

5 April 2006
By Fax Only

GRO

Rowe Cohen
Solicitors

Bond Pearce LLP
Ballard House
West Hoe Road
Plymouth PL1 3AE

GRO

stephen.dilley GRO
Direct: GRO

Our ref:
SJD3/ABG1/348035.134
Your ref:
MDT.113969

Dear Sirs

Without prejudice save as to costs
Post Office Limited -v- Mr L Castleton

We refer to our letter dated 30 March.

Ms Talbot, (the person responsible for this matter at the Post Office), is on annual leave between 10 and 23 April. However, she is currently available from 24 April to 4 May (the remainder of the stay period) to attend a mediation.

We attach the Commercial and IT Mediation Biographies of John Lang, a CEDR Accredited Independent mediator. As you will see, Mr Lang has had very considerable experience mediating commercial and IT disputes and we believe that he would therefore be ideal for this case. Mr Lang has confirmed that he is currently available on 25, 27 April and 1, 2, and 3 May.

Mr Lang's standard fee is £3,500 per day for the mediation which includes preparation time of up to 5 hours and an 8 hour mediation day. Additional hours (to be pre-agreed if in relation to the preparation in excess of 5 hours) are charged at £280 plus VAT per hour. Fees are usually split equally between the parties. Accordingly, if there are no additional hours, each party's fee for the mediator would be £1,750 plus VAT plus 50% of the mediator's expenses (which are apparently just travelling if the mediation is outside London and any accommodation costs). As you know, we have previously proposed London as the mediation venue as a compromise given that the writer is based in Plymouth and you are based in Manchester.

You can find more information about Mr Lang on www.jonlang.com and he has confirmed that he would happy to speak to you if you consider that might be helpful. His telephone number is: GRO

In terms of venue, we suggest either Keating Chambers, the IDCR 70 Fleet Street or Harry Counsel on Fetter Lane. We will obtain some quotations for these venues and revert to you.

In the meantime, please can you confirm whether you are willing to use Mr Lang as the mediator and your preferred dates, so that we can put this in diaries as soon as possible. Clearly, it is better to fix a date sooner rather than later since everyone's availability is likely to become more restricted as time goes on.

Finally, we believe that the mediation is likely to take up a very full day and accordingly, it would be helpful if you could confirm now whether there will be any cut off times for you on the date of the mediation in terms of travelling because of trains.

We look forward to hearing from you as soon as possible.

Yours faithfully

Bond Pearce LLP