

Stephen Dilley

From: Stephen Dilley
Sent: 16 May 2006 18:51
To: 'mandy.talbot'; **GRO**
Subject: Post Office Limited -v- Mr L Castleton
Attachments: DOC_1156457.DOC; eCopy scanned document.pdf

Dear Mandy,

I refer to my e-mails of 15 May.

As you know, on Thursday of this week (18 May) we have to exchange with Mr Castleton's solicitors a list of documents, containing all documents relevant to the claim and counter claim which either helps or hinders the Post Office or Mr Castleton. There are sanctions and penalties for not complying with disclosure obligations, so we must be thorough.

Over the past year, we have received various information from the Post Office Chesterfield, Leeds and London offices, together with HSH and NBSC. We have used this information to prepare the list of documents.

I attach the list of documents and attachments. Please can you review them carefully. If you believe that they are accurate, please can you sign and date the list and return it to me by fax and post. If you have any queries, please do not hesitate to contact me.

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

Kind regards,

Stephen Dilley
Solicitor
for and on behalf of Bond Pearce LLP
DDI: **GRO**
Main office phone: **GRO**
Fax: **GRO**
www.bondpearce.com

Please note our new contact details from 8 May 2006 as set out above.

List of documents: standard disclosure

Notes

- The rules relating to standard disclosure are contained in Part 31 of the Civil Procedure Rules.
- Documents to be included under standard disclosure are contained in Rule 31.6
- A document has or will have been in your control if you have or have had possession, or a right of possession, of it or a right to inspect or take copies of it.

In the	High Court of Justice Queen's Bench Division
Claim No.	HQ05X02706
Claimant (including ref)	Post Office Limited SJD3/348035.134
Defendant (including ref)	Mr Lee Castleton MDT.113969
Date	

Disclosure Statement

I, the above named

☒ Claimant ☐ Defendant

☒ Party (if party making disclosure is a company, firm or other organisation identify here who the person making the disclosure statement is and why he is the appropriate person to make it)

I am the person with overall responsibility at Post Office Limited for this case.

state that I have carried out a reasonable and proportionate search to locate all the documents which I am required to disclose under the order made by the court on (date of order)

9 March 2006

☒ I did not search for documents:-

☒ pre-dating 12/2003 (for financial docs)

☒ located elsewhere than

Documents with accounting teams in Chesterfield, personal records held in Leeds, together with HSH and NBSC call logs, transaction information, Girobank and Inventory team in Leeds.

☐ in categories other than

☐ for electronic documents

☒ I carried out a search for electronic documents contained on or created by the following:
(list what was searched and extent of search)

(a) The electronic data we have searched for is from an Electronic filing cabinet (EFC) which has all documents relating contractual issues in one place for ease of reference and retrieval.

b) The losses which form the subject matter of the claim occurred in January to March 2004, so we have not searched for financial documents significantly beyond that period.

(c) The categories of electronic documents not searched (see next page) for is either because it is not believed such categories exist, or because such electronic documents (if any) would not fall under CPR 31.6.

☒ I did not search for the following:-

☒ documents created before	12/03 (for financial docs)
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documents contained on or created by the ☐ Claimant ☐ Defendant

☐ PCs

☒ portable data storage media

☒ databases

☐ servers

☒ back-up tapes

☐ off-site storage

☒ mobile phones

☒ laptops

☒ notebooks

☒ handheld devices

☒ PDA devices

documents contained on or created by the ☐ Claimant ☐ Defendant

☐ mail files ☐ document files
☒ calendar files ☒ web-based applications
☐ spreadsheet files ☒ graphic and presentation files

documents other than by reference to the following keyword(s)/concepts
(delete if your search was not confined to specific keywords or concepts)

I certify that I understand the duty of disclosure and to the best of my knowledge I have carried out that duty.
I further certify that the list of documents set out in or attached to this form, is a complete list of all documents which are or have been in my control and which I am obliged under the order to disclose.

I understand that I must inform the court and the other parties immediately if any further document required to be disclosed by Rule 31.6 comes into my control at any time before the conclusion of the case.

☐ I have not permitted inspection of documents within the category or class of documents (as set out below) required to be disclosed under Rule 31(6)(b) or (c) on the grounds that to do so would be disproportionate to the issues in the case.

