

Stephen Dilley

From: Tom Beezer
Sent: 31 March 2006 11:53
To: Stephen Dilley
Subject: RE: Post Office -v- Castleton: IT info required

v helpful - I am digesting this and may revert to you

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From: Stephen Dilley
Sent: 31 March 2006 11:45
To: Tom Beezer
Subject: Post Office -v- Castleton: IT info required

Dear Tom

In preparation for our telecon with Mandy next week, I have the following points:

(1) IT information we already have

- (a) The info attached to Mandy's 29 March email. I've been through this and it is basically helpline call logs relating to the period after Castleton was dismissed, so is of limited value. However, there are some point in those entries that need discussion.
- (b) The info exhibited to Cath Oglesby's statement dated 21 Jan 06. This includes NBSC and HSH call logs, a copy of the Horizon System User Guide, Failure Sub-Sections 12 and 143, an email from Andrew Price at NBSC to Cath Oglesby stating that Andrew Wise at NBSC had been unable to find any errors and an email from Julie Welsh, Service Delivery Manager HSH which stated that there was no evidence of any system problem.

(2) Information required in the IT report

- (a) We need to explain to a Judge who will know nothing about Horizon exactly how it works. What precisely happens when a customer goes into a Post Office to buy an item? How is this recorded? Is it manually recorded into the Horizon system at the same time or later in the day? Is the cash register linked to Horizon?
- (b) Precisely what steps Fujitsu took to examine the Horizon system at the Marine Drive Post Office in 2004 and what their conclusions were.
- (c) Whether there have been any similar or serious problems with the Horizon system at the Marine Drive Post Office since Mr Castleton's suspension and dismissal.
- (d) Whether Fujitsu believe that the suggestion put forward by Mr Castleton's experts is likely to be correct and their reasons, either way (if they are able to comment on this).
- (e) If there have been human errors in recording the transactions, could an explanation be that:
 - (a) There was nothing wrong with Horizon, because it simply reflected the information entered on to it; but
 - (b) If staff entered the wrong numbers into Horizon there may have been no real loss (even

though Horizon would show a loss), because there could be a human error in accurately recording transactions.

If so, would that be a likely explanation?

6. Any other information that may be relevant.

(3) Who could provide the IT report and how are we going to get it

I sent the attached letter to Nick Samuel of the P.O on 18 November 2005. Nick was going to forward it to Fujitsu. Nick has since left (he was part of Dave Hulbert's team) and Dave has been following up with Fujitsu, but apparently without success.

(a) We firstly need to understand exactly what steps the P.O have taken to get the info from Fujitsu. Dave Hulbert should be patched in on our call next week to give an explanation.

(b) Then we need to establish precisely what roles **Andrew Wise** at NBSC and **Julie Welsh**, Service Delivery Manager HSH have, where they are based and what info they could provide.

(c) If they cannot help, Tony Utting at the P.O ought to be able to explain how Horizon works, but I don't think he had any contemporaneous dealings with the Castleton case, so Fujitsu should be able to offer more value.

(d) I initially hoped that the attached letter produce the result, but it hasn't and we need to refine our strategy. Either the P.O need to meet Fujitsu and thrash this out with them or we need to meet a someone who is in a position to help us face to face to take a proof of evidence. We need to make it easy for them and if we meet them and do the drafting, this should do it.

(e) In addition to the above, we have permission to instruct an IT expert. We need to consider whether we want to use an independent expert in addition to any Fujitsu witness. I think we should. If you agree, we need to identify candidates.

(4) Timescale

(a) Mediation has to take place by **4 May**. (Likely to be end of April early May).

(b) W/s of fact to be exchanged by **14 July** (so this will probably include Fujitsu witnesses)

(c) Expert evidence to be served on **11 August**

Tom - we need to consider with the P.O whether they either want us to:

(i) start interviewing people now in anticipation that the case will not settle at mediation; or

(ii) try to save cost by putting interviews on hold until after mediation.

We will also need to identify an accountancy expert, but it sounds as though Mandy's current focus is on I.T issues.

I'm around all day if you want to discuss.

Kind regards.

Stephen Dilley

Solicitor

for and on behalf of Bond Pearce LLP

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