

WITN08500100

Witness Name: Mandy Talbot

Statement No: WITN08500100

Dated: 31 of May 2023

## POST OFFICE HORIZON IT INQUIRY

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### FIRST WITNESS STATEMENT OF MANDY TALBOT

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I, MANDY TALBOT, will say as follows;

1. I have been asked to provide a Rule 9 Witness Statement addressing the questions set out in the Annex to the Rule 9 Request sent to me on the 14<sup>th</sup> of April 2023.
2. I have been assisted by DAC Beachcroft LLP in the preparation and drafting of my statement.

#### **Background**

3. I have a BCS Econ in Law and Politics 2;1 from Aberystwyth University and a Masters in Commercial Law from Bristol University. After working at Cameron McKenna's and Wilde Sapte I joined the Post Office Solicitors Office as a Legal Assistant in January of 1990 in the Civil Litigation Department.

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4. I left Royal Mail Legal Services in January of 2011 to join the Regulation Team in Royal Mail Group Ltd. This team was formed to facilitate the Initial Public Offering of Royal Mail Group Ltd. I took voluntary redundancy in September of 2014.
  
5. I do not now recall the date that the Post Office Solicitors Office became Royal Mail Legal Services (Legal Services).
  
6. At the beginning of my career working for Legal Services all litigators conducted a broad spectrum of cases including personal injury, employment disputes, debt collection, landlord and tenant cases, disputes under the provision of the Postal Services Act, contract and commercial disputes. Prosecution was the exception as this was always a distinct specialism. I have never been a prosecutor. Legal Services provided litigation services to all the businesses that now make up Royal Mail Group and some which have now ceased to exist.
  
7. Gradually teams were created to specialise in the aforementioned areas of civil law. By 2004 I was the Team Leader of the Postal Litigation team within the Civil Litigation Department. At no time did the team work predominantly for the Post Office Ltd (POL) or on cases involving Sub Post Masters, that was a small proportion of the work. Eventually the Postal Litigation team ceased to exist and was absorbed into the Dispute Resolution Department which was the new name of the Civil Litigation Department. There was no formal structure for upward report within the Department although my line managers

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operated an open-door policy. We were never provided with guidance on what issues should be reported. My first line manager in the Civil Litigation Department was Joe Ashton followed by Clare Wardle, Biddy Wyles and Rebekah Mantle. I cannot remember the exact dates when they changed.

8. Jim Cruise had been a solicitor working in the Prosecution Team but he took the opportunity to retrain as a solicitor in the Civil Litigation Department. I cannot now recall when he joined the Postal Litigation Team.
  
9. Royal Mail Group offered voluntary redundancy to almost the entire Legal Services Department in 2004. It was for this reason that Jim Cruise left Legal Services. Civil Litigation and the other Teams had begun the process of outsourcing case work to external law firms prior to the redundancy offer. However, as a result of the sheer number of lawyers who “took up” the offer of redundancy it became necessary to outsource the majority of litigation work to a number of regional law firms including Bond Pearce, Weightmans, Hugh James etc (the agents).
  
10. I have asked the Inquiry Team for access to the full civil litigation files referred to in the Annex to the Request, to answer the questions fully but have been advised that they are not available. I have only been provided with a limited number of documents, rather than full case files. As such I can only answer in so far as I can remember based on the limited documentation provided and the period of time that has elapsed since the events I am being asked about.

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This also means that my responses cannot be seen in the context of the litigation as cases developed.

**Cleveleys Post Office (Julie Wolstenholme)**

11. Jim Cruise was dealing with the case of Julie Wolstenholme of Cleveleys Post Office within the Postal Litigation Team. I had no real involvement in the case until Jim decided to take redundancy in 2004. I am sure that he would have discussed the case with me and his concerns about it but after this period of time, I am not able to recall the details necessary to answer the question fully.
  
12. It appears from the Email dated 7<sup>th</sup> of June 2004 from Jan Holmes to Colin Lenton -Smith, (FUJ00121637) and paragraph 28 of the Second Witness Statement of David Smith (WITN05290200) that a joint report had been commissioned from an Expert. I cannot recall the content of the report or even why an expert had been appointed, save that it is recorded at paragraph 10 of the Second Witness Statement of Jan Robert Holmes (WITN04600200) that both I and Jim Cruise were concerned. I do not have a copy of the report and without the litigation file I am unable to recall anything further about these concerns. I believe that the case had been outsourced to Weightmans solicitors, as our agents, directly by POL. As it appears that it was too near to the trial date to obtain and submit witness evidence from the Post Office or Fujitsu to explain or clarify the conclusions reached by the Expert and no audit trail was available due to the age of the discrepancies, the best legal course was to advise POL that a settlement of the case should be attempted.

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13. I do not recall the conversation with David Smith but have no reason to believe that it did not occur as recorded in his statement at paragraph 28 (WITN05290200).
14. I do not recall the conversation with Jan Holmes former audit manager referred to at paragraph 10 of the Second Witness Statement of Jan Roberts Homes (WITN04600200). I do not know what access to systems or reports the Expert (or any expert involved in cases concerning Horizon) was given and whether they had access to the Horizon terminal at the Post Office or the data which Fujitsu was capable of creating. It would have been necessary for some access to have been provided to enable him to create a report but I am not aware of what access was provided to inform the Expert's opinion having not been able to access the litigation file and the time that has now passed. If the Expert had come to an erroneous conclusion and would not be swayed from this position despite additional materials from Fujitsu, which they firmly believed explained the position, then it would not have been beneficial for POL to disclose such a report to the Court.
15. I cannot recall who created the report, their qualifications, or the contents of the report.
16. I cannot recall why the decision was taken to appoint a joint expert or who was involved in this decision without access to the complete legal file. I do not recall whether the Court ordered that a Joint Report be commissioned. The

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duty of any Expert is to assist the Court on matters within their field of expertise, if the report is relied on by the parties in Court.

17. I am not aware of any issues with regards to the retention of the report amongst POL records. On the conclusion of the case, I assume that it would have been retained in accordance with the retention protocols in place at the time and disposed of thereafter. I was not party to any discussions as to its retention or distribution to the best of my recollection.
18. Fujitsu's response to requests for assistance were technical with a view to demonstrating that Horizon was robust. The responses from Fujitsu are at pages FUJ00121690 – Email from Jan Homes to Keith Baines re Cleveleys, FUJ00121691 – Analysis of calls made to Horizon System by Jan Holmes, FU00121692 – Glossary of Fujitsu POL terminology and how technical support is provided, FUJ00121696 – Email from Jan Holmes to Keith Baines re Cleveleys, FU00121697 – Cleanstart Migration confirmation of the date on which Horizon went live at Cleveleys and FU00121700 – Email Jan Holmes to Mandy Talbot re Cleveleys. These documents consisted of a detailed analysis of the call logs from Cleveleys contrasted with other Sub Post Offices, why they considered that the number of calls was not abnormal, a glossary containing an explanation of the abbreviations used by Fujitsu and an explanation of the multi layered system used by Fujitsu and POL to receive, investigate and resolve problems raised by Sub-Postmasters. Lastly a document confirming the date that the Sub Post Office went live and the Sub Post Office was migrated into the Horizon system. I would have been involved

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in asking Fujitsu to assist the legal agents but I cannot recall after this period of time what evidence Fujitsu was asked for on behalf of the agents and therefore whether the responses from Fujitsu were adequate.

