

Stephen Dilley

From: Stephen Dilley
Sent: 06 December 2005 08:42
To: mandy.talbot; **GRO**
Cc: Tom Beezer; Julian Summerhayes
Attachments: LETTER_1096127.DOC

Dear Mandy,

Tom and I had a brief conversation with Counsel Richard Morgan on 30 November and I spoke again with him yesterday evening. He has made some helpful suggestions for John Jones' draft statement which I will incorporate and recirculate.

Counsel also advised that to try to protect the Post Office's position on costs, that you should now consider making a CPR Part 36 offer at around the £25k mark. (The claim is for £27,115.83 plus interest). An offer would help put pressure on Mr Castleton (a) to settle and (b) at least to agree to set aside the Default Judgment on the Counterclaim, or face a potential costs risk in relation to that hearing. Accordingly, I attach a draft CPR Part 36 offer to Mr Castleton's solicitors offering to accept payment of £24,750 in full and final settlement with each party bearing their own costs, for your approval. (The costs of applying to set aside the default judgment will be born by BP).

I look forward to hearing from you.

Kind regards,

Stephen Dilley
Solicitor
for and on behalf of Bond Pearce LLP
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