneficial to POL was
 10 considered to be so important to the business.
 11 The document you've just referred to was, in my
 12 opinion, the very first attempt by Post Office
 13 Limited to, in effect, take an overview as to
 14 the whole subpostmaster estate. I think before
 15 that, there was no single strategy behind
 16 anything.

17 **Q.** So there was no policy in place about, for
 18 example, the expenditure of disproportionate
 19 costs in a case?

20 **A.** No.

21 **Q.** Was there no policy on when matters needed to be
 22 raised with senior management within the Post
 23 Office?

24 **A.** No. Although I had worked for two City firms
 25 for a very short period of time, I didn't really

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1 **Q.** Can we look at POL00069766, please. Thank you.
 2 If we go to the bottom email, please. We have
 3 an email from Mark Turner, solicitor in the
 4 commercial group of Rowe Cohen solicitors and he
 5 is emailing Stephen Dilley and this is forwarded
 6 on to you. He says:

7 "I have just tried to speak to Mr Castleton
 8 but have been informed by his wife that he is
 9 rather unwell, is in bed on his doctor's
 10 instructions, and is on some pretty strong
 11 medication to treat the stress-related condition
 12 that led to his hospitalisation last week. As
 13 a result of the medication, he is somewhat 'out
 14 of it' and apparently not in any fit state to
 15 provide me with instructions."

16 That's 15 November 2006 and, if you scroll
 17 up, you can see that Stephen Dilley forwarded
 18 that to you by way of an update.

19 There's another email POL00069722, two days
 20 later, 17 November. This is when settlement was
 21 being discussed with Mr Castleton's solicitors.
 22 If we look at the email at the bottom, it says:

23 "Dear Mandy,

24 "Please see below from Castleton's
 25 solicitors. I have spoken to him and chased him

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1 have any experience of management. When I first
 2 came into Post Office Legal Services, I wasn't
 3 aware of the lack of structure that would be
 4 apparent in most firms and most organisations,
 5 in terms of reporting matters upwards, or
 6 obtaining instructions coming downwards. It
 7 just wasn't there.

8 **Q.** So what was your view of the Post Office as
 9 an organisation, in the way it was run in
 10 respect of the bringing of actions, management
 11 of actions against subpostmasters?

12 **A.** This is my own personal opinion. I could never
 13 understand why, in some cases, actions were
 14 taken because, as I've said, the way the system
 15 was set up enabled departments to go out
 16 straight to external lawyers without referring
 17 to in-house legal assessment at all. And why,
 18 on other occasions, the appropriate thing
 19 considered was to get the Security teams
 20 involved and, thereafter, refer it to the
 21 Prosecution or Criminal Litigation department.

22 **Q.** I want to move on to a different topic, which is
 23 Mr Castleton's health and costs and issues of
 24 bankruptcy?

25 **A.** Mm-hm.

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1 to sign the content order. He is going to call
 2 Mr Castleton's GP today to check that Castleton
 3 has the mental capacity to give him instructions
 4 ..."

5 Then if you look at the top email from you
 6 to Stephen Dilley, you say:

7 "Noted. It's frustrating given that
 8 hopefully the settlement will be concluded
 9 shortly."

10 Were you aware of any policies within the
 11 Post Office addressing what to do if a party was
 12 hospitalised through stress?

13 **A.** I wasn't aware of any policy within Post Office
 14 Limited itself relating to the physical or
 15 mental health of a party.

16 **Q.** If we look at POL00070210, please. There is
 17 an agreement between the Post Office and Bond
 18 Pearce, and this is called a "Subpostmaster and
 19 Commercial Litigation Protocol"; do you remember
 20 this document?

21 **A.** I didn't until the additional disclosure.

22 I don't know if this was created before the
 23 *Castleton* case or as a consequence of the
 24 *Castleton* case. I just can't remember the date
 25 of it.

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1 Q. It has you down as the Legal Services
2 representative?
3 A. For subpostmaster cases.
4 Q. Yes. So does that suggest that you were
5 responsible within the Post Office for
6 subpostmaster cases?
7 A. Within my small area of Civil Litigation, I was
8 the liaison between Bond Pearce over these
9 matters. Whether I was the liaison with all of
10 the other regional firms on subpostmaster cases,
11 I can't recall.
12 Q. Could we go down to the second page, the bottom
13 of the second page. There's reference there to
14 "Significant/Sensitive Cases", and it says that:
15 "Bond Pearce shall notify the client and
16 [you] of all significant and sensitive cases
17 ..."
18 Then it gives some examples.
19 Now "stress/bullying/harassment", am I right
20 to understand that that is not in the context of
21 the litigation? That means the topic of the
22 litigation, whether it's --
23 A. I'm trying to recall whether Bond Pearce dealt
24 with employment cases, where a provision like
25 that would have been far more relevant.

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1 that was?
2 A. I assume someone within the Error Resolution
3 Team because I think that, as a subpostmaster
4 deficiency, theirs would have been the
5 department tasked with recovering the
6 deficiency.
7 Q. Thank you. We're now in 2007, so it's after the
8 original court case in the *Castleton* case, and
9 you say there:
10 "He has declared himself bankrupt which was
11 expected and we are still awaiting details of
12 the valuation. After a year if he has not sold
13 the property the rights of his kids to have
14 a house over their heads becomes an irrelevance
15 and as the largest creditor we can put the
16 property up for sale through a trustee in
17 bankruptcy."
18 You say there it was expected that he would
19 declare himself bankrupt. Was that something
20 that you were aware of during the proceedings?
21 A. During the proceedings?
22 Q. Yes.
23 A. No. I think in the period after the trial, it
24 was suggested.
25 Q. Given the value of the claim and given the

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1 Q. If we scroll down the list of significant and
2 sensitive cases, do you consider the *Lee*
3 *Castleton* case to have been a significant or
4 sensitive case, falling within any of those
5 criteria?
6 A. As it developed, yes.
7 Q. Which one would that be?
8 A. Although it refers to case values in excess of
9 500,000, I actually am of the opinion that any
10 case involving £250,000 is also something that
11 should have been reported on.
12 Q. We know that you were, of course, aware of this
13 particular case.
14 A. Mm-hm.
15 Q. I mean, if we scroll up, all this agreement
16 means is that you would be notified. Was there
17 an equivalent policy within the Post Office to
18 notify those within management, for example, of
19 those kinds of cases?
20 A. No, there wasn't, that I am aware of.
21 Q. I want to address now his bankruptcy. Can we
22 look at POL00113487, please. It's page 7 of
23 this pack of documents. Page 7., thank you.
24 It's that middle email from yourself to Martyn
25 Mitchell of the Post Office. Do you recall who

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1 strategy that the Post Office adopted, which was
2 to essentially, as you've accepted, make
3 an example of Mr Castleton for wider purposes to
4 dissuade other subpostmasters from bringing
5 actions, did you think it was proportionate for
6 the Post Office to seek to recover its costs
7 through the sale of Mr Castleton's home?
8 A. There had been opportunities at the time of the
9 proposed Tomlin Order to have settled the matter
10 without the then additional costs of the trial.
11 As we had been -- as Post Office Limited had
12 been put to the cost of the trial, it was just
13 normal litigation tactic to try to recover
14 whatever costs we could using legal methods.
15 Q. There's an email from Stephen Dilley that I can
16 take you to. It's POL00072206. This is even
17 later. This is now 2009. You may recall from
18 Mr Dilley's evidence, it's the bottom email,
19 where he says:
20 "It is frustrating that there is no
21 financial recovery in this instance although we
22 knew that the prospects were slim particularly
23 after he was made bankrupt. Post Office
24 Limited's main goal in pursuing Mr Castleton was
25 achieved in that we have a good judgment

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1 precedent which helps us to defend the Horizon
2 System."

3 Do you think it was fair to bankrupt
4 Mr Castleton in pursuit of that wider goal?
5 **A.** Mr Castleton chose to bankrupt himself but it
6 was a legitimate -- it was legitimate on the
7 part of Post Office Limited as the major
8 creditor to seek to recover what costs it could.
9 **Q.** You've been very frank about this in your
10 witness statement and I'd like to turn that up,
11 please. So could we have a look at
12 WITN08500100. That's Mrs Talbot's witness
13 statement. It's page 19 I'd like to look at.
14 It really draws the themes that I've been
15 exploring just now of cost and bankruptcy
16 together. It's page 19 of the witness
17 statement. Thank you.

18 At the end, at the bottom of that page,
19 please. You say there at the bottom, it begins
20 at the very last line:

21 "The tactic of [the Post Office] was to draw
22 the costs position to the attention of
23 Mr Castleton ... then to overwhelm Castleton
24 with evidence and preserve the trial date of
25 early December. I refer to the telephone

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1 until the defendant or those acting for him had
2 made the appropriate formal application to the
3 court. I don't know what consideration POL took
4 before deciding to send the matter out to
5 external solicitors to issue proceedings.
6 I just don't know whether they took somebody's
7 physical or mental health into consideration.
8 **Q.** So if we look at paragraph 44 below, you say:
9 "In general the physical or mental wellbeing
10 of a subpostmaster may well have been considered
11 a relevant factor prior to the decision to refer
12 a matter out to agents but that was a matter for
13 [the Post Office]. I would not have been aware
14 of any decisions taken in this respect and do
15 not know if this was considered in this case.
16 Civil Litigation were never asked to the best of
17 my knowledge ..."

18 **A.** Yes.

19 **Q.** So to try to understand the process, you would
20 receive a case from somewhere within the Post
21 Office. Where, in particular, would you receive
22 a case relating to a subpostmaster?

23 **A.** It could have come from the teams dealing with
24 subpostmaster deficiency debt. In the case of
25 Mr Castleton, it was already sent out by

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1 attendance note [et cetera]. These would have
2 been standard tactics in high ... litigation
3 cases."

4 Pausing there, do you see the Post Office as
5 in any way different to a normal litigating
6 partner?

7 **A.** I don't think that I do see it as different to
8 any other client.

9 **Q.** Can we go on to the next paragraph, in fact
10 paragraph 44, page 21 -- sorry, it's 43, in
11 fact. Thank you.

12 You say at the top of that page, page 21, so
13 over to the next page, please. You say:

14 "A Defendant's wellbeing was not considered
15 by [the Post Office] as relevant to the manner
16 in which litigation was conducted unless or
17 until the Defendant or those acting on his
18 behalf made a relevant application to the Court
19 assuming that litigation had already commenced."

20 Can you assist us with what you mean there?

21 Did at no stage the Post Office consider the
22 wellbeing of a party, unless that party had made
23 an application to the court?

24 **A.** I can't speak as to Post Office Limited but,
25 within Civil Litigation, we wouldn't, unless and

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1 Ms Woodward to Bond Pearce without us in-house
2 solicitors having any knowledge of it.

3 **Q.** So would the in-house solicitors not have a say
4 as to whether the physical or mental wellbeing
5 of a subpostmaster was a relevant factor in
6 continuing a case?

7 **A.** Continuing with the case?

8 **Q.** Yes.

9 **A.** As I referred into my statement several
10 paragraphs before, it would only have become
11 an issue if a formal application had been made
12 to the court. I never knew of a case where we
13 were asked by Post Office Limited to keep them
14 apprised of what may be happening with
15 a physical or mental condition of a defendant.

16 **Q.** Do you think you did or didn't keep people
17 apprised of Mr Castleton's wellbeing in the
18 broader --

19 **A.** I was never asked to do so specifically and it
20 would not have been normal in general high value
21 litigation.

22 **Q.** Can we look at POL00072991, please. It's the
23 second page. We have an email there from Joseph
24 Napier, who was a partner in Napier & Sons.
25 We're now in December 2010, so further on,

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1 a year on.

2 **A.** Mm-hm.

3 **Q.** He says there, in the second paragraph:

4 "I have had discussions with [this is

5 somebody called Katherine McAlerney, with her

6 solicitor]. They're still making some noises

7 [regarding] the Horizon System but I am not

8 getting the impression that they expect their

9 arguments to bring them very far.

10 "McAlerney is in financial difficulty. She

11 is trying to sell land", et cetera.

12 Then your response above is:

13 "Joe

14 "Thank you for the update in this matter.

15 We recently won a prosecution of

16 a subpostmistress by the name of Misra and as

17 a result we anticipate that the complaints about

18 the Horizon System may decline. I presume that

19 her complaints about Horizon are generic rather

20 than specific."

21 This is a later case, dealing again with

22 complaints about Horizon, and there is mentioned

23 in that email from the solicitor about financial

24 difficulties. Am I right to read into that that

25 Mr Castleton's case was not unusual in the

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1 **SIR WYN WILLIAMS:** By all means. You take it as you

2 think appropriate, Mr Blake.

3 **MR BLAKE:** Thank you.

4 Involvement in criminal cases. You address

5 this in your witness statement. It's

6 paragraph 54 of your statement, where you say:

7 "Civil Litigation solicitors would have no

8 interest or involvement in a criminal case until

9 it had been concluded."

10 Can you assist us with how those teams were

11 separated? Were they physical separations?

12 **A.** When I first joined Legal Services, we were in

13 a tower block in Croydon and the Legal Services

14 Departments were spread out on two separate

15 corridors, two separate floors. The Criminal

16 Department was down another corridor, in effect

17 physically separated from the general Civil

18 Litigation Team and, by about 2006 -- and I'm

19 basing this on disclosure that was made on

20 Tuesday -- the Prosecution criminal team was

21 based in Victoria in Central London.

22 So we were geographically in separate places

23 for the middle to latter portion of 2000 to

24 2010, and physically separated in terms of being

25 two separate ends of a divided corridor, when we

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1 respect of the ultimate result causing

2 significant financial difficulties to

3 a subpostmaster?

4 **A.** I have no idea. We were never tasked with

5 keeping any sort of financial record or any

6 other sort of record about subpostmaster

7 deficiency cases, until such time as the Andy

8 Greening document, end-to-end postmaster debt,

9 in the August 2010 and, even then, I don't know

10 whether that was ever properly implemented.

11 **Q.** So, throughout your years in the legal

12 department at the Post Office, did you not

13 yourself see trends rising in relation --

14 **A.** I was never asked to look for trends.