19. Given the lack of documentation provided by the Inquiry and the period of time that has elapsed I am not able to recall any further information that would be of assistance to the Inquiry on the matter of Cleveleys Post Office.

**Post Office v Lee Castleton**

20. The case of Lee Castleton (Castleton) of Marine Drive Sub Post Office had been sent out by POL directly to our agents Bond Pearce as was the procedure at that time. In retrospect this was a structural weakness as our oversight in Civil Litigation was usually limited to keeping an eye on costs and advising on who to consult in POL for information. The case of Castleton was unusual in the extent of my involvement. This was because judgment had been entered in default for potentially a very large sum of money on a counterclaim which would have materially affected the business. POL would take the decision as to which cases they wished to pursue by way of civil action. I cannot recall after this period of time the identify of anyone within POL that would have taken this decision or the team or teams that would have been involved. I was not aware of any clear policy why certain cases were referred for civil debt recovery. I was not aware of the case until notified by Stephen Dilley of Bond Pearce that due to an oversight, judgment in default had been entered against POL on a counterclaim which the Defendant had entered against the business for a very large sum of money. Initially I was not

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too concerned as long as Bond Pearce paid the costs of having the matter set aside as mistakes can happen when there is a turnover of staff and or annual leave intervenes as appears to have been the case here. However, when I learned of the size of the judgement in default and that there was a hearing to assess damages shortly thereafter, I was much more concerned. (Email Bob Heckford to Richard Challands (Bond Pearce) re Lee Castleton POL00073855). However, in my opinion Bond Pearce as soon as they were aware of the issue, dealt with the application to set aside and for permission to file a Defence to the Counterclaim appropriately and with dispatch. (Email Stephen Dilley to Tom Beezer senior partners in Bond Pearce re Lee Castleton POL00070496).

21. Horizon was implemented in 2000 and I left Royal Mail Legal Services in January 2011. During this time POL sent cases out to the agents when they considered that it was appropriate under the terms of the original outsourcing agreement to seek to recover outstanding monies. I cannot estimate or remember how many litigation cases were issued to agents as they were sent out directly to legal agents by POL. To the best of my recollection Civil Litigation was not asked to keep a centralised record of the number of such cases being issued in house or by agents. There was no instruction from senior management at POL or Legal Services as to how these cases should be dealt with or litigated. I considered that it would be more efficient if all the regional firms were sent instructions containing the same basic types of evidence in support of the cases for debt recovery. Further if defences were received containing allegations seen in other cases then the solicitors knew



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who to contact within POL to obtain further evidence and statements. It was for this reason that I wished to see consistency in the way that the agents dealt with the Horizon cases that came their way. As an example I asked Bond Pearce to liaise with Hugh James, a firm of solicitors based in Cardiff, as appropriate. I am sure that I participated in an attempt to establish consistency of approach but cannot recall if it was me solely who attempted to instigate such an approach or indeed whether it really got off the ground. I asked that no cases involving Horizon be issued by Bond Pearce in future without discussion with me, as in this case there had been initial concerns about some missing documents prior to issue of proceedings. I cannot recall whether my request was implemented.

22. To the best of my recollection and without sight of the paperwork, my concerns relating to the impact of the Castleton case was that it would be very expensive in terms of time and money to prove a negative. This was because Castleton's allegation was that he was not responsible for any of the losses at the branch, alleging that substantially all loss was created by Horizon. As a result POL and Fujitsu would be in a position of proving that there was nothing wrong with the Horizon system to counter his argument. The original claim was for somewhere in the region of twenty-seven thousand pounds including interest but the costs of fully defending the full action would have far exceed this sum. Castleton had alleged that all the debt at his branch was as a result of the Horizon system despite having signed cash accounts confirming that the cash at the branch matched what was recorded. To fully prove a negative potentially the entire history of transactions at the Sub Post Office would have

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had to be examined and reported on. In addition, a host of statements would have needed to be obtained from Fujitsu and POL to refute his allegations.

23. It was essential to defend the counterclaim because otherwise there could have been a judgment in place for a substantial sum of money which supported Castleton's claim that Horizon was a defective computer system.

24. At that time I believed Fujitsu's assurances that Horizon was infallible and by this time it had been rolled out to all the Crown Post Offices and Sub Post Offices in the United Kingdom. I had heard but cannot recall where from that Fujitsu were allegedly so satisfied with their product that there was talk of its sale to other companies. I had also heard from Hugh James, although after this period of time I cannot recall exactly who from, that some Sub Postmasters were considering a class action alleging that Horizon was defective. It was therefore essential for the reputation of Horizon that the case be fully defended and if possible, won as this would likely dissuade a class action. (Telephone Attendance Stephen Dilley to Mandy Talbot re Lee Castleton POL00072669).

25. Castleton had pleaded a large unsupported claim for damages by way of a counterclaim. I had authorised the issue of a Part 18 Request for more Particulars of his Claim to assess the likely actual value prior to an offer of mediation. The Courts required mediation, at the time, so as to try to get the parties to litigation to resolve issues that were not in contention and so narrow the issues in dispute. Indeed, in some cases Mediation led to settlement. By

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March of 2006 POL had already expended a large sum of money by way of legal costs and business time on this case. (Telephone Attendance Stephen Dilley to Mandy Talbot re Lee Castleton POL00072669). My concern about the impact of the Castleton case was its potential impact on the reputation of Horizon and POL should we not be successful in defending the Counterclaim and proving the original debt. Should the civil action for the debt and the counterclaim not be successful then it was likely that it would encourage other Sub Postmasters to defend cases and bring counterclaims against POL. The difficulty in the case involved proving a negative by obtaining numerous witness statements to interpret the data from POL and Fujitsu, accessing paper documents in support of the existence of a contact between POL and Castleton, the full suite of transaction corrections, Cash accounts etc and to locate witness who could explain the same. It was for all of the above reasons that I believe that it was necessary for a "firm line" to be taken with this case (POL00072691 - Telephone Attendance between Stephen Dilley and myself).

