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ROLLING TASK LIST VERSION 1
18 AUGUST 2006POST OFFICE LIMITED v MR LEE CASTLETON
CLAIM NO: HQ05X02706

Bond Pearce

Action required	Update	Responsibility	Date required
Attendance note of conference with counsel of 10 August	✓	Adrian Bratt	Thursday 24 August 2006
Email client re conference with counsel, outcome and advice costs capping order potential and amendment to particulars, costs involved going forward, raise costs capping again, transfer to CLCC and set out next steps	✓	Tom Beezer	Friday 18 August 2006
Letter(s) to Rowe Cohen solicitors setting out the following: <i>DOON TURS.</i> ✓ 1. Need to extend trial time table to 7-10 days. ✓ 2. Raise possibility of transfer to Central London County Court given proportionality and use of High Court's time. 3. Ask them to clarify their letter to us about week 42. Ask what "manual reconciliation" means and request any supporting documents. ✓ 4. Seek permission to amend particulars of claim etc. 5. Ask for details of their IT experts. Suggest IT experts to meet at branch and in Manchester re access to Fujitsu system. 6. Disclose all call logs for branch for extended period. The point here is that if subsequent post master(s) are experiencing the same IT problems, but are not suffering any losses, then this helps discredit Castleton's contention that his IT problems were to blame for the losses. <i>d. d. d. d. d.</i>		Stephen Dilley	Monday 21 August 2006 (given Castleton's solicitor is away at the moment)
Stephen Dilley to contact the Post Office to discuss the following issues: 1. The structure of the branch business, how it works as a matter of law, how the sub-postmaster contract works, who owns what branch, what are the details of the auction house next door, get a plan of the branch. 2. How is cash handled? How is cash transferred into and out of the Post Office. Where does the sub-postmaster get information from to insert into the cash account. How exactly does the cash account work. How is the shortfall calculated in the cash account? Does the sub-postmaster calculate the shortfall. If the stock is different on the cash account to what the sub-postmaster received, does this generate an error notice 3. Remming in - what is the information from Graham Ward based on? For example is it based on Horizon figures or what Mr Castleton declares? Are there any other documents to support our evidence on remming in. <i>How does remming in work?</i> 4. When was the Post Office audited before Mr Castleton took control? How can we prove from day one that he had the stock that is mentioned in the very first cash account? How can we also approve at the start of the period when he suffered losses, that he had the stock as contained in the cash account? 5. We need to go through the particulars of claim with the Post Office to explain how each individual item of loss mentioned in the particulars of claim is calculated and in particular what the £176 relates to, whether it was raised from an error during Mr Castleton's period in office and whether they want to claim this (given <i>CO wks.</i> <i>2. Stephen Dilley has discussed with P.O and will brief in Richard Morgan.</i> <i>File - Box</i> <i>Clery</i>		Stephen Dilley, Bond Pearce	SJD to speak to various people at the Post Office to bottom these points out as quickly as possible.

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proportionality and the sum involved). 6. What happens to all the cheques and giros etc and all of the documents that go to EDS processing centre. Can we get them?	<i>clearly on who to need.</i> 6. Cheques eventually go to banks so we won't be able to trace and recover these. Giros go to girobank so SJD to check recoverability		
Witness statements Catherine Oglesby 1. Consider inserting into Cath Oglesby's witness statement details of how the PO works etc as specified above. 2. Review paragraph 13 – what are the PO documents she is referring to? 3. Review paragraph 20 – dealing with cash accounts from the time Mr Castleton was dismissed to date? – Counsel suggest we have a few cash accounts for the next sub-postmaster's period of tenure. 4. Paragraph 40 – this needs re-wording so that it makes more sense and we will also need to check that we have the documents that are referred to in that paragraph.	<i>Amend Cath statement.</i>	Stephen Dilley	15 September (assuming court approval to revise consent order)
John Jones 1. Paragraph 8 – consider exhibiting the other notices referred to. 2. Paragraph 14 – consider exhibiting documents referred to. 3. Paragraphs 18 and 27 – need to qualify these in the light of the part 20 reply and John Jones' subsequent email. 4. Paragraph 23 get AT's analysis 5. Helen Rose (nee Hollingsworth) SJD to amend this statement to reflect the fact that the audit report is erroneously dated 25 March instead of 23 March.	<i>AMEND JONES ST.</i> <i>AMEND HELENS ST.</i>	Stephen Dilley	15 September
Cheryl Woodward/Chesterfield SJD to interview Cheryl to find out whether she or any of her colleagues at Chesterfield were responsible for reviewing cheques etc for checking these against Horizon information and exactly what this manual procedure is. SJD then to take witness statements to set this out and to include (the fact that there were no area notices generated on the Castleton case) or at least none that relate to the losses in question.			SJD to speak to Cheryl asap and witness statement