Signed

Date _____

(Claimant) ~~(b) (6)~~ ~~(b) (7)(C)~~ ~~(b) (7)(D)~~

number
here
order
bundles of
documents
of the
signature, e.g.
(as) in your
control
which you do
not object to being
inspected. Give a
short description
of each document
so that it
or bundle can be
identified, if it is kept
here i.e. with a
bank or solicitor
else

I have control of the documents numbered and listed here. I do not object to you inspecting them/producing copies.
see attached list.

List and number
here, as above,
the documents in
your control which
you object to being
inspected.
(Rule 31.19)

I have control of the documents numbered and listed here, but I object to you inspecting them:

Correspondence passing between the Claimant/Part 20 Defendant and their solicitors for the purposes of this action, instructions and opinions of counsel, drafts of pleadings and other documentation settled by Counsel, Experts' drafts and opinions and all other documents of a confidential nature brought into being for the purposes of this proposed action.

Say what your
objections are

I object to you inspecting these documents because:
they are privileged.

List and number
here, the documents
you once had in your
control, but which
you no longer have.
For each document
listed, say when
it was last in your
control and where it
is now.

I have had the documents numbered and listed below, but they are no longer in my control.
Originals of documents described as copies which are in the hands of recipients or lost/destroyed.

TAB No.	DOCUMENT	Date/Week
1.	HORIZON CASH ACCOUNTS <i>The attachment for each of these Cash Accounts greater than 6 pages long typically include documents headed "Postage Labels" "Po Encashed" "Working Family/Disabled Persons/IR Child Benefit" "Green/Violet Girocheques"</i> <i>For week 52 (first copy) , there is also an attached document called "Pensions and Allowances"</i>	
	2003/2004 Horizon cash Accounts (Final) - 10 pages	Week 39 (23.12.03)
	2003/2004 Horizon cash Accounts (Final) - 9 pages	Week 40 (30.12.03)
	2003/2004 Horizon cash Accounts (Final) - 10 pages	Week 41 (07.01.04)
	2003/2004 Horizon cash Accounts (Final) - 10 pages	Week 42 (14.01.04)
	2003/2004 Horizon cash Accounts (Final) - 10 pages	Week 43 (21.01.04)
	2003/2004 Horizon cash Accounts (Final) - 6 pages	Week 44 (28.01.04)
	2003/2004 Horizon cash Accounts (Final) - 12 pages	Week 45 (04.02.04)
	2003/2004 Horizon cash Accounts (Final) - 12 pages	Week 46 (11.02.04)
	2003/2004 Horizon cash Accounts (Final) - 12 pages	Week 47 (18.02.04)
	2003/2004 Horizon cash Accounts (Final) - 12 pages	Week 48 (25.02.04)
	2003/2004 Horizon cash Accounts (Final) - 12 pages	Week 49 (04.03.04)
	2003/2004 Horizon cash Accounts (Final) - 12 pages	Week 50 (11.03.04)
	2003/2004 Horizon cash Accounts (Final) - 6 pages	Week 51 (17.03.04)
	2003/2004 Horizon cash Accounts (Final) - 7 pages	Week 52 (25.03.04)
	2003/2004 Horizon cash Accounts (Final) - 6 pages	Week 51 (18.03.04)
	2003/2004 Horizon cash Accounts (Final) - 6 pages	Week 52 (24.03.04)
	2003/2004 Horizon cash Accounts (Final) - 6 pages	Week 1 (31.03.04)
	2003/2004 Horizon cash Accounts (Final) - 6 pages	Week 2 (07.04.04)
	2003/2004 Horizon cash Accounts (Final) - 6 pages	Week 3 (14.04.04)
	2003/2004 Horizon cash Accounts (Final) - 6 pages	Week 4 (21.04.04)
	2003/2004 Horizon cash Accounts (Final) - 6 pages	Week 5 (28.04.04)
	2003/2004 Horizon cash Accounts (Final) - 6 pages	Week 6 (05.05.04)
2.	GIRO DEPOSIT AND WITHDRAWALS RECEIPTS	
	Giro Deposits and Withdrawals	01.05.03
	Giro Deposits and Withdrawals	02.05.03
	Giro Deposits	03.05.03
	Giro Deposits and Withdrawals	06.05.03
	Giro Deposits and Withdrawals	07.05.03
	Giro Withdrawals	07.05.03
	Giro Deposits and Withdrawals	08.05.03
	Giro Deposits and Withdrawals	09.05.03
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	Giro Withdrawals	21.05.03
	Giro Deposits and Withdrawals	21.05.03
	Giro Deposits and Withdrawals	22.05.03
	Giro Deposits and Withdrawals	23.05.03
	Giro Deposits	24.05.03
	Giro Deposits and Withdrawals	27.05.03
	Giro Deposits and Withdrawals	28.05.03
	Giro Deposits	28.05.03
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	Giro Deposits and Withdrawals	31.05.03
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Giro Deposits and Withdrawals	02.08.03
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	Giro Deposits and Withdrawals	08.03.04
	Giro Deposits and Withdrawals	09.03.04
	Giro Deposits and Withdrawals	10.03.04
3.	DECLARED CASH/CASH ON HAND RECEIPTS	
	Giro EN Pay Receipt	20.10.03
	Cash on Hand Thursday	23.10.03
	Cash on Hand Friday	24.10.03
	Cash on Hand Saturday	25.10.03
	Cash on Hand Monday	27.10.03
	Cash on Hand Tuesday	28.10.03
	Declared Cash	30.10.03
	Cash in Hand Thursday	30.10.03
	Cash in Hand Friday	31.10.03
	Cash in Hand Monday	03.11.03
	Cash in Hand Saturday	03.11.03
	Cash in Hand Tuesday	04.11.03
	Declared Cash	06.11.03
	Cash in Hand Thursday	06.11.03
	Cash in Hand Friday	07.11.03
	Declared Cash	07.11.03
	Cash in Hand Saturday	08.11.03
	Cash in Hand Monday	10.11.03
	Cash in Hand Tuesday	11.11.03
	Declared Cash	13.11.03
	Cash in Hand Thursday	13.11.03
	Cash in Hand Friday	14.11.03
	Cash in Hand Saturday	15.11.03
	Cash in Hand Monday	17.11.03
	Cash in Hand Tuesday	18.11.03
	Declared Cash	19.11.03
	Declared Cash	20.11.03
	Cash in Hand Thursday	20.11.03
	Cash in Hand Friday	21.11.03
	Cash in Hand Saturday	22.11.03
	Cash in Hand Monday	24.11.03
	Cash in Hand Tuesday	25.11.03
	Cash in Hand Thursday	27.11.03