26. I did not believe at this time that Horizon was capable of being "changed after the event." I was aware that if a Sub Postmaster had an issue with a Transaction, he could ring Post Office Customer Services and on following their guidance that he could take steps to rectify a problem on his Horizon terminal. Further if Customer Services could not assist that the call could be escalated through a sequence to obtain more advanced POL and then Fujitsu assistance. I had previously been informed, although after this period of time I cannot recall who from or the context of this exchange, that Horizon was a closed system and by this, I mean that nobody bar the Sub Postmaster could

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add or subtract anything from the system at the terminal or elsewhere in the system. I can no longer recall what Tom Beezer on page 5 of the personal attendance note (Conference with Counsel – attendance note – re Lee Castleton POL00069622) was referring to by “changed after the event”. It was seen as a test case because; to the best of my recollection, it was one of the few POL cases involving Horizon that was being fully litigated at that time in the civil courts. If such allegations were being made in the criminal courts, I was not made aware of this defence or what if any response POL and Fujitsu had to such an allegation.

27. I did not understand why there was a reluctance on the part of Post Office staff to provide a statement confirming the amount of loss arising at a particular Sub Post Office if all the documentation in support were present and all Transaction Corrections both in favour and against the branch had been received and could be added into the final figure. I was aware that there was some missing documentation in this case and possibly that was the reason for the reluctance on the part of the Auditor Helen Rose. (Email Stephen Dilley to Carol King re Castleton POL00069527). To the best of my recollection Mr Castleton had alleged that one of the POL staff had removed some documentation on a visit to his Sub Post Office. This was strenuously denied by POL and I believe statements were obtained covering all losses. On this basis I do not remember being too concerned with these allegations.

28. I was the in-house solicitor giving instruction to Bond Pearce in the case of Castleton on behalf of the POL in this case. This would have involved liaising

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with them to provide them with the information they required. Ordinarily this would have been done directly by POL to the regional law firms. All civil litigation cases where substantial costs have been incurred involve an element of brinkmanship. This is because an awful lot of the costs of a case can be incurred in actually going to Court rather than in the preparation of the case for it. Bond Pearce would have been required to serve a schedule of costs on Castleton's Solicitors as part of the preparation for the trial. It is common to attempt final negotiations at this time to see if the cost of an actual trial can be saved. I had general discretion from Legal Service to reach settlements in debt recovery cases. However, I felt the need to seek the approval of POL before making an offer to Castleton's solicitors due to the size of the potential counterclaim and costs incurred. (E-mail from Stephen Dilley to Richard Morgan re Castleton POL00069450).

29. Greg Booth, a witness who was going to be called for the defence, had experienced an issue at his Sub Post Office in October of 2006 according to the Email from Stephen Dilley to Brian Pinder re Castleton (POL00069404). Stephen Dilley sought a report directly from Fujitsu on the issue for Mr Booth to comment on in a revised statement. I did not recall this incident until I was shown a copy of the correspondence and cannot now recall my response to it.

30. I believe that BDO was the expert used in the Castleton case but I cannot recall what the reference to £3,500 was about. As the expert report by BDO was commissioned by POL then it was up to POL to decide if it was going to

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rely on it in Court. (Telephone Attendance Stephen Dilley to Richard Morgan re Castleton POL00069871).

31. It is difficult for me to assess the level of co-operation between the POL and Fujitsu in 2006. The reason that I have difficulty in responding to this question is because the relationship was directly between POL and Fujitsu. Castleton was a case where the agents, Bond Pearce, were able to obtain witness statements from Fujitsu employees. To the best of my recollection Bond Pearce did not experience any constraints in this case in obtaining witness statements but this would need to be confirmed by Bond Pearce as to whether they experienced the same constraints as Civil Litigation did in getting witness statements in other cases. It was also possible to obtain information from them on other cases at short notice. (Email from Stephen Dilley to Andrew Dunks FUJ00122333 and Witness Statement of Andrew Paul Dunks FUJ000122334 and Exhibit ADI to the statement of Andrew Paul Dunks FUJ00122335). Stephen Dilley of Bond Pearce in his email to me (POL00069599) at paragraph 3 believed that he had vigorously queried Fujitsu IT on the reply to the Part 20 Request. I believe that this level of attention by Fujitsu was exceptional due no doubt to the value of the Counterclaim and the risk to the reputation of Fujitsu.

32. I do not think that Fujitsu were particularly co-operative in the provision of evidence, witness statement and attendance at Court in other civil cases. They would do so when absolutely required but cost and time were often mentioned when more wide-ranging reports were requested to investigate

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allegations (Email from myself to Vicky Harrison POL00073598). I recall Fujitsu were defensive for the most part of any allegation that there were any substantive issues with the Horizon system but without access to the Civil Litigation files and after this passage of time I cannot provide any specific examples. Civil Litigation did not challenge Fujitsu or POL about this but tried to work within the limits of the information that they did provide, as the number of civil debt collection cases was modest.

33. Cases such as Bajaj or Brown/Callendar Square were relevant to this case only in so far as they, in the case of Brown, diverted resources very close to the trial date. So instead of preparing for trial based on the pleaded case I and the agent had to try to investigate whether the type of problems that had been experienced at Callendar Square were present in the Castleton case. Castleton' solicitors advised that they would be calling Mr Brown to give evidence.

34. I knew of the case of Bajaj but had no real involvement in it to the best of my recollection, as it was a prosecution case. I knew that despite the different levels of evidence required in prosecution and civil cases that solicitors acting for Bajaj were interested in the outcome of the Castleton Case. I was not made aware of the precise details of the case of Mr Bajaj merely that Castleton was likely to refer to it. I was also aware as the result of a conversation with Hugh James that the case was in abeyance awaiting the result in Castleton. (Telephone Attendance Thomas Bourne to Mandy Talbot POL00069431).

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35. Allegations were made about alleged faults in the Horizon system at Grangemouth PO in Falkirk in Scotland and I sought to investigate to ascertain whether there was any relevance to the issues in the upcoming trial. (Email from Mandy Talbot to Lesley Joyce re Grangemouth POL00070172 and (Email Thomas Bourne to Stephen Dilley re Ferryhill POL00070175). These allegations by Castleton were made shortly prior to the date of the Castleton trial, so it was always open to debate whether any of the allegations, evidence or witness statements would be admitted by the Judge at Trial. I collected what limited evidence could be obtained from POL and Fujitsu as detailed in an Email from me to Stephen Dilley containing print outs in respect of Ferryside Post Office. (Email Mandy Talbot to Stephen Dilley re Ferryhill POL00070176). Further information was sent by me to Stephen Dilley in an Email relating to Callendar Square (Email Mandy Talbot to Stephen Dilley re Callendar Square re Mr Brown POL00081928). It transpired that there was a problem at Callendar Square as detailed in the Emails from Brian Trotter to Sandra MacKay (Email Mandy Talbot to Stephen Dilley re Callendar Square re Mr Brown POL00081928), but that it had been anticipated the issue would be resolved by the release of a S90 fix from Fujitsu. This was an error that occurred where there were multiple stock units in use at a Post Office. Multiple stock units were not used in Castleton's Sub Post Office. Anne Chambers advised that the footprint of the Callendar Square problem was something checked for by Fujitsu and it had been not present at Castleton's Post Office and hence not relevant to the issues in the



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Trial. (Email from Mandy Talbot to Stephen Dilley re Callendar Square POL00070135).