15 **Q.** You weren't asked to look for trends but did you

16 not sense any trends yourself?

17 **A.** As I said earlier, ordinarily, when I wasn't

18 dealing with cases like Mr Castleton, that were

19 truly extraordinary, I would spend one maybe two

20 hours a week on these matters, subpostmaster

21 deficiency. It was a very, very small part of

22 my caseload.

23 **Q.** I'm going to move on to a different topic.

24 Sir, I think I'll continue. We have

25 20 minutes before 1.00. I think I'll press on.

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1 were all working together in Impact House.

2 There is a sort of landing with two sets of

3 double doors and Criminal and Prosecution were

4 down one end and Civil down the other end.

5 **Q.** Did you share any joint meetings?

6 **A.** I think it extremely unlikely, until possibly

7 the 2000s, because --

8 **Q.** Do you mean 2000s or do you mean post-2010?

9 **A.** No, sorry, 2010. Because from 2000 to the end

10 of 2009, and possibly way in to 2010, our only

11 real connection with Prosecution was cases where

12 they had not been able to achieve recovery of

13 outstanding debt. Therefore, they would

14 prosecute an individual and if they forgot to

15 apply for a compensation order or the court

16 wasn't minded to grant it then, and only then,

17 would a case from Prosecution be referred to

18 ourselves.

19 **Q.** How about management? Did you share the same

20 management structure?

21 **A.** As I say, I worked to either my team leader or

22 to the Head of Civil Litigation. Criminal and

23 Prosecution worked to Mr Rob Wilson. So we

24 didn't share a management structure in that

25 respect.

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1 Q. Did their managers share a manager, if you're
2 able to assist us with that?

3 A. I believe that Rob Wilson -- if I can go back to
4 the early days, I believe that Rob Wilson and
5 Joe Ashton, who were respectively Head of
6 Criminal and Head of Civil Litigation, reported
7 directly to Catherine Churchard, who was the
8 solicitor to the Post Office at that time. And
9 I believe that that's a structure that was
10 maintained subsequently.

11 Q. Thank you. Can we look at POL00083161_002,
12 please. It's page 2 of that document. Again,
13 I'm going to take this broadly chronologically,
14 looking at involvement in criminal cases. If we
15 could look at the bottom email. There is
16 an email forwarded by you, but it's originally
17 from Graham Ward, who was Graham Ward? I think
18 if we scroll down, we can actually --

19 A. There's possibly his title on the next page.

20 Q. There is. It says "Casework Manager, Post
21 Office Limited Investigation Team"?

22 A. Yeah.

23 Q. So he was part of the Investigations team, was
24 he?

25 A. Yes, and they worked primarily on criminal
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1 as evidence in criminal proceedings?

2 A. Very, very rarely. At this time, we were
3 trying, and Stephen Dilley was trying, to obtain
4 witness statements and I think Graham thought it
5 might be of assistance if Stephen got in touch
6 with Jan Holmes because he had prepared
7 a witness statement in another case. Looking at
8 it, it appears possibly the witness statement
9 from Jan Holmes was attached to this email --
10 oh, yes, it was: "Revised witness statement, Jan
11 Holmes". Yes, so I would have seen a copy of
12 that witness statement at the time.

13 Q. Was this particular to you in your role that you
14 are being involved or sent matters relating to
15 criminal prosecutions? You've said that your
16 team had little involvement?

17 A. No, this was as a consequence of Stephen trying
18 to identify people within POL and Fujitsu who
19 were capable of giving witness statements on
20 this type of case.

21 Q. So is this relatively isolated, then?

22 A. Oh, yes, absolutely.

23 Q. Can we look at POL00067487, December 2006. So
24 before we were December 2005, so a year later.
25 We have a letter and it's relating to Josephine
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1 cases.

2 Q. Thank you. If we go up to the bottom of the
3 page before, so the bottom of page 2, a little
4 bit further, so the bottom of that page. Thank
5 you. He says:
6 "Mandy (Keith -- for info) ..."
7 That's Keith Baines?

8 A. Mm-hm.

9 Q. "As discussed yesterday ... please find attached
10 the statement from Jan Holmes which was used in
11 a prosecution of a counter clerk at Camberwell
12 Branch Office in 2002."
13 Pausing there, we know that was Tracy
14 Felstead, who was 19 years old at the time and
15 her conviction has subsequently been overturned.

16 A. Mm-hm.

17 Q. It says:
18 "I would suspect that Jan Holmes' statement
19 is more or less exactly what you'll need should
20 the 'Castleton' case proceed all the way
21 (however I seem to recall that at the time, as
22 it was out of the normal this statement did cost
23 us an 'arm and a leg' ... but I maybe wrong)."
24 Did you on occasion, therefore, have sight
25 of statements and other documents that were used
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1 Hamilton, sent to Cheryl Woodward in the Agents
2 Debt Team and it says, as follows -- if we could
3 go halfway down the page to that middle
4 paragraph it says:
5 "Ms Hamilton is likely to allege that she
6 was inadequately trained on the Horizon System.
7 It is possible that she may also contend that
8 there were errors with the Horizon software
9 although her Solicitors have not specifically
10 said so. Her letter does however hint at it.
11 In light of that I am copying this letter to
12 Mandy Talbot."
13 Now, these were the criminal proceedings
14 against Josephine Hamilton, again another case
15 that we know has subsequently been quashed. It
16 was written, in fact, the day before she first
17 appeared in a Magistrates Court and it refers
18 there to her potentially challenging Horizon,
19 and copied to you in light of that. Why would
20 matters challenging Horizon be copied to you?

21 A. I'm not 100 per cent certain, though as this is
22 Cheryl Woodward and she was the lady who gave
23 instructions to begin proceedings in *Castleton*,
24 she may have thought it appropriate to tell Hugh
25 James to keep me copied in for that reason.
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1 This was something that was referred to me
 2 for information, as far as I was concerned. No
 3 more.

4 **Q.** I mean, sorry, if we could zoom out slightly.
 5 This is a letter from Hugh James. The fact that
 6 they knew that you would be interested in cases
 7 relating to errors within the Horizon software,
 8 shall we not read anything into that?

9 **A.** Hugh James had informed me of the possibility of
 10 an embryonic class action. As such, I may have
 11 been copied in on that basis.

12 **Q.** Were you starting, at this point, to coordinate
 13 cases?

14 **A.** No, no.

15 **Q.** This is precisely the time when, of course, the
 16 *Castleton* case was going on. Did you tell Hugh
 17 James that you had a similar case,
 18 Mr Castleton's case: a similar case where
 19 Horizon software was being challenged?

20 **A.** I believe that I asked Bond Pearce to liaise
 21 with Hugh James and any -- by implication, any
 22 other external agents on subpostmaster cases,
 23 because I wanted to ensure that proceedings were
 24 not issued again where the documentary evidence
 25 wasn't in apple-pie order and that we wouldn't

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1 case on its particular facts and as a singular
 2 item.

3 **Q.** Can we please look at POL00053778, please.
 4 Thank you. Can we turn to page 5, the bottom of
 5 page 5. An email from you to, is it Michele?

6 **A.** Michele.

7 **Q.** Michele Graves. Who was Michele Graves?

8 **A.** Somebody within Post Office Limited but,
 9 unfortunately, I cannot remember which
 10 department after this period of time.

11 **Q.** The subject there is an Eleanor Dixon. We're in
 12 January 2010, and you say this. You say:
 13 "As you know, the business is prosecuting
 14 a former subpostmistress who is adducing all
 15 sorts of statements and comments from former
 16 postmasters in support of the contention that
 17 Horizon is the cause of all evil and that they
 18 were perfect postmasters."

19 **A.** Mm.

20 **Q.** Is that a little sarcastic?

21 **A.** I do very much regret the language I used in
 22 this and, as I've said in my statement, with
 23 perfect hindsight, they were right to so adduce.

24 **Q.** You say:
 25 "I attach a statement from Dixon along those

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1 be able to prove on the arithmetic that losses
 2 had been sustained at individual branches.

3 **Q.** Undoubtedly a serious matter, Ms Josephine
 4 Hamilton being prosecuted, shortly before her
 5 appearance in court. You're being told about
 6 it.

7 **A.** Mm-hm.

8 **Q.** Did you think at that stage to raise, for
 9 example, that you had, by then, received two
 10 expert reports where allegations were being made
 11 about the Horizon System or concerns were being
 12 raised about the Horizon System?

13 **A.** No, I did not.

14 **Q.** Did you tell them, for example, that you had
 15 that Cleveleys case, where the independent
 16 expert had raised concerns about the Horizon
 17 System?

18 **A.** I believe I merely read the letter and probably
 19 filed it.

20 **Q.** Did you think, with criminal cases being brought
 21 to your attention, that you had any duties of
 22 disclosure in respect of those cases of your --
 23 in respect of your knowledge of any problems
 24 with the Horizon System?

25 **A.** No, at the time, I dealt with each and every

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1 lines. Please can you locate any material which
 2 [the Post Office] may still have on this lady so
 3 we can assist the barrister who is prosecuting
 4 the case on our behalf."

5 So having said that getting involved in
 6 criminal cases was quite rare, we again have
 7 another case here where you seem to be involved
 8 in the --

9 **A.** I believe what I said was it was quite rare
 10 until 2010. If I didn't say that --

11 **Q.** Yes, I think you're absolutely right. Why was
 12 it in 2010 that you became involved in criminal
 13 proceedings?

14 **A.** In 2010, the Criminal department began the
 15 prosecution of Ms Misra and, for the first time
 16 I can ever recall, I was approached by a clerk
 17 in the prosecution team, on behalf of a criminal
 18 barrister, and asked to provide him with
 19 information about civil cases that had been
 20 dealt with in the civil courts where Horizon was
 21 challenged or, alternatively, he may have
 22 provided me with a list of cases that he wanted
 23 additional information on. I can't quite recall
 24 which of those approaches were taken.

25 **Q.** I have a document that may assist you in that

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1 regard. It's POL00055212. This is 2 September
2 2010. Can we scroll down, please. This is the
3 case of the *Crown v Gurdeep Dhale*, and it's
4 Jarnail Singh writing to you. Jarnail Singh,
5 the senior lawyer in the Criminal Law Division,
6 writing to you and saying:

7 "I have [this case]. Can the Defendant have
8 identified previous cases where the Horizon case
9 system has been criticised, namely Lee Castleton
10 Jo Hamilton, Noel Thomas, Amar Bajaj, Alan
11 Bates, Alan Brown and Julie Ford.

12 "I understand that you and Counsel Warwick
13 Tatford looking at a number of cases in similar
14 circumstances in my case of Misra and I would be
15 grateful if you could give me details of that
16 and whether you can identify any other cases
17 listed above as to there were any questions or
18 criticisms of the Horizon System."

19 Does that assist you?

20 A. Yes.

21 Q. Can you tell us then what it was you were being
22 asked to do or what you understood the task to
23 involve?

24 A. I believe that Mr Phil Taylor of the Criminal
25 Law Department contacted me, it would either

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1 Q. Those are all specific named cases. I think he
2 also says "whether you can identify any other
3 cases listed above and whether there are any
4 questions or criticisms of the Horizon System".
5 Did you at that point carry out any exercise to
6 look back at the cases you had been involved in
7 over the years to see if there had been any
8 issues involving the Horizon System that might
9 be disclosable in those criminal cases?

10 A. No, I didn't.

11 MR BLAKE: Sir, I think that's an appropriate time
12 to pause for lunch.

13 SIR WYN WILLIAMS: Yes.

14 MR BLAKE: Can we come back at 2.00, please?

15 SIR WYN WILLIAMS: Yes, of course.

16 MR BLAKE: Thank you very much.

17 (1.00 pm)

(The Short Adjournment)

19 (2.00 pm)

20 MR BLAKE: Good afternoon, sir.

21 SIR WYN WILLIAMS: Good afternoon.

22 MR BLAKE: Thank you.

23 Mrs Talbot, when we left off before the
24 break we were on POL00055212 and that was
25 a letter from Jarnail Singh in relation to the

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1 have been very late December 2009 or early
2 January 2020, and asked me for information,
3 I believe, on the *Castleton* case, and I tried to
4 retrieve what information we had and supplied
5 that to the barrister.

6 I think, from other internal documentation,
7 that the barrister may even have spent a couple
8 of days at our office looking at materials on
9 the case of *Castleton*.

10 Now, *Jo Hamilton*, as you say, was
11 a Prosecution case, so I would never have had
12 any information on that.

13 Callendar Square, the only information I had
14 was that provided by yesterday's witness about
15 a particular glitch that, you know, became known
16 as the Callendar Square issue, Callendar Square
17 problem.

18 So, although Mr Singh has asked me for
19 information across all of these cases, I would
20 only ever have been able to provide information
21 about civil actions to him and I believe that my
22 ultimate response in December 2010 was along the
23 lines of "I would have thought you already had
24 this material as your barrister in the case of
25 Misra spent a number of days with us".

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1 case of *Dhale*, requesting certain information
2 from you. That should be brought up on the
3 screen. Thank you. Do you recall that letter,
4 yes?

5 A. Yes, I do.

6 Q. Thank you. I'm going to move on but I'll come
7 back to that particular topic shortly but can
8 we, before I do that, go to POL00107242 and it's
9 page 3. It this is 9 December 2010 and an
10 email from yourself to all and it says:

11 "Dear All,

12 "Now that the Misra prosecution has
13 concluded we now have to pick up civil Horizon
14 cases to see whether or not we should be
15 bringing proceedings in respect of them."

16 Had civil cases been paused pending the
17 decision in the Seema Misra case or the
18 judgment -- the verdict even, in the Seema Misra
19 case?

20 A. I think some had, yes.

21 Q. Looking down to a message to Dave, you say
22 there:

23 "This was a chap who worked as a postmaster
24 2007 to 2008."

25 This is about David Bristow,

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1 a subpostmaster:

2 "He refuses to believe that he has done
3 anything wrong and that it was the fault of
4 Horizon which led him to be threatened with
5 summary termination -- he eventually resigned."