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			to be served by 15 September
Girobank SJD to repeat exercise above for girobank slips. <i>our g giro to 25/8</i>			15 September
Liz Morgan and David Cumberland These people are mentioned in paragraph 43 of cath Oglesby's written statement as being the people who independently verified the figures. We need to speak to these and see what recollection they have and see whether they have any documents and then we can take statements from them.	Carol King (Chesterfield) to provide Stephen Dilley with contact details	Stephen Dilley	SJD to interview asap. Witness statements to be exchanged by 15 September.
Anita Turner - she is mentioned at paragraph 23 of John Jones' witness statement as being the person who independently verified the figures that he checked. We need to get her contact details and contact her and similarly take a witness statement from her. GRO <i>Anita Turner</i> GRO	Carol King (Chesterfield) to provide Stephen Dilley with contact details	Stephen Dilley <i>Chase Carol</i>	Witness statements to be exchanged by 15 September.
Andrew Wise - SJD to amend his draft statement and finalise asap. Remove the daily procedural information because that may be copied and pasted to cath Oglesby's witness statement if she is happy to give that evidence. <i>AMEND STATEMENT</i>	<i>W.M. Andrews</i>		
Ann Chambers' witness statement - SJD to amend as per conference with counsel of 11 October 2006.			
Ruth Simpson - she was the sub-postmaster that took over after Lee Castleton. Stephen Dilley to interview and to obtain some cash accounts from several weeks just to illustrate the fact that she wasn't making any losses (or certainly nothing significant).	<i>Get cash acc. written to for interview.</i>	Stephen Dilley	Interview asap and witness statements exchanged by 15 September.
Greg Booth was one of the sub-postmasters who took over after Mr Castleton. SJD to interview asap - as per Ruth Simpson <i>written to -</i>		Stephen Dilley	ASAP witness statement to be exchanged by 15 September.
Christine Train - Mr Castleton's assistant		Stephen Dilley	ASAP

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SJD to write to her to ask if she will be interviewed, although from Mr Castleton's AQ we expect that she will give evidence to him and refuse to be interviewed.	write to		
Fujitsu - we need to obtain a full list of all software updates from November 2003 to date. We also need to obtain details of all hardware from Fujitsu Is the hardware Castleton was using still there. What has been removed. Where is it. What did the build plan update involve? When was it switched on?	write to.	Stephen Dilley to pick up with Ann Chambers/Brian Pinder	ASAP - experts reports to be exchanged by October but Bridget ?? evidence to be served earlier.
Expert - before instructing experts, SJD will speak to Cath Oglesby to see if there is anymore financial information we can give them. We then need to prepare separate letters of instruction for the IT and accountancy experts. We should also explain that the IT experts must attend the Marine Drive branch together and also the Manchester training centre together.	handled.	Stephen Dilley to revise letters of instruction to IT experts once he has spoken with the PO just to bottom out the position in relation to the general questions we have to raise with them.	ASAP - experts reports to be exchanged in October
Copy disclosure bundles for Tom Beezer.	Done.	Adrian Bratt	ASAP
Amend particulars of claim and in due course reply and defence to counterclaim. Tom Beezer to seek P.O instructions so Counsel can do this.	SD Roches.	Counsel.	No deadline yet.