36. Allegations were also made about problems at the Carshalton Branch as detailed in my email to Stephen Dilley (Email from Mandy Talbot to Stephen Dilley re Carshalton POL00070160), but the details provided by Castleton were very sparse. It appeared that Carshalton Post Office may also have been known as West End and if so that the only information which could be located of an issue had been resolved by advice given as detailed by Dorothy Kiernan at page 4 and 5 of POL00070160.

37. In respect of the documents at POL00070126, telephone attendance Thomas Bourne, SDJ3, Richard Morgan and Mandy Talbot, and POL00070133, email from Mandy Talbot to S Parker at Fujitsu copied to Stephen Dilley re Callendar Square, these evidence the ongoing attempts that were made in investigate allegations up to the date of trial. The investigations took up time but did not affect the strategy of POL.

38. Castleton's solicitors proposed a settlement as set out in document POL00113909, Email from Paul Dann to Martyn Mitchell re offer of settlement. The documents Email from Stephen Dilley to Mandy Talbot re draft Tomlin Order (POL00069775) , Email from Stephen Dilley to Mandy Talbot re Confidentiality, (POL00069737), Email from Stephen Dilley to Mandy Talbot re settlement counter proposal (POL00069779), Email Stephen Dilley to Castleton's Solicitor re wording of the Tomlin Order (POL00069767), Email

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Stephen Dilley to Mandy Talbot re Tomlin Order (POL00069763), Email from Stephen Dilley to Mandy Talbot re settlement (POL00069722), Email from Stephen Dilley to concerned parties re failure of settlement (POL00069741), Telephone Attendance Note between Stephen Dilley and Mandy Talbot re Castleton's decision to dismiss his solicitor (POL00069678), Email Stephen Dilley to Bob Heckford re continuation of trial (POL00069695) all contain details of the negotiations towards the proposed settlement. I have based my reply on their contents as I do not have access to any other documentation and my recollection of the negotiations has faded with time.

39. I believe that the proposed settlement as contained in the draft Tomlin Order which I do not have access to, would have been beneficial to both parties. The case would have been recorded as settled on any search of Court records and the details of the settlement would remain private between the parties. This would have facilitated Castleton's intention to seek employment in Financial Services. The costs would have been settled on a relatively modest level without the costs of experts and of trial. Castleton would have confirmation that the Post Office had never alleged he was dishonest and he would have withdrawn his allegations against Horizon. By dismissing his solicitors and proceeding to trial he incurred substantial further costs and a judgement was entered against him. POL would also have benefited by saving costs and time plus it could make reference to the terms of the Tomlin Order which exonerated Horizon if required to, in the appropriate circumstances. The contents of the proposed Tomlin Order would not have been an unusual way of settling a civil litigation case. I believed that it would

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have been in the best interest of POL. The judgment to the best of my recollection was merely for a sum of money, dismissing the counterclaim, but did not make any reference to the Horizon system. I do not have access to a copy of the final Judgment in this case.

40. To the best of my recollection, the proposal that Castleton did not repeat his allegations against the Horizon system was important to POL so much so that Keith Baines, Senior Contracts and Services Manager at POL, amended the proposed wording to make it more robust. See POL00069775, Email Stephen Dilley to Mandy Talbot re Draft Tomlin Order, page 2 email from Keith Baines to Mandy Talbot.

41. A confidentiality clause meant that the terms of the proposed settlement would be kept private between the parties unless disclosure was needed for implementation or by order of the Court. I believe that POL was of the opinion that a settlement would reduce the number of allegations made by Sub Post master's about the Horizon system. This would have been a standard requirement for litigation of this nature.

42. The Post Office had already incurred a disproportionate amount of legal costs by September of 2006 given the size of the initial claim. It wished to avoid incurring more costs by seeking agreement with Castleton's solicitors to disclose their experts report on a without prejudice basis. As a formal Part 30 offer had been made to Castleton earlier in the case; that was unlikely in our opinion to be bettered at trial, he was at risk in respect of costs. The tactic of

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POL was to draw the costs position to the attention of Mr Castleton (see Telephone attendance Stephen Dilley and Mandy Talbot POL00069603) then to overwhelm Castleton with evidence and preserve the trial date of early December. I refer to the telephone attendance note between Stephen Dilley and myself re costs and tactics POL00069470. These would have been standard tactics in high value litigation cases. I would have obtained confirmation from POL based on the legal advice from our agents and Counsel but I cannot confirm exact details of who accepted this advice without access to the "in house" Civil Litigation papers on this case. This tactic was partially successful in that Castleton's solicitors reduced the size of the counter claim and offered a settlement the following month. In the telephone note between Stephen Dilley and myself (Telephone Attendance re pleadings and tactics POL00069672) the tactic of refusing to consent to Castleton's late amendment of pleadings and disclosure of evidence was discussed and the decision taken to press on with the Trial. These are all legitimate tactics on the part of a claimant to reach a settlement or trial of the case for the least amount of costs and to reach a conclusion as quickly as possible.

43. The Email from Stephen Dilley to myself (Email from Stephen Dilley to Mandy Talbot re reason for delay POL00069766) explained that Castleton was unwell and that his own solicitors were experiencing difficulty in obtaining instructions from him in relation to the proposed Tomlin Order. The Email from Stephen Dilley to myself (Email Stephen Dilley to Mandy Talbot re Castleton's health POL00069756) explained that although he was medically fit to give instructions, that he did not want to sign the Tomlin Order or authorise his

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solicitors to do so. It was the opinion of Stephen Dilley that Castleton was unwell. A Defendant's wellbeing was not considered by POL as relevant to the manner in which litigation was conducted unless or until the Defendant or those acting on his behalf made a relevant application to the Court assuming that litigation had already commenced. Clearly if such an application had been made then Civil Litigation would have had to consider POL's position in pursuing the claim or possibly staying the litigation until the defendant was able to provide meaningful instructions.

