

Richard Morgan

From: Stephen Dilley
Sent: 05 September 2006 13:47
To: 'rmorgan'; **GRO**
Cc: Tom Beezer
Subject: Latest version of every statement
Attachments: STATEMENT_1207758.DOC; STATEMENT_1207759.DOC;
STATEMENT_1207760.DOC; STATEMENT_1207763.DOC;
STATEMENT_1207764.DOC; STATEMENT_1207766.DOC;
STATEMENT_1207767.DOC; STATEMENT_1207769.DOC;
STATEMENT_1207770.DOC; STATEMENT_1203953.DOC;
STATEMENT_1107486.DOC; STATEMENT_1107425.DOC;
STATEMENT_1208412.DOC

Dear Richard,

I refer to our telephone conversation this afternoon and attach the following statements in their latest format (these will change as I am still working on them)

1. Andrew Wise - currently training manager and formerly of NBSC. He helpfully described the balancing procedure and talks through the NBSC call logs. Played relatively minor role at time helping Sarah Pennington (who has now left the P.O) look at whether there were any IT problems.
2. John Jones - he dealt with the appeal and is a key witness.
3. Davlyn Cumberland - she assisted Liz Morgan to look at cash accounts for Cath Oglesby and doesn't remember much.
4. Gillian Hoyland - not involved at time but can give evidence if nec on the procedure of what happens when a customer pays in a cheque.
5. Greg Booth - The second temp sbpmr who I mentioned in my statement yesterday.
6. Ken Crawley - not involved at time but can give evidence if nec on the pensions procedure.
7. Liz Morgan - looked at cash account for Cath Oglesby to see if anything unusual but cannot remember much.
8. Meryl Ludditt not involved at time but can talk about procedure of a customer paying for sthg by credit card (APS). Reluctant to get involved and we may have to use someone else.
9. Michael Johnson - Not involved at time but can if nec give evidence on procedure of buying a lottery ticket
10. Andrew Dunks - not involved at time but can talk through HSH call logs
11. Catherine Oglesby - retail line manager heavily involved at time and key witness. I need to amend this statement to include description of the branch and other issues we discussed in conference
12. Helen Rose - auditor involved at time
13. Anne Chambers - employed by Fujitsu and involved briefly at time in considering whether anything wrong with the I.T

In addition, there are the following other potential witnesses for whom I have not yet obtained a statement:

14. Ruth Simpson - relief spmr **GRO** not available to take a proof for several weeks.
15. Lesley Joyce - contracts manager present at LC's dismissal hearing but who does not remember much at all.
16. Neil Howard, Alliance & Leicester - not involved at time but I need to speak to him to see if he is willing and able (if nec) to give evidence on procedure of what happens if a customer makes a giro deposit or withdrawal.

I have just spoken to Castleton's solicitors and in view of Ruth Simpson's unavailability asked to

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put back exchange of statements to **29 September** at earliest. They are taking instructions and will revert tomorrow but I think they will agree. We both recognised this may put back experts reports and also that the trial window may well need to be moved/extended in view of this but we would deal with that after exchange when they can see which of our witnesses they need to call.

Please can you let me know which witnesses you'd like to see on Monday so that I can stand down the others.

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

Kind regards.

Stephen Dilley
Solicitor
for and on behalf of Bond Pearce LLP

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