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Your Ref: MWH AJGROY26/202

Our Ref: ANSH/BAJ 4-3

Date: 17 October 2006

Telephone

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GROMessrs Hugh James
Solicitors
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Dear Sirs

MR BAJAJ AND THE POST OFFICE LTD

Thank you for sending us the details of the calls made to the Call Centre, however, what we note is that it merely shows our client made these complaints, it does not show whether any steps were taken to remedy the situation or address his complaints. As you will be aware, our client has also written numerous letters to senior management.

Are you able to produce any records of communication between your client and Horizon in relation to the complaints made regularly by the various sub-post masters?

From the communications our client has received, we would imagine that numerous complaints are received on a daily basis about faults with the Horizon system. It would appear that your client would rather put this down to human error, rather than accepting that there may be something in it.

Some of the information our client has collected from around the country is as follows:

1. Mr Thomas in a sub-post office in Wales was facing a claim by your client for a shortage of about £38,000. It is understood that that has been postponed indefinitely. Mr Bajaj and Mr Bilku were due to appear as defence witnesses.
2. Hajinda Singh was due to face trial in Luton Crown Court on the 6th November 2006, again for shortages. You have discontinued proceedings against Mr Singh, and again Mr Bajaj was due to appear as a defence witness and had prepared witness statements etc.
3. We are advised that the Carshalton Post Office has been given a credit of £4,000 by your clients to cover the alleged shortages and settle the dispute.

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Our client is certain that there are a number of other sub-post offices with similar complaints with whom your client has also settled disputes.

Given that our client has been a witness in two criminal prosecutions, which have been stayed or discontinued, our client is naturally of the view that your client has no faith in your statement that there are no faults with the Fujitsu Horizon system and that any problems our client has encountered with the system can only be put down to human error.

As you will be aware, should we issue proceedings we will require specific disclosure of all communications between your client and Fujitsu Horizon, as to how the sub-post master's complaints were being dealt with, as notably our client was receiving visits from Post Office personnel not Fujitsu technicians.

From the articles that have appeared in the sub-post master magazine, our client regularly publishes his views, which in turn attracts more sub-post masters to get in contact with him.

We note that both sides agree that mediation would be appropriate, and would suggest that to make effective use of time, both Mr Bajaj and Mr Bilhku's matter could be dealt with on the same day. We are, however, concerned that you are not prepared to accept that there is any problem with the Horizon system, as this may make mediation a waste of time and costs, if it is only applications for specific disclosure which will reveal whether the faults have been properly investigated.

We note we are still waiting a substantive response from you, and would respectfully request that we receive that within the next 7 days.

Yours faithfully, Tolhurst Fisher