

Bond Pearce

Telephone attendance

Client: Royal Mail Group PLC Sub Postmaster Litigation

Matter: Mr Lee Castleton

Matter no: 348035.134

Attending:

Name: Stephen Dilley

Location: N/A

Date: 23 November 2005

Start time:

Units:

I had a telephone conference with Tom Beezer (BP) and Mandy Talbot (Post Office). We agreed the following next steps:

1. I will continue to go through all of the receipts from the Post Office to make a precise list of what we have received. Once I have completed that list I will ask Mr Jones, Mrs Oglesby and Lesley Joyce whether that list is complete or whether there ought to be other documents. If there are any other documents I will pursue every avenue I can to try and get them back but Lesley Joyce might be the right person.
2. I will telephone David Halbert of the Post Office to ask him what will be the cost and ease of retrieving data about Fujitsu and other cases the Post Office may have.
3. I will prepare witness statements for John Jones, Helen Hollingsworth and Cath Oglesby. Once these are in relatively good draft form, I will send them to Mandy & Tom for approval.
4. I will ask Helen Hollingsworth whether the auditors did a cash account themselves, if I cannot find one amongst the papers I have.
5. I will get the post office documents copied and sent to Cath Oglesby, Helen Hollingsworth and Mr Jones so that this will help build their witness statements.
6. Tom recommended Richard Morgan or Michael Gibbon of Maitland Chambers to do this job. He said that they were both good on their feet, technically minded and good advocats. Mandy Talbot asked Tom to check whether any of the two of them had got technology experience as she thinks this could be useful if this case. Previously she has used Devereaux Chambers, but that is where the other side deny the terms of the employment contract. This is not the case in this instance.
7. In any event I will email to Mandy Talbot those Counsel from Deveraux who we are told this morning are available to attend hearing on 6 December. Tom will buzz to Mandy Counsel from Maitland Chambers and their profiles.
8. The question for Mandy to ask at the meeting on Friday is to ask whether the rebooting of the system will change the cash accounts.
9. Mandy asked me for a copy of the expert's reports that she stated that she hadn't seen. I reminded her that I had sent them to her a few weeks ago, and further copies were enclosed with the bundle that I had sent to her yesterday, but I could always send them by PDF.

Tom made it clear that we were to get Counsel involved at an early stage as BP were picking up the tab for rectifying the default judgment and he wanted to go for a sledgehammer approach. Mandy agreed. Mandy would prepare an internal report for her colleague at the Post Office.

50 minutes.