

List of documents: standard disclosure

Notes

- The rules relating to standard disclosure are contained in Part 31 of the Civil Procedure Rules.
- Documents to be included under standard disclosure are contained in Rule 31.6
- A document has or will have been in your control if you have or have had possession, or a right of possession, of it or a right to inspect or take copies of it.

In the High Court of Justice Queen's Bench Division	
Claim No.	HQ 05 X 02706
Claimant (including ref)	Post Office Limited (SJD3.ABG1.348035.134)
Defendant (including ref)	Lee Castleton (MDT.113969)
Date	19 May 2006

Disclosure Statement

I, the above named

☐ Claimant ☒ Defendant

☐ Party (if party making disclosure is a company, firm or other organisation identify here who the person making the disclosure statement is and why he is the appropriate person to make it)

state that I have carried out a reasonable and proportionate search to locate all the documents which I am required to disclose under the order made by the court on (date of order) 9 March 2006

☒ I did not search for documents:-

☐ pre-dating

☒ located elsewhere than

the Defendant's possession (which specifically excludes documents held in the Post Office at the Defendant's premises at Marine Drive, Bridlington)

☐ in categories other than

☒ for electronic documents

☐ I carried out a search for electronic documents contained on or created by the following:
(list what was searched and extent of search)

☐ I did not search for the following:-

☐ documents created before

documents contained on or created by the ☐ Claimant ☐ Defendant

- | | |
|--|--|
| ☐ PCs | ☐ portable data storage media |
| ☐ databases | ☐ servers |
| ☐ back-up tapes | ☐ off-site storage |
| ☐ mobile phones | ☐ laptops |
| ☐ notebooks | ☐ handheld devices |
| ☐ PDA devices | |

documents contained on or created by the ☐ Claimant ☐ Defendant

- | | |
|--|---|
| ☐ mail files | ☐ document files |
| ☐ calendar files | ☐ web-based applications |
| ☐ spreadsheet files | ☐ graphic and presentation files |

documents other than by reference to the following keyword(s)/concepts
(delete if your search was not confined to specific keywords or concepts)

I certify that I understand the duty of disclosure and to the best of my knowledge I have carried out that duty.
I further certify that the list of documents set out in or attached to this form, is a complete list of all documents
which are or have been in my control and which I am obliged under the order to disclose.

I understand that I must inform the court and the other parties immediately if any further document required to
be disclosed by Rule 31.6 comes into my control at any time before the conclusion of the case.

☐ I have not permitted inspection of documents within the category or class of documents (as set out below)
required to be disclosed under Rule 31(6)(b) or (c) on the grounds that to do so would be disproportionate to
the issues in the case.

Signed

GRO

Date

19 May 2006

(Claimant) (Defendant) (Counsel for the Defendant)

List and number here, in a convenient order, the documents (or bundles of documents if of the same nature, e.g. invoices) in your control, which you do not object to being inspected. Give a short description of each document or bundle so that it can be identified, and say if it is kept elsewhere i.e. with a bank or solicitor

I have control of the documents numbered and listed here. I do not object to you inspecting them/producing copies.

See attached Schedule A

List and number here, as above, the documents in your control which you object to being inspected.
(Rule 31.19)

I have control of the documents numbered and listed here, but I object to you inspecting them:

- (a) those documents created in contemplation of litigation; and
- (b) solicitor-client correspondence; correspondence with counsel; drafts of documents.

Say what your objections are

I object to you inspecting these documents because:
they are by their nature privileged from disclosure

List and number here, the documents you once had in your control, but which you no longer have. For each document listed, say when it was last in your control and where it is now.

I have had the documents numbered and listed below, but they are no longer in my control.

SCHEDULE A

Transactional logs/documents

- ✓ 1. Daily cash declarations from Week 41 (2 January 2004) to Week 51 (11 March 2004)
- ✓ 2. Weekly suspense account reports relating to Weeks 47 and 49
3. Weekly cash accounts relating to Weeks 39 to 06
4. Weekly final balance reports for Weeks 39 to 51 inclusive
5. Manual cash declaration sheets from 18 July 2003 to 22 March 2004
6. Transaction log for 17 March 2004
7. Screen print from Horizon system 10 May 2004
- (8. Transactional log dated 11 February 2004 for each computer node
9. Transactional log dated 3 February
10. Balance snapshot for 3 February
11. Balance snapshot for 11 February
12. Sales report for 11 February
13. Cheque listing form for 11 March to 17 March
14. Schedule of National Savings & Investments deposits and withdrawals for 11 March to 17 March
15. Schedule of Personal Banking deposits and withdrawals for 11 March to 17 March
16. Former Subpostmaster's Statement of Errors dated 17 March 2004
- (17. Former Subpostmaster's Statement of Errors dated 24 March 2004
18. Former Subpostmaster's Statement of Errors dated 24 March 2004
19. Copies of documents previously supplied by Bond Pearce

Correspondence

20. Letter to Lee Castleton from Lesley Joyce dated 23 March 2004
21. Letter to Lee Castleton from Cath Oglesby dated 26 April 2004
22. Letter from Lee Castleton to Cath Oglesby and Lesley Joyce dated 28 April 2004
23. Letter from Dorothy Constable dated 28 April 2004

