





22 November 2006

By Fax Only **GRO**

Mandy Talbot  
Company Secretary's Office  
Royal Mail Legal Services

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Our ref:  
SJD3/KAK2/348035.134  
Your ref:

Dear Mandy

**VERY URGENT**  
**Post Office Limited -v- Lee Castleton**

I refer to our telephone conversation this morning and as discussed, attach a copy of the disclosure list for you to approve, sign and date and fax back to me on **GRO**

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

Kind regards.

Yours sincerely

**GRO**

**Stephen Dilley**  
Solicitor  
for and on behalf of Bond Pearce LLP

Enc

# List of documents: standard disclosure

<b>In the</b>	High Court of Justice Queen's Bench Division
<b>Claim No.</b>	HQ05X02706
<b>Claimant</b> (including ref)	Post Office Limited SJD3/348035.134
<b>Defendant</b> (including ref)	Mr Lee Castleton
<b>Date</b>	

## Notes

- The rules relating to standard disclosure are contained in Part 31 of the Civil Procedure Rules.
- Documents to be included under standard disclosure are contained in Rule 31.6
- A document has or will have been in your control if you have or have had possession, or a right of possession, of it or a right to inspect or take copies of it.

## Disclosure Statement

I, the above named

Claimant       Defendant

Party (if party making disclosure is a company, firm or other organisation identify here who the person making the disclosure statement is and why he is the appropriate person to make it)

I am the person with overall responsibility at Post Office Limited for this case.

state that I have carried out a reasonable and proportionate search to locate all the documents which I am required to disclose under the order made by the court on (date of order)

9 March 2006

I did not search for documents:-

pre-dating 18 July 2003

located elsewhere than

Documents with accounting teams in Chesterfield, personal records held in Leeds, together with HSH and NBSC call logs, transaction information, Girobank and Inventory team in Leeds and at Fujitsu.

in categories other than

for electronic documents

I carried out a search for electronic documents contained on or created by the following:  
(list what was searched and extent of search)

(a) The electronic data we have searched for is from an Electronic filing cabinet (EFC) which has all documents relating contractual issues in one place for ease of reference and retrieval.

(b) The categories of electronic documents not searched (see next page) for is either because it is not believed such categories exist, or because such electronic documents (if any) would not fall under CPR 31.6.

I did not search for the following:-

documents created before

documents contained on or created by the  Claimant  Defendant

- PCs  portable data storage media
- databases  servers
- back-up tapes  off-site storage
- mobile phones  laptops
- notebooks  handheld devices
- PDA devices

documents contained on or created by the  Claimant  Defendant

- mail files  document files
- calendar files  web-based applications
- spreadsheet files  graphic and presentation files

documents other than by reference to the following keyword(s)/concepts  
(delete if your search was not confined to specific keywords or concepts)

I certify that I understand the duty of disclosure and to the best of my knowledge I have carried out that duty. I further certify that the list of documents set out in or attached to this form, is a complete list of all documents which are or have been in my control and which I am obliged under the order to disclose.

I understand that I must inform the court and the other parties immediately if any further document required to be disclosed by Rule 31.6 comes into my control at any time before the conclusion of the case.

I have not permitted inspection of documents within the category or class of documents (as set out below) required to be disclosed under Rule 31(6)(b) or (c) on the grounds that to do so would be disproportionate to the issues in the case.

Signed

Date

(Claimant) ~~XXXXXXXXXXXXXXXXXXXX~~

List and number here, in a convenient order, the documents (or bundles of documents if of the same nature, e.g. invoices) in your control, which you do not object to being inspected. Give a short description of each document or bundle so that it can be identified, and say if it is kept elsewhere i.e. with a bank or solicitor

I have control of the documents numbered and listed here. I do not object to you inspecting them/producing copies.  
see attached list.

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List and number here, as above, the documents in your control which you object to being inspected.  
(Rule 31.19)

I have control of the documents numbered and listed here, but I object to you inspecting them:

Correspondence passing between the Claimant/Part 20 Defendant and their solicitors for the purposes of this action, instructions and opinions of counsel, drafts of pleadings and other documentation settled by Counsel, Experts' drafts and opinions and all other documents of a confidential nature brought into being for the purposes of this proposed action.

Say what your objections are

I object to you inspecting these documents because:  
they are privileged.

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List and number here, the documents you once had in your control, but which you no longer have. For each document listed, say when it was last in your control and where it is now.

I have had the documents numbered and listed below, but they are no longer in my control. Originals of documents described as copies which are in the hands of recipients or lost/destroyed.

<b>No.</b>	<b>DOCUMENT</b>	<b>Date/Week</b>
1.	Horizon Message Store	Various
2.	Horizon system user guide	Various
3.	Horizon Operations Manual	Various
4.	List of Software updates	01/2004 to 04/2004
5.	Spreadsheet of stock remittances	01/2004 to 03/2004
6.	Spreadsheet of errors brought to account	2003 to 2004
7.	Spreadsheet of total daily cash declaration	01/2004
8.	Spreadsheet of total daily cash declaration	02/2004
9.	Spreadsheet of total daily cash declaration	03/2004
10.	Spreadsheet of daily cash declarations by denomination	11/03/2004 to 31/03/2004
11.	Spreadsheet of notes delivered to the Marine Drive branch	18/07/2003 to 31/03/2004
12.	Spreadsheet of coin delivered to the Marine Drive branch	18/07/2003 to 31/03/2004
13.	Spreadsheet of notes and coin delivered to the Marine Drive branch	18/07/2003 to 31/03/2004
14.	Daily procedures and Horizon Reports	Edition 4/10/2005
15.	Balance Procedure	03/2006
16.	Subpostmasters Contract	09/1994 edition
17.	Amended Particulars of Claim	23/10/2006
18.	Order of Deputy Master Nussey on behalf of Master Fontaine	25/08/2006
19.	Order of Master Turner	23/10/2006
20.	Notice of Trial	04/12/2006
21.	Notice of date for Returning Pre-Trial Checklist	23/10/2006
22.	Email from John Jones to Catherine Oglesby	25/06/2004
23.	Letter from Defendant to Cheryl Woodward	Undated
24.	Letter from Defendant to Cheryl Woodward	19/08/2004
25.	Letter from Defendant to Cheryl Woodward	24/08/2004
26.	Letter from Defendant to Cheryl Woodward	01/12/2004
27.	Letter from Defendant to Cheryl Woodward	15/12/2004
28.	Letter from Cheryl Woodward to Defendant	15/12/2004
29.	Letter from Defendant to Cheryl Woodward	16/12/2004
30.	Interpartes solicitors correspondence post dating the Claimant's first disclosure list	18/5/2004 onwards