Cash in Hand Friday	28.11.03
Cash in Hand Saturday	29.11.03
Cash in Hand Monday	01.12.03
Cash in Hand Tuesday	02.12.03
Declared Cash	04.12.03
Cash in Hand Thursday	04.12.03
Cash in Hand Friday	05.12.03
Cash in Hand Saturday	06.12.03
Cash in Hand Monday	08.12.03
Cash in Hand Tuesday	09.12.03
Declared Cash	11.12.03
Cash in Hand Thursday	11.12.03
Cash in Hand Friday	12.12.03
Cash in Hand Saturday	13.12.03
Cash in Hand Monday	15.12.03
Cash in Hand Tuesday	16.12.03
Declared Cash	18.12.03
Cash in Hand Thursday	18.12.03
Cash in Hand Friday	19.12.03
Cash in Hand Saturday	20.12.03
Cash in Hand Monday	22.12.03
Declared Cash	24.12.03
Cash in Hand Wednesday	24.12.03
Cash in Hand Friday	27.12.03
Cash in Hand Saturday	27.12.03
Cash in Hand Monday	29.12.03
Declared Cash	31.12.03
Cash in Hand Wednesday	31.12.03
Cash in Hand Friday	02.01.04
Cash in Hand Thursday	02.01.04
Cash in Hand Saturday	03.01.04
Cash in Hand Monday	05.01.04
Cash in Hand Tuesday	06.01.04
Declared Cash	08.01.04
Cash in Hand Thursday	08.01.04
Cash in Hand Friday	09.01.04
Cash in Hand Saturday	10.01.04
Cash in Hand Monday	12.01.04
Declared Cash	15.01.04
Cash in Hand Thursday	15.01.04
Cash in Hand Friday	16.01.04
Cash in Hand Saturday	17.01.04
Cash in Hand Tuesday	19.01.04
Cash in Hand Monday	19.01.04
Cash in Hand Tuesday	20.01.04
Declared Cash	21.01.04
Declared Cash	22.01.04
Cash in Hand Wednesday	22.01.04
Cash in Hand Thursday	22.01.04
Cash in Hand Friday	23.01.04
Cash in Hand Saturday	24.01.04
Cash in Hand Monday	26.01.04
Cash in Hand Tuesday	27.01.04
Declared Cash	28.01.04
Cash in Hand Wednesday	28.01.04
Declared Cash	29.01.04
Declared Cash	29.01.04
Cash in Hand Thursday	29.01.04
Cash in Hand Friday	30.01.04
Cash in Hand Saturday	31.01.04
Cash in Hand Monday	02.02.04
Cash in Hand Tuesday	03.02.04
Weekly Cash-flow	04.02.04
Cash in Hand Wednesday	04.02.04
Declared Cash	04.02.04