6 You say halfway through the next paragraph:

7 "He has jumped on the Postmasters for
8 Justice Bandwagon. I appreciate that the
9 complete printout would be very expensive.
10 Given your knowledge of Fujitsu, can you
11 estimate what the cost would be or suggest
12 whether there is any other way of proving that
13 the system was working correctly and that
14 therefore the losses it showed were real
15 losses?"

16 You seem there to be getting slightly tired
17 of the "bandwagon"; is that a fair summary of
18 your mindset at that time?

19 **A.** Within Civil Litigation, I was beginning to feel
20 frustrated and I think I've alluded to that in
21 my statement, because Fujitsu and POL were
22 constantly assuring us that there was absolutely
23 nothing wrong with the Horizon System and, yet,
24 every time -- well, every time a matter was
25 referred to Civil Litigation -- and this would

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1 back to POL the business and get them to
2 authorise that they were prepared to pay for the
3 same. So that's why I'm talking about cost in
4 that particular extract.

5 **Q.** At this stage, you've said you were frustrated.
6 It seems as though it seems all a bit of
7 a bandwagon to you and you don't want to go
8 through the expense of having to get information
9 from Fujitsu?

10 **A.** No, I was asking for Dave's opinion as to what
11 he thought and I think this is probably Dave
12 Hulbert, what he thought Fujitsu would charge to
13 obtain that information. I wasn't rejecting it
14 at all. I wanted information.

15 **Q.** At this stage, 2010, were you aware of, for
16 example, the article in *Computer Weekly*? That
17 was a 2009 article?

18 **A.** I didn't read it personally but I have seen
19 additional disclosure making reference to it.

20 **Q.** Can we move on to POL00055894, please. When we
21 just started after lunch I took you back to that
22 document, where it was a request in the case of
23 *Dhale*, that request was the 2 September 2010,
24 and this was, I think, your response, dated
25 16 December 2010. Do you recall why it took

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1 only have been a tiny proportion of postmaster
2 deficiency cases -- the response was becoming
3 regular that the subpostmasters were not at
4 fault, it was Horizon.

5 So we were frustrated because we'd been
6 given assurances there's nothing wrong on one
7 side and yet people are claiming there's
8 something wrong on the other.

9 **Q.** You say there it would be expensive to get
10 a complete printout. I mean, by that stage were
11 you having so many cases brought by
12 subpostmasters or so many complaints about
13 Horizon being brought that you didn't want to
14 waste money on it?

15 **A.** No, that's -- pardon me. No, that's not what
16 I mean at all. I'm not a commercial lawyer but,
17 under the contract between POL and Fujitsu,
18 Fujitsu were only obliged to provide their
19 services in analysing cases 100 times a year.

20 Now, I'm not a prosecutor but I did come to
21 know that Prosecution would, in their own
22 investigations, utilise an awful lot of that 100
23 opportunities. Therefore, if you're dealing
24 with a civil case and you want an analysis of
25 data from Fujitsu, you would then have to go

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1 such a long time to respond to Jarnail Singh?

2 **A.** I think it's because there was another exercise
3 going on within Legal Services this time, to try
4 to reduce headcount and, during that process,
5 I was informed there was no more role for me
6 within Legal Services and it is on that occasion
7 that I moved over in the following January to
8 Royal Mail Group, the business.

9 **Q.** So, by that stage, how small had the legal team
10 within the Post Office become?

11 **A.** In terms of permanent members of staff, quite
12 small, because a process had begun under which
13 the -- some of the regional agents but certainly
14 a lot of the London agents would provide lawyers
15 for a period of six to nine months to come and
16 work with the in-house team, ergo reducing the
17 actual employee numbers.

18 **Q.** I don't quite understand that, sorry.

19 **A.** Sorry. There was an exercise going on to reduce
20 headcount within Legal Services --

21 **Q.** Yes.

22 **A.** -- and I think, as part of trying to fulfil
23 obligations to our clients, in place of some of
24 us who were going, a process began under which
25 our external legal agents began to supply

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1 members of their firms to come and work within
 2 Legal Services for a period of time, I think
 3 a minimum of six months, sometimes longer.
 4 **Q.** So a secondment of some sort?
 5 **A.** A secondment, that's the word I was --
 6 **Q.** So they were reducing the size of the legal team
 7 and replacing people who were experienced in
 8 dealing with these kinds of cases with external
 9 lawyers for a temporary period of time?
 10 **A.** That's correct.
 11 **Q.** You say in that response:
 12 "I thought that your barrister on the case
 13 of *Misra* would have copies of everything which
 14 he considered to be relevant from the time he
 15 spent two days here. I only have email folders
 16 on Lotus Notes insofar as they can be retrieved
 17 and in Outlook but you are welcome to come over
 18 and search them.
 19 "There are numerous boxes in respect of
 20 *Castleton* most of which are still with Stephen
 21 Dilley ... who can let you know how much it
 22 would cost retrieve them from their storage
 23 facility."
 24 Then you say this:
 25 "There are ongoing cases every month which
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1 comment on that.
 2 **Q.** But the fact that cases seem to have been
 3 stayed, on hold, awaiting a decision on *Misra*
 4 sounds as though *Misra* would have been very
 5 significant for the Post Office?
 6 **A.** I think it was significant to the Post Office,
 7 yes.
 8 **Q.** "There are ongoing cases every month which raise
 9 the issue of Horizon ..."
 10 Was that not indicative of a wider problem
 11 with Horizon at that stage?
 12 **A.** The Mr Greening document that we referred to
 13 this morning, if that had begun to be
 14 implemented, would have required us to begin
 15 reporting on subpostmaster cases and there's
 16 a possibility that I might have been concerned
 17 about numbers arising out of that. But, as
 18 I say, that document was created in August 2000.
 19 We're still only in December 2000. Probably --
 20 **Q.** 2010.
 21 **A.** 2010, sorry. Probably hadn't got off the ground
 22 as yet.
 23 **Q.** We have quite serious criminal proceedings going
 24 on against Mr Dhale and Ms Misra. Do you know
 25 if they were told that there were ongoing cases
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1 raise the issue of Horizon so it's a movable
 2 feast. I'm endeavouring to pull together a list
 3 of those cases currently with us where
 4 allegations have been made in respect of
 5 Horizon. Most of these cases have been on hold
 6 awaiting the decision on *Misra*. The transcript
 7 of that case is now being created and should be
 8 with us shortly ..."
 9 Why was it that *Misra* was so significant at
 10 this time?
 11 **A.** *Misra* was significant for the business. It was
 12 a criminal case, so, logically, looking back, it
 13 shouldn't have had an impact on civil matters at
 14 all. I can only conclude that a decision was
 15 made that any embryonic subpostmaster deficiency
 16 civil cases should be stayed pending that
 17 decision -- pending the conclusion of the *Misra*
 18 case, sorry.
 19 **Q.** I'll go on to draw your attention to a number of
 20 other documents relating to the *Seema Misra* case
 21 but, before I do that, might it be the case that
 22 like Lee Castleton, Seema Misra's case was being
 23 held out as an example to dissuade future
 24 claims?
 25 **A.** It was a criminal prosecution, so I can't
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1 every month which raised issues of Horizon?
 2 **A.** I don't know.
 3 **Q.** By this time, 2010, you knew about the report in
 4 Cleveleys, you knew about the BDO report in the
 5 *Castleton* case. You knew about complaint after
 6 complaint about the Horizon System, so much so
 7 it seems that cases were put on pause awaiting
 8 a decision in the *Misra* case. Was all that
 9 knowledge that you had relevant to the *Misra*
 10 case and what was to become a precedent? Did
 11 you feel any burden on yourself knowing that
 12 this significant case was taking place to
 13 provide information about your knowledge of the
 14 complaints that had been made about the Horizon
 15 System over the years?
 16 **A.** I didn't see that as my role at the time.
 17 I think I assumed, and this is only a personal
 18 assumption, that Criminal would have been aware,
 19 given their involvement with Security, Fujitsu
 20 and POL.
 21 **Q.** You've said that the Criminal Divisions and the
 22 Civil Divisions were kept very much apart?
 23 **A.** They were.
 24 **Q.** You seem here to be a conduit for information in
 25 some ways to the Criminal team. Did you see any
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1 responsibility on yourself to inform the
2 Criminal team about, for example, the Coyne
3 report in the Cleveleys case or the doubts that
4 were raised in the *Castleton* case or other
5 complaints, civil complaints, that you had
6 received in relation to the functioning of
7 Horizon?

8 **A.** I didn't.

9 **Q.** Was there any process in place for drawing all
10 of those civil strings together and providing
11 that information to the Criminal team?

12 **A.** No, there wasn't.

13 **Q.** Can we look at POL00055716. I think this is
14 a letter here -- is this from you or -- yes, if
15 we look over the page, it's a letter from you to
16 Guildford Crown Court. If we go to page 1, you
17 write to enquire whether the court will be
18 prepared to authorise the release of the tapes
19 of the hearing to arrange for them to be
20 transcribed:

21 "We need the transcript to us in other cases
22 where Fujitsu and the Horizon System are
23 challenged on similar facts. If the Judge is
24 prepared to release the tapes to us or the
25 transcribers for this purpose I would also want

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1 So it does seem, like the *Castleton* case,
2 that this was an important case for the Post
3 Office to win to dissuade others that were
4 waiting in the wings.

5 **A.** This was a criminal case and therefore I have
6 very limited information about it. I believe --
7 I know that I was asked to apply to the
8 Guildford Crown Court for the transcript. For
9 what use it was going to be put to, other than
10 that -- other than to be of benefit to Post
11 Office Limited, I can't really comment.

12 **Q.** Who asked you to do that?

13 **A.** I'm very sorry but, without access to my papers,
14 I can't tell you.

15 **Q.** You recall being asked to do it. It wasn't of
16 your own volition --

17 **A.** Oh --

18 **Q.** -- but you don't recall who asked you?

19 **A.** I would never have written a letter like the one
20 on the screen at my own volition.

21 **Q.** But you can't remember who asked you?

22 **A.** Not without additional disclosure.

23 **Q.** I'm going to move on to a different topic, which
24 is the awareness or involvement of the Post
25 Office leadership and senior management. Can we

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1 them to include details of the sentencing
2 hearing."

3 It does seem to some extent that you were
4 a conduit for these criminal matters and
5 gathering evidence to use against postmasters
6 who were involved in civil claims.

7 **A.** I don't think I was a conduit for civil -- for
8 criminal matters. I had other clients within
9 the business and I believe, if I was a conduit
10 for anybody, it was to provide information to
11 them, parties such as Mr Rod Ismay and Mike
12 Granville, who was Head of Regulatory
13 Relationships.

14 I can't now recall whether or not any order
15 was made for Misra to pay over any money to Post
16 Office Limited, so, therefore, it may be that
17 part of the reason for me writing to Guildford
18 Crown Court was to obtain this documentation
19 with a view to taking further civil proceedings,
20 but --

21 **Q.** You're there writing to the Crown Court and you
22 say:

23 "We need the transcript to us in other cases
24 where Fujitsu and the Horizon System are
25 challenged on similar facts."

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1 please look at WITN04600211, please. I'm going
2 to start with Keith Baines who was the contract
3 manager with Fujitsu. So we're moving now far
4 back in time back to where we started today, the
5 Wolstenholme case, 4 August 2004. Can you
6 assist us with what involvement Keith Baines had
7 in the Wolstenholme case and these cases more
8 broadly?

9 **A.** I can only conclude from this that Keith Baines
10 had access to a statement that would have been
11 in general form useful in terms of creating
12 a witness statement specific to the facts of the
13 Cleveleys case.

14 **Q.** Do you recall Keith Baines having been involved
15 in the early development of the Horizon project?

16 **A.** I don't know anything about the early
17 development of the Horizon project.

18 **Q.** Did Keith Baines ever raise with you any
19 concerns he had about the functioning or
20 reliability of the Horizon System?

21 **A.** Never.

22 **Q.** We've seen his name on a few documents today.

23 **A.** Mm-hm.

24 **Q.** What was his level of involvement generally in
25 these civil proceedings against subpostmasters?