44. In general the physical or mental wellbeing of a Sub Postmaster may well have been considered a relevant factor prior to the decision to refer a matter out to agents but that was a matter for POL. I would not have been aware of any decisions taken in this respect and do not know if this was considered in this case Civil Litigation were never asked to the best of my knowledge, to advise on this matter.

45. The draft List of Documents contained in the Fax from Stephen Dilley to me (POL00069657) is proportionate to the pleaded case as it appeared in May 2006. In so far as other documents came into creation, they were attached to the supplemental List of Documents created in November of 2006. See Email Stephen Dilley to Thomas Bourne re Supplemental Disclosure, POL00069701. A sequence of allegations were made by Castleton late in the case and close to the date of trial. Some of the witnesses that were already briefed for trial were prepared to deal with these points if the Court had

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permitted the evidence to be entered. It may have been necessary to create a Further Supplemental List of Documents, beyond what was created in November, if the case had progressed in that way dealing with the allegation that Horizon Faults at Callendar Square, Carshalton etc were not relevant and comparable to events that had occurred at Marine Drive. Civil Litigation was prepared to disclose documentation relating to the Challoner Square problem with witness evidence refuting that a similar event had occurred at Marine Drive. As such I was content that disclosure was appropriate.

46. Judgment had been entered against Castleton in the civil court and POL had expended a large sum of money on legal costs. Castleton had rejected a number of attempts at compromise and as such was liable for a substantial proportion of the costs incurred by POL in addition to his own. Although Castleton had agreed to POL's costs as set out in the Email from Stephen Dilley to me, (POL00070302) describing the necessary next steps, he had refused to sign a consent order to that effect. As he had refused to enter into any dialogue about making good the judgment and costs, this led POL to incur further costs to obtain a court order. As Castleton took no steps to comply Bankruptcy, was the natural next step. Sometimes the threat of bankruptcy will lead to the offer of a repayment programmes.

47. The document at POL00072146, Email to Stephen Dilley from Mandy Talbot re bankruptcy/potential claim by Day, of May 2008 acknowledges his report noting the failure by Castleton to progress with the sale of the property at Marine Drive. The final document on the case is an email from myself to

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Stephen Dilley re conclusion of the case (POL00072206) in which I acknowledged the final report concerning the bankruptcy and the failure of POL to recover its costs. These steps would be standard practice in any debt recovery litigation.

48. Gareth Jenkins of Fujitsu provided evidence in the form of Witness

Statements to our agents in this case. (Email from Brian Pinder to Gareth Jenkins re Castleton FUJ00122279). Gareth Jenkins described himself in the draft Witness Statement (FUJ00122280, Draft witness statement of Gareth Jenkins) as a Distinguished Engineer and described himself as having a working knowledge of the Horizon computer system. I did not participate in the creation of his Witness Statement. I do not know anything about the length or the scope of his experience working with Fujitsu or his knowledge of the bugs, errors or defects that were known about by Fujitsu at this time. The draft Witness Statement and presumably the final Witness Statement demonstrate a broad knowledge of the manner on which the Fujitsu system worked.

49. The Prosecution solicitor's team were to the best of my recollection entitled to

ask Fujitsu for a total of 100 free reports per year to assist with the investigation and potential prosecution of cases. Civil Litigation solicitors were only able to ask for reports if the entitlement to free reports had not been used up by Prosecution. As a result of this situation civil litigation, could not ask for additional reports without expense that POL would have to agree to absorb. Further Civil Litigation was never offered Horizon training at the point-of-sale terminal or at the various Administrative Centres. As such solicitors in

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effect learned about the system on a case-by-case basis relying on information supplied to us by POL and Fujitsu.

50. Anne Chambers of Fujitsu provided a witness statement for Stephen Dilley in September of 2006 in response to his email (Email from Stephen Dilley to Anne Chambers FUJ00122321). The call logs (Call logs for a variety of dates in Jan, Feb, March 2004 FUJ00122322) are from Marine Drive and were the basis of her analysis of the issues complained of by Castleton. In her witness statement (FUJ00122323 Draft Witness Statement of Anne Chambers) she describes herself as a Systems Specialist tasked with the role of investigating problems with the Horizon system. I contacted her directly later on in the case and recorded her comments in my email to Stephen Dilley (Email from Mandy Talbot to Stephen Dilley 6<sup>th</sup> December 2006 re Castleton POL00070135). This approach by me was made to try to investigate allegations made by Castleton about the Sub Post Office known as Callendar Square. To the best of my recollection, she presented as calm and knowledgeable about the Horizon system. She was a witness not an Expert and both I and external solicitors relied on her. As she was not an expert, I had no duty to test her ability to answer the issues being raised. She was the person being put forward as a witness by POL as having the necessary knowledge of the Horizon system to deal with Mr Castleton's' allegations. As Castleton was the first fully litigated case in the civil courts involving Horizon, I had no ability to challenge the information provided by Anne Chambers about the system. I received no training on the Horizon system before or after it was rolled out. Even if I had



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been supplied with the complete download of data, I had no knowledge about the system to challenge her information and subsequent statements.

51. After this period of time, I cannot recall Penny Thomas and as such I do not know whether she worked for POL or Fujitsu.

52. The solicitors working for civil litigation did not receive any training in how to use the Horizon system or how to analyse reports created using it or to interrogate the system

**Post Office v Seema Misra.**

53. Seema Misra was prosecuted by the Criminal Law Team within Legal Services. Within Legal Services they were usually referred to as the Prosecution Team. The Advice from Counsel Mr Warwick Tatford was created for the Prosecution Team and I am not sure that I have ever seen it before (Advice from Counsel Mr Warwick Tatford POL00044557). According to the Advice I was asked to search for any papers relating to Mrs Nixon and a witness statement describing the manner in which the layout of the terminal screen could create a problem. Further Counsel asked me to access some civil litigation files and explain them to him. A request such as this from Prosecuting Counsel, was an unusual occurrence. I cannot now recall either of these events.

54. Speaking to or communicating with Counsel in a criminal prosecution case was a very rare event. Usually, the civil litigation solicitors would have no

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interest or involvement in a criminal case until it had been concluded and civil litigation was asked to conduct debt recovery. In October 2010 Mr Jarnail Singh, Senior Lawyer in the Criminal Law Division sent an email to me (Email Jackie Whitham to Zoe Topham re outcome of Misra Case POL00044997) and a large number of other parties communicating the result of the trial in Guildford Crown Court. I have no idea why I was addressed first as my only involvement was to provide information on civil cases to Counsel. The other parties copied in included a selection of solicitors within Legal Services, including Mr Doug Evans the Head of Legal Services at that time, prosecution solicitors, commercial solicitors, my secretary, and a variety of POL employees.

