



**My Ref:** 200801481  
T03 Evangelos G Manollaras  
**Tel:** (02) 9224-5103  
**Fax:** (02) 9224-5122  
**Email:** [crownsol@agd.nsw.gov.au](mailto:crownsol@agd.nsw.gov.au)

12 May 2011 *[This field is a date creation field. The date will change if you save the document as a new document.]*

Mr Michael Cashion SC  
6 Wentworth Chambers  
DX 398 SYDNEY

**By hand***[delete options not required]*

Dear Mr Cashion

AIL [REDACTED] **& D B v State of NSW**

I **enclose** a draft copy of Peter Maxwell's affidavit and the exhibit bundle as at 12 May 2011 for Senior Counsel's consideration.

Unless something is drastically wrong with the final version that may affect the exhibit bundle, may I suggest that it be fixed in a supplementary affidavit, which will be necessary in any event, given that investigations as to prejudice are continuing.

Yours faithfully

Evangelos G Manollaras  
Solicitor  
**for Crown Solicitor**

Encl. *[delete if not required]*