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- 1 A. I'm sorry, this is 2004. I dealt with thousands
2 of managers over the 23 years I was working for
3 Royal Mail Group. I can't recall his specific
4 function.
- 5 Q. Okay. I'll move on, then, to Rod Ismay and
6 others. Can we start by looking at POL00107426,
7 please. Can we look at page 3 of this document.
8 We have an email there from yourself to David
9 Smith, Jennifer Robson, Tony Utting, Rod Ismay,
10 and copied to certain people. In this, you
11 summarise the facts of the *Castleton* case. Can
12 you recall why this distribution list was being
13 used to summarise the facts of the Castleton
14 case in 2005?
- 15 A. I believe that David Smith was the most senior
16 officer on that list. Tony Utting was Head of
17 Security. Rod Ismay, you've already heard of.
18 Jennifer Robson, I think, was within the
19 subpostmaster deficiency collection team.
- 20 Q. Was this a group that you communicated regularly
21 with?
- 22 A. No, these groups, as I've said before, they
23 really were a movable feast. People would move
24 in and out of these contractor lists.
- 25 Q. I mean, there are some names that crop up time
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- 1 perhaps we can look at the final paragraph on
2 that page. It says:
3 "Mr Bajaj has taken the step of writing
4 an article in the SubPostmaster November 2005
5 edition, seeking information from other
6 postmasters in a similar situation."
7 Then you highlight there "Issues":
8 "In each case the postmasters are
9 challenging the validity of data provided by the
10 Horizon System and the cases became litigious
11 before that evidence could be properly
12 investigated.
13 "In each case it was known that Horizon was
14 going to be challenged but there was no
15 procedure in place to
16 "(a) acquire the necessary data
17 "(b) identify somebody with the relevant
18 knowledge and capacity to interpret the data and
19 report on the same.
20 "If the challenge is not met the ability of
21 [the Post Office] to rely on Horizon for data
22 will be compromised and the future prosperity of
23 the network compromised."
24 What did you mean by "the future prosperity
25 of the network compromised"?
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- 1 and time again in documents we've seen, such Rod
2 Ismay. Is there a particular reason why these
3 kinds of emails were going to him?
- 4 A. I can't remember what his title was at the time.
- 5 Q. I'd like to read you briefly from this email.
- 6 A. Mm-hm.
- 7 Q. It goes:
8 "Summary of Facts
9 "Castleton."
10 Perhaps we could scroll down a little bit
11 further. He says at the bottom of that, bottom
12 paragraph:
13 "As part of the claim the solicitors for
14 [Lee Castleton] have stated in the allocation
15 questionnaire that they intend to call evidence
16 from other existing and former postmasters about
17 the problems with the Horizon System. They have
18 asked for disclosure of data about all calls or
19 complaints logged from postmasters about the
20 Horizon System, presumably from the inception of
21 the system. They have called for disclosure of
22 all documents removed from the Branch Office
23 during the investigation. There is an issue
24 over locating all of those documents."
25 Then you summarise the case of Bajaj, and
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- 1 A. POL's ability to rely upon the Horizon System
2 was absolutely crucial for the continuation of
3 POL as a business.
- 4 Q. So you had challenges from subpostmasters, here
5 Castleton and Bajaj, that you were concerned
6 about. The future of the network was at stake
7 and you make five suggestions, and I'd just like
8 to take you through those suggestions. The
9 first:
10 "A robust procedure is set up and
11 communicated to all relevant parties for
12 extracting necessary data from Horizon at
13 an early stage in all cases leading towards
14 possible termination of contract in each case
15 where the Horizon data is challenged."
16 Second, you talk about:
17 "... identifying a small team and training
18 them in interpretation and investigation
19 techniques."
20 Third:
21 "Fujitsu and the [Post Office] to liaise on
22 identifying a number of individuals or
23 specialist computer firms who could provide
24 a professional and independent report upon the
25 Horizon System in general and in the two cases
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1 to hand if necessary."
 2 Just pausing there, the evidence this
 3 morning was very much that you took each case as
 4 it came, each case individually, you weren't
 5 coordinating the various cases. This is quite,
 6 it seems, a significant suggestion that the Post
 7 Office and Fujitsu should identify an external
 8 firm to carry out an independent report. Do you
 9 recall making that recommendation?
 10 **A.** This is my communication. I wish to ensure that
 11 for each and every case that we always litigated
 12 on a purely independent basis and, by that,
 13 I mean on the facts of every single case, that
 14 we would be in the best possible position to
 15 litigate by having all relevant data. I was
 16 somewhat frustrated by the fact that proceedings
 17 had been issued in the matter of Mr Lee
 18 Castleton without all appropriate data being
 19 present.
 20 I was seeking, therefore, to try to persuade
 21 the powers that be within POL -- I can't now
 22 recall to whom entirely this communication
 23 went -- but I was trying to persuade the
 24 business that they really should put procedures
 25 in place that would give solicitors, such as
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1 solicitors, so that we didn't end up in another
 2 situation where proceedings were issued without
 3 all the relevant material being present.
 4 **Q.** Was that coordinating role established as at
 5 2005/2006 and onwards?
 6 **A.** It was -- it -- the nearest it ever got was
 7 an offer by Mr Tony Utting, who is third or
 8 fourth on the communication list, who said that
 9 he was prepared to do so, but then -- I think he
 10 referred to it as "the sting in the tail", his
 11 department had been tasked with reducing
 12 headcount by a percentage. So, ultimately, no
 13 such position was ever created and I think that
 14 late on in 2000, when Andy Greening was trying
 15 to get a grip of the whole subpostmaster estate,
 16 that was still outstanding.
 17 **Q.** Thank you. If we look, just to complete this
 18 document, on that page you were on before,
 19 page 5, there were two other recommendations
 20 there. The fourth and fifth, if we scroll down,
 21 thank you: one was investigating whether or not
 22 they hold any data of the number of complaints;
 23 and the fifth was identifying members of staff
 24 who can provide witness statements.
 25 Can we move on to POL00070496, please. This
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1 myself, a better chance of being able to
 2 litigate successfully. But I was just a case
 3 worker.
 4 **Q.** If we look at page 3, that has the recipient
 5 list that we've already been through. You say
 6 you can't recall, but --
 7 **A.** Mm.
 8 **Q.** -- whose responsibility within that list would
 9 it have been to take forward the recommendation
 10 of identifying an independent external firm who
 11 could carry out an investigation of Horizon?
 12 **A.** I think, this is just to the best of my
 13 recollection and opinion, that David Smith was
 14 the most senior person on that list of contacts.
 15 **Q.** As at the end of 2005, going into 2006, 2007,
 16 was that independent report commissioned?
 17 **A.** No.
 18 **Q.** Were you concerned that it wasn't commissioned?
 19 **A.** Of the, I think, five or so recommendations that
 20 I made, I was less concerned about the
 21 commission of an independent report than I was
 22 about the creation of a team or even
 23 an individual who would gather sufficient
 24 knowledge of the system so as to be able to give
 25 proper instructions on each case to external
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1 is a similar time, this is a couple of days
 2 earlier. If we look at the bottom email from
 3 Tom Beezer. This is updating various
 4 individuals about the position of the *Lee*
 5 *Castleton* case and he outlines there some
 6 concerns you had. It says:
 7 "I spoke to Mandy. She is ... a little
 8 disturbed that this matter has wide implications
 9 ..."
 10 This I talking about the default judgment
 11 and it references there:
 12 "As we were talking about this morning, Hugh
 13 James are trying to contain an embryonic and not
 14 yet issued class action relating to the Horizon
 15 System.
 16 "A judgment in relation to it is currently
 17 very bad news."
 18 Then there are requests from you and it
 19 says:
 20 "Mandy has made a number of requests that
 21 I feel we MUST comply with ...
 22 "1) that [you are] kept fully informed on
 23 [the *Castleton*] matter ...
 24 "2) that [you] be sent a full set of
 25 proceedings ... and a full set of
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1 correspondence ...
 2 "3) due to the matters handled by Hugh James
 3 relating to Horizon, Mandy asks that we speak to
 4 them to ensure we are all pulling in the same
 5 direction. This is even more important given
 6 the threatened class action. Who makes this
 7 call is partly dictated by how many Horizon
 8 related cases we currently have. More on this
 9 below."

10 Then 4:

11 "Mandy asks that we NEVER issue proceedings
 12 on a claim based on Horizon evidence ... without
 13 her specific consent."

14 Now, that role not having been created, the
 15 Horizon co-ordination role, were you in some way
 16 filling the vacuum and fulfilling that role?

17 **A.** In respect of cases that were being dealt with
 18 by Bond Pearce, yes. But that was purely in
 19 respect of litigation. It was not my role to
 20 coordinate anything on behalf of POL or Fujitsu.
 21 This was just my concern as a litigator to
 22 understand what -- which cases Bond Pearce were
 23 already instructed to issue proceedings upon.
 24 I did not want another repeat of *Castleton*.

25 **Q.** At 4, you asked that they never issue

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1 **A.** Usually Error Resolution Team at Chesterfield.
 2 **Q.** They're specific and quite -- the language used
 3 is rather mandatory. Was this you on your own
 4 asserting control or were you acting on somebody
 5 else's behalf in instructing Bond Pearce in this
 6 way?

7 **A.** No, this was me trying to fill my role as
 8 a solicitor, in-house solicitor for Post Office
 9 Limited in this case. This -- yes, this was me
 10 acting to try to ensure that a repetition of
 11 issuing proceedings in a *Castleton* situation
 12 didn't occur again.

13 **Q.** Can we look at POL00090437. It's page 63. This
 14 is a bundle of papers that we've looked at
 15 already. Can we look at page 63, please. Still
 16 sticking with the theme of management knowledge,
 17 page 63 is an email from you to a very similar
 18 list of names, common names that we've seen
 19 before. David Smith, Rod Ismay, et cetera.
 20 This is you passing on the good news about the
 21 *Castleton* case. It's a document I think we
 22 looked at earlier and it's where you update them
 23 about the progress of the negotiations.

24 Why this particular list on this particular
 25 occasion? It's quite a detailed note of

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1 proceedings without your specific consent. Why
 2 was that?

3 **A.** Because, as I've just said, I didn't think it
 4 was appropriate on the case of *Castleton*, under
 5 proceedings had hadn't been issued before
 6 without -- with missing documentation in place,
 7 leading to a very expensive defence of
 8 a counterclaim. If they were to issue
 9 proceedings on a subpostmaster case, I wanted to
 10 make certain that all the appropriate
 11 documentation was going to be in place and I was
 12 still hoping at this time that it would be
 13 possible for POL to commission a team to, you
 14 know, facilitate that going forward.

15 **Q.** You've described in your evidence earlier that
 16 you were just a case worker.

17 **A.** I was.

18 **Q.** This doesn't sound much like the role of a case
 19 worker. It sounds as though you were applying
 20 some management of the Horizon cases; is that
 21 fair?

22 **A.** I was never a manager of the Horizon cases.
 23 I just tried to deal with cases that came into
 24 my inbox.

25 **Q.** Who were you doing this for?

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1 negotiations. It's not a summary of what's
 2 happened. It's very much contemporaneous: this
 3 is happening. Why would people in other parts
 4 of the Post Office's business be interested in
 5 that or why would they have received that?

6 **A.** This is really rather similar to the list of the
 7 document we looked at two documents back.

8 **Q.** Yes.

9 **A.** Therefore, these were individuals who had
 10 an interest in the case of Mr *Castleton*.

11 **Q.** Do you know why they were particularly
 12 interested in the case of Mr *Castleton*?

13 **A.** I can't speak to that, I'm sorry.

14 **Q.** Can we look at page 33 of the same document.
 15 It's the second half of the page. Sorry, the
 16 bottom page, even. You're there updating the
 17 entire group, 2007 now:

18 "This is just to let you know that we have
 19 been completely successful in defending all the
 20 allegations made by Mr *Castleton*. You will
 21 recall that he contended that no genuine losses
 22 occurred whilst he was a postmaster and that any
 23 losses were manufactured by the HORIZON System.
 24 The judgment has entirely vindicated the HORIZON
 25 system."

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1 Again, similar, if not the same,
 2 distribution list. Was it common for updates of
 3 cases to be sent to this distribution list or is
 4 there something particularly special about the
 5 *Castleton* case?
 6 **A.** The importance of the *Castleton* case was the
 7 size of the counterclaim and the, in effect,
 8 attack on the Horizon System.
 9 **Q.** If we look above, we have a response from Rod
 10 Ismay. Rod Ismay there says:
 11 "Thanks Mandy -- great news."
 12 Then in the next paragraph:
 13 "What can we do on a proactive comms front
 14 here? We've watched the various inflammatory
 15 letters in the SubPostmaster letters page and
 16 wanted to be able to assure branches and clients
 17 that they can rely on the integrity of Horizon.
 18 "Any thoughts on comms following this case?"
 19 What role did Rod Ismay have in respect of
 20 comms, communications? He was the head of
 21 Product and Branch Accounting, would you have
 22 understood it to be part of his job to be
 23 promoting communications there?
 24 **A.** I don't know what the extent of his function was
 25 at the time. It may well have included comms.

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1 about defending claims for repayment.
 2 "Outstanding matters are:
 3 "communicating the matter to the Fed --
 4 agreeing a suitable form of words possibly with
 5 the assistance of external relations.
 6 "arranging a meeting with Fujitsu --
 7 [proposed form of words].
 8 "agreeing with the auditors that they will
 9 formally ask for, examine and refer to at least
 10 three months worth of branch trading statements
 11 [in future cases]", et cetera.
 12 Do you think it was appropriate for somebody
 13 who describes themselves as "just a case worker"
 14 to be making suggestions on how to publicise the
 15 result of a court case?
 16 **A.** It wasn't, in retrospect. I can only assume
 17 that that has something to do with the document
 18 that we looked at previously.
 19 **Q.** In 2007, you hadn't moved on to your 2010 role
 20 in the wider Post Office. You were still
 21 managing Civil Litigation at this stage?
 22 **A.** Yes.
 23 **Q.** Why do you think you were drawn into making use
 24 of the judgment and commenting on ways in which
 25 it would be publicised?

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1 There was a Comms team at Royal Mail Group
 2 Headquarters.
 3 **Q.** Let's look at a document that makes a similar
 4 point. It's POL00113488. We're now on
 5 20 February 2007 and this is where Mr Castleton
 6 has agreed to pay the costs. If we scroll down,
 7 please, to the second half of the page. Similar
 8 names on this distribution list. Keith Baines,
 9 John Cole, Rod Ismay, et cetera. It says:
 10 "Castleton has ... agreed our total bill for
 11 costs in writing which means that we do not have
 12 to go to Court to have them taxed which incurs
 13 additional legal costs in its own right. This
 14 response also indicates that Castleton has no
 15 intention of appealing against the decision of
 16 the Court and that the judgment is the final
 17 comment on the matter.
 18 "As such, we need to get on with making as
 19 much use of the judgment as possible. Stephen
 20 Dilley has asked for permission to publish
 21 an article in a legal journal about the case
 22 which I have no objection to as long as we
 23 maintain editorial control as the more publicity
 24 the case is given, the greater should be its
 25 effect upon postmasters who take legal advice

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1 **A.** I don't know. I can only assume there is
 2 a missing minute of a conversation where
 3 possibly I was asked to assist on this matter.
 4 I agree with you, this is not the role of
 5 an ordinary civil litigator and this was
 6 possibly the one and only time that this ever
 7 occurred.
 8 **Q.** Do you think it was inappropriate to be doing
 9 that?
 10 **A.** As an ordinary civil litigator, yes, it was but
 11 I can only conclude that I was asked to do so by
 12 some of the parties to whom that communication
 13 is addressed.
 14 **Q.** You were asked to, you say, by one of those
 15 people, but --
 16 **A.** I assume.
 17 **Q.** You assume. Did you ever raise any concerns
 18 with anybody about the position that you were
 19 being put in?
 20 **A.** No.
 21 **Q.** Can we please look at POL00104618, please.
 22 We're now in August 2008. Can we please look at
 23 the second page, at the bottom half of the
 24 second page. We have an email from Andrew Winn
 25 and we'll see in due course that this is

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1 forwarded to you. Do you recall Andrew Winn?
 2 **A.** I don't recall Andrew Winn and I don't believe
 3 I ever dealt with this email, as the writing on
 4 it isn't mine. It could well have been dealt
 5 with whilst I was away on annual leave.
 6 **Q.** Let's just have a look at what it says. It
 7 says:
 8 "Coms to branches
 9 "I think we still do not have clear sign-up
 10 around who would be communicated to. My
 11 understanding is that the business only wants to
 12 contact branches who have reported the
 13 discrepancy or who have suffered financial loss
 14 by making good an inflated amount."
 15 We'll see in due course through the later
 16 email what this is all about. It's about
 17 a software glitch within Horizon and this email
 18 is a discussion about who to tell about the
 19 software glitch, whether you tell the individual
 20 branches who have suffered the glitch or whether
 21 you communicate it more widely. Do you recall
 22 this at all?
 23 **A.** No. I believe it could have been dealt with by
 24 my line manager, given the manuscript comments
 25 on the document.