55. Mr Jarnail Singh in his Email (Email Jackie Whitham to Zoe Topham re outcome of Misra Case POL00044997) reporting on the case of Misra, referred to an unprecedented attack on the Horizon system. Counsel's Advice refers to multiple Requests for Information and for access to a disproportionate amount of data from Fujitsu. Apart from supplying some information to Counsel I had no participation in the prosecution and so cannot answer the question from the Inquiry.

56. I am not able to provide any other information about the case of Seema Misra. I left the Dispute Resolution Team in Royal Mail Legal Services in the January of 2011.

**Civil and Criminal Cases.**

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57. Civil and Criminal Cases within Legal Services were dealt with by entirely different teams. Where the Prosecution team had successfully prosecuted a Sub Postmaster but no award was made for compensation or the prosecution team was not pursuing a proceeds of crime application in the criminal Courts then the case would sometimes be referred to civil litigation for debt recovery.

58. I have been asked for my recollections (if any) of the criminal cases for several named individuals. I have asked for access to the case paper for the all the cases referred to but have been advised that none are available. I cannot recall any involvement in any of the criminal cases asked about or in any other prosecution case.

59. As mentioned above I am not a prosecuting solicitor.

60. I have been asked for my recollections (if any) of the civil cases for several named individuals. As explained earlier many civil cases were sent out directly by POL to our legal agents. Without access to my case files, I cannot recall my involvement in any of the cases referred.

61. I cannot recall the names of any cases in addition to those asked about.

62. Looking back, I obviously have concerns about the cases I was involved in knowing now that there were problems with the Horizon system but that is with hindsight and the knowledge that has come into the public domain. At the

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time when civil litigation was instructed to obtain repayment of money by POL via legal agents, we genuinely believed the position adopted by Fujitsu.

### **General**

63. I have read the documents at POL000104593 (Emails from myself to various re change of accounting. Plus, extracts from undated counsels' advice on criminal case, very early advice on civil and criminal cases and undated advice from Civil Litigation), which consist of an exchange of emails between myself and POL and the response of Jennifer Robson, a Debt Recovery Section Manager POL in September of 2004. This was a summary of a meeting attended by Clare Wardle, my line manager, on my behalf. The email from Jennifer Robson contained an amended version of my email where Karen Hillsden subsequently added her response to points and inserted them into my original document, in a contrasting colour. In addition, there are extracts from a number of Reports from unidentified parties that appear to be Counsel's advice in a Prosecution case, an Advice commenting on challenges in both civil and criminal cases and an email from I assume civil litigation to an unknown party all of which are undated. I am not sure of the period of time between the meeting and my email but it demonstrates that civil litigation was not entirely up to date with the activities within POL despite its best endeavours. There was no obligation upon POL to keep Civil Litigation up to date with changes in its processes for dealing with Sub Postmasters but it would have been beneficial.

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64. Prior to the implementation of the Horizon system bringing civil proceedings against a Sub Postmaster to recover outstanding monies under the Sub Postmaster's contract was dependent upon POL locating sufficient documentary evidence to prove the debt. This could take the form of multiple different documents all of which had different retention periods. The content of the undated email from Civil Litigation (POL000104593) summarised the problems that it experienced in bringing cases against Sub Postmasters prior to the full implantation of Horizon or in the early days of its implementation.
65. Under the contract the Sub Postmaster was responsible for all losses including those incurred by his staff. To the best of my recollection prior to late 2004 Sub Postmasters could elect whether they would make good a deficiency that arose by using one of three methods; if they believed that a correcting Transaction Correction would come through to rectify a loss in a few weeks they could ask the permission from POL to put the loss into a local suspense account to await resolution, make good the loss themselves from their own cash or raise the issue with POL as a disputed transaction. By the end of 2004 POL removed the ability of Sub Postmasters to put disputed transactions into a local suspense account. Thereafter a Sub Postmaster could only settle locally where he would make good the debt immediately or settle centrally, both methods accepted that the Sub Postmaster accepted the debt but with the latter was asking for it to be investigated by POL. If on investigation POL found that a third party had made an error e.g. DWP then it would issue a Transaction Correction and the debt was erased. If no explanation could be found upon investigation, then the debt would remain the

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responsibility of the Sub Postmaster and could be paid by debit card or deducted from remuneration.

66. The email POL00104593 of the 30th of September 2004 refers to the proposal to require that Sub Postmaster's print out a monthly Branch Trading Statement and sign and retain them for auditors to inspect so as to enhance the volume and status of paper evidence available to support civil recovery cases. Civil Litigation had been advised that more robust processes were being put in place to record the amount of Cash (Remittance) sent to and received from a Sub Post Office. Civil Litigation was not aware at the time of this exchange of emails that POL had already begun to offer Sub Postmasters the option to pay outstanding errors by way of deduction from remuneration.

67. Civil Litigation was trying to agree processes with POL that would enable it to acquire more documentary evidence in support of potential civil litigation cases e.g. more documentary evidence supporting the monthly trading in the Sub Post Offices. The ability of a Sub Postmaster to put an error into a local suspense account had apparently been removed between the date of the meeting referred to and the exchange of emails. This would have placed responsibility for investigation of an error firmly within the remit of POL/Fujitsu. It would also make it more difficult for a Sub Postmaster to ignore a loss by just moving it into a local suspense account. It compelled a Sub Postmaster to admit responsibility for a debt narrowing his choices to settling it locally or centrally. I can no longer recall whether there was a formal change of contract

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permitting deduction from remuneration or whether it was dealt with by amending policy and incorporating it into the contract by way of reference.

68. I do not recognise the term IMPACT programme and as such I cannot comment on whether I was involved in the same.

69. POL00104618 is an email chain from Phil Ashley of POL branch IT to myself and Biddy Wyles, my line manager at the time. The handwriting on the exchange is not mine and it may have been dealt with in my absence. It sought assistance on the drafting of a response to Sub Post Offices where the effect of a bug may have impacted on errors. If proceedings were issued by legal agents on behalf of the business, they would have sought assurance from the business that the reports obtained from POL and Fujitsu were accurate at the time. Usually when a bug within the Horizon system was detected the "footprint" of the error was identified and a Fujitsu employee would look for it when investigating other cases.

70. Although Civil Litigation was aware by 2008 of issues with the Horizon system e.g. Callendar Square I was still convinced by the assurances given by POL and particularly Fujitsu that the system was substantially sound and that bugs when they arose were unusual, confined and were resolved by the application of fixes. As such civil litigation cases were pleaded on the basis of the facts pertaining to the individual case and disclosure was limited to the documents and reports created for that case. Disclosure in a particular case did not include information about bugs that had been located in what POL and Fujitsu

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assured us were a limited number of other cases and in unique circumstances. This is because civil litigation did not consider they had relevance to a case being litigated at that time on a separate set of facts.

