Affid ⌇ & 3/3/2011

Begin forwarded message:

From: Peter Maxwell <petermaxwell1@me.com>
Date: 16 July 2012 1:10:23 PM AEST
To: Jodie_Vella@agd.nsw.gov.au
Subject: Fwd: Biles draft affidavit as of 3/3/11

Hi Jodie,

this was my original affidavit.

cheers
peter

Begin forwarded message:

From: Peter Maxwell <peterfmaxwell@mac.com>
Date: 3 March 2011 9:24:53 AM AEDT
To: Angelo Manollaras <evangelos_manollaras@agd.nsw.gov.au>, Patrick Saidi <saidi@selbornechambers.com.au>, Paul Arblaster <parblaster@selbornechambers.com.au>
Subject: Biles draft affidavit as of 3/3/11

Angelo,

i have sent it as a pdf as i dont want too many of the word documents floating around which might cause confusion or result in earlier drafts being saved over later drafts.

Paragraph numbers need to be added.

para 6 sets out the structure of the affidavit A to I. which are self-explanatory.   In A. is set out my methodology of search, lines of inquiry etc. knowledge of both DoCS & Police records/ systems etc.

 Effectively i utilised various allegations as contained within the statement of claim dividing them into sections called B, C, D, E, F, G - (note that in E i have combined items 13. b & d as I consider them to be very close to the same meaning.

QUERIES

1. many of the named persons could be inserted into multiple section B to G - do i insert their names into multiple sections and if so do I type their name in and then type SEE ABOVE F(c) or whatever . Or do I do a cut and paste from the earlier entry such that that name and details appears twice in the same affidavit

2.
a. In relation to the documents in the files. with the exception of the 2001 brief of evidence all the files and their contents inclusive of mentioning of the names are digitised into the Biles Job Sheet. The files are also all page numbered and those page numbers are referred to in the Biles Sheet.   Do we just tell the Court this is how you do it i.e. use the control +F button, type in the name and then find it in the Biles Job Sheet document which will then tell you the page numbers which can then be referred to. That is provide the court with the Biles Job Sheet and a numbered set of files and let them do it themselves.

b. do I detail the page numbers of the names in the relevant section of the affidavit but which means the court would have to be provided with a numbered set of files (but the actual biles job sheet document would not then be required)

c. do I photocopy those pages from the files for each named person mention this in the section relating to that name. Then just give that bundle an annexure number/tab number which gives more continuity in a sequential numeric way to the affidavit keeping it simple. This as opposed to a separate exhibit bundle which must then have separate indexing. This would result in one document and one set of tabs sequentially numbered (with the documents neatly included into the affidavit keeping it simple).   This as opposed to one affidavit a set of tabs PLUS multiple exhibit bundles for each of the numerous persons .

biles_maxwe...avit (121 KB)

it is pretty much a downhill run now with going through my table (I am up to 54 MIke Corcoran), choosing the relevant section the witness fits in that is either B to G, looking up my investigation folder which has the same witness table as my Table document and then typing it in.

Peter Maxwell