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1 there:
 2 "Hi Andy -- before anyone sends any comms
 3 anywhere please can you get confirmation that
 4 Mandy Talbot/Biddy Wyles in Legal have seen and
 5 are OK with proposed wording."
 6 Now, why was Rod Ismay suggesting that you
 7 comment on wording that was sent to branches,
 8 following the identification of a software
 9 glitch?
 10 **A.** My reading of these communications is a request
 11 by Rod Ismay for myself or Biddy, who was my
 12 line manager at the time, to look at the
 13 drafting of the letter. It's headed "Comms" but
 14 I would have interpreted it as a letter that
 15 they proposed to send to individual branches who
 16 had suffered from this particular glitch. It
 17 was really -- it was also part of our function,
 18 although we were a Civil Litigation Department,
 19 to assist many departments within POL and Royal
 20 Mail Group with drafting correspondence if they
 21 felt they needed assistance.
 22 **Q.** Did Rod Ismay put your name forward in
 23 particular because he knew that you were dealing
 24 with issues relating to the Horizon System?
 25 **A.** I think you would have to ask him on that point.

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1 **Q.** It says there:
 2 "This accepts the risk that other branches
 3 may raise the issue with [the Post Office] at
 4 a later date.
 5 "In terms of communication script I would
 6 have thought something on the lines of --
 7 Singleton makes good loss -- "Your branch
 8 received a software change to Horizon. This has
 9 caused a stock unit discrepancy to be calculated
 10 incorrectly and as a result you have made good
 11 a loss of [X amount] whereas the correct
 12 loss/gain should have be [Y amount].
 13 "Post Office Limited need to compensate you
 14 for the loss and will send you cheque for the
 15 above amount. Can I confirm [the name that is
 16 required]."
 17 Then over the page, if we could scroll down,
 18 so we can just see the top of the page before.
 19 Where a branch has actually made a gain, the
 20 proposal there is:
 21 "Post Office do not intend to recover the
 22 gain."
 23 If we go to page 1 of this document,
 24 please -- sorry, if we go over the page to
 25 page 2 we have an email from Rod Ismay who says

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1 **Q.** Is it something that you would typically be
 2 asked about, irrespective of your involvement in
 3 the Horizon System or is it more likely that
 4 this was being provided to you because of your
 5 knowledge of the Horizon System?
 6 **A.** We were asked to draft, in some cases, comment
 7 and edit letters from all different departments
 8 in the whole of Royal Mail Group.
 9 **Q.** Let's look at the first page. This is the email
 10 that is sent to you. So it's sent to you and
 11 Biddy Wyles. It says:
 12 "Not sure if you are the right people to
 13 contact regarding this.
 14 "Basically, we recently suffered a software
 15 glitch within the Horizon System which resulted
 16 in various over/under payments (both actual and
 17 virtual) to certain (but definitely not all)
 18 [Post Office] branches.
 19 "We are trying to come up with suitable
 20 wording to use in explaining these over/under
 21 payments and how we intend on correcting them,
 22 and were wondering if you are the right legal
 23 people to run this past first?"
 24 Is it your evidence that you never saw this
 25 email, despite it being sent to you?

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1 **A.** If I were away on holiday but my line manager
2 Biddy -- whose handwriting I think I recognise
3 on the documents that were disclosed to me --
4 had already dealt with it, I would have been
5 very grateful that that was something I didn't
6 have to look at.

7 **Q.** Do you recall in 2008 it being brought to your
8 attention that there was a software glitch with
9 Horizon, which resulted in various over/under
10 payments?

11 **A.** Until such time as this material was disclosed,
12 no, I do not. I've no recollection of it.

13 **Q.** Are you aware of any similar references to
14 software glitches around this time that was
15 communicated throughout the department or
16 throughout senior figures within the Post
17 Office, for example?

18 **A.** I can't speak as to senior members of the Post
19 Office. Legal Services were a distinct unit in
20 their own right. I can only speak as to what
21 I personally knew.

22 **Q.** You're not aware of that having been
23 communicated amongst your team?

24 **A.** No.

25 **Q.** Can we look back at a document that we have
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1 the Chairman's Office?

2 **A.** It wasn't -- it was not part of my job to liaise
3 with the Chairman's Office, but quite often we
4 would receive requests for assistance from the
5 Chairman's Office and, therefore, I knew the
6 names of people to ask in the Chairman's Office
7 who did indeed deal with high profile
8 correspondence sent to the group. I knew their
9 identities so I knew who to contact there to see
10 if they had any record of Mrs Nixon or Dixon.

11 **Q.** Who, in particular, would you liaise with in the
12 Chairman's Office?

13 **A.** In this instance, it appears to be Michele
14 Graves. But, again, there were lots of
15 different team members over the 20-odd years
16 I was dealing with the Chairman's Office.

17 **Q.** If we stick to 2010, who, in particular, would
18 you deal with in the Chairman's Office?

19 **A.** Well, on this occasion, I think it's apparent
20 that it was Michele Graves.

21 **Q.** Was there anybody else who you liaised with in
22 the Chairman's Office during this period?

23 **A.** I cannot recall. Possibly if there's other
24 emails, I might recognise the names.

25 **Q.** In this period, to your knowledge, was the
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1 already looked at today, and that is
2 POL00053778, and can we look at page 5, please.
3 Thank you. It's the bottom of that page. So we
4 saw there, that is the email from you to Michele
5 Graves and others about the prosecution of
6 a former postmistress and allegations about the
7 Horizon System. If we turn to page 1 of this
8 document, we have an email being forwarded from
9 you to Warwick Tatford and it says:

10 "Warwick

11 "I have made enquiries of our Chairman's
12 Office team which deals with high profile
13 correspondence and they know nothing of
14 Mrs Nixon or Dixon of Highcliffe."

15 It's signed by you there. I think now it
16 says "Dispute Resolution, Company Secretary's
17 Office". By this stage were you in a different
18 team?

19 **A.** I was in exactly the same department, it's just
20 we'd stopped becoming litigators and we were now
21 dispute resolvers.

22 **Q.** You're there mentioning enquiries of the
23 Chairman's Office?

24 **A.** Yes.

25 **Q.** How often was it part of your job to liaise with
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1 Chairman's Office aware of complaints from those
2 who were being prosecuted about the Horizon
3 System?

4 **A.** I cannot speak to what the Chairman's Office or
5 their staff knew. This is merely an example of
6 me seeking information from them.

7 **Q.** Do you think it's likely that, when you were
8 seeking information from them, you would have
9 told them that there is a case ongoing that is
10 making a complaint about the Horizon System?

11 **A.** It's possible.

12 **Q.** Do you recall what the enquiries were that you
13 were making at that time?

14 **A.** This was in connection with the case of *Misra*,
15 judging by the time period.

16 **Q.** Thank you. I'm going to move on to another
17 document, POL00106867, please. This is a pile
18 of correspondence and I'm going to go through
19 three or four emails within this pile. Can we
20 start, please, with page 27. Thank you. Can we
21 scroll down to the bottom half of that page.
22 You're not, at this stage, copied in, although
23 you are within the chain and I'll take you to
24 the relevant email. But this is an email from
25 Andrew Daley to Jason Collins, Graham Brander.
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1 We have Andy Hayward bcc'd in. Andy Hayward was
 2 from the Security team. Do you remember him?
 3 **A.** It's a name I recognise.
 4 **Q.** It says:
 5 "Jason/Graham,
 6 "Andy called me and asked whether you guys
 7 ... could put together some stats on these cases
 8 where the accused's defence was/is the Horizon
 9 data is unreliable for any amount of reasons
 10 given the accused."
 11 He attaches there an article which is titled
 12 there "Horizon blamed.pdf". This is February
 13 2010. I mean, this sounds like much kind of
 14 thing that you were recommending in 2005, wasn't
 15 it?
 16 **A.** I was -- I was recommending in 2005 that
 17 a sensible process be put up to assist us with
 18 civil litigation cases.
 19 **Q.** This is 25 February, 11.49. Can we now turn to
 20 page 25 in the bottom email. We have the same
 21 date now, 4.10 pm, and it says:
 22 "Andrew/Jason
 23 "I'm aware of two ongoing cases at West
 24 Byfleet ... & Orford Road ... and also some
 25 historical cases ... but as FIs ..."
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1 is a brief summary of the agreed key activities
 2 to progress the next steps in relation to the
 3 above piece of work ..."
 4 The above being the subject, "Challenges to
 5 Horizon". Do you recall that conference call
 6 taking place?
 7 **A.** I don't.
 8 **Q.** "AH & MT ..."
 9 Presumably the "MT" is you, Mandy Talbot.
 10 **A.** I believe so.
 11 **Q.** "AH" is presumably Andy Hayward; is that right?
 12 **A.** I assume so. I think there is a list of our
 13 initials at the end of this document.
 14 **Q.** Absolutely. If we scroll down, we can see
 15 exactly who was in attendance. It's over the
 16 page. Then we have: MT, Mandy Talbot; RI, Rod
 17 Ismay; RM, Rebekah Mantle; Dave King; Sue
 18 Lowther; Dave Posnett; Andy Hayward.
 19 So if we go back, it has you providing
 20 information on past and present cases with
 21 reference to the Horizon challenges, and it
 22 says:
 23 "Note: I have asked the fraud team to review
 24 [approximately] the past 2-3 years case file
 25 although these challenges are of a more recent
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1 Do you understand what that means at all?
 2 **A.** For information, possibly.
 3 **Q.** "... we wouldn't have Horizon disputed cases
 4 other than those reported by the investigators,
 5 who will have far more details on the issues
 6 than us."
 7 Then he says this:
 8 "I have attached an article from an IT
 9 magazine which may have brought this issue to
 10 the fore in the 1st place and which may be of
 11 interest to Ian."
 12 Do you remember the article that's referred
 13 to in this correspondence at all?
 14 **A.** I've seen reference to it but I can't remember
 15 ever reading it.
 16 **Q.** Can we please look at page 3 of this chain.
 17 Thank you. If we look at the bottom half, we're
 18 now at 26 February and Andy Hayward has included
 19 you as the first recipient of this email. I'm
 20 going to take you through it. Do you recall
 21 receiving this email?
 22 **A.** Not until it was disclosed, no.
 23 **Q.** It says, as follows:
 24 "All,
 25 "Following our conference call today, below
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1 nature."
 2 Do you recall the decision to review two to
 3 three years of case files?
 4 **A.** No. All that would have concerned me, on
 5 receipt of this email, is to try to provide
 6 Andy, on behalf of Sue, with any information
 7 I had that could assist them with this piece of
 8 work.
 9 **Q.** The case of *Castleton*, for example, and the case
 10 of *Cleveleys*, they were older than two to three
 11 years.
 12 **A.** Mm.
 13 **Q.** Do you recall, around the 2010 time, talking to
 14 these individuals about the *Cleveleys* case or
 15 about the *Castleton* case?
 16 **A.** No, and I wouldn't have. I would only have
 17 provided what information I had about civil
 18 litigation cases. The reference to the fraud
 19 team there, they were the investigators that fed
 20 into the Prosecution department. So that really
 21 wouldn't have involved me.
 22 **Q.** Then:
 23 "Information Security ... to conduct initial
 24 investigations and provide Terms of Reference
 25 outlining remit and requirements to carry out
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1 full investigation."
 2 So the proposal seems to be that the
 3 Information Security team conducted an initial
 4 investigation but that is then followed by
 5 what's called a full investigation. Do you
 6 recall that?
 7 **A.** I don't recall the conference call but, as it is
 8 recorded on this document, then that must be
 9 what happened.
 10 **Q.** If we look at the third piece of work:
 11 "Subject to agreement of 2 above, conduct
 12 full investigations into integrity issues, with
 13 conclusions/report provided. Once investigated
 14 and conclusions drawn, gain external
 15 verification to give a level of 'external
 16 gravitas' to the response to these challenges
 17 (Recommend Ernst & Young as most suitable
 18 partner to complete this)."
 19 Was there in fact a full investigation into
 20 integrity issues that was verified in some way
 21 by an external firm?
 22 **A.** If that ever occurred, I was never made aware of
 23 it.
 24 **Q.** In fact, you don't recall this meeting?
 25 **A.** I don't, but I suspect that it was probably
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1 **A.** Given that I had originally suggested something
 2 similar in 2005, although I cannot recall it,
 3 I suspect that I probably did.
 4 **Q.** Do you recall any conversations?
 5 **A.** I'm sorry, I can't.
 6 **Q.** Can we look at page 1. This is the email, the
 7 intervention that you've referred to. Actually,
 8 sorry, if we look at the bottom of page 1 you'll
 9 see that Dave Posnett there forwards the earlier
 10 chains to Rob Wilson, and he says:
 11 "Can we please ensure that Rob Wilson (Head
 12 of Criminal Law, [Royal Mail Group]) is kept
 13 appraised of the situation ..."
 14 If we scroll up, this is his response. Do
 15 you recall why Rob Wilson wasn't invited to that
 16 original meeting?
 17 **A.** No, I don't. As I say, I don't actually recall
 18 the telephone -- I really do suspect that it
 19 probably was a telephone conference. I've no
 20 idea why he wasn't invited to that original
 21 conference.
 22 **Q.** Having been what you described as just a case
 23 worker up until this point, was it not
 24 significant to you that you were being drawn
 25 into what was quite a significant step on behalf
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1 a telephone conference call and we had lots and
 2 lots of those.
 3 **Q.** Do you recall, in February 2010, the discussion
 4 about a full investigation into integrity
 5 issues?
 6 **A.** I cannot recall it but, as it is recorded on
 7 this document, it must have occurred. I can't
 8 unfortunately assist the Inquiry any further on
 9 this point than what is already written on the
 10 document.
 11 **Q.** Isn't that entirely consistent with your
 12 recommendation back in 2005, that there be
 13 a full investigation?
 14 **A.** And that is why I was very happy to support it.
 15 **Q.** What did you do in respect of supporting it?
 16 **A.** I believe, though I would have been prepared to
 17 provide what information I had about civil
 18 subpostmaster deficiency cases to Sue Lowther
 19 but I do not think, because of an intervention
 20 by the Head of Criminal Law, that this piece of
 21 work proceeded any further. But that is just my
 22 opinion.
 23 **Q.** Being consistent with your suggestion in 2005,
 24 do you recall having spoken out in favour of
 25 this full investigation into integrity issues?
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1 of the Post Office?
 2 **A.** Well, both I and my line manager, Rebekah
 3 Mantle, were litigators and, in effect, we had
 4 an interest in the business being able to
 5 litigate as efficiently as possible and, given
 6 my recommendations in December 2005, I wasn't
 7 too surprised to be involved in this.
 8 **Q.** Is it not something that you would have had
 9 quite a good recollection of, given that it was
 10 one of the more recent incidents, 2010 -- we're
 11 not going to back to 2005 now -- and that you
 12 were being involved in what is quite
 13 a significant enterprise on behalf of the Post
 14 Office?
 15 **A.** I wish my memory were that good. I'm sorry,
 16 I can't assist any further.
 17 **Q.** Can we look at the top of page 1, and this is
 18 the email response from Rob Wilson. I'm going
 19 to read from quite a lot of it. It says:
 20 "Dave,
 21 "If it is thought that there is a difficulty
 22 with Horizon then clearly the action set out in
 23 your memo is not only needed but is imperative.
 24 The consequence however will be that to commence
 25 or continue to proceed with any criminal
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1 proceedings will be inappropriate. My
2 understanding is that the integrity of Horizon
3 data is sound and it is as a result of this that
4 persistent challenges that have been made in
5 court have always failed. These challenges are
6 not new and have been with us since the
7 inception of Horizon as it has always been the
8 only way that Defendants are left to challenge
9 our evidence when they have stolen money or
10 where they need to show that our figures are not
11 correct.