71. The document at POL00053778 was an email from me to Counsel Warwick Tatford. Mr Tatford was dealing with a prosecution case in which a statement had been disclosed by the Defence from a Mrs Nixon or Dixon of Highcliffe. He had contacted a Legal Executive in the Prosecution Team Phil Taylor and he had asked me for assistance with locating any information within the business on the individual concerned. I requested that searches be made within the Chairman's Office team and the relevant Branch Managers, National Managers and at Storage. I believe that Mrs Nixon's statement said that the icons were so close together on the Horizon Terminal it was easy to press the wrong one.

72. There was no culture of trying to withhold documentation within POL at the time to the best of my knowledge. When POL were asked to locate information, they did their best to comply with the request. There had been a number of cases by 2010 where the Horizon system had been tested before the criminal Courts. Although not a prosecutor I was aware that the prosecutions had been successful. I think that there was a feeling of frustration within POL because it was being assured by Fujitsu that the system was sound. To the best of my knowledge, it appeared to be working well for thousands of Sub Post Offices and Crown Offices. Yet, when the decision was taken to issue proceedings to recover an outstanding debt often the same



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general defence was being made, usually with little specific detail but seeking to blame the Horizon system. In retrospect my comments about “usual list of suspects” was erroneous and not appropriate given what I now know about the history of problems with the Horizon system and the history of bugs and defects from its inception and roll out. In retrospect my expressed opinion of the former Sub Postmasters that Horizon was the” cause of all evil” was probably closer to the truth than my belief at the time. I do not believe that I was alone in holding or expressing my belief in the summer of 2010 but it was genuinely held and based on what I believed were solid assurances from Fujitsu and evidence supplied by them. After this period of time I cannot recall details of the parties who gave these assurances.

73. By February 2010 Sue Lowther of POL Information Security wished to conduct an exercise on the Horizon system. I cannot now recall whether I was present at the meeting summarised by Andy Hayward. As he summarised the meeting initially on the 26<sup>th</sup> of February there was a desire to conduct a full investigation into integrity issues. He was minded to seek external expert opinion to give gravitas to the findings. Criminal Litigation had not been invited to the meeting of the 26<sup>th</sup> of February. Once Rob Wilson, Head of Criminal Law became aware of the suggested investigation, he made clear its possible consequences. His email was copied into the Head of Legal Services at the time Mr Doug Evans. As Civil Litigation had always been assured of the integrity of the system by POL and Fujitsu this request came from out of the blue as far as I was concerned. However, as its subsequent declared aim was to improve the quality of messaging within the Horizon system and therefore

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witness evidence, I was supportive. (Email from Rob Wilson to Dave Posnett Fraud Risk Manager re challenges to Horizon POL00106867). There is reference to a request for me to provide information about civil and criminal cases to the Information Team. I am sure that I would have sent information about civil cases to them and referred the request for information about criminal cases to the Prosecution Team. I cannot recall whether I ever saw the output of the Information Security exercise or indeed whether it ever progressed.

73. Within Civil Litigation the challenge with Horizon cases was to locate documentary evidence from POL or the Sub Post Office branches, obtaining adequate print outs from POL Customer Services, comprehensive reports from Fujitsu and persuading staff to give Witness Statements and appear in Court. It was exacerbated by the high turnover of staff in the teams dealing with Sub Postmasters and the consequent loss of knowledge about the Horizon system.

### **Other Matters**

74. Dealing with Sub Postmaster debt cases was a small part of my role in Civil Litigation although from time to time as in the case of Castleton it did become a priority. There was never any formal guidance issued within the general Civil Litigation department on what cases should be reported upwards, in what circumstances and to what level of seniority in the Legal Services Department. As such solicitors worked in silos reporting to our line managers on an ad hoc basis. The exception to this were personal injury cases but this

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was dictated by the requirements of external Insurers. There were never sufficient Sub Postmaster cases in Civil Litigation or subsequently out with Legal Agents for me to adopt any formal system of upward reporting.

75. Further there were never any demands from POL for regular reports on Sub Postmaster's cases that in retrospect might have enabled Civil Litigation to detect a trend. POL was able to send cases directly out to legal agents with Civil Litigation providing assistance and monitoring costs. In retrospect this ability by POL would have made tracking any patterns still more challenging.

76. If there had been a formal process in place for upward reporting within Civil Litigation, to the Head of Legal and beyond then it is possible that the increasing number of Horizon cases could have been identified earlier.

77. When I was asked for information by Counsel Mr Tatford on the number of civil litigation cases it was for the purpose of dealing with a Prosecution. To the best of my recollection the first time I was asked for information about civil cases, for any other purpose other than to assist with a prosecution by POL, was for Sue Lowther.

78. There was never any suggestion that Solicitors should look for and report on trends with cases either within civil litigation or across Legal Services and send the data across to POL or the other business. The management of the cases referred by the business out to agents would have made this

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challenging in any event. As such, I was not aware of the developing scale of the problem.

79. The Head of Legal Services Mr Doug Evans was aware of the concerns of Rob Wilson expressed in his email of the 3<sup>rd</sup> of March 2010. (POL00106867) My Line Managers sequentially Joe Ashton, Clare Wardle, Bidy Wyles, Rebekah Mantle would all have been aware of action taken by civil litigation against Sub Postmasters. However, without a formal process in place for upward reporting and evaluation for financial and reputational risk, the Horizon cases were not assessed.

80. Civil Litigation was aware that the agreement between POL and Fujitsu was very prescriptive. Solicitors in civil litigation were reliant upon colleagues in POL for locating documentation, downloading reports, and creating witness statements upon them. Fujitsu dealt with the more technical requests for information and witness statements explaining the same. As solicitors within Civil Litigation were not trained on the Horizon system and were not able to demand reports from Fujitsu to investigate cases, without agreement as to cost, it would have been almost impossible for solicitors to challenge the information they received and push back against the experts.

I believe that the facts contained in this my witness statement are true.