	Declared Cash	05.02.04
	Cash in Hand Thursday	05.02.04
	Cash in Hand Friday	06.02.04
	Cash in Hand Saturday	07.02.04
	Cash in Hand Friday	07.02.04
	Cash in Hand Monday	09.02.04
	Cash in Hand Tuesday	10.02.04
	Weekly Cash-flow	11.02.04
	Declared Cash	12.02.04
	Weekly Cash-flow	12.02.04
	Cash in Hand Thursday	12.02.04
	Cash in Hand Friday	13.02.04
	Cash in Hand Saturday	14.02.04
	Cash in Hand Monday	16.02.04
	Cash in Hand Tuesday	17.02.04
	Declared Cash	19.02.04
	Cash in Hand Thursday	19.02.04
	Cash in Hand Friday	20.02.04
	Cash in Hand Saturday	21.02.04
	Cash in Hand Monday	23.02.04
	Cash in Hand Tuesday	24.02.04
	Cash in Hand Wednesday	25.02.04
	Weekly Cash-flow	25.02.04
	Declared Cash	25.02.04
	Declared Cash	26.02.04
	Cash in Hand Thursday	26.02.04
	Cash in Hand Saturday	28.02.04
	Cash in Hand Monday	01.03.04
	Cash in Hand Tuesday	02.03.04
	Declared Cash	04.03.04
	Cash in Hand Thursday	04.03.04
	Cash in Hand Friday	05.03.04
	Cash in Hand Saturday	06.03.04
	Cash in Hand Monday	08.03.04
	Cash in Hand Tuesday	09.03.04
	Weekly Cash-flow	10.03.04
	Declared Cash	11.03.04
4.	FINAL BALANCE LISTS	
	Final Balance	30.10.03
	Final Balance	06.11.03
	Final Balance	13.11.03
	Final Balance	20.11.03
	Final Balance	27.11.03
	Final Balance	04.12.03
	Final Balance	11.12.03
	Final Balance	18.12.03
	Final Balance	24.12.03
	Final Balance	31.12.03
	Final Balance	08.01.04
	Final Balance	15.01.04
	Final Balance	22.01.04
	Final Balance	29.01.04
	Final Balance	05.02.04
	Final Balance	12.02.04
	Final Balance	19.02.04
	Final Balance	26.02.04
	Final Balance	04.03.04
	Final Balance	11.03.04
	Final Balance	23.03.04
	Final Account Def Receipt	23.03.04
5.	MISCELLANEOUS TRANSACTIONS	
	Miscellaneous Transactions	29.10.03
	Miscellaneous Transactions	05.11.03
	Miscellaneous Transactions	12.11.03
	Miscellaneous Transactions	03.12.03