12 "What is being suggested is that an internal
13 investigation is conducted. Such
14 an investigation will be disclosable as
15 undermining evidence on the defence in the cases
16 proceeding through the criminal courts.
17 Inevitably the defence will argue that if we are
18 carrying out an investigation we clearly do not
19 have confidence in Horizon and therefore to
20 continue to prosecute will be an abuse of the
21 criminal process."

22 Pausing there, is that something that you
23 recall being said to you in these discussions?

24 **A.** I don't remember the discussions and this is the
25 opinion of a criminal prosecutor.

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1 be open to criticism. This is 2010. So quite
2 a long time before the Court of Appeal
3 ultimately heard these cases. Given the
4 significance of such a statement, do you still
5 not recall receiving this, discussing it?

6 **A.** I'm afraid I don't, but I can see that the
7 second person to whom this document is
8 addressed, Mr Doug Evans, was the solicitor at
9 the time.

10 **Q.** There is, of course, reference below to civil
11 litigation. It says:

12 "What we really need to do is impress on
13 Fujitsu the importance of fully cooperating in
14 the provision of technical expertise and witness
15 statements to support the criminal and civil
16 litigation now and in the future.

17 "Given the nature of the discussions that
18 took place on 26 February, I am staggered that
19 I was not invited to take part in the
20 conference."

21 In light of the implications of this
22 potential report, I think you said that it
23 wasn't ultimately pursued, the independent
24 investigation and you linked it in some way to
25 this email. Can you assist us with how you link

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1 **Q.** The concern that appears to be being raised in
2 this email is that, by carrying out
3 an investigation, that will be disclosable as
4 undermining evidence. Would you not remember
5 something that significant?

6 **A.** I'm afraid I don't.

7 **Q.** If we continue, the third paragraph:

8 "To continue prosecuting alleged offenders
9 knowing that there is an ongoing investigation
10 to determine the veracity of Horizon could also
11 be detrimental to the reputation of my team. If
12 we were to secure convictions in the knowledge
13 that there was an investigation, where the
14 investigation established a difficulty with the
15 system we would be open to criticism and appeal
16 to the Court of Appeal. The Court of Appeal
17 will inevitably be highly critical of any
18 prosecutor's decision to proceed against
19 Defendants in the knowledge that there could be
20 an issue with the evidence."

21 Again, quite, you might think, a significant
22 statement, that it could be detrimental, that if
23 they secure convictions in the knowledge that
24 there was an investigation where the
25 investigation established a difficulty, they'd

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1 the two?

2 **A.** Given the concerns raised by Mr Wilson, this is
3 only my opinion, I assume that this dissuaded
4 the Information Security Department from
5 proceeding with their original intention. But
6 that is just my opinion.

7 **Q.** We can look at another email you were copied
8 into on page 9 of this chain. It's an email
9 from Susan Lowther of the Information Security
10 team, and she says:

11 "All,

12 "As was discussed on the conference call and
13 taking into account Rob's comments to confirm
14 that what we're looking at is a 'general' due
15 diligence exercise on the integrity of Horizon,
16 to confirm our belief in the robustness of the
17 system and thus rebut any challenges."

18 Looking back at that original email where
19 the discussion had been taking place to carry
20 out an exercise, is that a fair description of
21 what seems to have been discussed at the
22 original meeting? That it was simply going to
23 be a general due diligence exercise?

24 **A.** I'm afraid, as I've said before, I cannot
25 remember the original conference call meeting.

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1 Q. There's one final document that I'll take you to
2 in this pack and I'll leave it at that. It's
3 page 15. The final. Thank you very much. Dave
4 King, Security Architect, continues on this
5 email chain. You're still copied in, 8 March,
6 3.27 pm.

7 "As discussed, I can confirm that we are in
8 no way questioning/investigating the financial
9 integrity of Horizon, or of the accounting
10 system as a whole. The Information Security
11 review is to look at the ways in which messages
12 are sent at a system level ..."

13 Again, is that consistent really with what
14 was being proposed at the meeting at which you
15 attended?

16 A. I'm afraid I cannot recall the precise detail of
17 that meeting. I'm sorry, but I can't assist
18 further.

19 Q. Okay. Eventually, we have something that we
20 refer to as the Ismay report. Can we look at
21 POL00026572. You're copied into this report
22 from Mr Ismay. The date is 2 August 2010. You
23 may not be able to assist us but is this
24 something that arose out of that meeting or is
25 this something else?

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1 of enquiries that were made by Rod Ismay?

2 A. I don't know. It all depends what he asked me
3 for. I would have done my best to provide him
4 with what information I had.

5 Q. Can we please now look at POL00055418. We're
6 still in 2010. We're now in October, 8 October
7 2010. This is an email from you to Jarnail
8 Singh, copied to Mike Granville and Rod Ismay.
9 The subject is "The Horizon trial". It seems as
10 though this may be the *Seema Misra* case. It
11 says:

12 "Mike and Rod are very interested in any
13 developments at the trial next week which impact
14 on Horizon. You promised to let me know if
15 anything unfortunate occurred in respect of
16 Horizon. Please can you copy Rod and Mike into
17 any messages. Incidentally, I assume that you
18 have briefed external relations. Can you let us
19 know who you have briefed because Mike and Rod
20 may wish to have input into any story relating
21 to Horizon. They may give you call on [and it
22 gives a number]. Incidentally Postmasters for
23 Justice met with the Minister this week and were
24 accompanied by Issy Hogg and the lady from
25 Shoosmiths."

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1 A. I do not know whether this document arose
2 directly out of the original Sue Lowther
3 proposal just discussed.

4 Q. Were you involved in the drafting of this report
5 in any way?

6 A. No. I may have been asked for information by
7 Mr Ismay, but I had no involvement in the
8 drafting of it whatsoever.

9 Q. All of the things that we've been talking about
10 today, the Cleveleys case, the report from Jason
11 Coyne, the *Castleton* case, the report from BDO,
12 all of the various reports to you over the years
13 where people were complaining about the Horizon
14 System, are these matters that you passed on to
15 Rod Ismay as part of his investigation?

16 A. If he had asked for information as broadly as
17 you've just defined it then I would have
18 provided that to him. But, after this period of
19 time, and with no documentary evidence recording
20 what I sent or did not send to him, I cannot
21 assist further.

22 Q. Your evidence today was that you dealt with each
23 case individually.

24 A. That is correct.

25 Q. Do you think you took that attitude in respect

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1 We spoke earlier about whether it was
2 appropriate to get involved in matters relating
3 to publicity, et cetera. What exactly was your
4 role here in relation to the Horizon System and
5 in relation to more senior members of the Post
6 Office?

7 A. I didn't recall this document until it was
8 disclosed. I believe, to a large extent, I was
9 just performing the role of being a conduit
10 between more senior members of the POL business
11 and Mr Jarnail Singh, who was dealing with the
12 case of Horizon, which had become the next --
13 the case of *Misra*, which had become the next
14 test case on the Horizon System.

15 Q. Was *Misra* -- I think we've discussed this
16 already -- very much seen as that test case,
17 very similar to *Castleton* in that respect?

18 A. I believe that it was, although I had much less
19 knowledge about it, simply because it was
20 a prosecution not a civil action.

21 Q. Do you think here you're once again being used
22 in a policy role, rather than a legal role?

23 A. I have never been involved in a policy or
24 a strategy role. I can only assume that I had
25 been asked by Mike Granville and Rod Ismay to

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1 keep them updated with developments in this
 2 case.
 3 **Q.** You've told us that you weren't involved in
 4 criminal prosecutions and rarely came across
 5 them. Why are you, in particular -- why were
 6 you dealing with this on behalf of Mike and Rod?
 7 **A.** This was an unusual case, because, as I referred
 8 earlier, the barrister in the case of *Misra* had
 9 been in touch personally to ask for information
 10 and, therefore, I believe, on this case alone,
 11 I was performing that conduit function.
 12 **Q.** Can we move on to POL00062075, please. Here
 13 we're in 2014, so you now are in your regulatory
 14 role --
 15 **A.** Yes.
 16 **Q.** -- and you're receiving information relating to
 17 a criminal prosecution.
 18 **A.** Excuse me. If I can interrupt. I suspect that
 19 I was copied in to that by mistake. I assume
 20 I was on original template and they just never
 21 bothered to remove me. I would have had nothing
 22 to do with any prosecution case in 2014. I was
 23 firmly embedded in the compliance team within
 24 Royal Mail Group by then. It might have had my
 25 CC on it, but I would never have come across
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1 a December trial, but preserving our ability to
 2 get that adjourned if they serve a late report
 3 that we need to deal with. I said that we could
 4 prepare for a December trial if necessary and
 5 I was happy to do so, but I was concerned to
 6 make sure that we could reply to any expert
 7 reports served by Castleton. I also think that
 8 our Counsel was effectively trying to ambush the
 9 other side because he thinks that when we serve
 10 these fifteen witness statements on them, they
 11 will be knocked reeling a bit. Mandy
 12 appreciates the tactics of this. She said that
 13 the only thing with a December trial is that the
 14 Post Office get very busy", et cetera.
 15 Were you happy with the general approach
 16 that was taken in Mr Castleton's case?
 17 **A.** As detailed in the paragraph we're looking at,
 18 yes, I was.
 19 **Q.** It seems there as though Stephen Dilley
 20 certainly thought that you were providing
 21 instructions. I think the answer is going to be
 22 no because we've been over this a few times
 23 today, but can you recall who in the Post
 24 Office, other than yourself, who driving this
 25 strategy?
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1 this document.
 2 **Q.** But even in 2005/2006, or onwards, prior to your
 3 moving roles, why would you be copied into a --
 4 the result of a criminal case?
 5 **A.** I would have been copied in to the result of
 6 a criminal case in the pre-POCA days, where
 7 there'd been a failure to obtain an order for
 8 compensation, so that Civil could assess on
 9 behalf of the business whether there was any
 10 viability of bringing civil proceedings to
 11 achieve a recovery.
 12 **Q.** Thank you. I have two more topics to address.
 13 I should finish them hopefully before the break
 14 otherwise we'll take a break and I'll finish the
 15 final topic. There will then be a small number
 16 of questions on behalf of Core Participants.
 17 I want to briefly address the general
 18 strategy that was pursued against Mr Castleton.
 19 Can we look at POL00072432. This is
 20 an attendance note that we saw that I went
 21 through with Mr Dilley and it's paragraph 3,
 22 about halfway down, that I'd like to look at.
 23 It's 16 October 2006. It says there:
 24 "Counsel therefore wants to play some
 25 brinkmanship with the other side, ie push for
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1 **A.** I'm afraid I can't. I would have obtained
 2 instructions, but after this period of time, I'm
 3 sorry, I can't assist.
 4 **Q.** Can we look at POL00069453, please. This is
 5 another attendance note. This time the 18th, so
 6 two days after. It says:
 7 "I had a conversation with Mandy Talbot.
 8 She has spoken with Claire and Catherine at the
 9 Post Office. They are happy to follow counsel's
 10 advice and go for a December trial purely as
 11 a tactic, even though acknowledging that it is
 12 an unlikely event."
 13 Et cetera.
 14 Does that assist you with identifying who at
 15 the Post Office, at least in respect of that
 16 particular strategy, was providing the
 17 instructions?
 18 **A.** This was a reference to Clare Wardle, my
 19 immediate line manager in Legal Services, and
 20 Catherine Churchard, who was the solicitor to
 21 the Post Office, as the whole organisation was
 22 known as back at that time.
 23 **Q.** Does that assist you in respect of any of the
 24 evidence that you've already given today?
 25 I know you asked to be pointed to specific
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1 documents. Does that assist you?

