

**Stephen Dilley**

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**From:** Stephen Dilley  
**Sent:** 16 October 2006 15:35  
**To:** 'Richard Morgan'  
**Cc:** Tom Beezer  
**Subject:** FW: Post Office Limited -v- Castleton  
**Attachments:** LETTER\_1223596.DOC

Dear Richard,

I attach an email from Rowe Cohen Solicitors, together with my draft response to send to them today if possible. Basically, they are taking instructions on the proposed amendments and will revert to me.

In terms of Witness Statements, I anticipate that I will have 12 or 13 Witness Statements by the end of the week signed. Of the remaining 2 or 3:

1. Ruth Simpson is away this week and so I will not be able to ascertain whether the draft I sent to her on 6 October is approved until she gets back next week.
2. The same applies for Paul Williamson (Girobank) whose boss was supposed to send me Paul's comments on the draft I e-mailed him on 4 October. I have chased Paul's boss (since Paul is away) and await hearing from him.
3. Finally I have also chased Wendy Smith on her statement, the amended copy of which I e-mailed her on 10 October and await comments. We are due to speak tomorrow afternoon about it and I anticipate there will be further amendments. I will then email it to you for comment,

Given that Paul and Wendy's are early drafts, I would not like to exchange them for the time being, even in draft, since they may change substantively before the final versions are served. If you have any comments on the draft fax that I propose to send to Rowe Cohen, please let me know. I think we should include this fax in the CMC bundle. I propose to send you a copy of that bundle in tomorrow's DX if that is ok with you?

Finally, I am due to catch up with Mandy Talbot tomorrow or Wednesday re your suggestion of brinkmanship and trial etc etc.

Kind regards.

Stephen Dilley  
Solicitor  
for and on behalf of Bond Pearce LLP

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**From:** M.Turner [redacted] GRO  
**Sent:** 16 October 2006 13:22  
**To:** Stephen Dilley  
**Subject:** Post Office Limited -v- Castleton

Dear Mr Dilley,

17/10/2006

I refer to your letter of 11 October. Adopting your numbering:

1. We await discussing your proposed amendments with our client. We shall revert to you before the CMC, and most likely within the next 24 hours, on whether the proposed amendments can be dealt with by consent.
2. We assume that the bundle has been finalised as per your draft index. For the avoidance of doubt, we have no issue with the draft index.
3. Please provide us with a copy of the bundle, against our undertaking to meet your reasonable photocopying expenses. I should also be obliged if you would send a copy directly to our counsel, Alexander Goold at Hardwicke Building, DX 393 LONDON. He is going to be out of Chambers for much of this week so, ideally, the bundle needs to be despatched to him in tonight's DX. If this is not going to be possible, could I ask you to let me know by return of e-mail, in which case I will try to make arrangements to have a bundle prepared at my end to be sent to him tonight.
4. Confirmed.
5. Noted. We shall revert to you shortly on this point.

Regards,

Mark Turner  
Solicitor  
Commercial Group

Rowe Cohen Solicitors

T: +  
F: + **GRO**

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