

Stephen Dilley

From: Stephen Dilley
Sent: 27 September 2006 12:18
To: 'Richard Morgan'
Subject: RE: Amended second statement of John Jones: P.O -v- Castleton

Richard,

Anne Chambers and Liz Morgan have already returned signed statements.

I wonder whether I should wait until I've got every witness statement into final form before sending it to you? There are 14 witnesses of fact. 2 I haven't interviewed yet. 4 witness statements (Ken Crawley, Mike Johnson, Gillian Hoyland and Meryl Ludditt) will change when I hear back from Carol King about the (1) excel schedule of errors (2 lottery errors are omitted from it) and (2) who is going to replace Meryl Ludditt. Andrew Wise and Cath Oglesby I'm still waiting their comments on. Given that the witnesses keep disappearing on holiday (it shouldn't be allowed!), there's a risk that as not all of the final versions of the statements are going to be ready just yet, that I delay sending the whole lot out and consequently then we don't get them back as quickly as we'd like.

I think if you're happy with this what I propose to do is send you 12 of the 14 statements by the end of this week (those 12 should be in final form then) and the remaining 2 statements for the people I've not yet spoken to (if prepared by then) in draft.

Kind regards.

Stephen

-----Original Message-----

From: Richard Morgan [GRO]
Sent: 27 September 2006 12:09
To: Stephen Dilley
Subject: RE: Amended second statement of John Jones: P.O -v- Castleton

Stephen,

I thought we were going to review them all again in final form, and if he signs then any subsequent amendments will have to go into a second statement. However, if there is to be no further review, then I agree that he should sign.

Richard

-----Original Message-----

From: Stephen Dilley [GRO]
Sent: 27 September 2006 11:59
To: john.h.jones [GRO]
Cc: Richard Morgan; Tom Beezer; mandy.talbot [GRO]; carol.king [GRO]; andy.r.pearson [GRO]
Subject: RE: Amended second statement of John Jones: P.O -v- Castleton

Dear John,

Thanks for your email of 18 September. Given your comments below, I have made some further changes to those paragraphs of your statement. I have also paginated the exhibit. I attach now what should hopefully be the final version for signature. Please can you print, sign and date 2 copies and return 1 to me.

I will send to you a copy of the exhibit in the post.

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

Kind regards.

Stephen Dilley
Solicitor
for and on behalf of Bond Pearce LLP

GRO

www.bondpearce.com

-----Original Message-----

From: John H. Jones [GRO]
Sent: 18 September 2006 15:37
To: Stephen Dilley
Cc: rmorgan [GRO]; Tom Beezer; mandy.talbot [GRO]; carol.king [GRO]; andy.r.pearson [GRO]; John H. Jones [GRO]
Subject: Re: Amended second statement of John Jones: P.O -v- Castleton

Stephen

I can confirm , in answer to your questions :-

(Paragraph 11) I reviewed the interview notes taken from the interview of the 10th May. This is aside from reading all the documentation that accompanies the case file.

(Paragraph 13) I can confirm that the cash deposited from the car auction company had no Giro deposit slip, nor receipt slip completed by the customer.

The deposit pouch I examined from the company at my visit to the branch, contained a large amount of cash and was accompanied by a blank inpayment book and receipt slip.

I was advised by the Interim Subpostmaster that this was normal practice for the branch to check the amount in the pouch and then complete the deposit and receipt slip on behalf of the customer. The amount deposited was then processed without any verification with the customer.

The pouch would then be returned to the customer with the receipt slip on their next visit to the branch.

(Paragraph 25) Actioned.

I have signed the statement and returned, marked for your attention.

Regards

John

John Jones
Area Change Manager
Network Change
Post Office Ltd
Sales & Service

Upper Floors, The Markets DMB, 6/16 New York Street, Leeds LS2 7DZ

[GRO]

"Stephen Dilley" [GRO]
To: <John.H.Jones [GRO]>
cc: <rmorgan [GRO]> "Tom Beezer"
<Tom.Beezer [GRO]> <mandy.talbot [GRO]> <carol.king [GRO]>
13/09/2006 12:27 <andy.r.pearson [GRO]>
Subject: Amended second statement of John Jones: P.O -v- Castleton

Dear John,

Thanks for meeting us in conference on Monday.

I attach an amended statement of your witness statement and a marked up version for ease of reference. Please can you read this through carefully, make any changes you want (bearing in mind Counsel's comments about softening it and also that you have to be 100% happy with it) and also let me have your answers to the questions in bold italics. Don't worry about the page numbering of the exhibit for now.

I also attach various docs in pdf you might find helpful including:

1. The FOSACS statement of outstanding debt so you can see the reversal of the £1,256.88 error.
2. Summary of events and interview notes (relevant for my question in para 11).

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

Kind regards.

Stephen Dilley
Solicitor
for and on behalf of Bond Pearce LLP

GRO

www.bondpearce.com

The information in this e-mail and any attachments are confidential and may be legally privileged and protected by law. The intended recipient only is authorised to access this e-mail and any attachments. If you are not the intended recipient, please notify the sender as soon as possible and delete any copies. Unauthorised use, dissemination, distribution, publication or copying of this communication is prohibited.

Any files attached to this e-mail will have been checked by us with virus detection software before transmission. You should carry out your own virus checks before opening any attachment. Bond Pearce LLP accepts no liability for any loss or damage which may be caused by software viruses.

Bond Pearce LLP is a Limited Liability Partnership registered in England and Wales number OC311430.
Registered Office: 3 Temple Quay, Temple Back East, Bristol, BS1 6DZ.
A list of Members is available from our registered office. Any reference to a Partner in relation to Bond Pearce LLP means a Member of Bond Pearce LLP.
Bond Pearce LLP is regulated by the Law Society.

>>>> STATEMENT_1211418 (2).DOC attachment was removed from this email
>>>> <<<<

>>>> STATEMENT_1207759 (2).DOC attachment was removed from this email
>>>> <<<<

>>>> eCopy scanned document.pdf attachment was removed from this email
>>>> <<<<

This email and any attachments are confidential and intended for the addressee only. If you are not the named recipient, you must not use, disclose, reproduce, copy or distribute the contents of this communication. If you have received this in error, please contact the sender and then delete this email from your system.

The information in this e-mail and any attachments are confidential and may be legally privileged and protected by law. The intended recipient only is authorised to access this e-mail and any attachments. If you are not the intended recipient, please notify the sender as soon as possible and delete any copies. Unauthorised use, dissemination, distribution, publication or copying of this communication is prohibited.

Any files attached to this e-mail will have been checked by us with virus detection software before transmission. You should carry out your own virus checks before opening any attachment. Bond Pearce LLP accepts no liability for any loss or damage which may be caused by software viruses.