2 **A.** This is an example of me escalating up within
3 civil litigation the advice that I'd been given
4 to ensure that they were satisfied with the
5 same. I would imagine that there would have
6 been a similar escalation within the POL side of
7 the business at the same time. But I --

8 **Q.** You say the POL --

9 **A.** I can't assist with the identity of those
10 parties after this period of time.

11 **Q.** Okay. The final topic before we take a break is
12 the difficulty or issues relating to obtaining
13 information from Fujitsu.

14 Can we look at POL00082080. And it's
15 page 6. This is an email from Stephen Dilley to
16 yourself.

17 **A.** Mm-hm.

18 **Q.** If we could scroll down, please, it says:
19 "Both
20 I copied you into my epic email ... but the
21 response to the same has been limited in the
22 extreme.
23 "I attach the responses of Graham C Ward and
24 David Hulbert. I have also been contacted by
25 John Cole asking for assistance in preparing

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1 and evidence from Fujitsu.

2 **Q.** There's a message passed on it's forwarding
3 a message from Graham, the casework manager at
4 the Post Office. If we scroll down a little
5 bit, and this is addressed to you, Mandy, and it
6 says there, at the bottom:
7 "With regards to my knowledge of Horizon,
8 I can obtain data as and when required being the
9 SPOC between [Post Office] and Fujitsu, but I do
10 not have the working knowledge of the system to
11 analyse data and comment on whether Horizon was
12 working correctly or not, or whether
13 transactions have been processed correctly and
14 may still affect the office balance. I know
15 Tony U has agreed to have a look at the
16 Marine Drive data, but he is still waiting to
17 hear exactly what information needs analysing."
18 Over the page it says:
19 "Fujitsu should be able to offer a technical
20 perspective of the system working properly.
21 I have searched my records of previous
22 statements received and have found one where
23 Brian Pinder's predecessor Bill Mitchell
24 provided a statement (see below)" -- and we'll
25 see that below -- "commenting on individual

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1 a spec for external expert or experts but
2 I think this is of limited use until we have
3 reports completed by Fujitsu on the system and
4 POL on the data provided. However in respect of
5 an external expert from the field of computer
6 systems and accounting can you suggest any
7 names ..."

8 Then it says:
9 "Stephen
10 "In the collation of evidence did you come
11 across anyone who you believe could actually
12 interpret the information which was obtained
13 from Fujitsu via Graham or the paper documents
14 which were available from the Post Office. As
15 you can see I am still getting the run around on
16 these cases by people who are not prepared to
17 assist."

18 Do you recall any issues with getting people
19 to assist and if so, who?

20 **A.** In the matter of Castleton, I believe that
21 Stephen Dilley was able to eventually provide --
22 obtain assistance and witness statements from
23 persons within Fujitsu. However, I've alluded
24 to the fact that in ordinary civil cases, it
25 could be very challenging to obtain information

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1 calls to the [Helpdesk] and then including
2 a general paragraph stating that 'None of these
3 calls would have had an effect on the integrity
4 of the data on the system ...'.
5 If we scroll down, he says at the top there
6 "Presumably Dave will" -- sorry, no. If we
7 scroll up to the top of the page, sorry, he
8 says:
9 "Perhaps I should ask Fujitsu to provide
10 a similar type of statement in respect of
11 Marine Drive ... what do you think?"
12 Then if we scroll down to the bottom, near
13 the bottom of this email, it's a little
14 confusing as to who everything in this email
15 comes from, but he says:
16 "Fujitsu's responses thus far haven't really
17 helped answer the questions posed in each case,
18 their written responses have been brief to say
19 the least.
20 "My own opinion therefore is that PO Ltd
21 needs to cover off all questions relating to
22 office misbalancing and transaction details ...
23 and that Fujitsu should provide us with
24 a general statement for each case (as per the
25 statement above from Bill Mitchell) detailing

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1 calls estimate to the [Helpdesk]."
 2 Did you have any concerns about using
 3 a generic form of words in these cases, such as
 4 the one that is at the top of this page?
 5 **A.** I don't think we did use a generic form of
 6 words. I think they were prepared to begin with
 7 a generic, and then make it specific to the
 8 events at Marine Drive.
 9 **Q.** So the suggestion at the top, if we could go to
 10 the top, is that there was some general form of
 11 words. And we may or may not, during the course
 12 of this Inquiry, come to a number of statements
 13 that look very similar in how they're
 14 formulated, certain forms of words. Do you have
 15 any recollection of general statements being
 16 used in witness statements?
 17 **A.** No. This may have been something that was
 18 utilised in the prosecution's sphere, but they
 19 were tailored and unique insofar as we were
 20 dealing with civil litigation.
 21 **Q.** Can we look at POL00072692, please. This is the
 22 last document that I'll take you to myself, and
 23 the last document before the break. This is the
 24 attendance note of 7 April 2006 from
 25 Stephen Dilley. It's a document that we have
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1 audit data, enhanced ARQ?
 2 **A.** I'm not an expert in that field. I knew there
 3 were four lines of calls that a subpostmaster
 4 could make to various help desks, et cetera, and
 5 I knew that there was a data that only Fujitsu
 6 had access to, but I didn't know the detail and
 7 I couldn't distinguish one type of data from
 8 another.
 9 **Q.** And contractually I think it's your evidence
 10 that essentially the Civil Litigation Team were
 11 an afterthought in respect of --
 12 **A.** Correct.
 13 **Q.** -- the ability to obtain it?
 14 **A.** Correct.
 15 **MR BLAKE:** Thank you.
 16 Sir, we do have some questions from
 17 recognised legal representatives. Not a huge
 18 amount, but, if you're content, I think this may
 19 be the appropriate moment to take a 20-minute
 20 break.
 21 **SIR WYN WILLIAMS:** Twenty minutes would take us
 22 to 3.50.
 23 **MR BLAKE:** Sorry, 15-minute break, sorry.
 24 **SIR WYN WILLIAMS:** Well, okay, 3.45.
 25 I just want to give notice to everyone that
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1 seen before. It says:
 2 "Before the Post Office joined the call,
 3 Stephen Dilley and Tom Beezer had a telephone
 4 conversation with Ian Herbert. Agreeing that
 5 [Post Office] ... had difficulty obtaining
 6 information from Fujitsu and that the strategy
 7 should be to identify key individuals at Fujitsu
 8 who could provide the relevant information ..."
 9 It then says:
 10 "The [Post Office] joined the telephone
 11 conversation and Tom Beezer outlined our
 12 proposal to Mandy Talbot. Mandy broadly
 13 agreed ..." et cetera.
 14 Do you recall problems obtaining information
 15 from Fujitsu?
 16 **A.** As I mentioned earlier, prosecution was entitled
 17 to 100 reports or analyses per year. We were
 18 left in a situation where, if they hadn't
 19 utilised that 100, we were entitled to request.
 20 Anything over and above that, Fujitsu would
 21 charge. And sometimes POL, I suspect, was not
 22 prepared to bear that cost.
 23 **Q.** Did you understand the difference in various
 24 types of information that was available from
 25 Fujitsu, such as ARQ data, audit trail, raw
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1 just as in the case of Mr Dilley, I do find it
 2 difficult to retain proper levels of
 3 conversation (sic) after about 4.15, so those
 4 questions need to be tailored with that in mind.
 5 I can see you, Mr Blake. What's the
 6 reaction amongst your fellow barristers?
 7 **MR BLAKE:** A fair few smiles. They agree.
 8 **SIR WYN WILLIAMS:** All right. Fine. So 15 minutes
 9 then, between 3.45 and 3.50. Yes.
 10 **(3.32 pm)**
 11 **(A short break)**
 12 **(3.46 pm)**
 13 **MR BLAKE:** Thank you, sir, we have questions from
 14 Ms Page and Mr Stein.
 15 Questioned by MS PAGE
 16 **MS PAGE:** Mrs Talbot, I act for a number of the
 17 subpostmasters in this case, including
 18 Mr Castleton. There would be little point in
 19 putting documents to you and asking you who gave
 20 you instructions in the Castleton case because
 21 you won't tell, will you?
 22 **A.** It's not that I won't tell, it's that I cannot
 23 recall, after this period of time, and it was
 24 a revolving selection of managers within Post
 25 Office Limited.
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1 **Q.** Well, somebody needed to approve the expenditure
2 of £321,000 in legal costs for the sake of
3 a precedent. Which department? Will you tell
4 us at least that, which department of POL could
5 have possibly justified that?

6 **A.** I cannot after this period of time, I'm sorry.

7 **Q.** There was a clear advantage to your own
8 department, wasn't there, because by bankrupting
9 Mr Castleton, you could threaten other
10 subpostmasters who disputed Horizon shortfalls
11 and you could threaten them with the same fate,
12 couldn't you?

13 **A.** I didn't run a department, and it was an
14 advantage for Post Office Limited, not myself or
15 my colleagues.

16 **Q.** But it was your job, wasn't it, to use the
17 precedent that you had achieved?

18 **A.** I don't personally ever recall using the case of
19 Castleton as a precedent.

20 **Q.** Well, it was a very expensive precedent. It
21 must have been used sometimes?

22 **A.** I assume it was, by Post Office Limited and
23 departments in that.

24 **Q.** Do you recall Mr Morgan gave an advice at the
25 end which was of use as a precedent for POL?

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1 of spread over the pages of 33 and 34, this was
2 you telling a group of ten people within POL
3 about the great news, the successful result in
4 the Castleton trial, and that the judgment had
5 entirely vindicated the Horizon System.

6 If we scroll down a little bit further, the
7 final paragraph of your email was:

8 "Mr Castleton appeared to be stunned by the
9 result and did not apply for leave to appeal
10 against the decision."

11 "Stunned". Why do you think you would have
12 mentioned that?

13 **A.** I wasn't present in court at the case involving
14 Mr Castleton, so this would have been based on
15 a report given to me by Bond Pearce.

16 **Q.** And why did you feel that those ten people
17 needed to hear that Mr Castleton was "stunned"?

18 **A.** I was just recording the report as had been
19 provided to me by external agents.

20 **Q.** The next point is:

21 "[He] ... did not apply for leave to appeal
22 against the decision."

23 That was a piece of good news, wasn't it?

24 **A.** Yes, because it meant, as far as Post Office
25 Limited was concerned, that that was the end of

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1 **A.** Excuse me, Mr Morgan gave an advice?

2 **Q.** That's right.

3 **A.** Yes, I do recall that and I remember feeding
4 recommendations back to POL.

5 **Q.** So at least that was of use to them, wasn't it?

6 **A.** Correct.

7 **Q.** What about the cases of Mr Bajaj and Mr Bilkhu?

8 What did you instruct your external lawyers to
9 say to them about the Castleton case?

10 **A.** I don't recall instructing external agents on
11 Bajaj or Bilkhu. I suspect that Post Office

12 Limited would have sent those cases directly out
13 to our external agent.

14 **Q.** Do you think they were authorised to refer to
15 the bankruptcy proceedings as well as just
16 relying on the judgment?

17 **A.** I have no idea.

18 **Q.** I'm just going to refer you to one document, one
19 document only. It's part of the large document
20 POL00090437. And when we get there, if we could
21 just straddle pages 33 and 34, please, there's
22 an email there. We've looked at it in part
23 already. I'm just going to draw your attention
24 to one bit.

25 If we scroll down a little bit and we sort

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1 the matter.

2 **Q.** And he had been told that he would need to lodge
3 some £50,000 in order to appeal, hadn't he?

4 **A.** That I cannot recall. I believe that that may
5 have had something to do with --

6 **Q.** Security for costs; yes?

7 **A.** Security for costs, that's correct.

8 **Q.** Exactly. So this was good news, and it seems,
9 from the way that you've written this email,
10 that you expected your audience of ten, your
11 readership of ten, to be pleased to hear that he
12 was stunned, that he was completely overcome,
13 that he was unable to appeal and that was that.

14 **A.** I think they were more interested in the fact
15 that we had brought the case to a satisfactory
16 conclusion, as far as POL was concerned. That
17 last paragraph is just me reporting verbatim
18 from a report which I received from Bond Pearce.

19 **Q.** Yes. You reported that he was overpowered,
20 utterly defeated, and that that was what POL
21 wanted, wasn't it?

22 **A.** No, that was not POL's objective.

23 **Q.** It was part of a culture at POL?

24 **A.** Abs --

25 **Q.** Those who stood up to the institution must be

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1 utterly overcome and defeated?
 2 **A.** Absolutely not.
 3 **Q.** Your task was effectively, metaphorically, to
 4 put Mr Castleton's head on a spike. And you did
 5 that, didn't you?
 6 **A.** Absolutely not.
 7 **Q.** And it was somebody's idea, not yours, wasn't
 8 it? Somebody in POL came up with that idea, did
 9 they not?
 10 **A.** No. This began as a small, relatively small,
 11 deficiency case. It expanded out of all
 12 proportion because of the size of the
 13 counterclaim, and then became a virtual and then
 14 actual test case due to the allegation that
 15 there were substantial defects with the Horizon
 16 System.
 17 **Q.** Do you still maintain that this case was about
 18 the counterclaim by this point?
 19 **A.** It was about the counterclaim up until the time
 20 the counterclaim was reduced to the level of
 21 about £11,000 or so. Thereafter, it was indeed
 22 about the desire on the part of POL to have
 23 a substantial judgment dealing with allegations
 24 about the Horizon System.
 25 **Q.** That's what you delivered for them, wasn't it?

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1 where you got this direction from. Is it your
 2 evidence that you simply can't remember who told
 3 you what the POL line was? Is that actually
 4 your evidence?
 5 **A.** The line would have come from POL as an
 6 organisation. There were many different
 7 managers in that organisation, and I was given
 8 instructions by many people during the course of
 9 litigation. Can I put my hand on my heart and
 10 come up with a name of a person? I'm afraid
 11 I can't. I wish I could, for the subpostmasters
 12 who you represent.
 13 **Q.** Okay. So no one single name comes to your
 14 recollection?
 15 **A.** No.
 16 **Q.** Not one?
 17 **A.** I'm sorry.
 18 **Q.** Okay. If I can take you to your statement,
 19 please, which you should have there.
 20 **A.** Yes.
 21 **Q.** It's WITN08500100. If we can have on screen
 22 paragraph 7, which is page 2. If you can scroll
 23 down to paragraph 7, I'll be very grateful.
 24 Right.

