

Nicola McSherry

From: Thomas Bourne
Sent: 20 November 2006 14:44
To: Stephen Dilley
Subject: RE: VERY URGENT Post Office Limited -v- Lee Castleton

which bundle do these and the previous ones go in?

From: Stephen Dilley
Sent: 20 November 2006 14:42
To: Thomas Bourne
Subject: FW: VERY URGENT Post Office Limited -v- Lee Castleton
Importance: High

The attached docs are also not on our disclosure list and need to go into bundle. I'll include them on the supplemental list I'm dictating.

Cheers.

From: Stephen Dilley
Sent: 17 November 2006 12:08
To: 'M.Turner' GRO
Subject: VERY URGENT Post Office Limited -v- Lee Castleton
Importance: High

Dear Sirs,

We refer to our unanswered letters dated 19 October, and 9 November.

1. You were ordered to serve your Amended Defence and Counterclaim on 6 November. You still have not done so. The trial of this matter is due to commence on 4 December 2006, in just 2 weeks. Please now immediately provide us with a signed copy of your Amended Defence and Counterclaim. You will also need to seek the Court's permission to serve it out of time.
2. In our recent telephone conversations, your Mr Turner said that he had no objection in principle to us having an extension of time to serve the Amended Reply and Defence to Counterclaim, commensurate with the same amount of time that it takes you to serve your Amended Defence and Counterclaim. As requested, please confirm this in writing.
3. Please confirm that you will put your witness statements in the DX to us **today**. Upon receipt of your confirmation, we will do likewise. Please can you also send a further set of your witness statements at the same time directly to our counsel, Richard Morgan, Maitland Chambers, 7 Stone Buildings, Lincoln's Inn, London, WC2A 3SZ, DX LDE 326. We agree to be responsible for your reasonable photocopying charges in this regard.
4. As previously requested, please now confirm whether you and your Counsel are available on 27 or 28 November for a PTR. If you fail to now provide this information, then on Monday we shall apply to Court for a PTR to be fixed as soon as practicable.
5. Your expert's accountancy report was due to be served on us by no later than 4pm, Friday 10 November, but you have failed to do so. Do you propose to serve any expert accountancy evidence? If so, you will need to seek the Court's permission to serve it out of time. Please confirm that we may have an extension of time to serve any expert

28/12/2006

evidence in reply, commensurate with the same amount of time that it takes you to send to us your report. Please send us any report on which you intend to rely today and please also send a copy of your report by fax directly to our counsel Richard Morgan on fax number **GRO**

6. On 19 October 2006, we wrote to you in relation to your client's legal expenses insurance. At the hearing on 23 October, you said that you would reply to that letter. We have spoken to you since and you also said that you would reply to that letter. Please now do so.

7. In accordance with the Post Office's continuing obligations of disclosure, we attach the following:

- (a) 3 spreadsheets of the total of each day's cash Declaration made by Marine Drive in January, February and March 2004. This is not new information because these declarations were all already contained in the transaction logs that were disclosed to you in May 2006. The P.O has simply extracted the cash declarations from the other information in those transaction logs, for ease of reference.
- (b) Cash Declarations for the period 11 to 31 March 2004 which breaks down the amounts of each denomination of cash declared.

We reserve the right if necessary to produce this email and previously unanswered correspondence at the appropriate time to the Court on the question of costs.

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

Yours faithfully,

BOND PEARCE LLP