



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: 18 May 2006

Start time:

Units:

I had a telephone conversation with Mandy Talbot. She had received the disclosure list. She asked me why I thought she was the most appropriate person to sign it as opposed to somebody on the business side, or me as the solicitor dealing with it. I explained that under the court rules, I could not sign it. I thought she was the most appropriate person to sign it as she had overall responsibility for the claim. She did agree that she was responsible at the Post Office for gathering all the information. She asked who had signed the pleadings. I said that we could sign them, but what we could not do is sign a disclosure list. I said that initially the claim had started in Chesterfield with Cheryl Woodward's team, but that as it had escalated it had been transferred to Mandy. I therefore did not know who else would be in a position to sign the list. Vicky Harrison at Leeds had been very helpful in assembling the documents.

Mandy asked me whether I could say that this contained everything that Vicky had sent to me and I said that it did. Mandy was happy to sign our list and she will sign it over, scan it and send it back to me.

I said that tactically how I anticipated that no matter how much information we gave Mr Castleton's solicitors, they are bound to ask for more, because unless they get new experts reports, that is the only real leverage they have before mediation (assuming mediation takes place immediately after disclosure). If they get expert comment on disclosure lists, then we could too. The point is that I think they will struggle to understand some of the financial documents.

Informing Mandy that what I had not included was call logs post dating Mr Castleton's dismissal because I could not at this stage really see they were relevant. However, we can always re-consider if Castleton's solicitors pressed for these. Mandy agreed.

Finally explained to Mandy that Vicky Harrison had sent to me a transaction log of every single transaction in January, February and March 2004, which was the relevant period. This really is the full audit trail that Mr Castleton's solicitors have been asking for, so provided they understand that then they ought not to be asking for further documents to be on that.

Time engaged including attendance note: 12 minutes