Now, here we have you saying that:

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1 **A.** Yes.
 2 **MS PAGE:** Thank you.
 3 **SIR WYN WILLIAMS:** Mr Stein?
 4 **Questioned by MR STEIN**
 5 **MR STEIN:** Mrs Talbot, my name is Sam Stein,
 6 I represent a very large number of
 7 subpostmasters and mistresses.
 8 You've mentioned in your evidence, and
 9 I just read at a little bit of what you were
 10 saying this morning, you said, I think at about
 11 11.30, 11.35, you believed that the "Post Office
 12 felt the need to demonstrate that it would take
 13 a firm line with any ... challenges to Horizon".
 14 Then you've answered a number of questions
 15 from Mr Blake, and then, more recently, on the
 16 question of whether you have any evidence that
 17 you can tell us about, about where that
 18 direction came from, that firm line.
 19 Again, you said this earlier: no idea where
 20 that direction would have come from.
 21 Now, Mrs Talbot, you don't come across, if
 22 I may say so, as someone that seems to be having
 23 any problems with your memory. So the large
 24 number of people that I represent are finding it
 25 very hard to believe that you cannot recall

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1 "By 2004 I was the Team Leader of the Postal
 2 Litigation team within the Civil Litigation
 3 Department. At no time did the team work
 4 predominantly for the Post Office Ltd ... or on
 5 cases involving Sub Post Masters, that was
 6 a small proportion of the work."
 7 Then you go on to say in the next sentence
 8 that:
 9 "... the Postal Litigation team ceased to
 10 exist and was absorbed into the Dispute
 11 Resolution Department which was the new name of
 12 the Civil Litigation Department."
 13 Now let's concentrate on the next couple of
 14 sentences:
 15 "There was no formal structure for upward
 16 report within the Department although my line
 17 managers operated an open-door policy. We were
 18 never provided with guidance on what issues
 19 should be reported."
 20 Okay. So let's see if you can help us
 21 understand the way this worked.
 22 **A.** Sure.
 23 **Q.** You're saying clearly in your statement that
 24 there was no formal structure reporting upwards?
 25 **A.** Correct.

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1 Q. Right. But you're also saying in your evidence
 2 that there was a structure for you getting the
 3 line or the policy from POL in relation to
 4 subpostmasters. You said repeatedly, as you did
 5 to me a few minutes ago, that POL made it clear
 6 what their attitude was toward issues with the
 7 Horizon System. So are you saying in your
 8 statement no upwards policy or guidance system
 9 but there certainly was a downwards one?
 10 A. My paragraph 7 describes the position purely
 11 within the Civil Litigation Department. There
 12 was neither a formal upwards escalation for
 13 seeking guidance, neither was there a downwards
 14 sequence of guidance from the solicitor down to
 15 caseworkers.
 16 What you're describing I believe is on the
 17 Post Office Limited side of affairs, and during
 18 the duration of the Castleton litigation, the
 19 identity of the parties that you've seen in the
 20 correspondence to whom I was reporting
 21 backwards, in effect developed. Day 1,
 22 Castleton legislation, there was merely
 23 Ms Woodward from the Error Resolution Team at
 24 Chesterfield.
 25 Q. I see. Well, let's then turn to the last part

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1 Q. Right. So you are saying very clearly none of
 2 those individuals provided you the POL line; is
 3 that right?
 4 A. Well, they couldn't because they were members of
 5 the Civil Litigation Department.
 6 Q. Were they your managers?
 7 A. Each and every one of them was my manager.
 8 Q. Right.
 9 A. Sequentially.
 10 Q. Right. So, these individuals, which were your
 11 managers, sequentially, over the period of time
 12 when you were dealing with litigation, none of
 13 those provided you with the POL line you've been
 14 asked many questions about?
 15 A. No.
 16 Q. So it didn't come through them?
 17 A. No.
 18 Q. And you remember very clearly it didn't come
 19 through them?
 20 A. They were my colleagues who I worked with on
 21 a daily basis.
 22 Q. Do you remember, as clearly as the rest of your
 23 apparent -- the rest of your evidence, that this
 24 POL line didn't come through them? Is that what
 25 you're saying?

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1 of that paragraph, paragraph 7. Page 3 of your
 2 statement. Let's go through the people that we
 3 have here. See if this helps you.
 4 So we've reached the end of the sentence:
 5 "We were never provided with guidance on
 6 what issues should be reported."
 7 Then you go on to say:
 8 "My first line manager in the Civil
 9 Litigation Department was Joe Ashton ..."
 10 Okay, let's just go through these people and
 11 see if you can help.
 12 A. Sure.
 13 Q. Did you get the steer about the Post Office and
 14 its line towards people doubting the Horizon
 15 System through your line manager, first of all
 16 Joe Ashton?
 17 A. No.
 18 Q. Right. Clare Wardle, same question.
 19 A. No.
 20 Q. No?
 21 A. No.
 22 Q. Right. Biddy Wyles?
 23 A. No.
 24 Q. Right? Rebekah Mantle?
 25 A. No.

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1 A. I genuinely do not believe it came from them.
 2 Q. Right. So, eliminating those, as far as we can,
 3 it's come from some other source; is that
 4 correct?
 5 A. That would be logical, yes.
 6 Q. Yes, okay.
 7 Now, can I take you then please to how
 8 things developed in relation to 2010. I'll take
 9 you to the document which is the Rod Ismay
 10 report, it's been called generally a whitewash
 11 report.
 12 That's POL00026572. Very grateful. If we
 13 can just enlarge the top. Thank you.
 14 Now you described yourself in your evidence
 15 as being a conduit. Our understanding of what
 16 you're trying to say there is you're a conduit
 17 for the wishes of the Post Office. Yes?
 18 A. Correct.
 19 Q. I assume you're not trying to portray yourself
 20 as some sort of evil robot?
 21 A. Absolutely not.
 22 Q. No, okay. So you're a conduit for the
 23 Post Office's intentions and wishes in relation
 24 to the way that matters are dealt with regarding
 25 Horizon. Is that what you're trying to say?

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1 A. I think what I said was by 2010 I was performing
2 some conduit actions in respect of information
3 about the Misra case, and relaying that back to
4 Mike Granville and Rod Ismay.

5 Q. Okay. Let's have a look at the heading of this
6 particular part of what becomes the
7 Ismay report. Now, obviously under the word
8 "Confidential" it's got that it's going to
9 Dave Smith, managing director. It's from
10 Rod Ismay. And then the other people that are
11 referred to here.

12 Now we see yourself referred to:

13 "Mandy Talbot, Principal Lawyer (Civil)"
14 Yes?

15 A. Mm-hm.

16 Q. Was that a title you gave yourself?

17 A. No, it was a title that emerged.

18 Q. Yes, because it's "Mandy Talbot, Principal
19 Lawyer (Civil)", which is distinguishing itself
20 from "Rob Wilson, Head of Criminal Law"?

21 A. Yes.

22 Q. So it appears, so far as we can tell in this
23 document, that you are being portrayed as the
24 principal lawyer in the civil department?

25 A. That is incorrect. That is incorrect.

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1 to as "Mandy Talbot, Principal Lawyer" without
2 the "Civil" in brackets in some internal
3 correspondence. In the same way that Royal Mail
4 Group at one time became Consignia, it was quite
5 open to changing titles.

6 Q. Mrs Talbot, you've made reference a couple of
7 times in your evidence to the limitations on the
8 disclosed material you've seen. You've
9 commented on it being partial. You've commented
10 on the fact that if any you had access to your
11 own files, electronic files and electronic data.
12 Mrs Talbot, are you trying to say that somewhere
13 within all this missing material there might be
14 a document that would portray you in a more
15 sympathetic light? Is that what you're trying
16 to say?

17 A. No, I think the documentation that has been
18 disclosed portrays me in an accurate light.

19 MR STEIN: Well, Mrs Talbot, there I think my
20 clients would agree.

21 Thank you.

22 **Questioned by THE CHAIR**

23 SIR WYN WILLIAMS: Mrs Talbot, when you used the
24 word "partial" in relation to disclosure, do
25 I understand that to mean incomplete as opposed

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1 Q. Your boss at this time, was that --

2 A. That --

3 Q. Rebekah --

4 A. Rebekah Mantle at this time, yes.

5 Q. She's not on this email, is she?

6 A. No.

7 Q. No. Can you help with why it is that she would
8 have been not referred to within this email
9 chain?

10 A. I'm afraid I can't.

11 Q. Because the report that follows the Ismay report
12 is a report that looks at the question of
13 whether there should be a review or
14 investigation into the Horizon System. Why
15 isn't your boss involved in that?

16 A. I didn't create the report. I cannot give you
17 any information about the distribution list.

18 Q. You see, this suggests, as does other evidence
19 that you've gone through with Mr Blake, who
20 asked you questions first of all, that in fact
21 you're taking a principal lawyer role in
22 relation to Horizon errors, issues. It's
23 correct, isn't it?

24 A. No, it's not. That is merely a title that was
25 attached to my name. You will see me referred

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1 to selectively left out?

2 A. I think I used the word "partial" only in
3 respect of the initial report created by
4 Mr Coyne.

5 SIR WYN WILLIAMS: Well, I may have misunderstood
6 that so let me be clear about it. Let me try
7 and get to it in this way. When you either
8 sought instructions about a course of action
9 where you felt the need to seek instructions
10 either from your line managers or from some
11 other department within the Post Office, did you
12 generally seek those instructions in writing or
13 orally?

14 A. It would have been a combination of both.

15 SIR WYN WILLIAMS: Well, that I'm prepared to
16 consider to be quite likely, at the very least.
17 So one can take it that in respect of some of
18 the things you've been asked about, where you've
19 been unable to identify personnel, there ought
20 to be at least some written exchanges between
21 you and that person about whatever it was that
22 you were then seeking instructions and receiving
23 instructions?

24 A. Undoubtedly. That's correct.

25 SIR WYN WILLIAMS: And so far as you are concerned

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1 at least, you haven't been shown any of that
2 documentation? Do I understand you correctly on
3 that?

4 **A.** That is correct, though I did have to assimilate
5 a large amount of material on Tuesday of last
6 week. But to the best of my knowledge, no.

7 **SIR WYN WILLIAMS:** So that, for example -- and I'm
8 just using this as an example -- when the
9 strategy in Mr Castleton's case was being
10 discussed between Mr Dilley and you, can I take
11 it that, at least on occasions, you would have
12 escalated what was being discussed either to
13 your line managers or to some other department
14 before giving Mr Dilley an answer --

15 **A.** Absolutely.

16 **SIR WYN WILLIAMS:** -- as to the strategy to be
17 followed?

18 **A.** Absolutely. Both internally up to -- up the
19 line within civil litigation, and across to POL,
20 the business.

21 **SIR WYN WILLIAMS:** Yes, and just so that -- because
22 as you know, I am enquiring, so I'd like, if
23 I could, to understand who it was that would
24 have been giving you instructions in the sense
25 of knowing who that person was. All right?

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1 have sought instructions from, I'd be grateful
2 if you'd name them.

3 **A.** I sought assistance from a lot of departments
4 like Security; information from Fujitsu.

5 **SIR WYN WILLIAMS:** Can I just stop you there. When
6 you say you sought information from Fujitsu, did
7 you do that directly in the sense that you had
8 a contact in Fujitsu that you could contact
9 directly, or did you have to go through some
10 other process?

11 **A.** There were some people eventually, as the
12 litigation progressed, but initially an awful
13 lot of that material was sought by Mr Stephen
14 Dilley as a consequence of his letter addressed
15 to Fujitsu; and then people started responding
16 to that, sometimes copying me in to those
17 responses, ultimately, the material being sent
18 to Stephen. I really wish I could pin it down
19 to a department or even some persons.
20 Undoubtedly, Dave Smith was one of the most
21 senior people within POL who was fairly
22 regularly copied in to the emails. Indeed, he
23 is often first on the list on a number of those
24 early emails. And I think he was possibly
25 managing director of one of the POL departments

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1 So I understand that you've said you can't
2 remember, and I'm not going to probe that any
3 further, but can you at least say, apart from
4 your line managers, what other departments might
5 you have sought instructions from? In other
6 words, commercial, security? I'm just naming
7 them at random, but can you tell me the
8 likelihood of the departments you would have
9 sought instructions from?

10 **A.** The answer I can give categorically is the Error
11 Resolution Team at Chesterfield.

12 **SIR WYN WILLIAMS:** Right, so that's a department
13 that I might want to investigate. That's
14 number 1. Number 2, if any?

15 **A.** That is the one I can be absolutely certain
16 about, because they were the parties that sent
17 it out for litigation in the first place.

18 **SIR WYN WILLIAMS:** Yes, but don't worry about being
19 certain about it. In an Inquiry, you might say,
20 "Well, I think I might have done this", and then
21 it's up to me to decide if I want to follow it
22 up. Do you see what I mean?

23 **A.** Indeed.

24 **SIR WYN WILLIAMS:** So if there are other departments
25 that you think it at least likely that you may

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1 at the time.

2 **SIR WYN WILLIAMS:** Well, unless I'm wrong about it,
3 there were two Mr David Smiths in Post Office in
4 the relevant period.

5 **A.** David X Smith -- oh, pardon, sir. David X Smith
6 is --

7 **SIR WYN WILLIAMS:** No, one of them was certainly --
8 yes. I follow. All right. Thank you very
9 much.

10 **THE WITNESS:** Thank you, sir.

11 **SIR WYN WILLIAMS:** So all that remains is for me to
12 thank you for making a witness statement and for
13 coming to the Inquiry to answer a good many
14 questions during the course of the day.

15 **THE WITNESS:** Thank you, sir.

16 **MR BLAKE:** Thank you very much, sir. 10.00
17 tomorrow.

18 **SIR WYN WILLIAMS:** Yes, fine. Thank you.

19 (4.14 pm)

20 (The hearing adjourned until 10.00 am the following
21 day)

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