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11 October 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

Biles & Ors v State of NSW

I **enclose**, for inclusion in Senior Counsel's Brief, copies of the following documents:

1. A small folder containing a detailed chronology prepared by Paul Arblaster in October 2008;
2. Three lever-arch folders of the transcript of the trial of Colin Gibson (combination of documents produced by the ODPP (Packet 21) and transcripts ordered from District Court Transcript Sales);
3. One lever-arch folder of instructions to Dr Yvonne Skinner dated 8 September 2010 and 19 October 2010 regarding her medico-legal examination of Kathleen Biles;
4. 2 x DVDs produced by NSW Police (Packet 3);
5. Four lever-arch folders of DoCS documents arranged chronologically and by plaintiff;
6. Small folder of 'complaint documents' extracted from the documents in paragraph 5 above;
7. Supplementary Affidavit of Peter Maxwell and Exhibit Bundle sworn 3 August 2011;
8. Folder of authorities relevant to the limitation motion;
9. Documents produced by Concord Hospital (Packet 50);
10. Documents produced by Westmead Hospital (Packet 55);
11. Documents produced by Victims Compensation Tribunal (Packets 8-20);
12. Letter only produced by Dr Neil Phillips (Packet 27);
13. Documents produced by Brewarrina Aboriginal Medical Service (Packet 28);
14. Documents produced by Brewarrina Hospital (Packet 5); and

15. Documents produced by NSW Police (Criminal Records) (Packet 64).

I also **attach** the following correspondence to be included behind Tab 3 in the folder briefed to Senior Counsel under cover of my letter dated 22 August 2011, and an updated index to the same:

1. Letter from the CSO to WLS dated 7 September 2011;
2. Letter from the CSO to WLS dated 4 August 2011;
3. Letter from WLS to CSO dated 3 August 2011; and
4. Letter from CSO to WLS dated 2 August 2011.

I will brief Senior Counsel with copies of documents produced by Victims Compensation Tribunal (Packet 43) and NSW Police (Packet 3) shortly.

I advise that Senior Counsel will be briefed with an index/reading guide for the limitation motion under cover of a separate letter of today's date.

Yours faithfully

Jodie Vella
A/Solicitor
for Crown Solicitor

Encl. *{delete if not required}*