	Miscellaneous Transactions	17.12.03
	Miscellaneous Transactions	23.12.03
	Miscellaneous Transactions	30.12.03
	Miscellaneous Transactions	07.01.04
	Receipt Number 2-1159041-1	07.01.04
	Miscellaneous Transactions	07.01.04 (17:16)
	Miscellaneous Transactions	14.01.04
	Miscellaneous Transactions	21.01.04
	Miscellaneous Transactions	28.01.04
	Miscellaneous Transactions	04.02.04
	Miscellaneous Transactions	11.02.04
	Receipt Number 1-917231-1	18.02.04
	Miscellaneous Transactions	25.02.04
	Miscellaneous Transactions	03.03.04
	Miscellaneous Transactions	10.03.04
	SALES REPORTS	
	Sales Report	04.02.04
	Sales Report	12.02.04
	Sales Report	19.02.04
	Sales Report	25.02.04
	Sales Report	03.03.04
	Sales Report	10.03.04
	Sales Report	09.03.04 (08:32)
	Sales Report	09.03.04 (07:33)
6.	BALANCE SNAPSHOTS	
	Balance Snapshot	10.02.04 (17:46)
	Balance Snapshot	10.02.04 (09:02)
	Balance Snapshot	12.02.04
	Balance Snapshot	13.02.04
	Balance Snapshot	14.02.04 (11:59)
	Balance Snapshot	14.02.04 (08:55)
	Balance Snapshot	16.02.04
	Balance Snapshot	17.02.04
	Balance Snapshot	18.02.04
	Balance Snapshot	26.02.04
	Balance Snapshot	27.02.04
	Balance Snapshot	28.02.04
	Balance Snapshot	01.03.04
	Balance Snapshot	02.03.04 (08:56)
	Balance Snapshot	02.03.04 (17:39)
	Balance Snapshot	04.03.04
	Balance Snapshot	05.03.04
	Balance Snapshot	09.03.04
7.	TRIAL BALANCE	
	Trial Balance	03.03.04
	Trial Balance	04.03.04
	Trial Balance	23.03.04
8.	WEEKLY CASH FLOW REPORT	
	Weekly Cash-flow	11.02.04
	Weekly Cash-flow	09.03.04 (17:34)
	Weekly Cash-flow	09.03.04 (08:31)
9.	TRANSACTION LOG	
	Transaction Log	23.03.04 (08:09)
	Transaction Log	23.03.04 (08:21)
	Transaction Log	23.03.04 (08:28)
	Transaction Log	23.03.04 (08:30)
	Transaction Log	23.03.04 (08:44)
	Transaction Log	23.03.04 (08:45)
	Transaction Log	23.03.04 (09:00)
	Transaction Log	23.03.04 (09:11)
10.	OFFICE SNAPSHOT	
	Office Snapshot	23.03.04 (08:06)
11.	OTHER RECEIPTS	
	User Summary of an Office Copy	23.03.04
12.	TEST DOCUMENTS	

	Receipt Number 1-1008499-1	05.05.04
	Balance Snapshot	07.05.04 (14:20)
	Receipt Number 1-1012813-1	07.05.04
	Office Snapshot	07.05.04 (14:15)
	Suspense Account Office Copy	07.05.04
	Office Snapshot	05.05.04 (10:22)
	Office Snapshot	05.05.04 (10:26)
	Suspense Account Office Copy	05.05.04
	SPREADSHEETS	
13.	Fujitsu Product Codes (104 pages)	Sept 05
14.	Transaction Log (214 pages)	Jan 04
15.	Events Log (88 Pages)	Jan 04
16.	Transaction Log (207 pages)	Feb 04
17.	Events Log (89 pages)	Feb 04
18.	Transaction Log (223 pages)	Mar 04
19.	Events Log (84 pages)	Mar 04
20.	ONCH List	Jan – Mar 04
21.	HSH Calls Log	Dec 03
22.	HSH Calls Log	Jan 04 –Mar 04
23.	NBSC Calls Log	Dec 03 –Jan 04
24.	OTHER DOCUMENTS	
	Telephone Call Logs	Various
	Errors on Alliance & Leicester Commercial Bank Deposits Listing & Giro Bank Deposit Copy	03.10.03
	4 Handwritten sides of A4 paper marked "CA Week no" listing weeks 34 to 42 and 01 to 03, prepared by Catherine Oglesby	Undated
	Handwritten Notes 2 pages from a spiral notepad headed up "Marine Drive Chesterfield" prepared by Catherine Oglesby	Undated
25.	CONTRACT	
	Subpostmasters Contract Section 21 Subpostmasters Contract Subpostmasters Remuneration Booklet	October 2004
	DISCIPLINARY DOCUMENTATION	
26.	Agent Case Summary for appeal against termination of contract	Undated
27.	Catherine Oglesby's Summary of events	Undated
28.	Audit Report (hand written and typed versions)	23.03.04
29.	Letter from Lesley Joyce, Contract Manager to Defendant (Confirming Suspension (original))	23.03.04
30.	Letter from Catherine Oglesby (Claimant) to Defendant (Formal Charge Letter)	26.04.04
31.	Letter from Defendant requesting information (original)	28.04.04
32.	Response letter from Catherine Oglesby and information enclosed being: HSH Calls log (28.01.04- 26.04.04) NBSC Calls log (19.01.04- 23.04.04) Horizon System User Subsection 12,13 & 14	06.05.04
33.	Email Cath Oglesby to Jean Sokell Email Andrew Price to Cath Oglesby Email Cath Oglesby to Jean Sokell Email Richard Benson to Cath Oglesby with email from Julie Wesh to Richard Benson (05.05.04, 12:32) attached.	05.05.04 (15:59) 20.04.04 (11:57) 05.05.04 (15:57) 05.05.04 (14:06)
34.	Interview Notes	10.05.04
35.	Decision Paper	10.05.04
36.	Letter to Defendant from Catherine Oglesby (Final Balance)	14.05.04
37.	Letter from Catherine Oglesby to Defendant (Termination Letter)	17.05.04
38.	Letter from Defendant to Catherine Oglesby (Appeal Letter (Original))	23.05.04
39.	Letter from Mrs Audrey Thirsk (Mother of assistant) and compliments slip (Original)	20.05.04
40.	Letter from Defendant requesting further information (original)	24.05.04
41.	Letter from Defendant to D Mellows-Facer	01.06.04
42.	Letter from D Mellows-facer to Defendant	02.06.04
43.	Letter from John Jones to Defendant	21.06.04
44.	Handwritten Appeal Minutes (Original)	01.07.04
45.	Letter from Defendant to John Jones and amended appeal notes (Original)	03.07.04

