

Bond Pearce

Telephone attendance

Client: Royal Mail Group PLC Sub Postmaster Litigation

Matter: Mr Lee Castleton

Matter no: 348035.134

Attending:

Name: Stephen Dilley

Location: N/A

Date: 5 September 2006

Start time:

Units:

Had a telephone conversation with Rowe Cohen solicitors – speaking to Mr Turner.
Discussing the following points:

1. Exchange of witness statements. Telling him that I was informed that Ms Simpson **GRO** **GRO** would not be available yet to be interviewed for several weeks. Therefore I think the earliest I could interview her is in the week commencing 25 September although I will know nearer the time. Therefore I suggested that we either exchange statements on 15 September as agreed and I send to him the witness statement later or if he wants to preserve his position then exchange witness statements simultaneously, and put that back. He said he would prefer to put it back and would take instructions by exchanging on the 29 September.
2. Discussing the timetable generally because we think the trial may take 7 to 10 days. However, agreeing with him that he will be in a better position to assess this when he sees our witness statements and sees which he is prepared to agree so that he will not need to call those witness statements. Explaining to him that some of the witness statements will just be outlining the procedure. We agreed to keep the timetable under review and that we may need to jointly apply to adjourn or extend the trial.
3. Discussing experts and saying to him that I think it might be helpful for the experts to meet and talk through any questions with Fujitsu and also with Manches for a demonstration. He will take instructions on this together with all my recent correspondence. He is meeting Mr Castleton today and he will come back to me regarding the issues that I have raised.
4. On a without prejudice basis, discussing ADR. He said that they hadn't ruled out ADR, but he thought now was not the time. We might want to put back the trial timetable to allow for ADR if it was appropriate. I said that I was speaking without instructions and on a without prejudice basis, but clearly if the experts reports came down one way or the other then ADR may well prove to be useful. He said that the reason he hadn't previously gone to ADR was that he didn't think there was anything to discuss whilst the Post Office clearly thought that Mr Castleton's position had no merit. Agreeing that the next step is that he will come back to me on the question of deferring a date for exchanging statements.

Time engaged on telephone including attendance note – 42 minutes
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