

Stephen Dilley

**From:** mandy.talbot [GRO]  
**Sent:** 25 November 2005 17:01  
**To:** Stephen Dilley  
**Subject:** Re: Draft witness statement of John Jones (Post Office Limited -v- Lee Castleton)

Thanks for site of the draft statement.

I only have a few points to make.

I know that in the application to set aside judgement and in this statement we ask for an extension of time for service of the defence and reply to counterclaim to the 15/11/05 but as I was still discussing drafts with your colleagues until well after 5 PM that evening valid service would not have occurred until the morning of the 16/11/05.

In paragraph 7 we need to get John if possible to confirm the dates on which the errors occurred and when they were reported as these are usually two separate dates. to use an old fashion example under the paper based system if an error was made and too little money was charged for a driving license 1/1/05 the problem would not be notified to POL by DVLA for months leading to the date 1/3/05 appearing on the print out of errors. Part of Castleton's case appears to be that after the temporary postmaster was appointed he was not liable for any errors which were notified after that date. That is incorrect because he would still be liable if the error occurred prior to 23/3/ even if it was not notified until afterwards.

In paragraph 15 I do not know that John could give a complete explanation of what happens from transaction to the end of the process. Perhaps Tony R Utting or Keith Baines could suggest the identity of somebody who could help you on this point even if it does mean another statement.

Regards

Mandy

Litigation Team Leader  
Company Secretary's Office  
Legal Services

Royal Mail, Impact House, 2 Edridge Road, CROYDON, CR9 1PJ

Postline: [GRO] Mobile:  
[GRO]  
External Email: mandy.talbot [GRO]

"Stephen Dilley"  
[GRO]  
To: <mandy.talbot [GRO]>  
cc: "Tom Beezer" <Tom.Beeze [GRO]>, "Julian Summerhayes" <Julian.Summerhayes [GRO]>  
25/11/2005 12:12 Subject: Draft witness statement of John Jones (Post Office Limited -v- Lee Castleton)

Dear Mandy,

I refer to my emails of 24 November.

I attach a draft witness statement and Exhibit that I propose to send to John Jones. I have put some comments in bold italics to discuss with him. Do you have any comments in it before I email it to John?

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