23. Note of interview between Lee Castleton, Chrissie Train, Cath Oglesby and Lesley Joyce dated 10 May 2004
24. Letter to Mr Castleton from Cath Oglesby dated 6 May 2004
25. Letter to Lee Castleton from Cath Oglesby dated 14 May 2004
26. Letter to Lee Castleton from Cath Oglesby dated 17 May 2004
27. Letter from Lee Castleton to David Mellows-Facer dated 24 May 2004
28. Letter from Mr Castleton to David Mellows-Facer dated 1 June 2004
29. Letter to Lee Castleton from David Mellows-Facer dated 2 June 2004
30. Letter to Lee Castleton from David Mellows-Facer dated 3 June 2004
31. Letter from Lee Castleton to David Mellows-Facer dated 8 June 2004
32. Letter from Christine Train to David Mellows-Facer dated 8 June 2004
33. Letter from Lee Castleton to David Mellows-Facer dated 12 June 2004
34. Letter to Christine Train from David Mellows-Facer dated 14 June 2004
35. Letter from Lee Castleton to David Mellows-Facer dated 18 June 2004
36. Letter from Lee Castleton to David Mellows-Facer dated 18 June 2004
37. Letter to Lee Castleton from John Jones dated 21 June 2004
38. Letter to Lee Castleton from David Mellows-Facer dated 24 June 2004
39. Lee Castleton's notes of meeting held on 1 July 2004 at Darlington Post Office
40. Letter from Lee Castleton to John Jones dated 3 July 2004
41. Letter to Lee Castleton from John Jones dated 6 July 2004
42. Letter to Lee Castleton from John Jones dated 8 July 2004
43. Letter to Lee Castleton from John Jones dated 9 July 2004
44. Letter to Lee Castleton from Cath Oglesby dated 21 July 2004
45. Letter to Lee Castleton from Cath Oglesby dated 3 August 2004
46. Letter to Lee Castleton from Michael Farray (Post Office Agent Recruitment) dated 10 August 2004
47. Letter to Lee Castleton from Cheryl Woodward dated 18 August 2004
48. Letter to Lee Castleton from Cheryl Woodward dated 9 September 2004
49. Letter to Lee Castleton from Cath Oglesby dated 16 September 2004
50. Letter from Lee Castleton to David Mellows-Facer dated 24 September 2004

51. Letter to Lee Castleton from David Mellows-Facer dated 23 September 2004
52. Letter from Lee Castleton to David Mellows-Facer dated 24 September 2004
53. Letter to Lee Castleton from David Mellows-Facer dated 27 September 2004
54. Letter to Christine Train from Marilyn Rabinovitch (Post Office Chairman's Correspondence Administrator) dated 22 October 2004
55. Letter to Christine Train from Richard Barker (General Manager, Urban Network) dated 28 October 2004
56. Letter from Lee Castleton to Greg Knight MP dated 6 December 2004
57. Letter to Lee Castleton from Cheryl Woodward dated 13 December 2004
- ✓ 58. Letter to Lee Castleton from National Savings & Investments dated 30 December 2004
59. Letter from Lee Castleton to Cheryl Woodward dated 2 January 2005
- (60. Letter from Lee Castleton to Cheryl Woodward dated 4 January 2005
61. Letter to Lee Castleton from Greg Knight MP dated 6 January 2005
- ✓ 62. Letter to Mr Castleton dated 12 January 2005
63. Letter from Lee Castleton to Mr Lister dated 18 January 2005
64. Letter to Lee Castleton from Greg Knight MP dated 27 January 2005
65. Compliments slip sent to Lee Castleton from Cheryl Woodward with attached Statement of Outstanding Debt dated 11 February 2005
66. Letter to Lee Castleton from Cath Oglesby dated 21 February 2005
67. Letter to Lee Castleton from Greg Knight MP dated 25 February 2005
- (68. Letter to Lee Castleton from Greg Knight MP dated 1 April 2005
69. Letter to Lee Castleton from Greg Knight MP dated 14 April 2005
70. Undated letter from Lee Castleton to John Jones

Miscellaneous

71. Sub-postmaster's contract
72. Fujitsu Siemens engineer's work completed form dated 26 February 2004
73. Note of audit of Marine Drive Post Office dated 25 March 2004
74. Extract from "Subpostmaster" November 2005 containing a letter from Mr V K Bajaj of Torquay Road Post Office, Chelmsford

75. "Balancing with Horizon" system user manual
- ✓ 76. Error notice dated 23 May 2004
- ✓ 77. Marine Drive Post Office accounts
78. Logs of calls placed by Mr Castleton and his staff to the Horizon System Helpline
79. National Savings & Investments balance sheet print out for Dorothy Constable dated 28 May 2004

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

Claim No. HQ05X02706

BETWEEN:

POST OFFICE LIMITED

**Claimant and Part
20 Defendant**

- and -

LEE CASTLETON

**Defendant and
Part 20 Claimant**

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THE CASE MANAGEMENT CONFERENCE ON 23 OCTOBER 2006**

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