

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: 6 February 2007

Start time:

Units:

Richard Morgan and I had a telephone conference with Mandy Talbot to go through her e-mail to me of today.

Basically discussing the following points:

- a) An electronic signature is best, but if it is not available, then a tick box certification is the next best thing. Richard explaining that this should state that the sub-postmaster confirms that the accounts accurately record a summary of the transactions that have taken place in the branch and the stock and mop (method of payment) and cash actually present and that by his signature he is verifying that. There should be a condition in his contract that he ticks this box and he shouldn't be allowed to roll over into the next week until he has done so. Especially the Post Office should have the ability to allow him to roll over, but only where they know of a specific mistake that has been made that is explainable and so that they can agree that the cash or stock or mop is not accurate.
- b) In terms of action of the post master on the final account, the sub-postmaster should also be required to sign off the auditors being accurate and that he adopts the audit figures as his own figures. That way if the auditor leaves the Post Office, it will be less detrimental to their case because the post master will have accepted the audit figures. If he declines to sign off on the audit, he must produce the accounts himself there and then. I also added that this would depend upon how practical it was to enforce on the ground.
- c) Richard agreed that it would be useful for the auditors to go through previous accounts. I explained to Mandy of course that they could not go through previous actual cash stock figures because they could not time travel and so they would only ever be able to count the cash and stock on the day that they go and complete their audits. However by looking over the past accounts when they do their audit they might be able to come up with an explanation as to why figures are like they are eg is there a reason for the losses that explains them and either supports or contradicts the audit.
- d) In terms of whether there are any other useful steps, Richard suggested that their clause claim to the contract that says that the post master agrees to pay without deduction or set off and that he signs off on the final audit. That way I explained say for example the sub-postmaster stated there were error notices which were going to result in a claim error in his favour and he genuinely but mistakenly believes there were going to be those errors notices and decided to

set off one would hold some monies from the Post Office, he wouldn't be able to do that.

Time engaged including attendance note: 30 minutes.