

Stephen Dilley

From: vicky.harrison [GRO]
Sent: 16 May 2006 12:18
To: Stephen Dilley
Cc: cath.oglesby [GRO]; lesley.joyce [GRO]; john.h.jones [GRO]
Subject: Re: URGENT: Post Office -v- Castleton - Marine Drive branch

Stephen thanks for your e-mail. You would be accurate saying that I have searched for information from our accounting teams in Chesterfield, personal records held in Leeds, together with HSH and NBSC call logs. Supplementary to this I have retrieved transaction information from Horizon via our Investigations team. I have also searched for information via Girobank and received information regarding overnight cash holdings from our Inventory team in Leeds.

The electronic data I have sent you has been from all the places you mention below and as above the transaction/events logs came from the Horizon archive via our investigations team.

I assume people involved in the case have not retained any data on their lap tops because we have an Electronic filing cabinet (EFC) which has all documents relating contractual issues in one reference point for ease and I have disclosed to you any documents relating to this case that I have/or were stored on the EFC. I was not involved in the initial case so have no hand written notes, phone records, diary entries, other items on my laptop etc.

Lesley, John and Cath do you want to input to this and let Stephen know before Thursday your responses to the below if he had not contacted you separately on this matter already.

Hope this helps if not please come back to me as a matter of urgency.
Regards

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LS2 7DZ

"Stephen Dilley"
<Stephen.Dilley [GRO]> To: <vicky.harrison [GRO]>
cc: <mandy.talbot [GRO]>
Subject: URGENT: Post Office -v- Castleton - Marine Drive branch
15/05/2006 16:44

Dear Vicky,

As you know, I've previously asked everyone connected with this case to provide me with relevant documents which you have played a helpful role collating. I believe that I now have pretty much everything the P.O has.

On Thursday of this week (18 May) we have to exchange with Mr Castleton's solicitors a list of documents that I am preparing, containing all documents relevant to the claim and counterclaim which either helps or hinders us. The list will include documents such as:

Horizon cash accounts;
Giro receipts;
Declared cash/cash on hand receipts;
Final Balance lists;
Miscellaneous transactions;
Balance and office snapshots;

Trial balances;
Weekly cash flow reports;
Fujitsu product codes
Transaction logs;
Events logs;
Cath Oglesby's handwritten notes;
Dismissal Interview notes;
John Jones' cash account analysis;
Appeal notes;
Appeal decision notes;
Helen Rose' audit report;
HSH and NBSC call logs;
Emails with HSH and NBSC re Horizon; and Correspondence between the P.O and Castleton and each party's solicitors.

Mandy will have to sign a certificate confirming that the P.O has conducted a reasonable and proportionate search to locate all relevant documents.

There are sanctions and penalties for not complying with disclosure obligations, so we must be thorough.

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/>We have to explain the extent of the P.O's search. I am currently minded to state that the search was just for documents contained at the P.O's Chesterfield, Leeds and London offices, together with HSH and NBSC call logs. Would this be accurate?

We also have to say what was excluded from the search. Am I right in thinking that the electronic documents you have sent me over the previous months comes from:

1. PC;
2. Server;
3. Mail files;
4. Spreadsheet files;
5. Document files
6. Off-site storage (i.e Leeds)

and that we have not checked the following categories (either because no such documents exist or because such documents would not help or harm our/Castleton's case):

7. Databases;
8. Back-up tapes;
9. mobile phones;
10. notebooks;
11. PDA devices;
12. portable data storage media;
13. laptops;
14. handheld devices;
15. calendar files;
16. web based applications; and
17. graphic and presentation files.

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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Please note our new contact details from 8 May 2006 as set out above.

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