



Access to Justice

For the Attention of Mr Phil Taylor
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By Fax: **GRO**

Your reference	Our reference	Please ask for	Date
	ICH 03/06/09	Issy Hogg	13th November 2009

Dear Phil

RE: **R v Seema Misra**
Guildford Crown Court – 30th November 2009 - Trial

Please find enclosed your request for disclosure.

I also look forward to hearing from you as a matter of urgency with regard to my last request.

Finally, I confirm that I spoke with your colleague yesterday to indicate that our expert was only able to attend West Byfleet Post Office on Tuesday 17th November 2009.

Yours sincerely

GRO

Issy Hogg
Coomber Rich

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Regulated by Solicitors
Regulation Authority

In the Guildford Crown Court

R

V

Seema Misra

Request for Disclosure

Contract

- 1) Please provide a copy of our client's signed Post Office Contract for Services.
- 2) In a response dated 30 December 2008 (a copy of which is attached hereto) to an FOI request, the Post Office indicated that, between July 1999 and December 2008, 244 sub postmasters had their contracts terminated under s1, Paragraph 10 of their Contract for Services.
 - a) Please confirm the same information for 2009
 - b) Please indicate how many of those sub postmasters had losses recorded on the Horizon system.

Training

- 3) Please provide a copy of the training manual supplied to the Defendant.
- 4) Please provide copy records of all training provided to the Defendant.
- 5) Please provide details of the qualifications of the trainer and their ability to train sub postmasters on the Horizon system.

Horizon System

- 6) Please provide details of any business testing carried out by the Post Office on the system before it went live.
- 7) Please provide a clarified audit trail in relation to the Defendant's Horizon accounts.

- 8) Please provide the Service Logs for the system at West Byfleet Post Office for a period commencing six months prior to the defendant taking over as Sup-Post Mistress to the present day.
- 9) Please confirm when (i.e. dates and times) and why the hardware in the system at West Byfleet Post Office has been changed.
- 10) By whom have these changes been made?
- 11) When new hardware was installed at West Byfleet was it brand new or reconditioned (i.e. existing hardware that has been wiped prior to installation).
- 12) If it is the latter please confirm the identity of the Post Office from which the reconditioned hardware came and why the hardware had been removed from that Post Office.

Prosecutions

The Prosecution are Aware that the Defence raise issues with the Horizon System. The Defence contend that this situation is not uncommon throughout the country.

- 13) Please confirm how many past and current prosecutions for theft and/ or false accounting of a Sub-Post Master/Post Mistress have led to the Defence raising issues with the Horizon System.
- 14) Please also express this number as a percentage figure of the total prosecutions for theft and/or false accounting.