Signed

**GRO**

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Date 31 May 2023**Index to the First Witness Statement of Mandy Talbot**

<b>No</b>	<b>Control no</b>	<b>URN</b>	<b>Document Description</b>
1	POINQ012785 1F	FUJ00121637	Email from Jan Holmes to Colin Lenton-Smith re Cleveleys
2	WITN05290200	WITN05290200	Second Witness Statement of David Smith
3	WITN04600200	WITN04600200	Second Witness Statement of Jan Robert Holmes
4	POINQ0127904 F	FUJ00121690	Email from Jan Holmes to Keith Baines re Cleveleys
5	POINQ0127905 F	FUJ00121691	Analysis of calls made to Horizon System Helpdesk by Jan Holmes
6	POINQ0127906 F	FUJ00121692	Glossary of Fujitsu POL terminology and how technical support is provided
7	POINQ0127910 F	FUJ00121696	Email from Jan Holmes to Keith Baines re Cleveleys
8	POINQ0127911 F	FUJ00121697	Cleanstart Migration confirmation of the date on which Horizon went live at Cleveleys
9	POINQ127914 F	FUJ00121700	Email Jan Holmes to Mandy Talbot re Cleveleys
10	POL-0070418	POL00073855	Email Bob Heckford to Richards Challands (Bond Pearce) re Lee Castleton

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11	POL-0067027	POI00070464	Email Stephen Dilley to Mandy Talbot re Lee Castleton
12	POL-0067341	POL00070778	Email Stephen Dilley to Mandy Talbot re Lee Castleton
13	POL-0067059	POL00070496	Email Stephen Dilley to Tom Beezer, senior partner in Bond Pearce, re Lee Castleton
14	POL-0069232	POL00072669	Telephone attendance Stephen Dilley to Mandy Talbot re Lee Castleton
15	POL-0066185	POL00069622	Conference with Counsel -attendance note- re Lee Castleton
16	POL-0066090	POL00069527	Email Stephen Dilley to Carol King re Castleton
17	POL-0066013	POL00069450	Email from Stephen Dilley to Richard Morgan re Castleton
18	POL-0065967	POL00069404	Email from Stephen Dilley to Brian Pinder re Castleton
19	POL-0066434	POL00069871	Telephone Attendance Stephen Dilley to Richard Morgan re Castleton
20	POINQ01285 47F	FUJ00122333	Email from Stephen Dilley to Andrew Dunks re Castleton
21	POINQ012854 8F	FUJ00122334	Witness Statement of Andrew Paul Dunks re Castleton
22	POINQ01285 49F	FUJ00122335	Exhibit ADI to the statement of Andrew Paul Dunks re Castleton
23	POL-0066162	POL00069599	Email from Stephen Dilley to Mandy Talbot re Castleton

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24	POL-0070161	POL00073598	Email Mandy Talbot to Vicky Harrison re Castleton
25	POL-0065994	POL00069431	Telephone Attendance Thomas Bourne to Mandy Talbot
26	POL-0066735	POL00070172	Email from Mandy Talbot to Lesley Joyce re Grangemouth
27	POL-0066738	POL00070175	Email Thomas Bourne to Stephen Dilley re Ferryhill
28	POL-0066739	POL00070176	Email Mandy Talbot to Stephen Dilley re Ferryhill
29	POL-0078491	POL00081928	Email Mandy Talbot to Stephen Dilley re Callendar Square re Mr Brown
30	POL-0066698	POL00070135	Email from Mandy Talbot to Stephen Dilley re Callendar Square
31	POL-0066723	POL00070160	Email from Mandy Talbot to Stephen Dilley re Carshalton
32	POL-0066689	POL00070126	Telephone attendance Thomas Bourne, SDJ3, Richard Morgan and Mandy Talbot
33	POL-0066696	POL00070133	Email from Mandy Talbot to S Parker at Fujitsu copied to Stephen Dilley
34	POL-0011301 7	POL00113909	Email from Paul Dann to Martyn Mitchell re offer of settlement
35	POL-0066338	POL00069775	Email Stephen Dilley to myself re draft Tomlin Order
36	POL-0066300	POL00069737	Email Mandy Talbot to Stephen Dilley re Confidentiality

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37	POL-0066342	POL00069779	Email from Stephen Lilley to Mandy Talbot re proposed counter settlement
38	POL-0066330	POL00069767	Email Stephen Dilley to Castleton's Solicitors
39	POL-0066326	POL00069763	Email Stephen Dilley to Mandy Talbotre draft Tomlin Order
40	POL-0066285	POL00069722	Email from Mandy Talbot to Stephen Dilley re delay
41	POL-0066304	POL00069741	Email from Stephen Dilley to concerned parties re failure of settlement
42	POL-0066241	POL00069678	Telephone Attendance Stephen Dilley and Mandy Talbot re Castleton acting in person
43	POL-0066258	POL00069695	Email Stephen Dilley to Bob Heckford re continuation of trial
44	POL-0066166	POL00069603	Telephone attendance Stephen Dilley and Mandy Talbot re costs
45	POL-0066033	POL00069470	Telephone Attendance Stephen Dilley and myself re costs and tactics
46	POL-0066235	POL00069672	Telephone Attendance re pleadings and tactics
47	POL-0066329	POL00069766	Email from Stephen Dilley to myself re reason for delay
48	POL-0066319	POL00069756	Email Stephen Dilley to myself re Castleton's health
49	POL-0066220	POL00069657	Fax from Stephen Dilley to Myself re disclosure



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50	POL-0066264	POL00069701	Stephen Dilley to myself re supplemental disclosure
51	POL-0066865	POL00070302	Email from Stephen Dilley to Mandy Talbot re bankruptcy
52	POL-0068709	POL00072146	Email to Stephen Dilley from Mandy Talbot re bankruptcy /potential claim by Day
53	POL-0068769	POL00072206	Email from Mandy Talbot to Stephen Dilley re conclusion of the case
54	POINQ01284 93F	FUJ00122279	Email from Brian Pinder to Gareth Jenkins re Castleton
55	POINQ01284 94F	FUJ00122280	Draft witness statement of Gareth Jenkins
56	POINQ012853 5F	FUJ00122321	Email from Stephen Dilley to Anne Chambers
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58	POINQ01285 37F	FUJ00122323	Draft Witness Statement of Anne Chambers
59	POL-0066698	POL00070135	Email from Mandy Talbot to Stephen Dilley 6 <sup>th</sup> December 2006 re Castleton
60	POL-0041036	POL00044557	Advice from Counsel Warwick Tafford
61	POL-0041476	POL00044997	Email Jackie Whitham to Zoe Topham re outcome of Misra Case
62	POL00104593	POL00104593	Email from Mandy Talbot to various re change of accounting. Plus, extracts from undated counsels' advice on

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			criminal case, very early advice on civil and criminal cases and undated advice from civil litigation
63	POL-0104201	POL00104618	Email from Phil Ashley POL IT seeking advice on drafting
64	POL-0050257	POL00053778	Email from Mandy Talbot to Warwick Tatford plus various other emails to POL staff.
65	POL-0105550	POL00107242	Emails from Mandy Talbot and a colleague to various POL staff seeking evidence on a civil action.
66	POL-015175	POL00106867	Email from Rob Wilson to Dave Posnett Fraud Risk Manager re challenges to Horizon