

GRO

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: 20 November 2006

Start time:

Units:

I had a telephone conversation with Mr Turner of Rowe Cohen. Initially on an open basis. I confirmed to him that I had received the Notice of Change he had faxed to me this morning. I asked him whether he had sent me his Witness Statement. He had not. I asked him where he had got to with them. He said that Mr Castleton had four Witness Statements. Three were statements which had his comments on. Mr Castleton's Witness Statement was very much a work in progress and needed his input. He had told Mr Castleton that he will need to serve those statements.

I asked him whether he had ever received a signed amended Defence and Counter-claim before he came off the record. He said that he had not. However, his understanding was that the specific pleading about week 51 was in response to something in the amended Particulars of Claim and that when he, Mark Turner had spoken to Alexander Gould (his Counsel) about it, he thought that irrespective of whether week 51 had been signed, this did not require amendments. (I did not pick him up on this point, but did not think that that was correct).

We then went to speak on a without prejudice basis.

He told me that he had repeatedly advised Mr Castleton to settle the case and that there was no logical basis for taking the position he had. Mr Castleton is not entirely without funds if this was a question as to whether he could meet a costs Order. He said that he told Mr Castleton today that I would probably be calling him and suggesting that I wait until later today as Mr Castleton had just been to collect the papers from Rowe Cohen. He also thought that Mr Castleton had genuinely persuaded himself that computer problems were causing the losses and that our claim was really about saying that Mr Castleton was dishonest even though he has told Mr Castleton many times that all we are saying is that there has been a shortfall that he has to account for.

Given Mr Castleton's phone number which is the same as his fax number

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Time engaged including attendance note: 24 minutes.