

Stephen Dilley

From: Stephen Dilley
Sent: 08 January 2007 11:26
To: mandy.talbot; **GRO**
Cc: Tom Beezer; 'Richard Morgan'; martyn.mitchell; **GRO**
Subject: P.O -v- Castleton
Attachments: eCopy scanned document.pdf

Dear Mandy,

I refer to my email of 3 January. Please could you call me when you're out of your meeting today?

I attach a copy of my letter dated 4 January to Mr Castleton and his reply of today. He has said that he will be 45 minutes with each witness and that he wants to put questions to them arising from the Tivoli logs and that they are relevant to the "integrity of the system and balances." As I've said before, I think that he would construe anything we gave to him as the crown jewels, irrespective of whether it was truly relevant.

If we oppose his application on Thursday (on the grounds that the issues he raises are irrelevant and disproportionate) but he succeeds i.e the Court says he can examine 2 of our witnesses, then we will have to go back to Court again. On the other hand, I have checked with Anne Chambers and Ruth Simpson and they could both attend Court this Thursday. The Court has sufficient time to accommodate their re-examination. Therefore, on balance, I think we should recall them and let Mr Castleton ask any questions on Thursday (so at least he thinks he's had a fair shot, thereby reducing the chances of him successfully getting permission to appeal if judgment is against him). Hopefully, this would at least get it done and we will then get judgment on the day or shortly afterwards. Do you agree? If so, I'll line up the Court and witnesses.

I look forward to hearing from you.

Kind regards.

Stephen Dilley
Solicitor
for and on behalf of Bond Pearce LLP

GRO

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