46.	Letter from John Jones to Defendant	05.07.04
47.	Letter to John Jones from Defendant	06.07.04
48.	Letter to Defendant from John Jones (Horizon analysis)	08.07.04
49.	Letter to Defendant ref Appeal	09.07.04
50.	Appeal Decision Notes	Undated
51.	Letter to John Jones from Defendant ref Horizon Accounts (Original)	Undated
52.	Handwritten Notes of Chronological Weekly Activity	Various
53.	Marine Drive Cash Account Analysis prepared by John Jones	Weeks 39-03 (24.12.03- 14.04.04)
54.	Daily Analysis Cash Account 46,47 & 50 prepared by John Jones	Various
55.	Fax from Defendant to Mark Turner	Undated
56.	2 page handwritten open note from Dorothy Day	
	STATEMENTS OF CASE	
57.	Claim form	25.05.05
58.	Acknowledgement of Service	13.06.05
59.	Particulars of Claim	25.05.05
60.	Defence and counterclaim	15.08.05
61.	Reply to defence and defence to counterclaim	15.11.05
62.	Claimant's Part 18 Request	06.03.03
63.	Defendant's Further Information	10.04.06
	ORDERS AND JUDGMENTS	
64.	Order of Master Fontaine	04.10.05
65.	Default judgment for claimant	09.11.05 (sealed 10.11.05)
66.	Default judgment for defendant	09.11.05 (sealed 17.11.05)
67.	Order of Master Fontaine	08.02.06 (sealed 15.02.06)
68.	Order of Master Fontaine	09.03.06 (sealed 13.03.06)
	NOTICES	
69.	Notice of issue	09.06.05
70.	Notice that acknowledgment of service has been filed	14.06.05
71.	Notice that a counterclaim has been filed	05.09.05
72.	Notice of that allocation to the multi track	14.09.05
73.	Application notice and draft order	17.11.05
74.	Notice of private room appointment for 09.02.06	08.12.05
	WITNESS STATEMENTS	
75.	Witness statement of Stephen John Dilley	18.11.05
76.	Exhibit to the witness statement of Stephen John Dilley	18.11.05
77.	Witness statement of Helen Rose	11.01.06
78.	Exhibit to the witness statement of Helen Rose	11.01.06
79.	Witness statement of John Howard Jones	12.01.06
80.	Exhibit to the witness statement of John Howard Jones	12.01.06
81.	Witness statement of Catherine Oglesby	21.01.06
82.	Exhibit to the witness statement of Catherine Oglesby	21.01.06
	ALLOCATION QUESTIONNAIRES	
83.	Claimant's allocation questionnaire	07.09.05
84.	Defendant's allocation questionnaire	06.09.05
	EXPERTS REPORTS	
85.	Expert's report of Andrew Richardson of White & Hoggard Accountants	18.08.05
86.	Expert report of Chris Hine of Bentley Jennison	23.09.05
	CORRESPONDENCE	
87.	Interpartes	Various
88.	Without Prejudice Interpartes Correspondence	